Safeguarding Policy and Child Protection Procedures

THIS POLICY APPLIES TO MILLFIELD, MILLFIELD PREP SCHOOL AND MILLFIELD PRE-PREP SCHOOL (INCLUDING EYFS), (TOGETHER REFERRED TO IN THIS POLICY AS “MILLFIELD”).

Introduction

Millfield Schools (this refers to Senior School, Prep, Pre-Prep and the Early Years Foundation Stage “EYFS”) fully recognise their responsibility to safeguard and promote the welfare of the children and young people in their care, and that safeguarding is everyone’s responsibility. This system is described in statutory guidance Working Together to Safeguard Children. This responsibility encompasses the following principles:

- To protect children from harm (maltreatment)
- To prevent impairment of children’s health and development
- To ensure that children are growing up in circumstances consistent with the provision of safe and effective care thus enabling those children to have optimum life chances and to enter adulthood successfully
- To treat the interests of our children as paramount (taking into consideration their disability, culture and history)
- To consider at all times the best interests of the child

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

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

- Ensuring safer recruitment practice*
  Ensuring through training that all teaching and non-teaching staff are aware of and committed to the Safeguarding Policy and Child Protection Procedures (“the Policy and Procedures”) Code of Conduct, Whistleblowing Policy, Pupil Behaviour Policy Pre-Prep/Prep School, and Pupil Behaviour Policy Senior School. All policies can be found on the School Policies Xtranet Page.
- Establishing a positive, supportive and secure culture in which children can learn and develop, together with a School ethos which promotes in all pupils a sense of being valued, listened to and respected
- Including in the curriculum, activities and opportunities for PSHEE which equip pupils with the skills they need to stay safe from abuse and radicalisation which will help them develop realistic attitudes to the responsibilities of adult life
• Providing pastoral support that is accessible and available to all pupils and ensuring that pupils know to whom they can talk about their concerns.

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

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

• Sharing information about concerns with agencies who need to know and involving children and their parents/carers appropriately (including Children’s Social Care, the Police, the Local Authority Designated Officer (“LADO”) and in “Prevent” with the Channel process)

• Any member of staff can refer to the LADO or Children’s Social Care; however it is the expectation that the Designated Safeguarding Leads (“DSLs”) at both schools are the primary communicators with LADO and Children’s Social Care as appropriate. They will contact the LADO and LSCB within 24 hours of a disclosure or suspicion of abuse, although if there is risk of immediate harm this contact must be immediately

• The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Somerset’s LADO can be contacted via Children’s Social Care (Somerset Direct) on 0300 123 2224. There are online procedures which are regularly updated. (The website is accessible to all staff via Millfield Schools Intranet site - www.swcpp.org.uk)

• 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 pupil health and safety, bullying/cyber-bullying, appropriate medical provision, drugs and substance misuse. These have specific policies and guidance, which should be read in conjunction with this document.

**Managing Safeguarding and Child Protection**

**Roles and Responsibilities**

**Staff**

All staff including volunteers have a statutory obligation to report to the DSL if there is suspicion of abuse of a pupil, if a pupil discloses abuse or allegations of abuse or if there is any indication that a child is being abused by somebody. In addition any members of staff may refer a concern to the LADO or Children’s Social Care (Somerset Direct) themselves if they feel it necessary or appropriate.

Somerset’s LADO can be contacted via Children’s Social Care (Somerset Direct) on 0300 123 2224. NSPCC Whistleblowing Helpline 0808 800 5000.

This is an inescapable, personal and professional responsibility of all staff and volunteers for the protection of children from harm.
All staff need to have read and understood and be able to discharge their responsibilities as set out in Part One of Keeping Children Safe in Education ("KCSIE") 2018 and with due reference to The Prevent 2015 and Working Together to Safeguard Children April 2018 Guidance.

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

- the conduct of a member of staff
- a child, parent or member of staff ‘disclosing’ abuse
- evidence of physical hurt that may or may not be accompanied by
- unusual or uncharacteristic behaviour by a child.

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

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

It is an essential feature of good governance that responsibility is not delegated to others without first ensuring reliable mechanisms for monitoring and evaluation of policy implementation (ISI commentary on the regulatory requirements 2018). Governors of Millfield (as displayed on the Schools’ website) have ultimate and collective responsibility for ensuring pupils’ wellbeing, which encompasses safeguarding. Their responsibilities include:

- assessing the safeguarding risks that might arise from the Schools’ operations including, but not limited to, consideration of the Annual Risk Register;
- ensuring that the Schools have a Policy and Procedures known to all staff and Governors, that are in accordance with Local Authority and inter-agency procedures and that these are made available to parents on request;
- carrying out a review of this Policy and these Procedures annually in the Autumn term and following any serious incident report to the Charity Commission;
- approving each school’s Annual Safeguarding Audit (“the Annual Audits”) and submitting these to the Local Safeguarding Children’s Board (“LSCB”);
- undertaking monitoring to ensure effective implementation of the Policy and Procedures through
  i. the receipt of an annual presentation from the Designated Safeguarding Leads (“DSLs”) and through informal and on-going discussion with staff which must cover staff training (including the DSL and Heads); the steps being taken to listen to pupils; any referrals to children’s services (anonymised) in respect of the promotion of welfare; any referrals to the LADO in respect of staff/volunteers; and specific themes arising from these or elsewhere in the school and steps taken as a result;
  ii. enquiry of staff about their knowledge of the Policy and Procedures;
  iii. checking that staff have received regular safeguarding training (and that e-safety training for staff is considered as part of the overarching safeguarding approach);
- approving the DSL’s job descriptions which include the key activities of the role;
- ensuring that they know how children are taught about safeguarding, including online safety, through the curriculum and PSHEE.

