Mill Hill
EDUCATION GROUP

Safeguarding and Protecting the Welfare of Pupils

Instilling values, inspiring minds

Safeguarding and Protecting the Welfare of Pupils Policy

APPENDICES

Key External Contact Details

Local Authority	Barnet	Enfield
Group Schools	*Mill Hill School Mill Hill International* *Belmont Grimsdell* *Lyonsdown*	*Keble Prep*
Designated Officer in the Local Authority	London Borough of Barnet LADO Email: LADO@barnet.gov.uk (staff must always email) Telephone (Direct Line): 020 8359 5117 Mobile – 07801 992 592	Enfield Local Authority Designated Officer (LADO) 020 8379 2850
Multi-Agency Safeguarding Hub (MASH)	The Multi-Agency Safeguarding Hub (MASH) is the single point of entry for all children and young people who may need a service from Children's Social Care (see contact details below)	
	• For parents, referrals can be made by telephone. • For professionals, referrals must be made using the online referral form: http://www.barnet.gov.uk/wwcib/mash Tel: 020 8359 4066 (Mon to Thurs 9am – 5.15pm; Fri 9am to 5pm) Out of Hours Emergency Duty Team Tel: 020 8359 2000 https://wwc.barnet.gov.uk/wwc/working-children-barnet/practitioner-guidance/multi-agency-safeguarding-hub-mash-0	Enfield MASH: 020 8379 5555 Enfield Out of Hours Emergency Duty Team (EDT): 020 8379 1000 Children's Multi-Agency Safeguarding Hub | Safeguarding Enfield
Support and Advice about Extremism	Barnet Prevent Coordinator – Perryn Jasper Mobile 07856 002 586 Email: Perryn.jasper@barnet.gov.uk	Enfield Prevent Team: Prevent@enfield.gov.uk
	Police: Emergency 999; Non-Emergency 101 DfE: Non-Emergency: 020 7340 7264	National Anti-Terrorist hotline: 0800 789 321 Email: counter.extremism@education.gsi.gov.uk
Local Authority Housing advice	Barnet Homes, Tel: 020 8359 4797 (Monday to Friday 9am-5pm) or 020 8359 2000 (Out of hours) Email: housingadvice@barnethomes.org	Enfield Housing Advisory Service: 020 3821 1769 Enfield Out of Hours Emergency Housing Line: 020 8379 1000
Local Safeguarding Children Partnership	bscp@barnet.gov.uk	SafeguardingEnfield@enfield.gov.uk https://new.enfield.gov.uk/safeguardingenfield/safeguarding-enfield-partnership/
Police Safer Schools Contact	Shannon Farthing 07776 678 163	Police: 101

Local Authority	Kent	Hertfordshire
Group Schools	*Cobham Hall*	*St Joseph's in The Park Abbot's Hill Kingshott*
Designated Officer in the Local Authority	Education Area Safeguarding Adviser for North Kent: Anup Kandola anup.kandola@theeducationpeople.org Local Area Designated Officer (LADO) for concerns about staff – 03000 410 888 kentchildrenslado@kent.gov.uk or 03000 411 111. (03000 419 191 outside office hours) Early Help advice and support from an Early Help Co-ordinating team by email (GraveshamEarlyHelp@kent.gov.uk) or 03000 423 149 Further Contact details: https://www.theeducationpeople.org/our-expertise/partner-providers/kent-county-council-providers/safeguarding/safeguarding-contacts/	Hertfordshire LADO Andrea Garcia-Sangil Email: LADO.Referral@hertfordshire.gov.uk Tel: 0300 123 4043; 01992 556 986 Report concerns about a child or request support | Hertfordshire County Council
Multi-Agency Safeguarding Hub (MASH)	The Multi-Agency Safeguarding Hub (MASH) is the single point of entry for all children and young people who may need a service from Children's Social Care (see contact details below)	
	Kent: Integrated Front Door – 03000 411 111 (03000 419 191 outside office hours)	• For parents, referrals can be made by telephone. • For professionals, referrals must be made using the online referral form. Tel: 01992 588 757; 0300 123 4043 (Duty Social Worker) MASH (Multi-agency Safeguarding Hub) - Hertfordshire Grid for Learning (thegrid.org.uk)
Support and Advice about Extremism	Prevent Education Officer, Kent, Sally Green, sally.green2@kent.gov.uk 03000 413 439	Hertfordshire Prevent Programme Manager – Sophie Lawrence Mobile 07773 094 897 Prevent radicalisation in Hertfordshire | Hertfordshire County Council
	Police: Emergency 999; Non-Emergency 101 DfE: Non-Emergency: 0207 340 7264	National Anti-Terrorist hotline: 0800 789 321 Email: counter.extremism@education.gsi.gov.uk
Local Authority Housing advice	Kent: Gravesham Borough Council, Civic Centre, Windmill Street, Gravesend, Kent. DA12 1AU Public phone: 01474 337 759 / 01474 337 000 Email: housingneedsteam@gravesham.gov.uk	District and borough councils | Hertfordshire County Council
Local Safeguarding Children Partnership	Kent Safeguarding Children Multi-agency Partnership (KSCMP). Email: kscmp@kent.gov.uk Tel: 03000 421 126 https://www.kscmp.org.uk/ https://www.kelsi.org.uk/child-protection-and-safeguarding	https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/hscp.aspx
Police Safer Schools Contact	Police 101	Police 101

Key External Contacts and Mill Hill Education Group Contacts – for All Group Schools

NSPCC Whistleblowing Advice Line	Address: Weston House, 42 Curtain Road, London EC2A 3NH Tel: 0800 028 0285 (08.00 – 20.00 Mon to Fri) Email: help@nspcc.org.uk
NSPCC/Home Office Report Abuse in Schools Helpline	Tel: 0800 136 663 (08.00 – 22.00 Mon to Fri, 09.00 – 18.00 Sat Sun) Email: help@nspcc.org.uk
NSPCC Child Protection Helpline	Tel: 0808 800 5000
Childline	Tel: 0800 1111 www.childline.org.uk
Disclosure and Barring Service	Address: PO Box 181, Darlington DL19FA Tel: 01325 953 795 Email: dbsdispatch@dbs.gsi.gov.uk
Teaching Regulation Agency	Address: 53-55 Butts Road, Earlson Park, Coventry, CV1 3BH Tel: 020 7593 5393 Email: misconduct.teacher@education.gov.uk
Ofsted Safeguarding Children	Tel: 08456 404 046 Email: whistleblowing@ofsted.gov.uk
Forced Marriage Unit	Tel: 020 7008 0151 Email: fmu@fco.gov.uk
Reporting FGM	Police: 101
Independent Schools Inspectorate (ISI)	CAP House, Long Lane, London EC1A 9HA Tel: 020 7600 0100; Email: info@isi.net

