THE BRITISH SCHOOL OF GUANGZHOU
A NORD ANGLIA EDUCATION SCHOOL

Child Protection and Safeguarding Policy	
Title (or name) of Current Owner	Simran Monica Daryani
Category	Health & Safety
Extent	Whole School
Date Implemented	August 2013
Standard Review Period	Annual
Last Reviewed by	Simran Monica Daryani
Approved by	BSG SLT
Next Scheduled Review Date	August 2024

NOTES:

This policy sets out common values, principles and beliefs adopted by our school and describes the steps that will be taken in meeting our commitment to protect children. It must be reviewed annually.

Child Protection and Safeguarding Policy

The Designated Safeguarding Leads (DSLs)
for The British School of Guangzhou &
Nord Anglia International School (Olympic Park) Guangzhou are:

Overall Head of Safeguarding: Tim Richardson (School Principal)

Chief Safeguarding Lead (CSL): Monica Daryani

DSLs:

Early Years & Primary (BSG Campus)
Benjamin Brown

Early Years & Primary Olympic Park Campus
Monica Daryani

Secondary (BSG Campus)
Kate Manning

External contact in case of need is the Regional Managing Director (China), Terry Creissen. Contact details: terry.creissen@nordanglia.com

The School Principal has overall responsibility for all child protection and safeguarding concerns at our school. On a daily basis, this is delegated to the Chief DSL. The Deputy DSLs are there to directly support with concerns within their respective phases and, if unavailable, the Chief DSL can be contacted. As per NAE guidelines, schools are advised to give careful consideration before choosing the Head teacher/Principal to act as the Designated Lead for Safeguarding. At our school, there is an understanding that only under exceptional circumstances will the DSL structure comprise of a member of the Senior Leadership Team (i.e., Head of Phase); if this is the case, they must be subject to the same training and processes as other DSLs. DSL photos and titles are displayed on the Health and Safety noticeboards in all school buildings to ensure staff are aware of whom to turn to should they have any child protection and/or safeguarding concerns.

The Chief DSL reports directly to the Principal, who along with being the overall Head of Safeguarding at our school, also acts as an impartial voice on safeguarding policy and practice.

The Principal is the sole person to be informed with regards to any allegation against staff, including volunteers and external/third party staff. If a child safeguarding complaint is made against the Principal, the Regional Managing Director of China (Terry Creissen) must be contacted.

This policy is aligned with the Nord Anglia Education Safeguarding Policy, which is overseen by Barry Armstrong, overall Head of Safeguarding for NAE.

This policy is available in English and Chinese on our school website.

1. Introduction and Context

1.1 Definitions

Safeguarding

Safeguarding and promoting the welfare of children refers to the processes of protecting students from harm/maltreatment, preventing the impairment of their mental and physical health and development, ensuring that we seek to improve the general health and well-being of all students in our care and enabling every student to have the optimum life chances and enter adulthood successfully.

Child Protection

Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect.

Note: This policy applies in reference to children in our setting all the way up to end of their education in Secondary School. Students may turn 18 years of age whilst still at our school, but this policy and its approach still applies as long as they are on roll at our school.

1.2 Context/Rationale

Given our international context, we recognise and accept responsibility to safeguard all students under the UN Convention on the Rights of the Child (1989). Nord Anglia Education recognises the obligation to protect our students from harm and in particular, the obligation on our schools under the following Articles of the UN convention:

Article 3: the best interests of children must be the primary concern in decision making about them.
Article 13: children have the right to get & share information as long as it is not damaging to them/others.
Article 14: children have the right to think and believe what they want and to practise their religion.
Article 19: children have the right to be protected from hurt and mistreatment, physically and mentally.
Article 34: governments should protect children from sexual exploitation and abuse.
Article 35: governments take all measures to ensure that children are not abducted, sold or trafficked.
Article 36: children should be protected from any activity that takes advantage of them or could harm their welfare and development.
ARTICLE 37: NO ONE IS ALLOWED TO PUNISH CHILDREN IN A CRUEL OR HARMFUL WAY.

