

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

**Mill Hill School  
Belmont, Mill Hill Preparatory School  
Grimsdell, Mill Hill Pre-Preparatory School**

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

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

**Effective March 2011**

## **The Mill Hill School Foundation**

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## **The Mill Hill School Foundation**

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

#### **Statement**

The Mill Hill School Foundation [the 'Foundation'] fully recognises its responsibilities for child protection. The Foundation policy applies to all staff (whether employed full-time or part-time, contracted or a volunteer) working in the three schools, Mill Hill, Belmont and Grimsdell, and to the appointment of Members of the Court of Governors of the Mill Hill School Foundation. It is our intention that every pupil should feel safe and protected from any form of abuse: (neglect, non-accidental physical injury, sexual exploitation or emotional ill treatment).

The Foundation regards the Policy to Safeguard and Promote the Welfare of Children who are pupils at the School [the 'Policy'] as integral to the effective discharge of its duties and responsibilities. The Court of Governors recognises its legal responsibility for undertaking an annual review of this Policy and of the efficiency with which the related duties have been discharged and has determined that as part of this annual review that it will receive an annual Report on the Policy and the efficiency with which the procedures have been carried out. This annual Report will be undertaken by the named Governor responsible for overseeing the implementation of this Policy and the Heads. Taking into account this Report, the Court of Governors will then conduct its annual review in order to ensure that all members of the Court of Governors, as part of their legal responsibilities, are satisfied that the Policy is fully appropriate and compliant, and that the related duties have been discharged fully and efficiently. In addition, further review of the policies and procedures will be undertaken by the Court of Governors whenever required to ensure compliance with new legislation or updated best practice guidelines or legislation.

This Policy is available to all pupils, parents, prospective parents and members of staff by its publication on the website of each of the three Foundation Schools and it is available in hard copy, upon request to the School Office at each of the three Schools. In addition, copies of the Policy may be inspected at any point in the School day in the School Offices. It is also available to any adults working in the Foundation and, at Mill Hill School, to older boarders in positions of responsibility.

This Policy operates in accordance with the London Borough of Barnet and other locally agreed inter-agency procedures and is compliant with *Safeguarding Children and Safer Recruitment in Education* and the Statutory Framework and Practice Guidance for the Early Years Foundation Stage (EYFS).

## Aims and Objectives

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

Ensuring that the Foundation practises safe recruitment procedures in checking the suitability of all staff and volunteers (including staff employed by another organisation) working with our pupils in accordance with the guidance given in *Safeguarding Children and Safer Recruitment in Education*, the National Minimum Standards for Boarding Schools and the requirements of the Independent Safeguarding Authority (ISA) and in compliance with the Independent School Standards Regulations. The Foundation's recruitment policies are set out in detail in the Mill Hill School Foundation Recruitment, Selection and Disclosure Policy. This Policy provides for the appropriate checks to be carried out to confirm the suitability of a member of staff for appointment:

- satisfactory checks concerning identity, medical fitness, right to work in the UK, previous employment history, character references, professional references (where appropriate) and qualifications (where appropriate);
- satisfactory completion of an enhanced criminal record check and the enhanced criminal record certificate which is the subject of the application is obtained before appointment. In accordance with the Boarding Schools National Minimum Standards a successful applicant will not be permitted, under any circumstances, to commence employment at the Foundation until the Foundation is in receipt of the successful applicant's enhanced CRB certificate which the Foundation considers satisfactory;
- in the case of any person for whom, by reason of living or having lived outside the UK, obtaining such a certificate is not sufficient to establish suitability to work in a school, such further checks are made as the Foundation considers appropriate, having regard to any guidance issued by the Secretary of State;
- from July 2010 confirmation of registration with the ISA in accordance with the requirements of the ISA, A successful applicant will not be permitted, under any circumstances, to commence employment at the Foundation until the Foundation is in receipt of the successful applicant's confirmation of ISA registration

Ensuring that we carry out all necessary checks on the suitability of people who serve on the Foundation's Court of Governors in accordance with the above regulations and guidance given in *Safeguarding Children and Safer Recruitment in Education*, the Education (Independent School Standards) (England) Regulations 2003 as amended, the National Minimum Standards for Boarding Schools and the requirements of the ISA.

Ensuring that where the School Foundation ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a prompt and detailed report is made to the ISA. This report will be made within one month of the person leaving the Foundation.

Ensuring that where staff from another organisation are working with our pupils on another site, we have received assurances in writing that appropriate child protection checks and procedures apply to those staff.

Protecting each pupil from any form of abuse, whether from an adult or another pupil.

Being alert to signs of abuse both in the School and from outside.

Establishing a safe environment in which children can learn and develop and ensure that School premises are as secure as circumstances permit.