Governors		Email
Chair of the Court of Governors Safeguarding Governor	Mr Elliot Lipton Mr Nigel Taylor	clerktothegovernors@millhill.org.uk
Executives and Senior Management Team		
Chief Executive Officer (CEO) Director of Finance and Resources Director of Operations Director of Safeguarding Director of Prep Schools	Mr Antony Spencer Mrs Nicky Marlow Mr Sean Ryan Mrs Jane Morris Mr Leon Roberts	CEO@millhill.org.uk nmarlow@millhill.org.uk sean.ryan@millhill.org.uk jane.morris@mhsFoundation.uk leon.roberts@millhill.group
Out of hours for referring urgent safeguard concerns regarding staff	Email the Head of the relevant School (as above). If they are absent, contact the DFR or CEO or the Chair of the Court of Governors; otherwise contact MASH	

Key School Contacts:

	Mill Hill School	Mill Hill International	Belmont	Grimsdell
Head	Mr David Benson head@millhill.org.uk	Mrs Sarah Belllotti head@millhillinternational.org.uk	Dr Susannah Abbott head@belmontschool.com	Mrs Kate Simon head@grimsdell.org.uk
Designated Safeguarding Lead (DSL)	Ms Jade Boyle, Assistant Head Pastoral jmb@millhill.org.uk	Ms Suchita Prakash, Deputy Head (Pastoral) sp8@millhillinternational.org.uk	Ms Kaarin Scanlan, Deputy Head (Pastoral) kscanlan@belmontschool.com	Ms Jenny Ticehurst, Deputy Head, EYFS Safeguarding Lead jticehurst@grimsdell.org.uk
Designated Teacher for Looked After Children	The DSL in the School	The DSL in the School	The DSL in the School	The DSL in the School
Deputy Designated Safeguarding Leads (DDSLs)	Mr Jamie Clayton, Deputy Head Sixth Form jpc@millhill.org.uk Mr Jordan Meakin Assistant Head (Boarding) jme@millhill.org.uk Mr John Barron Teacher of Chemistry jab@millhill.org.uk Ms Jess Thurtell Housemistress (Priestley) Jat@millhill.org.uk Mr Stuart Hendy, Housemaster (Collinson) shendy@millhill.org.uk	Ms Alia Bano, Staff and Pupil Wellbeing Lead ab@millhillinternational.org.uk	Ms Libby Russo, Assistant Head (Wellbeing) lrusso@belmontschool.com Ms Rachel Sutherns Assistant Head (Lower School) rsutherns@belmontschool.com Siobhan Black Head of Year 6 sblack@belmontschool.com Louise Watters Assistant Head (Staff Development) lwatters@belmontschool.com	Ms Kim Vanstone (Assistant Head Pastoral and SENDCo) kvanstone@grimsdell.org.uk

	Cobham Hall	Lyonsdown	Keble Prep	St Joseph's in The Park
Head	Mrs Wendy Barrett barrettw@cobhamhall.com	Mrs Rittu Hall rhall@lyonsdownschool.co.uk	Mr Perran Gill pgill@kebleprep.co.uk	Mr Douglas Brown headpa@stjosephsinthepark.co.uk 01992 513 810
Designated Safeguarding Lead (DSL)	Mrs Sue Carney, Deputy Head carneys@cobhamhall.com 01474 823 371	Miss Zorana Telford, Assistant Head (Pastoral) ztelford@lyonsdownschool.co.uk 020 8449 0225	Mr James Fleet jfleet@kebleprep.co.uk 020 8360 3359	Mrs Nicole Welsh Nicole.welsh@stjosephsinthepark.co.uk 01992 513 810
Designated Teacher for Looked After Children	The DSL in the School	The DSL in the School	The DSL in the School	The Head of the School
Deputy Designated Safeguarding Leads (DDSLs)	Mrs Melissa Thompson, Head of Upper School thompsonm@cobhamhall.com Mrs Emma Wilkinson, Head of Lower School wilkinsone@cobhamhall.com Mr James Williams, Director of Pastoral and Boarding williamsj@cobhamhall.com	Mrs Emily Jenner, Deputy Head ejenner@lyonsdownschool.co.uk Mrs Rittu Hall, Head rhall@lyonsdownschool.co.uk	Mr Perran Gill, Head pgill@kebleprep.co.uk Miss Katie Callaghan, Head of Pre-Prep kcallaghan@kebleprep.co.uk Mrs Ferzana Rahman, Pre-Prep Pastoral Lead and Reception Teacher frahman@kebleprep.co.uk Mrs Moya Wright, SENCO and Head of Inclusion and MAT mwright@kebleprep.co.uk	Mrs Vanessa Sharp (DSL & acting EYFS DSL) Vanessa.sharp@stjoseph'sinthepark.co.uk 01992 513 810 Mrs Chloe Barham Chloe.barham@stjosephsinthepark.co.uk Mrs Ruth Jack-O'Brien (EYFS DSL on maternity leave) Ruth.Jack-O.Brien@stjosephsinthepark.co.uk

	Kingshott	Abbot's Hill
Head	Mr David Weston dweston@kingshottschool.com	Mrs Sharon Schanschieff
Designated Safeguarding Lead (DSL)	Mrs R Burrows, Head of Pupil Wellbeing rburrows@kingshottschool.com	Ms Marsha Brown, DSL and Attendance Officer mbrown@abbotshill.herts.sch.uk
Designated Teacher for Looked After Children	Deputy Head of the School	The DSL in the School
Deputy Designated Safeguarding Leads (DDSLs)	Ms Ruth De Naeyer rdenaeyer@kingshottschool.com Ms Lisa Dawes ldawes@kingshottschool.com For EYFS Miss Emily Emerson eemerson@kingshottschool.com	Ms Katherine Bluck, kbluck@abbotshill.herts.sch.uk For EYFS Mrs Sarah Lanchbery, Nursery Manager slanchbery@abbotshill.herts.sch.uk Mrs Lucy Daviss, Head of Early Years ldaviss@abbotshill.herts.sch.uk