ALL THE UN ARTICLES CAN BE FOUND AT THE FOLLOWING LINK:

HTTP://WWW.UNICEF.ORG/CRC/FILES/RIGHTS_OVERVIEW.PDF

In addition to Nord Anglia Education's commitment to the UN Convention on the Rights of the Child, Nord Anglia Education uses the standards outlined by the International Task Force on Child Protection to benchmark our safeguarding practice against as well as the UK schools' statutory guidance 'Keeping Children Safe in Education'. The NAE procedures are also underpinned by the UK multi-agency guidance "Working together (Feb 2019)" where relevant.

1.3 Related Documents

This policy should be read in conjunction with more detailed procedures outlined in the following NAE Policies:

- NAE Allegations Against Staff Policy
- NAE Social Media Policy
- NAE Guidance for Safer Working Practice

In addition to the above, it is essential that other policies are also referred to, such as the Recruitment Policy, Whistleblowing Policy, Code of Conduct and other related policies that tie into overall procedures that link with safeguarding measures at our school (e.g. Visitor Policy, RSHE Policy, Learning Digital Technologies Policy, Counselling Policy, Trips Policy, Crisis Emergency Plan). Staff who have access to NAU can find a range of resources, including basic details on some cyber risks and some simple tips on how to help avoid them (Staying Safe and Secure Online).

It is essential for staff to follow the same guidelines with regards to when students are on trips, including residentials. More information can be found on the Trips Policy. The DSL will coordinate and ensure that records are updated either during or after the trip; any information and records relating to safeguarding must only be shared via agreed reporting systems as outlined on this policy.

1.4 Principles, Beliefs and Policy

Our school believes that having a safeguarding and child protection policy comes with the expectation that all staff, including all volunteers in our school and any contractors or partner agency staff used by schools, recognise where a student is at risk of, or is actually being harmed and do all they can to reduce further risk or further harm. Our students are encouraged to make decisions for themselves and are supported in this by learning through specific elements of the curriculum, aimed at enabling students to be able to keep themselves safe (e.g. through personal, social and health education programmes or similar).

1.5 School's Aims and Objectives

The school aims are:

- to provide a safe environment for children to learn in;
- to establish what actions the school can take to ensure that children remain safe at school;
- to raise the awareness of all staff to these issues, and to define their roles and responsibilities in reporting possible cases of abuse;
- to identify children who are suffering, or likely to suffer, significant harm;
- to ensure effective communication between all staff on child protection and safeguarding issues;
- to ensure that the correct procedures are in place for those who encounter any child protection and/or safeguarding concerns.

1.6 What we will do

We will meet our commitment to protect children through the following means:

- **Awareness:** we will ensure that all staff and others associated with the school are aware of the problems associated with child abuse and safeguarding and the risks to children.
- **Prevention:** we will aim, through awareness and good practice, that staff and others minimise the risks to children.
- **Reporting:** we will ensure that staff and others are clear what steps to take where concerns arise regarding the safety of children.
- **Responding:** we will ensure that action is taken to support and protect children where concerns arise regarding possible abuse.

In order that the above standards of reporting and responding are met, the school and its employees will accept and adhere to these basic principles (also linked to the Code of Conduct):

1. The welfare of the child is paramount.
2. Adults should work and be seen to work, in an open and transparent way. The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity; all students have the same equal rights to protection, but we recognise that we need to do more for some students because of their special educational needs, disability, gender, religion or sexual orientation.

3. All students need to be safe and feel safe in school.
4. Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
5. Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
6. We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
7. Our guiding principle throughout is 'the best interests of the students'.
8. We take seriously any concerns raised, including listening to the views of the children.
9. We take positive steps to ensure the protection of children who are the subject of any concern, and act appropriately and effectively in co-operating with any subsequent process of investigation.

Note: all principles apply to both, physical and virtual, environments.