Raising awareness of child protection issues and equipping pupils with the skills needed to recognise and keep them safe from abuse, as part of the PSHE curriculum.

Having clear procedures in place for identifying and reporting suspected cases of abuse and which promote this Policy.

Supporting any pupil who has been abused in accordance with his/her agreed protection plan.

Creating an environment where children know they can approach adults, are encouraged to talk, and are listened to.

Being alert to the medical needs of children with medical conditions.

Operating robust and sensible Health and Safety procedures.

Operating clear and supportive policies on drugs, alcohol and substance misuse.

Considering and developing procedures to deal with any other safeguarding issues which may be specific to individual children in our School or in our local area.

Undertaking to follow the procedures set out in 'Safeguarding Children and Safer Recruitment in Education,' and to have regard to guidance issued by the Secretary of State for the Department for Education (DfE) in accordance with section 157 Education Act 2002 and associated regulations.

Every complaint or suspicion of abuse from within or outside the Schools will be dealt with according to the London Child Protection Procedures Version 3 (2007), will be investigated and in all proper circumstances will be referred to an external agency such as the social services of the local authority (SSD), the child protection unit of the police (CPU) in accordance with the procedures published by the Barnet Child Protection Team.

The Foundation undertakes to:

1. Ensure Safer Recruitment Procedures are always followed according to the DfE document 'Safeguarding Children and Safer Recruitment in Education' – January 2007.
2. Ensure that in each School there is a designated person for child protection who has received appropriate training and support for this role. At Grimsdell this will be the designated person for EYFS.
3. Ensure there is a nominated Governor responsible for safeguarding and child protection.

4. Ensure all members of staff and governors know the name of the designated persons and their role.
5. Ensure all staff understand their responsibilities in being alert to the signs of abuse and reporting arrangements for referring any concerns to the designated person responsible for child protection.
6. Ensure parents, through the publication of this policy and other similar means, have an understanding of the responsibility placed on the Schools and staff for child protection.
7. Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters including attendance at case conferences.
8. Notify Social Services if there is an unexplained absence of a pupil who is on the Child Protection Register
9. Notify the ISA of any employee, (whether current or having recently left the employ of the Foundation), about whom there is a concern regarding his or her attitude or actions towards pupils.

### **The Designated Person**

Each of the Foundation Schools has appointed a ‘designated person’ with the necessary status and authority who will take responsibility for matters relating to child protection and welfare. If the Designated Person is the subject of a complaint his/her duties will be carried out by the Head. Both persons will have received appropriate training in child protection and inter-agency working and attend refresher training at 2-yearly intervals.

The designated person at each school in the Foundation is:

Mill Hill School,	Mrs Jane Sanchez, The Deputy Head (Pastoral)
Belmont,	Mr Leon Roberts, The Deputy Head (Pastoral)
Grimsdell,	Mr Kevin Dobson, The Deputy Head (also for EYFS)

The designated person will:

- Hold a copy of *Safeguarding Children and Safer Recruitment in Education* and local area Safeguarding and Child Protection Procedures.
- Be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection except for allegations against staff, volunteers and the Designated Person with responsibility for Safeguarding which should be reported to the Head.
- Co-ordinate the child protection procedures in the School.

- Maintain an ongoing training programme (updated every two years) for the Head and (every three years) for all staff and ensure that part-time and voluntary staff who work with children are made aware of these arrangements.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely, separately from the main pupil file, and in a locked location.
- Follow procedures where an allegation is made against a member of staff.
- Ensure that, where a pupil on the child protection register leaves, the information is transferred to the new school immediately and that the pupil's social worker is informed.
- Liaise with the child protection officer appointed by the SSD (Local Authority Designated Officer), co-ordinate action with social services and (where applicable) the police following any child protection allegation or suspicion involving a day or boarding pupil.
- Ensure that, where appropriate, senior pupils given positions of responsibility (such as monitors, prefects and house prefects) over other pupils are briefed on appropriate action to take should they receive any allegations of abuse.
- Advise and act upon all suspicion, belief and evidence of abuse reported to him/her
- Keep the Head of the School informed of all actions unless the Head is the subject of a complaint. In this situation, the Designated Person should immediately pass the allegation to the Chairman of the Court of Governors of the Mill Hill School Foundation without notifying the Head first.
- Liaise with the SSD and other agencies on behalf of the School
- In the case of the designated person for Grimsdell (EYFS section) he/she will also, apart from taking lead responsibility for safeguarding children in the EYFS setting, liaise with local statutory children's agency of the London Borough of Barnet as appropriate.