The Education Committee reports to the Full Governing Body ("FGB") and has delegated responsibility for scrutiny of the Annual Audits and the Policy and Procedures prior to their submission to the FGB.
Nominated Governor

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

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

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

Chair of Governors

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

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

Headteachers

Mrs Shirley Shayler is the Headmistress of Millfield Prep School and Mr Gavin Horgan is the Headmaster of Millfield Senior School. Their responsibilities include:

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

The Designated Safeguarding Leads

In the Prep School (including the Pre-Prep, but excluding EYFS), the Deputy Head Pastoral, Mrs Tracey Hazell, is the Designated Safeguarding Lead (DSL). The Headmistress, Mrs Shirley Shayler, is the Deputy Designated Safeguarding Lead (DDSL). The Designated Safeguarding Lead in the Early Years Foundation Stage (Reception and Nursery) is Mrs Alison Blasdale and the Deputy Designated Safeguarding Lead is Mrs Tracey Hazell.

In the Senior School the Assistant Head (Pastoral) Mr Andy Collins, is the Designated Safeguarding Lead (DSL). Mrs Fi Ellison is the Deputy Designated Safeguarding Lead (DDSL), Mr Adrian Whatling (DDSL), Mr Craig Middleton (DDSL) and Mrs Kait Weston (DDSL).

Contact details for the Designated Safeguarding Leads and Deputies:

Prep School
Tracey Hazell - Deputy Head (Pastoral) hazell.t@millfieldprep.com
Tel: 01458 837510
Awareness, Training and Support

Any member of staff can refer to the LADO or Children’s Social Care (Somerset Direct); however it is the expectation that the DSLs at both schools are the primary communicators. They will contact the LADO and LSCB within 24 hours of a disclosure or suspicion of abuse. Together they hold the following responsibilities:

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

**Training and Support:**
All staff will receive the Somerset Basic Awareness Cascade Training every two years as well as any new legislative updates as required.

To ensure that:
- all staff, must understand the role of the DSL
- all staff, including Governors, receive and read Part 1 KCSIE September 2018 and appropriate confirmation of this is recorded and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One.
- all staff, including Governors, receive the Child Protection Code of Conduct
- the DSLs receive WRAP Training and coordinate the school’s implementation of the Prevent Duty, including protocols for visiting speakers
- the DSL and DDSL undertake LSCB training (Levels I and II) and undertake regular updates once every two years as a minimum to include inter-agency working plus any additional training to remain compliant with new guidance and legislation
- manage and deliver Child Protection training for the Heads and all staff who work with children, and keep records of this training. Any new legislation or updates will be communicated to staff on a regular (at least annual) basis either electronically or through Inset (or both).
- all new staff, including Governors, temporary staff and volunteers, must be provided with induction training that includes:
  - the school’s Child Protection Policy
  - the Millfield Code of Conduct, Behaviour Policy including the Whistleblowing Procedure
  - the identity of the Designated Safeguarding Person
  - a copy of Part 1 KCSIE (and Annex A as appropriate)
  - Prevent awareness training
  - Safe & Acceptable Use IT Policy
  - Social Media Policy

All policies can be found on the School Policies Xtranet Page.

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

• Concerns regarding the EYFS care of the Under 3’s should be addressed to OFSTED ref: Pre-School@MPS
  OFSTED registration number EY 395459
  Contact Number OFSTED: 0300 1231231, or enquiries@ofsted.gov.uk

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

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

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

Confidential Reporting (‘Whistleblowing’)

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

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

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them; see Whistle Blowing Policy. All policies can be found on the School Policies Xtranet Page.

The NSPCC whistleblowing helpline is available to staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call 0808 800 5000 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nsppc.org.uk
Child protection procedures and guidance

What is Child Protection?

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

What is significant harm?

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

Scope and Purpose of these Procedures

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

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

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

What constitutes child abuse?

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. What to do if you're worried a child is being abused. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Please consider that an abuser could also be female. Children may be abused in a family (e.g. witnessing domestic violence) or in an institutional community setting by those known to them, or more rarely by others (e.g. via the internet).

**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. 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. Giving a child poisonous substances includes inappropriate drugs and alcohol. 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 (FGM).

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

Indicators: There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found in Annex A: Further information, of Keeping Children Safe in Education. (Final update to follow in September 2018)

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). Teachers have a duty to make personally a report to the police (in addition to liaising with the DSL) where, in the course of their professional duties, they either:

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

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

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

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

To make a report it is recommended that the person does it orally by calling 101, the non-emergency number. However, where there is a risk to life or likelihood of serious immediate harm, then it should be reported immediately to police, including dialling 999 if appropriate. Reports should be made within 24 hours ideally. Further guidance can be found at the following link: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information.