List of Terms/Acronyms

BSCP	Barnet Safeguarding Children Partnership
CPOMS	CPOMS is the facility where all staff at Kingshott should lodge a referral to the DSL/DDSL regarding a safeguarding concern relating to a pupil
CSC	Children's Social Care
DBS	Disclosure and Barring Service
Designated Officer	The Officer who has overall responsibility at the Local Authority for the oversight of the procedures for dealing with safeguarding allegations against. Also called LADO.
DfE	Department for Education
FGM	Female Genital Mutilation
ISSR	Independent School Standards Regulations
KCSIE	*Keeping Children Safe in Education*
LSCP	Local Safeguarding Children's Partnership
MASA	Multi-Agency Safeguarding Arrangements which have replaced the Local Safeguarding Board
MASH	Multi-Agency Safeguarding Hub
MHEG	Mill Hill Education Group
NMS	National Minimum Standards for Boarding Schools
TRA	Teaching Regulation Agency
RecordMy	RecordMy is the facility where all staff should lodge a referral to the DSL/DDSL regarding a safeguarding concern relating to a pupil (not Kingshott, see above CPOMS)
LGBTQIA+	Lesbian, Gay, Bisexual, Trans, Queer, Intersex, Asexual pupils

1. This Policy

Mill Hill Education Group (the 'Group') is the trading name of The Mill Hill School Foundation. It is a group of independent mainstream Schools which together educate girls and boys aged 6 months to 18 years. It currently comprises:

Senior Schools (day and boarding)	Pre-Preparatory/Preparatory (day)
Mill Hill School	Grimsdell Pre-Preparatory School*
Mill Hill International	Lyonsdown School*
Cobham Hall	Keble Prep*
	St Joseph's in the Park*
	Belmont Preparatory School
	Abbot's Hill School (ages 6 months to GCSE)*
	Kingshott School (ages 3 years to GCSE)*
	*schools with EYFS provision

This Policy covers all the Group's Schools.

Mill Hill Education Group fully recognises its responsibilities for safeguarding, child protection and protecting the welfare of all its pupils. Safeguarding refers to measures implemented to protect the health, wellbeing and human rights of children so that they may live free from harm, abuse, neglect and exploitation.

The Policy applies to all pupils at Group schools including those in the EYFS and all staff (whether employed full-time or part-time or contracted or volunteer) working in these schools and to the Members of the Court of Governors of Mill Hill School Group. The Group may employ past pupils or use past pupils as volunteers only if more than three years has elapsed since the pupil left the Group.

This policy has regard to:
- the statutory guidance issued by the Department for Education (the 'DfE') in *Keeping Children Safe in Education* (September 2024) ('KCSIE')
- and operates in accordance with the London Boroughs of Barnet and Enfield, Hertfordshire and Kent County Councils and other locally agreed inter-agency procedures.

It is compliant with:
- *The Revised Prevent Duty Guidance for England and Wales* (Sept 2023),
- *The Prevent Duty: an introduction for those with safeguarding responsibilities* (Sept 2023)
- *The Prevent Duty: Departmental Advice for Schools and Childcare Providers* (June 2015),
- *What to do if you are worried a child is being abused (*March 2015*),*
- *The Use of Social Media for On-line Radicalisation* (July 2015),
- *Mobile phones in schools Guidance for schools on prohibiting the use of mobile phones throughout the school day* (Feb 2024)
- *Working together to Safeguard Children* (December 2023),

- *Working together to improve school attendance (*February 2024*)*,
- *Keeping children safe in out of school settings* (April 2022)
- *Disqualification under the Childcare Act* (August 2018),
- *Mental Health and Behaviour in Schools* (Nov 2018),
- *Counselling in Schools; a Blueprint for the Future* (February 2016),
- *Relationships Education, Sex and Relationships Education (RSE) and Health Education* (Sept 2021),
- the Independent School Standards Regulations (the 'ISSR') (2014),
- the Statutory Framework and Practice Guidance for the Early Years Group Stage (the 'EYFS') (2024)
- the requirements of the Code of Practice published by the Disclosure and Barring Service (the 'DBS'), and
- The Charity Commission Guidance *Safeguarding and protecting people for charities and trustees* (June 2022).

This Policy may be viewed on the website of each of the Group Schools. It is available in hard copy or larger print on request to the School Offices. It is also available to any adults working in the Group on the Group policy tracking platform 'VWVPlus Policy Tracker'.

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

This Policy is to be read and applied in conjunction with other relevant Group and School Policies and guidance documents including:

- Acceptable Use of IT Policy/Agreement (Staff and Governors)
- Anti-Bullying Policy
- Child Going Missing from School/School Activities Policy
- Early Years Policy
- Low-Level Concerns about Staff Policy
- Online Safety Policy
- Personal, Social, Health and Economic Education (PSHEE) and Relationship and Sex Education (RSE) Policy
- Positive Behaviour Policy
- Recruitment, Selection and Disclosure Policy and Procedure
- Restraint of Pupils Guidance
- Searches Guidance
- Staff Code of Conduct
- Taking, Storing and Using Images of Children Policy
- Whistleblowing Policy

2.   Principles and Practice

Safeguarding - definition

In KCSIE, safeguarding and promoting the welfare of children is defined as:
- "providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online

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

Group responsibilities

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

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

The Governors are aware of their obligations (particularly as regards to diversity inclusion, prejudicial and discriminatory bullying and sexual violence & harassment) under the Human Rights Act 1998 and the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

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

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

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

Helping Pupils to Keep Safe

The Group is committed to raising pupils' awareness of safeguarding and child protection issues. At every stage, pupils are taught through the wider curriculum and at an age-appropriate level how to stay safe, based on what may happen to them not only in school but also beyond it. This includes staying safe online, the dangers of cyberbullying and sexting, and the management of phone internet accessibility.

Pupils will be helped to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet. Pupils are also helped to understand the risks posed by those whose use the internet and social media, to bully,

groom, abuse or radicalise other people, especially children, young people and vulnerable adults. Appropriate filters and monitoring systems are in place to safeguard pupils from potentially harmful and inappropriate online material. Pupils are expected to conform to the requirements of the Group's Online Safety Policy and the guidance they are given by the respective schools regarding their acceptable use of technology.

Procedures

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

The Group follows the inter-agency procedures and local protocols of the schools' LSCPs and MASAs. It works collaboratively with these agencies and other professionals to take immediate action where a pupil has suffered or is likely to suffer significant harm and to provide additional support for children in need and those with emotional and mental health issues.

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

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

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

Staff

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

All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

The Group recognises the importance of creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role. It is important that the Group and the Schools' leaders

create the right culture and environment so that staff feel comfortable to discuss concerns regarding matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children. Staff should thus feel able to follow the Group's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices, potential failures by the Group or its staff properly to safeguard the welfare of pupils, or other wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children. There must be no retribution or disciplinary sanction taken against a member of staff for making such a report provided that it is done in good faith.

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

All speakers, contractors and other visitors who are not fully DBS checked, will be required to undergo an identity check on arrival and wear a visitor's badge/red lanyard at all times, displayed prominently. A member of staff will be assigned to supervise any visitors who display a red lanyard. No unsupervised access to pupils will be permitted for any visitor or contractor.

