



**MILLFIELD**  
ENTERPRISES

# **Millfield English Language Holiday Courses (MELHC)**

## **Safeguarding and Child Protection Policy**

**Safeguarding Policy**

Reviewed

July 2018 JZ

Next Review Date: June 2019



# MILLFIELD ENTERPRISES

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## Policy Statement

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

- The welfare of the child is paramount.
- To protect children from harm (maltreatment).
- All children 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.
- A strong 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 manage and deliver Safeguarding and 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 Safeguarding and Child Protection Procedures
- To ensure that all staff are aware of the Safeguarding and Child Protection Procedures.

### Scope and Purpose of this Policy

These procedures apply to the Director of Holiday Courses, MELHC Manager, 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 and how Millfield staff can foster an environment where the welfare of the child is safeguarded. A child is a person under 18 years but the principles of these procedures apply also to vulnerable young adults over 18 years.

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# Child Protection Procedures And Guidance

As previously stated all Millfield Staff have a duty of care to safeguard the welfare of all children on MELHC programmes. Staff should familiarise themselves with the primary and secondary forms of abuse and understand signs which may be possible indicators of abuse. Staff should be aware that *'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)

## Forms of Abuse (Primary)

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 Keeping Children Safe in Education (Department for Education 2018).

### i) 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.

### ii) Emotional Abuse

Emotional abuse is 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.

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### **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) 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 provide 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.

## **Forms of Abuse (secondary)**

### **i) Female Genital Mutilation (FGM)**

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. In cases of suspected FGM (or in cases where there is suspicion that a child is at risk of FGM) staff should report directly to the police and should then inform the DSL. Staff should not examine the person involved.

### **ii) Child sexual exploitation (CSE)**

A type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them<sup>1</sup>.

### **Indications or Signs of Possible Abuse:**

- 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.

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<sup>1</sup> <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/>



- 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.

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 (Designated Safeguarding Lead) 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. (See Safeguarding Team and Contacts).

## Referrals

Millfield Enterprises is not an agent of investigation, but an agent of referral. MELHC will not investigate serious allegations of abuse but instead will gather the facts and will escalate appropriately. In the event of a safeguarding concern, disclosure or allegation against a staff member, the following staff members should be contacted immediately, who will in turn escalate to matter to local authorities where appropriate (see Contacts). Any adult who becomes aware of child protection information must only share it with the designated team; not with anyone else, including their own family. Confidentiality about both the victim and the accused must be maintained.

### **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 (Designated Safeguarding Lead), Deputy Designated Safeguarding Lead and Director of Holiday Courses and Events, he or she may, as a responsible citizen, report concerns directly to Somerset Children's Social Care or the NSPCC (see Contacts). He or she will be considered to have acted as a responsible citizen and will not be held

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accountable for undermining a school decision.

### **Procedure in event of a disclosure from a child:**

The procedures following disclosure are... *Receive - Respond - Record - Reassure - Report* (the 5 Rs). All staff have ID cards with the 5 Rs of Safeguarding printed on the back.

#### **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 student understands from the outset that if they choose to disclose information that indicates actual or potential harm to themselves or others, then certain actions will need to be taken. If necessary, pause a child before he/she has begun what you anticipate might be a disclosure and remind them
- Allow the child to talk and finish their story. Let them tell you what they want and no more
- Do not ask any leading questions

#### **Respond:**

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

#### **Record:**

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

#### **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 eg. 'Everything will be alright now' – it may not be.

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### **Report:**

- Refer the matter within 24 hours or sooner and immediately if any student is in danger to the DSL. Do not discuss with parents/group leaders. The DSL will agree with the Social Care team when parents/group leaders 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.

### **Procedure in event of an allegation against a staff member:**

In the event of a safeguarding concern being raised against a staff member the DSL should be informed. The staff member will be relieved of duties pending investigation and will not be accommodated in a boarding house with children during this time. If the concern is found to be justified the DSL will inform the LADO having first possibly contacted the SSCB (Somerset Safeguarding Children Board) DSL Consultation Line. The DSL will inform the Director of Holiday Courses of the action taken. Other authorities may also be informed depending on the nature of the allegation. The member of staff would then have their contract terminated. If the concern is found to not be justified the member of staff will be allowed to return to normal working duties. In all cases the child / children concerned will be supported by the Pastoral staff team, DDSL and DSL.

### **Procedure in event of a child being accused:**

In the event of a safeguarding concern being raised against a child the DSL should be informed. The child would not be allowed to participate in normal course activities pending investigation. The DSL may then refer the child to SSCB (Somerset Safeguarding Children Board). The Director of Holiday Courses will be informed. Other authorities may also be informed depending on the nature of the allegation. In all cases all children concerned (both those who have the allegation being made against them and the alleged victim/s) will be supported by the Pastoral staff team, DDSL and DSL.

### **Procedure in event of the DSL being accused:**

In the event of a safeguarding concern being raised against the DSL, the Deputy DSL should be informed, and in the event of unavailability, the Director of Millfield Enterprises. If the Director is not available the Bursar of Millfield School should be informed.

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# Code of Conduct

Staff Guide Code of Conduct: Everyone involved in MELHC is urged to read the Staff Guide, Keeping Children Safe in Education (part 1), I.T Acceptable Use Policy, the Course Brochure, and the Parents' and Students' manuals. All staff are required to take the online Basic Safeguarding Awareness, Health & Safety and Prevent courses prior to arrival and present the certificates from these as proof.