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

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

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

**Child Sexual Exploitation:** is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power or status to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage satisfaction or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

See Annex A of [Keeping Children Safe in Education. (Final update to follow in September 2018)](#)

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

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

**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.

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

**Further information on Preventing Radicalisation**

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

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

As with managing other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. School staff should use their
professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Radicalisation and violent extremism could cause harm or have the potential to cause harm to the child and others. Under the Prevent Duty (2015) the school will report in line with the recommended policies and procedures to the LSCB / the local Police force (Tel: 101) / Prevent Channel duty offices as appropriate. The DfE dedicated telephone number for non–emergency advice for staff and governors is 0207 3407264 and the mailbox is: counter-extremism@education.gsi.gov.uk.

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

The above list is by no means exhaustive, and it is important to be aware that there may be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of pupils. Questions of the young person being in moral danger, being uncared for, engaging in antisocial or inappropriate behaviour and so on may be referred to the DSL, who will discuss the matter with the Deputy DSL and the Heads, and through them, as necessary, to Children’s Social Care. Such cases may also be referred to the Medical Centre and through them to Children’s Social Care. Staff are well advised to look beyond the setting - what is happening in other areas of the child’s life? Further detailed information on Radicalisation, ‘honour based’ violence, and CSE can be found in Annex A: Further information, of Keeping Children Safe in Education. (Final update to follow in September 2018)

Peer on Peer Abuse

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. Children are capable of abusing their peers. This is most likely to include, but may not be limited to, bullying (including cyber bullying), physical bullying such as hitting, kicking, choking, biting, hair pulling or otherwise causing physical harm, gender based violence/sexual assault, sexual violence, sexual harassment, sexting, hazing and so-called initiation ceremonies and involvement in gang culture. Staff should be clear as to the school policy and procedure with regards to peer on peer abuse

Anti-Bullying Policy (MPS)
Anti-Bullying Policy (Senior)
Allegations of peer on peer abuse will be investigated in line with other school policies and additional pastoral support will be put in place when required. Peer on Peer abuse should never be tolerated and is not “banter or “part of growing up”.

**Sexual Harassment and Sexual Violence Advice**

**Anti-Bullying Alliance**

**Children with Special Educational Needs**

Children with Special Educational Needs (SEN) and disabilities can face safeguarding challenges. Staff need to be aware that additional barriers that these children face such as communication barriers, disproportionately impacted by behaviours such as bullying without displaying symptoms and assumptions that indicators of possible abuse such as behaviour, mood, injury relate to the child’s disability without further explanation.

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

**Honour Based Violence**

See Annex A KCSIE 2018

**Looked after children**

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

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

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

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

Children who go missing

The Missing Child Policy and Missing Boarders Procedure ensure that all measures are taken to monitor attendance and provide guidance to all staff when a pupil is missing from lessons or house. In addition, Millfield is cognisant of the ‘Statutory guidance on children who run away and go missing from home or care’ - January 2014 and Working Together to Safeguard Children 2015 and all matters of this type are referred to the DSL, who will liaise with the appropriate Deputy Head and Head in each case.

Children missing from education

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

If a child is failing to attend school regularly or has been absent without the school’s permission for a continuous period of 10 school days, then the local authority will be notified of the absence.

The local authority will be notified when a pupil is deleted from the admission register / school register. This will be acted upon as soon as the grounds for deletion are met, but no later than deleting the pupil’s name.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare. Children’s social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: Contextual Safeguarding.

It is important as a school that we know of local issues, which could be gang culture, county lines and incidents of cuckooing.

Safeguarding concerns for children who move school or ‘disappear’

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

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

In addition, the UK Visa and Immigration service will be informed in line with HTS (Highly Trusted Status) procedures where appropriate.
See the link below for further guidance:
Procedures following any form of disclosure

Receive:
- **Listen** sympathetically and with an open mind
- Stay calm, conveying this through word and action
- **Do not** look at any potentially concerning electronic images. Pass all devices on to the DSL.
- **Never** promise confidentiality, only discretion. It is important that the 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
- Never ask leading questions
- 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**

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

Record:
- Record as much as you can remember as soon as possible (preferably immediately) afterwards, using the pupil’s own words as far as possible. Include who was present and the date, time and location of the incident or disclosure
- Log on to MyConcern and fill in a Cause for Concern Form.

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.

**Action to be taken by the Designated Safeguarding Lead / Deputy Designated Safeguarding Lead**

- Following the receipt of a report, the DSL and Heads will seek advice from the LADO/Children’s Social Care (depending on who the allegation is made against)
• This may be done without giving names at first, and then follow the advice given. Millfield Schools will not investigate allegations of abuse, but will instead always refer to the appropriate authority. In cases of serious harm, the Police would be informed from the outset.

• Agree with Children’s Social Care any necessary next steps in relation to:
  * informing a pupil’s parents when appropriate
  * medical examination or treatment
  * immediate protection for the victim or a pupil who has given information about an abuser or a pupil against whom an allegation has been made

• Inform the pupil or adult who made the initial allegation of what the next steps are to be

• Inform the relevant Heads of the allegation and action taken

• Ensure long term protection support for all pupils involved

• If unhappy with the action of the LSCB then use the Escalation Policy of the LSCB

• Any advice given will be clearly recorded as a file note.