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

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

3.   **Responding to Concerns**

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

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

The Local Authority should make a decision within one working day of a referral being made as to the course of action they are taking and should advise the referrer. Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where the child's situation does not appear to

be improving, the DSL (or the referring member of staff) must follow this up with the CSC and press for reconsideration to ensure that their concerns have been addressed and the child's situation improves. Concerns should always lead to help for the child.

When deciding whether to make a referral, following an allegation or disclosure, the Head and DSL should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the Designated Officer or MASA. This may be done without giving names in the first instance.

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

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

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

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

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

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

In the event that a child is at risk of immediate danger, the staff member receiving the disclosure must ensure that this is communicated to a DSL/DDSL immediately. This should be done face-to-face or by telephone.

Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or DDSL).

The record must be kept securely and handed to the DSL unless it involves the Head or a member of staff, including the DSL. If the allegation is made against the DSL or another member of staff the record must be handed to the Head of the School. If it involves the Head, the record must be passed directly to the CEO of Mill Hill Education Group who must immediately inform the Chair of the Court of Governors. If it involves the CEO it must be reported to the Chair of the Court of Governors.

5. **Early Help and Potentially Vulnerable Groups**

Early Help is support for children of all ages that improves a family's resilience and outcomes, or reduces the chance of a problem getting worse. Support should be given as soon as a problem emerges at any point in a child's life, from the early years through to the teenage years. In the first instance, staff who consider that a pupil may benefit from Early Help should discuss this with the School's DSL. The DSL must consider the appropriate action to take in accordance with the MASA referral threshold document. The DSL must support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If Early Help is appropriate, the matter must be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

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

Examples of potentially vulnerable groups include boarders, pupils with SEND, and pupils who have protected characteristics, and those who have experienced multiple suspensions or are at risk of being permanently excluded:

- Staff should be alert to pupil relationships and the potential for child abuse among boarders.
- Pupils with SEND may face additional safeguarding challenges, such as assumptions that signs of possible abuse such as behaviour, mood and injury relate to the pupil's disability without further exploration; that children with SEND can be disproportionately impacted by things like bullying (including prejudice-based bullying) – without outwardly showing any signs; and may have difficulties in cognitive understanding and communicating their concerns about abuse, neglect or exploitation. All staff need to be alert to the specific needs of these pupils, including young carers.
- Children who are LGBTQIA+ can be targeted by other children. In some cases, a pupil who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+. Again, staff should be alert to any signs or indicators of abuse and should discuss concerns with the DSLs and/or the DDSLs as appropriate.
- Children who are or identify as LGBTQIA+ must be made aware of a safe space and person for them to speak out with and share their concerns.

- Staff should also be aware that the school could consider taking positive action to support girls if there was evidence they are being disproportionately subjected to sexual violence or sexual harassment.

In order to provide the appropriate support and to keep looked after children safe, the DSL of each school must promote the educational achievement of children who are looked after at the Group Schools. Each DSL must have received appropriate training. The appropriate staff must be provided with all necessary information with regard to a looked after child to ensure the safety of the pupil.

The SEND Code of Practice is a useful source of information, and support is available from specialist organisations including The Special Educational Needs and Disabilities Information Advice and Support Services (SENDIASS).

6. **Child-on-Child Abuse, including sexual violence and sexual harassment between children.**

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

- abuse within intimate partner relationships (also known as teenage relationship abuse);
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which is a criminal offence and typically involves taking a picture under a person's clothing (not necessary a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- sextortion – individuals being forced into paying money or meeting another financial demand, after a person has threatened to release nude or semi-nude photos of them (this could be a real photo, or a fake image created of the victim by the person threatening its release);
- 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)

The schools must 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 the school. The DSL/DDSL (who should have a complete safeguarding picture) must be the most appropriate person to advise on the initial response by the school.

Abusive comments and interactions should never be passed off or dismissed as 'banter' or 'part of growing up'. Nor must harmful sexual behaviours be dismissed as the same or 'just having a laugh' or

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

For further information regarding sexual abuse, sexual harassment and harmful sexual behaviours, please see the relevant sections in Appendix A.

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

The Group takes steps to minimise the risk of child-on-child abuse, including induction and mentoring programmes; clear reporting procedures; a robust policy promoting positive behaviour; training pupils in leadership positions and appropriate lessons as part of the Group PSHE curriculum and assemblies/tutor periods. It is highly important that all staff challenge abusive behaviours between pupils.

Where an allegation of abuse has been made against a pupil, the Group work closely with safeguarding partners, including police (if appropriate) and children's social care, acting on their advice to ensure the alleged victim and perpetrator (or all children involved) are supported and protected.

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

When there has been a report of sexual violence, the DSL must make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The DSL must consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

The risk assessment must also consider:
- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation must be progressed and any support that they must be offered, but this must need to be balanced with the school's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. Is/are the alleged perpetrator(s) significantly older,

more mature and confident? Does the victim have a disability or learning difficulty?

- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- the importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children or school staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

For those bullying incidents which are not related to sexual violence and sexual harassment (child-on-child abuse), please refer to the Schools' Anti-Bullying Policies for details regarding procedures and protocols that will be followed.

7. Youth-Produced Sexual Imagery (Sexting)

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

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

8. Training (Induction, Ongoing and Ad Hoc, as required)

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

- this Policy;
- the Staff Code of Conduct;
- the Promoting Positive Behaviour Policy;
- the Anti-Bullying Policy;
- the Whistleblowing Policy;
- the identity, contact details and role of the DSLs and DDSLs;
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods, and what to do in the event a child goes missing during school/school activities;

- the Online Safety Policy, and the Acceptable Use of IT Policy/Agreement (Staff);
- Part 1 (Safeguarding Information) of KCSIE
- the use of the school's safeguarding system for making referrals of safeguarding concerns relating to pupils and on how to manage a report on child-on-child sexual violence or sexual harassment.

Governors, Heads and Senior Leadership Teams (SLTs) are required to read KCSIE in its entirety. Heads, SLTs, and staff who work directly with children must also be required to read Part Five (child-on-child sexual violence and sexual harassment) and Annex B (further information - additional information about specific forms of abuse and safeguarding issues) of KCSIE

All staff must be required to confirm that they have read this Policy and the parts of KCSIE (Sept 2024) as required by their job role.

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

All staff must undertake regular child protection training in line with guidance from the Local Safeguarding Children Boards. All staff must receive updates as required, and at least annually.

The Heads, DSLs, and DDSLs must undergo Advanced Child Safeguarding Training (formerly Level 3) which must be updated at least every two years. The DSLs (and all those members of staff who conduct interviews) must also complete safer recruitment training every three years. The DSLs must refresh their knowledge and skills at regular intervals, to enable them to understand and keep up with relevant developments.