Dr A Craig is the named Governor responsible for overseeing the implementation of this Policy. She is also responsible for presenting an annual Report, prepared following consultation with the Heads and Designated persons from each of the three Foundation Schools, to the Court of Governors on the Foundation's safeguarding and child protection policies and of the efficiency with which the related duties have been discharged. This annual Report will form part of the Court of Governors' annual review, which is undertaken to ensure that all members of the Court of Governors, as part of their legal responsibilities, are satisfied that the Policy is fully appropriate and compliant, and that the related duties have been discharged fully and efficiently.

## **Duty of Employees**

Every member of staff in each School (including voluntary staff, peripatetic music teachers, sports coaches and all other staff) is under a general legal duty:

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

## **Whistleblowing:**

In accordance with the Independent School Standards Regulation 3.(2)(b) which requires compliance with Safeguarding Children and safer recruitment in Education Section 2.23ff that refers to the National Minimum Standards for Boarding Schools Standard 3, the School recognises the requirement for a Whistleblowing section in this Policy.

All staff are required to report to the Designated Person, any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. Any allegation made against a member of staff or volunteer should be reported to the Head. In exceptional cases such reports should be made to Ofsted. There will be no retribution or disciplinary sanction taken against a member of staff for making such a report provided that it is done in good faith.

## **Procedures**

### **Any member of staff suspecting or hearing a complaint of abuse:**

1. Must listen carefully to the pupil and keep an open mind. Staff should not form a decision as to whether or not the abuse has taken place.
2. Must not ask a leading question, i.e. a question that suggests its own answer.

3. Must reassure the pupil but not give a guarantee of absolute confidentiality. The member of staff should explain they have to pass the information to the Head who will ensure the correct action is taken.
4. Must keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names and not initials. The record must be kept securely and handed to the Head. If the allegation is made against a member of staff or a volunteer and the Head is absent, the allegation should be passed directly to the Chairman of the Court of Governors of the Mill Hill School Foundation.
5. Preserve and safeguard all evidence, for example scribbled notes, mobile phones containing text messages, clothing and computers

### **Action taken by the Designated Person**

The action to be taken will take into account:

- The procedures published by the DfE – Safeguarding Children and Safer Recruitment in Education (see attached)
- The nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always and within 24 hours be referred to the SSD or the police without further investigation within the School.
- It is important to ensure that even allegations that appear less serious are followed up and taken seriously, and that they are examined objectively by someone independent of the school. Consequently, the LADO should be informed of all allegations that come to the school's attention and appear to meet the criteria for referral, so that he or she can consult police and social care colleagues as appropriate. The relevant criteria are that one or more persons have: behaved in a way that has harmed a child or may have harmed a child; possibly committed a criminal offence against or related to a child; or behaved towards a child or children in a way that indicates that they are unsuitable to work with children.
- When deciding whether to make a referral, following an allegation or suspicion of abuse, the Head and Designated Person should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the local authority designated officer (LADO). This may be done tentatively and without giving names in the first instance. What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus the school should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse, but should discuss their doubts and concerns with the LADO on a

no names basis without identifying the family. If the LADO advises that sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by telephone, the Designated Person will confirm the referral in writing to SSD within 48 hours. If no response or acknowledgment is received within one working day, the Designated Person will contact Social Services again.

- The wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
- The wishes of the complainant's parents provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Person is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.
- The lawful rights and interests of the Foundation community as a whole including its employees and its insurers.
- Not to take any action that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegation of abuse (see 'What to do if you're worried a child is being abused' Sections 10.2 and 10.3).

### **Referral Guidelines**

The Designated Child Protection members of the Foundation staff must have regard for the criteria set out in Paragraph 5.1 of Safeguarding Children and Safer Recruitment in Education (November 2007) when determining whether to make a referral to social services where a teacher or member of staff (including a volunteer) has:

- behaved in a way that has harmed a child, or may have harmed a child; or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.

Or if there are concerns about a child's welfare and there are signs that a child

- Is experiencing or may already have experienced abuse or neglect
- Is likely to suffer significant harm in the future

Within one working day of the recognition of risk

The safety of children is paramount in all decisions relation to the welfare of children and members of the Foundation staff should take all reasonable steps to offer a child immediate protection from an aggressive parent.