When there are reports of abuse involving a number of pupils against a pupil or other pupils or any specific safeguarding issues the DSL will meet with appropriate staff following advice from Children’s Social Care and coordinate the matters in line with guidance from LSCB and ISI. The DSL will:

• Follow procedure and refer to the Children’s Social Care team

• Ensure secure supervised spaces for all involved

• Involve the Deputy DSL and members of SMT trained to Level 2 as appropriate

• Follow guidance above with respect to each pupil in a secure supervised environment.

• If a pupil appears injured and/or distressed in anyway then medical attention may need to be received

• Practical and up to date support and information can also be found on www.nspcc.org.uk or via the www.gov.uk website

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

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

**Procedures Following an Allegation of Abuse by a Member of Staff (including volunteers)**

It is important to draw a distinction between complaints and allegations against staff. In other words, the difference between behaviours that suggest misconduct or unprofessionalism, and those which specifically raise child protection concerns.
An allegation should be made if a teacher or other member of staff has:

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

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

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

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

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

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

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

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

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

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

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

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

The school will report to the DBS **within one month of leaving** any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children, and the school has a duty to consider referral to Teaching Regulation Agency (TRA) this will be in line with the criteria by TRA. Advice about whether an allegation against a teacher is sufficiently serious to refer to TRA can be found at: Teacher Misconduct The Prohibition of Teachers - October 2015
Or the TRA website: https://www.gov.uk/government/organisations/teaching-regulation-agency

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

**Good Practice Recommendations for Record Keeping will involve:**

- Ensuring that a proper record is kept of any Child Protection referral and action taken, and that this is kept securely and in confidence
- Child Protection records should be kept for the approved timescale for the various Authorities we are in conjunction with and then shredded on the basis that this information has been shared with Children’s Social Care who will continue to hold copies
- When notes are dispatched to another school ensure that the original copies are held and that photocopies are despatched with notes and records of delivery i.e. special delivery / recorded delivery
- Ensuring that Child Protection files are monitored every term.

**Policy on allegations involving sexual impropriety**

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

- Listen sympathetically and afterwards briefly note the content of what was disclosed, sign and date it
- Contact the Designated Safeguarding Lead immediately, who will discuss with the relevant Head and the LADO whether Children’s Social Care should be notified
- If Children’s Social Care is notified and it is agreed that Millfield Schools alone should follow up the issue, the DSL will interview the complainant and report as quickly as possible to the relevant Head who will oversee the disciplinary aspects of the enquiry
- If Children’s Social Care seeks further investigations, they will open an enquiry. In these circumstances, Millfield Schools’ internal disciplinary procedures will be suspended until cleared by Children’s Social Care.
This policy should be implemented regardless of whether the complainant is over or under 16. Parents should be informed as soon as a referral to Children's Social Care has been made by the Child Protection Liaison Person, unless to do so would put the pupil at greater risk of harm.

Statement on confidentiality

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

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

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

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

Policy on safeguarding and ICT

SAFEGUARDING AND ICT GUIDELINES

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

Safeguarding pupils in both the real and virtual world is the responsibility of all staff. Staff must be familiar with these guidelines and understand how to respond to e-safety incidents. Staff need to be vigilant for threats of radicalisation on line as well as cyber bullying or any other safety issues. Pupils will be taught through the curriculum including PSHEE and other pastoral support systems how to behave and build resilience in dealing with such matters.

All pupils should be made aware of the Millfield Pupil Safe & Acceptable ICT Use Policy (All policies can be found on the School Policies Xtranet Page) and what to do if they have any ICT safeguarding concerns. Other school policies relating to Mobile devices and Social media also needs to be consulted. The Network Manager, the Esafety Coordinator and other key personnel may also be consulted with.

PROCEDURES FOR DEALING WITH INAPPROPRIATE/ILLEGAL INTERNET ACCESS OR MATERIAL

Millfield Schools have installed robust web filtering software to ensure the protection of its pupils whilst accessing the Internet. It is recognised that no software is infallible and the following procedures will be abided by where necessary.
Discovery of inappropriate websites, by staff or pupils, should be reported immediately to the Designated Safeguarding Lead, who in liaison with the Network Manager will consider referral to https://ceop.police.uk/ and the Police.

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

Action in the event of discovery of illegal material:

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

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

Further information regarding Safeguarding and ICT can be found in Annex C of Keeping Children Safe in Education. (Final update to follow in September 2018)

Guidance on sexting

Details of how to respond to incidents of sexting can be found at the following link:


Work Experience/Host families

Special Circumstances

Keeping Children Safe in Education. (Final update to follow in September 2018) - See Annex E

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

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

All policies can be found on the School Policies Xtranet Page.

Policy on keeping staff safe
Good Practice and Guidance on the Prevention of Allegations of Abuse - ‘Safe School, Safe Staff’

Millfield Schools are committed to ensuring that relationships between staff and pupils are conducted on a professional basis. Anticipation of possible risks and seeking to prevent all reasonable risk of misunderstandings and false allegations are seen as part of this commitment.

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

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

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

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

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

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

This is not an exhaustive list. The principle is that staff should avoid actions or behaviour which may constitute poor practice or potentially abusive behaviour or be open to misinterpretation.
If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded in writing as soon as possible and given to the DSL with a copy placed on the child’s file.