All Governors receive appropriate safeguarding and child protection training upon their induction, and this training is updated regularly. In addition, those Governors involved in recruitment within the Group complete appropriate Safer Recruitment training.

Staff must be trained on the need to reassure victims that they must be supported and kept safe, so that no victim must be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and that no victim must ever be made to feel ashamed for making a report.

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

9.   **The Designated Safeguarding Lead (DSL)**

The Court of Governors has appointed a member of staff of each Group school's senior leadership team to be that school's DSL. The DSL must take lead responsibility for child protection, welfare, online safety (including understanding the filtering and monitoring systems and processes in place in the school) and the prevention of radicalisation. The DSL must be given the appropriate status and authority within the schools to carry out the duties of the post, as well as the additional time, funding, training, resources and support they need to carry out the role effectively.

The DSL or Deputy Designated Safeguarding Lead (DDSL) must always be available in school hours to discuss safeguarding concerns about welfare and safeguarding matters. For out of hours/out of term activities, the relevant DSL/DDSL or the appropriate MASH office (in the borough where the pupil lives) should be contacted.

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

The names and contact details of the DSLs and DDSLs are given in Appendix E.

The DSL is the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies (such as MASA) in all matters of child protection except for allegations against staff, volunteers and the DSL, which must be reported to the Head of the School where the member of staff, volunteer or DSL is employed. Pupils may ask to speak specifically to either a male or a female DSL/DDSL and such a request must be accommodated whenever reasonably practicable.

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

The DSL must liaise with the Local Authority and work with partner agencies to seek advice, support and guidance, drawing on multi-agency expertise, knowledge and experience to support a pupil about whom there are concerns regarding harm, abuse, emotional well-being or other aspects of his or her welfare. The DSL must take prompt action where there are concerns that a pupil may be in need of help, and if a pupil is suffering or at risk of significant harm, the DSL must make an immediate referral to CSC or other agencies, including the Police.

While aspects of the DSL's Job Description may be delegated to a DDSL, the DSL nonetheless retains overall responsibility for all of them. In brief, these responsibilities cover the following safeguarding areas:

- Managing referrals – for example, to the local safeguarding partners, other relevant agencies, the Channel programme, the Disclosure and Barring Service, the police (as appropriate)
- Working with others - including liaising with the Deputy DSLs, the Head, the Court of Governors, other school staff, and the LADO and the local safeguarding partners
- Training – their own, and of others - including with regard to the risks associated with online safety for all pupils, and the increased risks which children with SEND may face online
- Raising awareness – ensuring the school's safeguarding policies are known, understood and used appropriately
- Information sharing - help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school senior leadership team
- The administration of child protection files - information sharing, including transferring files where children leave the school, and when it may be appropriate to share information in advance of a child leaving school
- Providing support to the staff in school - supporting and advising staff and help them feel confident on welfare, safeguarding and child protection matters.
- Understanding the views of children – the DSL should encourage a culture of listening to children and taking account of their wishes and feelings, understand the difficulties that children may have in

approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

- Keeping detailed, accurate, secure written records of all concerns, discussions and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.
- All members of the safeguarding team have received a full job description showing their full responsibilities in detail

10. **The Designated Safeguarding Governor**

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

In addition, he is responsible for presenting an annual Report jointly with the DSLs to the Court of Governors on the Group's safeguarding, child protection and prevention of radicalisation policies and of the efficiency with which the related duties have been discharged. This annual Report must be prepared following consultation with the Heads and DSLs from each of the Group Schools. It must form part of the Court of Governors' annual review of the Group's child protection Policies, which is undertaken to ensure that all members of the Court of Governors, as part of their legal responsibilities, are satisfied that this Policy and associated policies are fully appropriate and compliant, and that the related duties have been discharged fully and efficiently.

11. **Online Safety**

The Court of Governors holds online safety as a central theme in their whole setting approach to safeguarding. It is essential that pupils are safeguarded from potentially harmful and inappropriate online material. Their approach to online safety empowers the Group to protect and educate pupils and staff in their use of technology, with mechanisms in place to identify, intervene in, and escalate any concerns where appropriate.

The DSL is acknowledged as having overall responsibility for online safeguarding within each school. The DSLs and leadership teams follow the guidance regarding online safety within 'Keeping Children Safe in Education' 2024; and the DfE guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse must take place concurrently via online channels and in daily life.

It is recognised by the Group that the use of technology presents particular challenges and risks to children and adults both inside and outside of school, including when they are remote learning online at home. Where children are being asked to learn online at home the DFE has provided advice to support schools to do so safely.

The Group recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE and EYFS 2023 has appropriate policies in place that are shared and understood by all members of the school communities. Further information reading the specific approaches relating to this can be found in the Online Safety Policy.

The Group is directly responsible for ensuring it has the appropriate level of information security protection procedures, including appropriate filtering and monitoring systems, in place to safeguard our systems, staff and pupils. Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material, but without unreasonably impacting teaching and learning, in line with the DfE filtering and monitoring standards which were updated in May 2024. The effectiveness of these procedures is reviewed periodically to keep up to date with evolving cyber-crime technologies. For full details regarding the Group's approach to filtering and monitoring, please see Para 9 of the Online Safety Policy.

We review our entire approach to online safety and information security annually, or more often if circumstances dictate.

Detailed information about the school's full response to online safety, both in school and remotely, can be found in the schools' Online Safety Policy.

The Group must use communications with parents and carers to reinforce the importance of children being safe online. This must include:
- what systems they have in place to filter and monitor online use
- what they are asking children to do online, including the sites they must be asked to access
- who from the school or college (if anyone) their child is going to be interacting with online.

12.   Mental Health Support

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day to day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

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

The Group has an important role to play in supporting the mental health and wellbeing of the pupils, providing systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral pathways to seek professional support.

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

13. Educating Pupils About Safeguarding

Schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of non-acceptance of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The Group has a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life.

The following programmes must be used to ensure that pupils develop a clear understanding of safeguarding issues including those involving online safety, of the dangers of radicalisation and of the safeguarding dangers associated with alcohol, bullying, drug-taking, sexual assaults and sexting, and what they may do to play their part in ensuring their welfare and safety and in building resilience against the dangers of radicalisation:

- PSHE and RSE
- Assemblies / Chapel Services
- SMSC
- ICT/Computing (Online Safety)

The schools' curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils, as well as by a planned programme of evidence-based Relationships and Sex Education delivered in regularly timetabled lessons and reinforced throughout the whole curriculum (Relationships Education [for all primary pupils] and Relationships and Sex Education [for all secondary pupils]). All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school. In teaching RSE, schools must have regard for the statutory guidance from the DfE and must promote an awareness of the content that is age and stage of development appropriate (especially when considering pupils with SEND and other vulnerabilities).