## Staff

All staff including Group Leaders, agents and external contractors have a statutory obligation to report to the Designated Safeguarding Lead (DSL) 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.

## Good and safe working practice

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.

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

### Physical Interaction

All physical interaction with students 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.

Students 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.

### Favouritism

Do not single out any student for particular attention. Favouritism, whatever its origins, only causes resentment among other students. You are expected to exercise a maturity of judgement and not encourage the flattering attentions or admiration of students

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### Position of Trust

Sexual relations with anyone under 16 years old are against the law.

Sexual relations with students over 16 contravenes your responsibility to care for our students as a caring parent would and are illegal as you are an adult in a position of trust.

### Safeguarding & Social Media Policies

All staff are required to read the full version of our Safeguarding and Social Media Policies that are available in the Policies section of our website ([www.englishholidaycourses.com](http://www.englishholidaycourses.com)).

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 student as a friend or follower on such a website.

It is unacceptable for staff to e-mail to anyone or post any photographs that include the students on Facebook, MySpace, Twitter, Instagram, Snapchat or any other social networking sites. Staff must not give their personal e-mail address, Facebook, Twitter, Instagram, Snapchat (or other social networking site) details or personal telephone number to students. Personal mobile phones and cameras should not be used to take pictures during work time and should not be used at any time to take photographs of the students. Personal mobile phones should only be used during work time on excursions and in case of emergency. Those staff working with students **under 8 years of age** should ensure their personal mobile phones are switched off during work time at all times other than for exceptional circumstances and a manager should be made aware of this situation in advance.

### Managing Student Behaviour

Staff should ensure that a good standard of behaviour and discipline is maintained during sports, games and lessons, in the boarding house, or trip and other such activities.

All forms of physical punishment are forbidden on the MELHC. Alternative punishments e.g. picking up litter are encouraged.

Any incident of misbehaviour should be recorded in staff registers and when applicable on an online Incident/Accident report. When applicable please complete a Cause for Concern form and pass it to the DSL. This form is in a paper version only and for confidentiality reasons should not be saved electronically. If the child persists in showing unacceptable behaviour, the advice of senior staff should be sought. Serious misbehaviour such as bullying must be stopped quickly and students must be aware that they could face the ultimate punishment of being sent home early.

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### **Retention of Records**

Records relating to safeguarding concerns raised against a staff member will be retained until the individual reaches retirement age or ten years, whichever is longer. In the event of a malicious allegation or a misunderstanding, records will be destroyed.

The same policy applies to any suitability information obtained about volunteers involved with School activities.

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

## **Prevent**

Millfield Enterprises promotes an environment of tolerance and respect. 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. 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, must be challenged in class, on activities, and elsewhere during the programme. Millfield has established communication with the local Prevent Channel and the DSL is the Prevent Lead.

Please see the separate Prevent Policy on our website: [www.englishholidaycourses.com](http://www.englishholidaycourses.com) .

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## Contacts:

### Designated Safeguarding Lead

**Jane Zohoungbogbo**

Email: [zohoungbogbo.j@millfieldschool.com](mailto:zohoungbogbo.j@millfieldschool.com)

Tel: +44 (0) 7850 994 232

### Deputy Designated Safeguarding Lead

**Tom Jones**

Email: [jones.t@millfieldschool.com](mailto:jones.t@millfieldschool.com)

Tel: +44(0)7935 502680

### Millfield Enterprises Director:

**Mark Greenow**

Email: [greenow.m@millfieldschool.com](mailto:greenow.m@millfieldschool.com)

Tel: +44(0)7885 613692

### Somerset LADO

Mon-Fri 08.00-17.00:

Tel: 0300 123 2224

Out of hours no. - Emergency Duty Team (EDT)

Tel: 0300 123 23 27

### NSPCC Whistleblowing Helpline

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Tel: 0800 028 0285

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**Appendix 1: CAUSE FOR CONCERN FORM**

**Cause for Concern Form**

**Student Name:**

**Age:**

**House:**

**D.O.B:**

**Campus:**

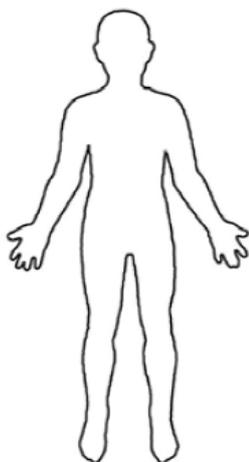
**Nationality:**

For any sections below please continue overleaf if necessary making sure it is signed and

**NATURE OF CONCERN:**

*Provide details of the incident or concerns you have including times, dates, description of any injuries (use body diagram to indicate area of injury), witness details, what you have observed, heard or been told, if the information is first hand, fact or opinion, any other relevant details / information, etc. Ensure you clearly record the voice of the child's (suggestion - use capital letters to ensure it can be easily recognised). Ensure you act in a timely manner when reporting concerns, especially if there is an injury noted.*

*Please clearly sign and date the record at the end of your statement.*



- Front
- Back

**AGREED ACTIONS & ANTICIPATED OUTCOMES:**

*Record all discussions, communications, referrals & decisions made. Include details of conversations with parents / other agencies & rationale behind key decision making. Clearly sign & date at the end of the record.*

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