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

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

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

- Listen and give the children time and space to talk safely
- Remember that no child under the age of 16 years can give informed consent to sexual activity. It is important to operate within LSCB guidance on this issue and the handling of children under 16 years old.
- Record actual comments and concerns raised without putting words into their mouths
- Recognising that the child is free to speak to whomever they feel comfortable with, not just dedicated counsellors and pastoral staff
- Remember – never promise confidentiality
- Engage parents where appropriate and talk openly but do not avoid talking to Children’s Social services if there are concerns about the welfare of the child at home. Never share concerns with parents if you are at risk of causing further damage to the child. In these matters take advice from DSL or Children’s Social care team.
- Take advice from external agencies and cooperate fully with them
- Understand the differences between “actual” harm and “likely” harm and what needs to be done

Related Documentation

- Prevent and Tackling Bullying – July 2017
- [Keeping Children Safe In Education, (Final update to follow in September 2018)](#)
- Children Missing Education – September 2016
- Mandatory Reporting of Female Genital Mutilation- procedural information – HM Office October 2015
- The Use of Social Media for online radicalisation (July 2015)
- The Prevent Duty – Departmental advice for schools and childcare providers – June 2015
- Keeping Children Safe in Education – Part 1 (March 2015) DfES
- Mental Health and Behaviour in schools - March 2015
- Counselling in Schools: A Blueprint for the Future – March 2015
- Keeping Children Safe in Education DFES (2015)
- “Prevent” Counter-Terrorism and Security Act(2015)
• Teacher misconduct: the prohibition of teachers July 2014 updated 31 Oct 2015
• ‘Statutory guidance on children who run away or go missing from home or care’ (Jan 2014) DfES
• Dealing with Allegations of Abuse against Teachers and Other Staff (October 2012) DfES
• Working Together to Safeguard Children 2010 (updated version July 2018) DfES
• Disqualification under the Childcare Act 2006 (by association)
• ‘Safeguarding Children in Education: Dealing with Allegations of Abuse Against Teachers and Other Staff’ - DfES/2044/2005
• ‘Safeguarding Children: Safer recruitment and selection in education’ - DfES/1568/2005
• ‘Safeguarding children in Education’ - DfES/0027/2004
• What to do if you are worried that a child is being abused - DfES/2003 www.dfes.gov.uk
• Care Standards Act 2000 and Children Act 1989 and 2004 (Section 17 and 47) South West Child Protection Procedures (SWCPP)
• Associated guidance replace Chapter 5 of SCSRE
• Sexting in schools and colleges: responding to incidents and safeguarding young people: UK Council for Child Internet Safety
• Regulated Activity in relation to children: scope
• UK Safer Internet Centre: Appropriate Filtering and Monitoring

Related School Documentation

• Whistle Blowing Policy
• Millfield Safer Recruitment and Selection Policy
• Anti-bullying policy
• Equal Opportunity Policy
• E safety Policy
• Acceptable Usage Policy
• Behaviour and Discipline policy
• Staff Code of Conduct
• EYFS documentation
• Health and Safety Policy
• Missing Children Policy
• Risk Assessments including off cite activities
• AEN policy
• EAL policy
• Staff misconduct and discipline policy
• Safe and Acceptable Use of IT Policy
• Social Media Policy

All policies can be found on the School Policies Xtranet Page.

Further LSCB documents can be found on http://sscb.safeguardingsomerset.org.uk/ and on SiX (Somerset Information Exchange).

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

- Children’s Social Care (Somerset Direct) 0300 123 2224 – contact LADO via this number
- Police 101 or 999 emergency
- NSPCC Whistleblowing Helpline 0808 800 5000
- Police Prevent Team 01793 507926
- Avon and Somerset Prevent 0117 9455543
- Regional Channel Coordinator 0117 9455539 channelsw@avonandsomerset.pnn.police.uk
- DfE dedicated helpline and mailbox for non-emergency advice for Governors and staff: 020 73407264 Counterextremism@education.gsi.gov.uk
- EYFS/Ofsted – 0300 123 1231 enquiries@ofsted.gov.uk
- LSCB (Chairperson Independent) – Sally Halls lscbchair@somerset.gov.uk
- Childline/NSPCC 0800 11 11
- Disclosure and Barring Services 0800 0200 190 customeroffices@dbs.gsi.gov.uk
- UK Council for Internet Safety
- National Education Network (NEN)
Appendix I

KEEPING STAFF SAFE

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

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

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

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


Appendix II: Safer Recruitment of Staff (NB to be read in conjunction with Millfield Schools’ Safer Recruitment and Selection Policy)
Issues relating to child protection and the welfare of pupils are central to the process of appointing both teaching and support staff.

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

• Ideally references should be sought on all short-listed candidates, and should be obtained prior to interview so that any issues of concern they raise can be explored further with the referee and taken up with the candidate at interview. Where a reference has not been obtained before interview, ensure that it is received and scrutinised, and any concerns are resolved satisfactorily, before the person’s appointment is confirmed. References should be completed on a reference pro forma and include sections requiring declarations of concerns raised, whether proven or not, which relate to the safety and welfare of children. References must be from at least two sources or institutions, and should always be sought and obtained directly from the referee. On receipt, the written reference should be checked to ensure all specific questions have been answered and information provided correctly corresponds with that on the candidates application form.

• When interviewing, at least one member of the interview panel must have completed the Safer Recruitment in Education training. The Heads will, where possible, be accompanied by a member of the Senior Management Team when interviewing so that proceedings may be recorded. Support staff will be interviewed by a member of the Human Resources team together with the relevant line manager. Senior staff will be interviewed by the Bursar and the Human Resources Manager. Those interviewing must not be afraid to ask difficult questions of the candidate or referee.