The RSE programme tackles issues that are central to our safeguarding approach, such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage or female genital mutilation (FGM), and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

Full details are given in the PSHE and RSE Policy.

14. Children who are Absent from Education

The Group recognises that unexplainable and/or persistent absences from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines. The school must

ensure that its immediate response to persistently absent pupils is robust, such that it helps prevent them becoming a child missing education in the future. This is particularly important for children known to social care.

DfE guidance on school attendance <u>Working together to improve school attendance (updated, effective August 2024)</u> includes information on how schools should work with local authority children's services where school absence indicates safeguarding concerns within the family or in the community.

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

The relevant School's DSL must inform the applicable Local Authority (within which the pupil resides when not at School) of any pupil who is going to be added to or deleted from the relevant School's admission register for one of a number of stipulated reasons. This must assist the Local Authority to fulfil its duty to identify children of compulsory school age who are missing from education, and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, child sexual or criminal exploitation, or radicalisation.

Action must be taken in accordance with the Group's Missing Child Policy if any absence of a pupil from the Group gives rise to a concern about their welfare.

15.   **Preventing Radicalisation**

The Prevent Duty Guidance for England and Wales (updated 2023) emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. The Group must have due regard to the need to prevent people from becoming terrorists or supporting terrorism, and to the statutory guidance issued under Section 29 of the Counterterrorism Security Act 2015. The Duty sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that children who are susceptible to radicalisation are supported as they would be under safeguarding processes.

The objectives of Prevent are to:
• tackle the ideological causes of terrorism;
• intervene early to support people susceptible to radicalisation;
• enable people who have already engaged in terrorism to disengage and rehabilitate.

Radicalisation is the process by which a person comes to support terrorism and forms of extremism. Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs, including calls for the death of members of the UK armed forces, whether in this country or overseas. For the full Government definition of extremism, see <u>New definition of extremism (2024) - GOV.UK (www.gov.uk)</u>.

Children and young people continue to make up a significant proportion of Prevent referral cases, and in recent years there have been concerns regarding increased numbers of learners being arrested for terrorism-related offences. Schools are often in a unique position, through interacting with learners on

a regular basis, to be able to identify concerning behaviour changes that may indicate they are susceptible to radicalisation.

Schools should not only be alert to violent extremism but also non-violent extremism, including certain divisive or intolerant narratives which can reasonably be linked to terrorism. See Educate Against Hate which provides further information on extremist narratives. (https://www.educateagainsthate.com/category/school-leaders/advice-and-training-school-leaders/)

The Department for Education has also published supporting advice for schools and further education settings on managing the risk of radicalisation in their education setting (https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation). Compliance with the Prevent duty will reflect existing good practice on safeguarding. For example, it will ensure susceptibility to radicalisation is incorporated into safeguarding training, policies and risk assessments.

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

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

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

16. **Visiting Speakers**

In accordance with the Prevent statutory guidance, the Group has a protocol to ensure that visiting speakers are suitable and appropriately supervised. A visiting speaker must be invited only with the permission of a senior leader.   Formal or informal background information about a visiting speaker must be obtained to decide whether to invite and/or permit a speaker to attend the School. For further information, please refer to the Visiting Speaker Policy.

17. **Early Years Group Stage (EYFS)**
(N/A for Belmont, MHS, MHI, Cobham Hall)

Personal mobile phones are not allowed to be used in the early years setting and must be locked away at all times. All photographs of children are taken on school cameras or devices and are stored in accordance with the Data Protection Act and the Online Safety Policy.

If a staff member is taking medication which may affect their ability to care for children, the staff member should seek medical advice. Staff medication is always safely stowed away out of the reach of children.

Staff are aware that they must declare to either the Head or Deputy Head if they are taking any medication, which might affect their ability to work with children.

It is an offence to employ anyone in connection with its Early Years and Later Years (under-8s) provision who is disqualified, or for a disqualified person to be directly involved in the management of its Early Years and Later Years (under-8s) provision. The Group must ensure that those who fall within the scope of the guidance in accordance with the Disqualification under the Childcare Act 2006 are required to complete a self-declaration form confirming that they do not meet any of the criteria for disqualification under the Regulations, as set out in the Group's Recruitment, Selection and Disclosure Policy.

The School must inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

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

EYFS Safeguarding Leads, by school:

School	DSL Team in Early Years	
Abbot's Hill	Sarah Lanchbery, Nursery Manager slanchbery@abbotshill.herts.sch.uk	Lucy Daviss, Head of Early Years ldaviss@abbotshill.herts.sch.uk
Grimsdell	Jen Ticehurst, Deputy Head jticehurst@grimsdell.org.uk	Kim Vanstone, Assistant Head Pastoral and SENDCo kvanstone@grimsdell.org.uk
Keble Prep	Katie Callaghan, Head of Pre-Prep kcallaghan@kebleprep.co.uk	Ferzana Rahman, Pre-Prep Pastoral Lead and Reception Teacher frahman@kebleprep.co.uk
Kingshott	Emily Emerson, Head of Nursery and EYFS eemerson@kingshottschool.com	
Lyonsdown	Zorana Telford, Assistant Head Pastoral ztelford@lyonsdownschool.co.uk	Emily Jenner, Deputy Head ejenner@lyonsdownschool.co.uk
St Joseph's in the Park	Ruth Jack, Head of Early Years Ruth.jack@stjosephsinthepark.co.uk	Vanessa Sharp Vanessa.sharp@stjoseph'sinthepark.co.uk

The DSL is responsible for liaison with the local statutory children's services agencies, and with the Local Safeguarding Partners (LSP).

18. Use of School Premises for non-school activities

When school facilities/premises are hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), the Group must ensure that they have appropriate arrangements in place to keep children safe. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School therefore seeks assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensures that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This requirement is included in every lease or hire agreement as a condition of use and occupation of the premises, and failure to comply with this would lead to termination of the agreement.

The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that the Group expects these providers to have in place.

19. Allegations Against Staff

This **'harms threshold'** section applies where an adult within the school community has behaved in a way that:

- has harmed a child, or may have harmed a child;
- indicates he/she may pose a risk of harm to a child;
- has possibly committed a criminal offence against or related to a child; or
- indicates they may not be suitable to work with children. This is termed 'transferable risk' in KCSIE and refers to an incident outside school which did not involve children, but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic violence at home. No children were involved, but schools/colleges need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk.

Where it is a child who makes the allegation, then the protocols given in Section 10 above (guiding members of staff in how they should respond to a disclosure from a child) should be followed, with the variations set down below.

