



Safeguarding and Child Protection Policy

What is Child Protection?

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

What is significant harm?

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

Statement of intent

MELHC fully recognises its responsibility to safeguard and promote the welfare of the children and young people in their care. This responsibility encompasses the following principles:

- The welfare of the child/young person is paramount
- To protect children/young people from harm (maltreatment)
- All children/young people without exception have the right to protection from abuse regardless of age, gender, ethnicity, disability, sexuality or beliefs
- The policy applies to all staff and other adults involved with MELHC e.g. Group Leaders, agents, external contractors etc.
- All concerns and allegations of abuse will be taken seriously and responded to appropriately
- Our commitment to safer recruitment, selection and vetting
- To ensure consistency between all policies and procedures relating to the safety and welfare of children and young people within our care
- To review all policies and procedures relating to child welfare and safety on an annual basis



What constitutes child abuse?

Abuse: Is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

‘A child is considered to be abused or at risk of abuse when the basic needs of the child are not being met through acts of either commission or omission, leading to demonstrable harm or demonstrable likely harm’. NSPCC 1987 (adapted)

It is generally accepted that there are four main forms of abuse which are not mutually exclusive. The following definitions are based on those from Working Together to Safeguard Children (HM Government 2010).

i) Neglect

Neglect is 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 include failing to provide the basic necessities of life: adequate food, clothing, warmth and shelter; failure to ensure adequate supervision including the use of adequate care-takers; protect a child from physical and emotional harm or danger; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

ii) Physical Abuse

Physical abuse involves physical injury to a child, where there is definite knowledge or reasonable suspicion that injury was deliberately inflicted or was not prevented. It may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. It also involves giving a child poisonous substances, inappropriate drugs and alcohol. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse, as well as being a result of an act of commission, can also be caused through omission or the failure to protect, as well as forced marriages and female genital mutilation.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.



iii) Sexual Abuse

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. This may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

iv) Emotional Abuse

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

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

Radicalisation:

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

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an



extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Indications or Signs of Possible Abuse including radicalisation:

- Signs of looking unwashed, undernourished, weight loss etc; inappropriate clothing for the conditions
- Changes in behaviour – depression or withdrawn behaviour or attention seeking behaviour
- Fearful behaviour - fear of specific people places, fear of separation etc.
- Mentioning being left alone or unsupervised
- Regressive or aggressive behaviour e.g. bed-wetting or severe temper outbursts that are out of character
- Mood swings
- Changes of friendship group
- Persistent or multiple bruising in unexpected places, that cannot be explained by normal childhood activity
- Minor injuries in unlikely places
- Burns, scalds or bites
- Delay in seeking access to medical care/treatment
- Excessive preoccupation with sexual matters
- Knowledge of sexual matters inappropriate for age of child
- Promiscuous behaviour
- Sexually explicit or otherwise disturbing creative writing or artwork.
- Expression of opinions that are at odds with our shared values, and which may be tantamount to, or explicitly inciting violence and/or illegal acts.

There may be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of students. Questions of the child or young person being in mortal danger, being uncared for, engaging in anti-social or inappropriate behaviour, may be referred to the Director of Holiday Courses and Events, who will discuss the matter with the MELHC Manager, Pastoral Compliance Manager and the relevant Centre Manager, and through them, as necessary, to Children's Social Care. Such cases may also be referred to the Medical Centre and through them to Children's Social Care.

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

- Ensuring safer recruitment practice*
- Ensuring through training that all staff are aware of and committed to the Safeguarding Policy and Child Protection Procedures
- Adopting a Code of Conduct for all staff*



- Establishing a positive, supportive and secure environment in which children can learn and develop, together with an ethos which promotes in all students a sense of being valued, listened to and respected
- Providing pastoral support that is accessible and available to all children and young people and ensuring that all course attendees know to whom they can talk about their concerns.

NB. * refers to separate policies and guidance for full details; this guidance will follow the British Council recommendations and comply with guidance with regard to the DBS (Disclosure & Barring Service). All employees have references checked and undergo a full enhanced DBS check).

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

Sharing information about concerns with agencies who need to know and involving children and their parents/guardians appropriately

Monitoring children known or thought to be at risk of harm and to contribute to assessments of need and support packages for those children. Safeguarding, in addition to child protection, encompasses issues such as student health and safety, bullying/cyber-bullying, appropriate medical provision, drugs and substance misuse. These have specific policies and guidance which should be read in conjunction with this document.

Child protection procedures and guidance

Scope and Purpose of these Procedures

These procedures apply to the Director of Holiday Courses, Managers, all staff (including Group Leaders, agents and external contractors) working for and on behalf of Millfield English Language Holiday Courses and explain what action should be taken if there are concerns that a child is or might be suffering harm. A child is a person under 18 years but the principles of these procedures apply also to vulnerable young adults over 18 years.

The procedures are available to parents on request or via the MELHC website.



Roles and Responsibilities

Staff

All staff including Group Leaders, agents and external contractors have a statutory obligation to report to the Designated Child Protection Person (DCPP) if there is suspicion of abuse of a student or if a student discloses abuse or allegations of abuse. ***This is an inescapable, personal and professional responsibility of all staff for the protection of children from harm.***

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

- The conduct of a member of staff
- A child, parent or member of staff 'disclosing' abuse
- Evidence of physical hurt that may or may not be accompanied by unusual or uncharacteristic behaviour by a student.