• On the day of interview, identity and qualification checks must be conducted and verified for each candidate by scrutiny of appropriate original documents. A form of photographic identification should be sought, except in exceptional circumstances, combined with evidence of address. Satisfactory explanations for gaps in employment history should also be sought at interview.

• Offers of appointment for all staff should be conditional on satisfactory completion of the following pre-appointment checks and a probationary period; references, identity, qualifications, right to work in the UK, DBS, the barred list, prohibition from Management check (for those appointed to a managerial role), prohibition from teaching check, disqualification declaration for those working or directly concerned in the management of Early Years settings, and medical declaration. Where the appointee has lived outside of the UK in the last 10 years further checks should be obtained i.e. Certificate of Good Conduct.

Any member of staff found not suitable to work with children will be notified to the Independent Safeguarding Authority (DBS). Any raised concern, whether proven or not, will be reported in staff references.
• In addition to staff files the Head of Human Resources will keep and maintain a single central record of recruitment and vetting checks to ease checking against names if enquiries are made or concerns raised.

Where an employee (teaching or non-teaching) is provided by a third party, identity checks must be conducted. Written confirmation must be obtained from the agency to confirm that all checks the School is required to conduct for its own employees has been undertaken. In relation to the DBS the written notification from the agency must confirm that relevant DBS disclosures have been requested for that individual, whether or not the Disclosure has been received, and if received whether it included any disclosed information. Other adults, who will come into direct contact with pupils as part of their business with the School, or on an infrequent basis, will need an Enhanced DBS disclosure and identity checks conducted.

• Assurance will be obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with Millfield pupils on another site (for example, in a separate institution).

Appendix III - Children Act Sections 17 and 47

Section 17

17 Provision of services for children in need, their families and others.
Section 47

47 Local authority’s duty to investigate.

Detail below is the recruitment and selection process that should be followed in accordance with the Independent Schools Inspectorate (ISI) requirements, and the Keeping Children Safe in Education guidelines, when recruiting and appointing a new member of staff and refers to Millfield Senior School, Preparatory School, Pre-Preparatory School and EYFS. This process should be followed for all appointments, and all checks must be completed before an employee can commence their employment with Millfield.

The School’s recruitment process is governed by the School’s principles of non-discrimination and is designed to achieve the best match between the individual’s knowledge and skills, experience and character, the requirements of the vacant post and recognition of the need for flexibility to respond to changing conditions.

<table>
<thead>
<tr>
<th>Pre-Advertisement</th>
<th>To be Completed By</th>
<th>Authorised By</th>
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<tbody>
<tr>
<td><strong>1. Authority to Recruit (ATR): All posts (both new and replacements) must be authorised by the Head, Bursar and Head of HR to ensure consistency of employment practice and that the budget requirements are met. An Authority to Recruit (ATR) form must be completed in full and submitted to the Human Resources Department, where applicable with the original resignation letter, for authorisation before any post can be advertised or filled. A Copy of the ATR can be found on the Xtranet under Non-Teaching, Human Resources, Recruitment, Authority to Recruit (ATR)</strong></td>
<td>Assistant Head (Teaching and Learning)</td>
<td>Assistant Head (Teaching and Learning), Bursar (Non Teaching) and Head of HR</td>
</tr>
<tr>
<td><strong>2. Advertising:</strong> All authorised appointments of three months duration or more will be advertised and subject to a competitive selection procedure. Advert details should be submitted on the ATR form where it is then checked by the Human Resources Department. Advertisements may be internal only or published simultaneously internally and externally. Posts may be advertised internally where it is anticipated that a suitable field of candidates exists and in response to specific needs such as redeployment. The aim of advertising is to attract a wide range of high-quality candidates from diverse backgrounds. All adverts should include the safeguarding policy i.e. statement of commitment to safeguarding and promoting welfare of children, and the need for successful applicants to be DBS checked. Where an ATR has not been received and authorised by the Head and Bursar to meet the above deadlines, or any other publication deadlines, adverts will not be placed. Where the ATR has been received and authorised a formatted draft advert will be sent to you for authorisation prior to the advert being placed. <strong>Agency:</strong> The use of employment agencies will only be utilised where advertisements have not produced an adequate field of candidates. The agency terms and conditions must be signed by the Head of HR before any agreement is entered.</td>
<td>HR Department</td>
<td>Line Manager</td>
</tr>
</tbody>
</table>

|
## Short Listing

3. **Applications**: During the recruitment process, application forms can be completed via the Millfield website. In addition, the candidate must confirm that they have read the job description, Application and Recruitment Guidelines, and the Schools Child Protection policy. For those applicants without access to the internet, a hard copy of all the above documents is posted to them. Applications will be passed to the Deputy/Assistant Head and Head of Department upon receipt. The HR department should be informed of the members of the short listing and interview panel, as well as the proposed interview date. Please note that a curriculum vitae will not be accepted in place of an application form.

4. **Short listing**: Short listing will be based on the selection criteria which assess the candidate’s qualifications, skills, experience, knowledge, attitudes and abilities. The capability of the individual to perform in the position will be the major factor, but the ability to work with others and individual potential will be taken into account. Any discrepancies/anomalies/gaps in employment should be noted and explored during the interview. The candidate should be shortlisted.