When allegations arise, the following protocols should be followed:

- Where an allegation is made against a member of staff, the member of staff receiving the allegation must immediately inform the Head of the School in which that member of staff works who must contact the DSL. If the Head is absent, the allegation should be passed to whoever is deputising for the Head in his/her absence that day. Where there may be a conflict of interest in reporting an allegation to the Head or the staff member deputising in their absence, a member of staff can report the matter to the CEO of The Mill Hill School Foundation, or directly to the LADO.

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

- Where an allegation is made against the Head, the member of staff receiving the allegation must immediately inform the CEO who must immediately inform the Chair of the Court of Governors (or in

his absence the nominated Safeguarding Governor) who must immediately consult with the LADO without notifying the Head first.

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

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

As stipulated in *KCSIE*, the Head or, where the Head is the subject of the allegation, the Chair of the Court of Governors should discuss the allegation immediately with the Local Designated Officer in order to consider the nature, content and context of the allegation and agree a course of action. A referral to the CSC or Police of a child protection allegation or suspicion against a member of staff or volunteer at the School must not normally be made where the case is one which, upon the advice of the Designated Officer, can be satisfactorily investigated and dealt with under the School's internal procedures. In such situations additional support from one or more external agencies should be sought and the parents should be kept fully informed, as appropriate.

The Designated Officer should be informed within 24 hours of all allegations that come to the School's attention and appear to meet one or more of the following criteria: that the person is alleged to have behaved in a way that has or may have harmed a pupil; or possibly committed a criminal offence against or related to a pupil; or behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; behaved or may have behaved in a way that indicates that they may not be suitable to work with children.

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

While the Group is not the employer of supply teachers, the Group must ensure allegations are dealt with following the correct procedures. When there is an allegation relating to a member of supply staff provided by an agency, the agency must be fully involved in the process. The relevant school must take the lead in any investigation as agencies do not have direct access to the children or other school staff and are thus not able to collect the facts or liaise with the Designated Officer.

A referral to MASH or the Police of a child protection allegation or suspicion against a person who is from outside the School and not a member of staff or volunteer at the School must be made and the advice of MASH followed. A complaint or suspicion of abuse involving the identification of someone who may already be engaged in illegal terrorist-related activity must always be referred to CSC and, if appropriate, the Police.

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

The Group's procedures for dealing with allegations against staff (including supply teachers or volunteers who work with children, and contractors) aim to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations. However, when considering its actions the Group must consider whether pupils are at risk or may be at risk, and whether the member of staff's presence in the school would impede an investigation.

The Group must ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course of action, unless there is an objection by CSC or the Police. The Group must appoint a named representative to keep the individual informed of the progress of the case and must consider what other support is appropriate for the individual.

Suspension must not be an automatic response to an allegation. The Group should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The Group must give due weight to the views of the DSL and the provisions of *KCSIE* when making a decision about suspension. Where the individual is suspended, the Group must ensure they know who their point of contact is in the Group and shall provide them with their contact details. Where a member of the boarding staff or a member of staff living in Group accommodation is suspended pending investigation, the Group must undertake to provide alternative accommodation away from pupils.

The Group must report to the DBS within one month of leaving the Group any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children. If any person (whether employed, contracted, a volunteer or pupil) is dismissed, or resigns, before a disciplinary process is completed the Head should inform the person about the employer's statutory duty to report the case to the DBS and must consequently inform the Authority. If any person (whether employed, contracted, a supply teacher, a volunteer or pupil) is dismissed, or resigns, and a judgement is made that a disciplinary process would have been instituted if that person had remained in post the Head should similarly inform the person about the employer's statutory duty to report the case to the DBS and must consequently inform the Authority.

If a teacher has been dismissed (or would have been dismissed had he or she not resigned) following an allegation the Group must consider whether to inform the TRA in accordance with *KCSIE* guidance.

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

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

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

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

As part of its whole school approach to safeguarding, the School must ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

The Group understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) 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 the Group 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 are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.

Allegations relating to external individuals or organisations that are using school premises

When a School receives an allegation relating to an incident that (may have) happened when an individual was using their school premises for the purposes of running activities for children (community groups, sports associations, extra-curricular activities), the Group must follow the school's regular safeguarding policies and procedures, including informing the LADO.

Introduction to the concept and importance of sharing Low-Level Concerns

Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in the School's Staff Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

All staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the School's Staff Code of Conduct.

'Low-Level Concerns' and allegations

The term 'low-level' does not mean that a concern is insignificant, it means that the behaviour towards a child does not meet the 'harms threshold' set out as above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school 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.

For full details please see the Group's Low-Level Concerns about Staff Policy.

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

20. **Record Keeping**
All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the DSL. Recently updated (April 2024) DfE guidance "Data protection in schools - Guidance - GOV.UK (www.gov.uk)" helps school staff and governors understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

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

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

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

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

21. **Complaints**
Any complaint arising from the application of this policy should be directed in the first instance to the DSL at the school concerned. Should the complainant be dissatisfied with the response given then they should follow the Group's complaints procedures.

Attention is also drawn to the contact details for ISI, NSPCC and Ofsted in the Key External Contacts section which might prove helpful to those with concerns about the conduct of a School.

22. **Review**
This policy is next due to be reviewed in August 2025.
This Policy was approved by the Court of Governors on 9th October 2024.
By resolution of the Chair of the Court of Governors, Elliot Lipton

Signed:
Elliot Lipton
Chair of the Court of Governors

APPENDIX A: ABUSE, NEGLECT AND EXPLOITATION

All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. They may be abused by an adult or adults or another child or children. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label and they can often overlap with one another.

Types of Abuse and Neglect

1.   Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2.   Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

3.   Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non- contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

4.   Emotional Abuse

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

Possible Signs of Neglect

- change in behaviour
- hunger
- child appearing 'unkempt'
- loss of weight
- tiredness
- being left alone or unsupervised
- inappropriate clothing
- poor hygiene
- eating more than usual/saving food
- poor dental hygiene
- not meeting a child's medical needs
- parents or guardians not contactable or unavailable to discuss academic/pastoral needs

Possible Signs of Physical Abuse

- unexplained injuries or burns, particularly if they are recurrent

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

Possible Signs of Sexual Abuse

Young people may:

- be chronically depressed
- be suicidal
- use drugs or drink to excess
- self-mutilate, show self-hatred
- have unexplained pregnancies
- experience memory loss
- become anorexic or bulimic
- run away frequently
- be inappropriately familiar with others
- be fearful about certain people like relatives or friends
- assume the role of parents in the house to such an extent that they do all the cooking, cleaning, child-minding and taking care of everyone's needs except their own.
- not allowed to go out on dates or have friends round.
- have soreness/bleeding in the genital or anal areas or in the throat.
- find excuses not to go home or to a particular place.
- have recurring nightmares/be afraid of the dark.
- be unable to concentrate, seem to be in a world of their own.
- have a 'friend who has a problem' and then tell about the abuse of the friend
- have chronic ailments such as stomach pains and headaches
- sexually abuse a child, sibling or friend
- exhibit a sudden change in school/work habits, become truant
- be withdrawn, isolated or excessively worried
- have outbursts of anger or irritability
- be fearful of undressing for Physical Education/Games
- have unexplained sums of money or gifts
- act in a sexually inappropriate way towards adults

Possible Signs of Emotional Abuse

- physical, mental and emotional development lags
- admission of punishment which appears excessive

- over-reaction to mistakes
- sudden speech disorders
- fear of new situations
- inappropriate emotional responses to painful situations
- neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- self-mutilation
- fear of parents being contacted
- extremes of passivity or aggression
- drugs/solvent abuse
- chronic running away
- compulsive stealing
- scavenging for food or clothes

Staff need to be aware that the following situations can lead to abuse, neglect and exploitation:

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 (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, through violence or the threat of violence, into criminal activity in exchange for something the victim needs or wants, or for the financial gain or other advantage of the perpetrator or facilitator. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact: it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, (see County Lines below) forced to shoplift or pickpocket or to threaten other young people.

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

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of

criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation,

Child Sexual Exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. CSE can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

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

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. CSE does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation: unexplained gifts or new possessions; association with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections or becoming pregnant; changes in emotional well-being; misuse of drugs and alcohol; going missing for periods of time or regularly coming home late; and is persistently absent from education, including persistent absences for part of the school day. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

County Lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders must often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools. Children are often recruited to move drugs and money between locations.

One of the ways of identifying potential involvement in county lines are episodes when the child goes missing (both from home and school) and may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, staff should follow the safeguarding referral procedure set out in this policy. The DSL must refer to local services/third sector providers who offer support to victims of county lines exploitation.

Children in the Court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers

Children who are absent from education

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

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children

Cyber crime

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 a school's computer network to look for test paper answers or change grades awarded;

- denial of Service (Dos or DDoS) 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) such as 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 designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It 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. Note that Cyber Choices does not currently cover

'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police', and National Cyber Security Centre - NCSC.GOV.UK.

Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. Experiencing domestic abuse 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, it is now mandatory for the police to inform the key adult (usually the designated safeguarding lead (or a deputy)) in school as soon as is reasonably practicable. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Young Lives: Young people and domestic abuse | Safelives](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness must have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff must be considering homelessness in the context of children who live with their families, and intervention must be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and must require a different level of intervention and support. Children's social care must be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: here.

Mental Health

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, attendance and progress at school.

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. See [Every Mind Matters]() for links to all materials and lesson plans.

Modern slavery and the National Referral Mechanism (NRM)

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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Sexual violence and sexual harassment between children in school

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of KCSIE.

Serious Violence

There are a number of indicators, which may signal 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.

The likelihood of involvement in serious violence may be increased by factors 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.

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy]().

So-called 'Honour'-Based Abuse (HBA), Female Genital Mutilation (FGM) and Forced Marriage

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

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

All teachers and healthcare professionals have **a statutory duty to report to the Police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out in a girl under 18. Those failing to report such cases must face disciplinary sanctions. It must be rare for teachers to see visual evidence, and they should not be examining pupils. Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out.

Forcing any person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the multi-agency guidelines: 'Handling Cases of Forced Marriage'. Group staff can also contact the Forced Marriage Unit if they need advice or information.

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

APPENDIX B: PREVENT: INDICATORS OF SUSCEPTIBILITY TO INVOLVEMENT IN EXTREMISM

Vulnerability: carries a sense of weakness and exposure to something attacking you.
Susceptibility: implies an aspect of repetition over time, and falling victim to conditions.

These terms can be interchangeable in some cases, but not all.

A list of indicators is given below to assist professionals to understand and identify factors that could suggest a child, young person or their family may be vulnerable, and therefore susceptible to, or involved with extremism. The Channel Duty Guidance: 'Protecting People Susceptible to Radicalisation' (2023) also contains guidance on the indicators of susceptibility to involvement in extremism. See: [Channel Duty Guidance: Protecting people susceptible to radicalisation (publishing.service.gov.uk)](publishing.service.gov.uk). The DfE's briefing note 'The Use of Social Media for Online Radicalisation (2015)' includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

The NSPCC advises that the following may constitute indicators that a child is supporting an extreme ideology or being radicalised:
- isolating themselves from family and friends.
- talking as if from a scripted speech.
- unwillingness or inability to discuss their views.
- a sudden disrespectful attitude towards others.
- increased levels of anger.
- increased secretiveness, especially around internet use.

Protecting children from radicalisation | NSPCC.

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

The NSPCC says: 'It might be something, it might be nothing. There's no harm in talking it through' and offer confidential help and advice via their Helpline on 0808 800 5000, and Childline on 0800 1111.

For full details re the Vulnerability Assessment Framework used by the Channel to guide decisions about whether someone needs support to address the risks of their becoming drawn into extremism/terrorism, please see Annex B of the Channel Guidance 2023 (link above).

INDICATORS (not an exhaustive list)

Vulnerability

- Identity Crisis: distance from cultural/religious heritage; uncomfortable with their place in the society around them;

- Personal Crisis: family tensions; sense of isolation; adolescence; low self-esteem; dissociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging;
- Personal Circumstances: migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations: perceptions of injustice; feeling of failure; rejection of civic life;
- Criminality: experience of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to Extremism/Extremist Influences

- Reason to believe that the child associates with those known to be involved in extremism – either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate (e.g. the child is a friend or family member of someone believed to be linked with extremist activity)
- Evidence to suggest that the child is accessing the internet for the purpose of extremist activity (e.g. use of closed network groups, access to or distribution of extremist material, contacting associates covertly via Skype/email etc.)
- Reason to believe that the child has been or might to be involved with extremist/military training camps/locations
- Possession or actively seeking to possess and/or distribute extremist literature or other media material likely to incite racial religious hatred or acts of violence
- Sympathy with or support for illegal/illicit groups: e.g. propaganda distribution, fundraising, attending meetings
- Support for groups which are not illegal/illicit but have links to extremist activity

Experiences, Behaviours and Influences

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

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/ young person travelled for extended periods of time to international locations known to be associated with extremism?

- Has the child/ young person employed any methods to disguise their true identity? Has the child/young person used documents or cover to support this?

Social Factors

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

More Critical Risk Factors Could Include

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

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