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

- **Mark Greenow, Director of Holiday Courses and Events** makes sure adequate policies and procedures are in place, known to all staff and are compliant with all British Council Regulations and UK Law.
- **Jane Zohoungbogbo, Millfield English Language Holiday Courses Manager**, ensures the procedures are adhered to and are made known and available to all students and parents
- **Luke Whitchurch, the Pastoral Compliance Manager** ensures that the Annual Review of the policy and procedures is carried out and brings the findings and reports to **Mark Greenow, the Director of Millfield Holiday Courses and Events.**
- **Mr Andy Collins and Mrs Fiona Ellison**, are the **Designated Safeguarding Leads (DSL) for Millfield School.**

Good and safe working practice

The general guidelines for all staff with regards to safeguarding are as follows:

- Staff must set the standard of expected behaviour at all times; members of staff are in effect the role models of the children at MELHC for several weeks.
- All physical interaction with pupils should be avoided – there are clearly instances where this is unavoidable e.g. the administration of first aid to a child.
- Staff must ensure that they accompany children when they are with a third party e.g. a coach/bus service.
- Pupils must never enter staff accommodation, communal areas or any other designated staff area.



- Staff should never smoke or drink alcohol in the presence of children at MELHC or encourage such activity to take place.
- When using social networking websites and other social media platforms such as Twitter, Facebook and Instagram, staff should take care to ensure that their passwords, usernames etc. remain confidential. Never accept a student as a 'friend' or 'follower' on a social media website and never add a pupil as a friend or follower on such a website.

Implementing welfare and safeguarding

- Staff must ensure that risk assessments are in place.
- Staff should ensure that a good standard of behaviour and discipline is maintained during sports and games, lessons, in the boarding house, or trip and other such activities.
- Separate accommodation is provided for boys and girls at MELHC. Pastoral staff must ensure that their allocated boarding house remains single sex at all times.
- Students should be familiar with the 'who's who' notice board at MELHC. All staff wear red t-shirts or polo-shirts so that they easily recognisable to students and can be approached should a student encounter a problem or difficulty.

Raising awareness

MELHC's responsibility is:

- To monitor and review annually, liaising with the Director of Millfield Holiday Courses and Events, the effectiveness of the Safeguarding Policy and Child Protection Procedures to ensure that they comply with current best practice
- To ensure parents have access to the Safeguarding Policy and Child Protection Procedures which alerts them to the fact that referrals may be made and explain the role of MELHC in this to avoid later conflict. Available on the MELHC website and a hard copy is provided on request.

To ensure, where necessary, records are passed on to the receiving language school if a student transfers.

Referrals

- To communicate immediately with **Children's Social Care (South West) when a serious allegation or disclosure is made (current or historical)**.
- To ensure that in all cases of actual or alleged harm to a pupil, the South West Child Protection Procedures are followed. This will involve contacting the Local Authority Designated Officer (LADO). The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Somerset's LADO can be contacted via Somerset Direct on 0300 123



2224. There are online procedures which are regularly updated. (The website is accessible to all staff via Millfield Schools Intranet site - www.swcpp.org.uk)

- Referrals may include informing the student’s parents and or agents and recommending that further action be taken in their home country.
- Ensure that clear, detailed written records of welfare concerns about pupils are kept secure and in a locked location
- MELHC will not investigate serious allegations of abuse but instead refer to the LADO.

Training and support

- All staff to have undertaken Basic Safeguarding Awareness Foundation training (Level 1) and to undertake regular updates (Level I) once every **two** years as a minimum
- Nominated staff on each campus to have undertaken Safeguarding Level 2 training
- To manage and deliver Child Protection training for the managers and all staff who work with children, every year and keep records of training. This is a minimum requirement, and any new legislation or updates will be communicated with staff
- To ensure all new staff and Group Leaders receive induction on Child Protection Procedures
- To ensure, that all staff are aware of the Safeguarding and Child Protection Procedures.

The procedures following disclosure are...

Receive	Respond	Record	Reassure	Report
---------	---------	--------	----------	--------

Receive:

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

Respond:

- Where necessary clarify what has been said
- Ensure that you have a full understanding of the facts as related by the pupil, perhaps by reporting back to the pupil for his/her confirmation
- When the pupil has finished make sure they feel secure. Explain what you will do next and (where appropriate) the referral process
- **Action must be taken immediately if the pupil is in imminent danger**



Record:

- Record as much as you can remember as soon as possible (preferably immediately) afterwards, using the pupil's own words as far as possible. Include who was present and the date, time and location of the incident or disclosure
- Complete a Cause for Concern Reporting Form and give this, with any other accompanying information, to the DSL.

Reassure:

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

Report:

- Refer the matter within 24 hours or sooner and **immediately if any pupil is in danger** to the DSL. Do not discuss with parents/carers. The DSL will agree with the Social Care team when parents/carers should be contacted and by whom.
- You have now fulfilled your duty and you should **not take any further action** or reveal this information to anyone else. The DSL will be aware that you may need support following a disclosure.

Confidential reporting (see 'Whistleblowing Policy')

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