## Pre-Interview

5. **Invitation to Interview**: PA to the Assistant Head sends invites to candidates with any relevant information for the selection day and informs HR who has been shortlisted. Every effort should be made to give candidates sufficient prior notice of the interview date and time. Candidates will be given all relevant information and instructions, including the day and time. All candidates will be asked to bring a form of identification and proof of any qualifications declared on their application form to the interview.

6. **References**: References will be sought directly from referees on shortlisted candidates. All referees will be asked to provide a form of identification and proof of any qualifications declared on their application form. The candidate should be shortlisted.

## Interview

7. **Interview Panel and Arrangements**: For all vacancies at least 1 member of the interview panel must have undertaken the Safer Recruitment Training.

## Conditional Offer of Appointment and Pre-Appointment Checks

Offers of appointment should be conditional on the satisfactory completion of the following pre-appointment checks and relevant probationary period:

9. **References**: If not obtained prior to interview, 2 references should be obtained and verified, one of which is from the last employer.

10. **Identity**: If this could not be verified during the interview, proof of identity should be obtained, verified and placed on file.

11. **Qualifications**: If these could not be verified during the interview, proof of qualifications should be obtained and placed on file.

12. **Right to work in the UK**: Proof of right to work in the UK should be obtained and placed on file.

13. **Evidence of additional overseas checks**: Where the candidate has lived or worked abroad within the last 10 years, a Certificate of Good Conduct is required from the country in which they were resident. This is to be obtained by the candidate.

---

**HR Department**

**Assistant Head (Teaching and Learning), Head of Department. Approved by Deputy Head (Academic)**

**Admin Support**

**Line Manager and HR Department**

**Interview Panel**

**Employee**
<table>
<thead>
<tr>
<th>No.</th>
<th>Description</th>
<th>Department</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>DBS: Satisfactory Enhanced DBS Disclosure to be received and checked for all new appointments. Where an offer of employment has been made to a previous employee of the School a new DBS may need to be obtained if there has been a break in service of 3 months or more.</td>
<td>HR Department</td>
</tr>
<tr>
<td>15</td>
<td>Medical Declaration: A medical statement form is to be completed by the employee and placed on file, where necessary a medical declaration is to be obtained from the employee's GP, and returned to the HR department and placed on file. If necessary the School's doctor may be consulted.</td>
<td>HR Department</td>
</tr>
<tr>
<td>16</td>
<td>Proof of Address: proof of address should be obtained and copy placed on file.</td>
<td>HR Department</td>
</tr>
<tr>
<td>17</td>
<td>Barred List Check (List 99)</td>
<td>HR Department</td>
</tr>
<tr>
<td>18</td>
<td>Prohibition from teaching check</td>
<td>HR Department</td>
</tr>
<tr>
<td>19</td>
<td>Prohibition from management check - applicable to staff appointed to management positions</td>
<td>HR Department</td>
</tr>
<tr>
<td>20</td>
<td>Full Employment History - If not obtained prior to interview full employment history should be obtained and placed on file. Any gaps of more than 3 months from leaving full time employment at the age of 16 years, should be scrutinised and explained.</td>
<td>HR Department</td>
</tr>
<tr>
<td>21</td>
<td>Disqualification Declaration (Pre-Prep and NPS Staff) - to be completed by those individuals working or directly concerned in the management of Early Years settings (children aged 0-5 years), including reception and out of hours school care for children up to eight years of age.</td>
<td>HR Department</td>
</tr>
<tr>
<td>22</td>
<td>EEA Restrictions - confirmation as to whether the applicant is subject to any restrictions imposed by all EEA authorities.</td>
<td>HR Department</td>
</tr>
<tr>
<td>23</td>
<td>Charity Trustee and Senior Manager Eligibility Declaration Form - to be completed by governors or senior managers with financial control</td>
<td>HR Department</td>
</tr>
</tbody>
</table>

RECRUITMENT AND SELECTION CHECKLIST - NON TEACHING

Detailed below is the recruitment and selection process that should be followed in accordance with the Independent Schools Inspectorate (ISI) requirements, and the Keeping Children Safe in Education guidelines, when recruiting and appointing a new member of staff and refers to Millfield Senior School, Preparatory School, Pre-Preparatory School and EYFS. This process should be followed for all appointments, and all checks must be completed before an employee can commence their employment with Millfield.

The Schools’ recruitment process is governed by the Schools’ principles of non-discrimination and is designed to achieve the best match between the individual’s knowledge, skills, experience and character, the requirements of the vacant post and recognition of the need for flexibility to respond to changing conditions.