A referral to the SSD or Police will not normally be made where:

- The complaint does not involve a serious criminal offence; and
- A referral would be contrary to the wishes of a pupil complainant who is of sufficient maturity and understanding and properly informed, and contrary also to the wishes of the complainant's parents; and
- The case is one that does not meet the Referral Criteria as set out above and, upon the advice of the LADO, can be satisfactorily investigated and dealt with under the School's internal procedures, the parents being kept fully informed, as appropriate

### **External Agencies**

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

External Agencies telephone contact details:

- The Social Service Department of the London Borough of Barnet - 0208 359 2000
- The Duty Social Worker on the Referral and Assessment Team of the Social Service Department of the London Borough of Barnet – 0208 359 4066
- Listening to Children Division of the London Borough of Barnet – 0208 359 4489

### **Boarding Pupils**

As there are boarding pupils at Mill Hill School, the requirements under Standard 3 of the National Minimum Boarding Standards apply to this policy. In accordance with this Standard, the School will ensure that:

- Senior pupils who are given positions of responsibility over other pupils are appropriately briefed on the appropriate actions to take should they receive any allegations of abuse. The responsibility for organising these briefings and for ensuring that they occur on a regular basis resides with the Deputy Head (Pastoral);
- The School's Missing Child Policy is known to staff and used in practice. This policy includes details of how a child who is believed to be missing should be searched for and, if necessary, reported as missing from School;
- Parents and boarders are aware of the possibility of reporting concerns or allegations to Ofsted. Anyone wishing to do this should contact the Ofsted

helpline on 08456 404040, or email enquiries@ofsted.gov.uk. Ofsted have produced a leaflet that gives information about how to raise concerns about schools; how to raise concerns with Ofsted; what Ofsted can and will do when they receive complaints; and Ofsted's enforcement and other powers. The leaflet, 'Concerns and complaints about childminders and childcare providers' can be found at <http://www.ofsted.gov.uk/Ofsted-home/Forms-and-guidance/Browse-all-by/Other/General/Factsheet-childcare-Concerns-and-complaints-about-childminders-and-childcare-providers>

- Pupils, parents and others are not penalised for making a complaint in good faith, thus giving immunity for *bona fide* whistleblowing.

### **Allegations against Staff**

The Foundation has procedures for dealing with allegations against staff (and volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations unless:

- The pupil is at risk
- Other pupils are at risk
- The member of staff's presence in school will impede an investigation

Suspension will not be an automatic response to an allegation. Where a member of boarding staff is suspended pending investigation, the Foundation will undertake to provide alternative accommodation away from pupils. Full consideration will be given to all the options, subject to the need to ensure:

- The safety and welfare of the pupil concerned
- The need for a full and fair investigation

The Foundation is required to report to the ISA within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. The ISA commenced operation on 20 January 2009 and its address for referrals is PO Box 181, Darlington, DL1 9FA (telephone 0300 123 1111).

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

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

If an allegation is made against a member of staff or a volunteer, the member of staff receiving the allegation must immediately inform the Head who will contact the Designated Person. If the Head is absent, the allegation should be passed directly to the Chairman of the Court of Governors of the Mill Hill School Foundation.

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

If an allegation is made against the Head, the member of staff receiving the allegation must immediately inform the Chairman of the Court of Governors of the Mill Hill School Foundation who will immediately pass the allegation to the Designated Person without notifying the Head first.

### **Allegations against Pupils**

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour and discipline will apply. Child protection concerns will be referred to the local authority child protection officer appointed by the SSD (Local Authority Designated Officer).

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

A member of staff who suspects that a pupil is suffering harm from outside the School should seek information from the child with tact and sympathy using 'open' and not leading questions. A sufficient record should be made of the conversation and if the member of staff continues to be concerned he/she should refer the matter to the Designated Person.

### **Policy on the Restraint of Pupils**

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

### **Missing Child Policy and procedures**

The Foundation has a Missing Child Policy which operates in accordance with this policy and each Foundation School has its own separate procedures to be used for searching for and, if necessary, reporting any child missing from School. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing. All staff are informed of the Missing Child Policy and the procedures to be followed for their School and which are published in the School Staff Handbook. This Policy is available to parents and prospective parents, Governors, volunteers and staff in hard copy, upon request to the School Office at each of the three Schools. In addition, copies of the Policy may be inspected at any point in the School day in the School Offices.

Each School's Missing Child Policy is compliant with *Safeguarding Children and Safer Recruitment in Education* and the relevant statutory or other regulations, namely at

Grimsdell the Statutory Framework and Practice Guidance for the Early Years Foundation Stage and at Mill Hill School the Boarding Schools National Minimum Standard 3.

**Code of Conduct**

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

**Monitoring**

The Heads of each school in the Foundation will monitor the operation of this policy and the effectiveness of its procedures, and the named Governor responsible for overseeing the implementation of this Policy will make an annual report on safeguarding and child protection to the Governing Body. Any deficiency that is noted in the Foundation’s safeguarding and child protection arrangements will be remedied without delay. The Court of Governors will undertake an annual review of this Policy.

Last review by the Court of Governors 2 July 2011

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By resolution of the Court of Governors

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

Date .....