<table>
<thead>
<tr>
<th>Pre-Advertisement</th>
<th>To be Completed By</th>
<th>Authorised By</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Authority to Recruit (ATR): All posts (both new and replacements) must be</td>
<td>Line Manager</td>
<td>Head of HR and Bursar</td>
</tr>
<tr>
<td>authorised by the Head of HR and the Bursar to ensure consistency of employment</td>
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<tr>
<td>practice and that the budget requirements are met. An Authority to Recruit (ATR)</td>
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<tr>
<td>form must be completed in full and submitted to the Human Resources Department,</td>
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<tr>
<td>where applicable with the original resignation letter, for authorisation before an</td>
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<tr>
<td>post can be advertised or filled. The ATR form can be found via the Xtranet under</td>
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<tr>
<td>Non-Teaching, Human Resources, Recruitment, Authority to Recruit (ATR)</td>
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<tr>
<td>2. Job Description and Specification: Prior to advertising a vacancy, a job</td>
<td>Line Manager</td>
<td>HR Department</td>
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<tr>
<td>description describing the purpose, duties and responsibilities of the post should</td>
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<tr>
<td>be prepared. This should also include a person specification outlining the</td>
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<tr>
<td>qualifications, skills, experience, knowledge, aptitudes and abilities that are</td>
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<td>essential and desirable for the post. This should be submitted with the ATR to the</td>
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<tr>
<td>HR Department where it will be authorised.</td>
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<tr>
<td>3. Advertising: All authorised appointments of three months duration or more will</td>
<td>HR Department</td>
<td>Line Manager</td>
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<tr>
<td>be advertised and subject to a competitive selection procedure. Advert details</td>
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<tr>
<td>should be submitted on the ATR form where it is then checked by the Human</td>
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<tr>
<td>Resources Department. Advertisements may be internal only or published</td>
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<tr>
<td>simultaneously internally and externally. Posts may be advertised internally</td>
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<tr>
<td>where it is anticipated that a suitable field of candidates exists and in</td>
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<tr>
<td>response to specific needs such as re-deployment. The aim of advertising is to</td>
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<tr>
<td>attract a wide range of high quality candidates from diverse backgrounds. All</td>
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<td>adverts should include the safeguarding policy i.e. statement of commitment</td>
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<tr>
<td>to safeguarding and promoting welfare of children, and the need for</td>
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<td>successful applicants to be DBS checked.</td>
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<tr>
<td>Where an ATR has not been received and authorised by the Bursar to meet the</td>
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<tr>
<td>above publication deadlines, or any other publication deadlines, adverts will not</td>
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<tr>
<td>be placed. Where the ATR has been received and authorised a formatted draft advert</td>
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<tr>
<td>will be sent to you for authorisation prior to the advert being placed. The use of</td>
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<td>employment agencies will only be utilised where advertisements have not produced</td>
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<tr>
<td>an adequate field of candidates. The agency terms and conditions must be signed</td>
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<td>by the Head of HR before any agreement is entered.</td>
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<tr>
<td>4. Applications: During the recruitment process application forms can be completed</td>
<td>Line Manager and HR</td>
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<td>via the Millfield website. In addition the candidate has to confirm that they have</td>
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<td>the job description, Application and Recruitment Guidelines, and the Schools’</td>
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<td>should be informed of the members of the short listing interview panel, as well as</td>
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<td>6</td>
<td>Invitation to Interview: The HR Department should be informed of all candidates selected for interview, candidates will then be contacted by the HR Department and invited to attend an interview. Candidates will be given all relevant information and instructions, i.e. advance notice of any practical test. All candidates will be asked to bring a form of identification and proof of any qualifications declared on their application form to the interview.</td>
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<tr>
<td>8</td>
<td>Interview Panel and Arrangements: For non teaching vacancies there should be a minimum of 2 interviewers at each interview, where possible this should include a member of the HR Department. The interview panel should have met and completed an interview proforma where questions / assessment criteria/standards should be noted. A proforma template can be obtained from the HR Department. For all vacancies, at least 1 member of the interview panel must have undertaken the Safe Recruitment Training.</td>
<td>Line Manager and HR Department</td>
</tr>
<tr>
<td>9</td>
<td>The Interview: Explores applicants' suitability and where applicable their ability to work with children for the post. Identity and qualifications of interview candidates should be verified on the day of interview by scrutiny of appropriate original documents; copies of documents taken and placed on file.</td>
<td>Interview Panel</td>
</tr>
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<td>References: 2 written references should be obtained and verbally verified, one of which should be from the last employer.</td>
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<td>Prohibition from Management: for those staff appointed to managerial positions</td>
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<td><strong>22</strong> Prohibition from teaching check (where applicable)</td>
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</tr>
<tr>
<td><strong>23</strong> Charity Trustee and Senior Manager Eligibility: Self-Declaration Form - for those who have general control and management of the administration of the charity/school.</td>
<td>HR Department</td>
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</tr>
<tr>
<td><strong>24</strong> EEA Restrictions - confirmation as to whether the applicant is subject to any restrictions imposed by an EEA authority.</td>
<td>HR Department</td>
<td></td>
</tr>
</tbody>
</table>

Following the satisfactory completion of the above pre-employment checks (points 10 - 24) an official start date will be confirmed with the candidate.

CH/dh/March15/Sept15/Feb16/Sept17/Aug18

<table>
<thead>
<tr>
<th>Policy owner</th>
<th>ASC/TAH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewed on</td>
<td>August 2018</td>
</tr>
<tr>
<td>Review by date</td>
<td>August 2019</td>
</tr>
<tr>
<td>Approved by Governor Committee</td>
<td>Full Board</td>
</tr>
<tr>
<td>Audited on</td>
<td>01/11/2017</td>
</tr>
<tr>
<td>Audit by date</td>
<td>01/11/2018</td>
</tr>
<tr>
<td>Publication</td>
<td>Xtranet, Portal, Website, ISI Policy (Part 6) Website</td>
</tr>
</tbody>
</table>