1.7 Training and Support
The school will undertake measures, including training, to ensure that all staff:

- read and acknowledge this policy every year (Appendix 7);
- are familiar with, understand and abide by the Code of Conduct (Section 2);
- are provided, through training and support, with the necessary skills to recognise children who are at risk or potentially at risk;
- fully understand the systems and frameworks through which concerns may be raised and addressed;
- are aware of the mechanisms by which this policy and its associated procedures will be applied and monitored and where the levels of accountability lie;
- if they are affected by a safeguarding/child protection issue and this might have had an impact on their mental well-being, they are supported (e.g. via counselling and/or possible referrals for this kind of support).

It is an aim that all Assistant Heads, Year Leaders, Student Welfare Leaders and Heads of Year will have additional training beyond NAU's 'Introduction to Safeguarding and Child Protection' course (i.e., via courses on NAU and/or other recommended courses from the DSL Team).

1.8 Co-ordination and Response
Any person who works with children should be aware of the possibility that a vulnerable or 'at risk' child may choose them to be the first point of contact. It is therefore important that all employees, including third party staff and volunteers, are fully aware of the procedures and guidelines relating to reporting and investigation. In addition, we will appoint designated senior staff members (Designated Safeguarding Leads) who will receive additional training so they may guide and support through the reporting and responding process. It is imperative that staff *do not carry* out an investigation about any suspected abuse but instead should report their concerns immediately. This can be highly specialist work and could interfere with a criminal investigation if this were required and appropriate under local laws. Related staff (DSLs and/or the School Principal) will coordinate next steps, including considering local guidance with the support of our Head of Administration and seeking advice from NAE (see Section 11).

Note: Should any DSL be involved in conducting student interviews that are deemed more sensitive in nature, there should always be a second member of staff present. It is imperative that in such situations, the DSL keeps the School Principal fully updated and considers to also share at least some information with the Head of Phase. The School Principal or Head of Phase will then nominate a second member of staff to support. Consideration will be given to ensure that either the DSL or the second member of staff is either female or male if it is felt that this minimises stress or potential embarrassment for the student during these interviews/meetings.

2. Code of Conduct (linked with NAE Guidance on Safeguarding & Safer Working Practice)

2.1 Purpose of Guidance

It is important that all adults working with children understand that the nature of their work and the responsibilities related to this, place them in a position of trust. The Code of Conduct provides clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities, in all settings and in all contexts. The Code aims to:

- Keep children safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided.
- Assist adults working with children to work safely and responsibly and to monitor their own standards and practice.
- Support line managers and the Principal in setting clear expectations of behaviour.
- Support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.
- Support safer recruitment practice.
- Minimise the risk of misplaced or malicious allegations made against adults who work with children and young people.
- Reduce the incidence of positions of trust being abused or misused.
- Fulfil requirements as a code of conduct and act as part of staff induction/any related training.

2.2 Duty of Care

All adults who work with, and on behalf of children, have a duty to keep children safe and protect them from harm and are accountable for the way in which they exercise authority; manage risk; use resources; and safeguard children and young people. Failure to do so may be regarded as 'neglect'. The duty of care is in part, exercised through the development of respectful and caring relationships between adults and children and young people. It is also exercised through the behaviour of the adult, which at all times should demonstrate integrity, maturity and good judgment. All staff should avoid actions or behaviour that may constitute poor practice or, potentially, abusive behaviour. All adults should:

- Understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.
- Always act, and be seen to act, in the child's best interests.
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Take responsibility for their own actions and behaviour.

All adults on site must wear an ID badge and lanyard at all times.

2.3 It is important for all staff and others in contact with children to:

- ensure they are familiar with and follow these safeguarding/child protection procedures and all other safeguarding related policies, e.g., Code of Conduct, Guidance for Safer Working Practice.
- recognise that if their behaviour, inside or outside, of the workplace breaches the NAE Code of Conduct, and/or the Guidance for Safer Working Practice, this may be considered a disciplinary action, or even a criminal, matter.
- follow procedures when outlined in this document when/if concerned about any child.
- support relevant staff to act appropriately and effectively and to cooperate with any processes of investigation (this will be guided by the DSLs and/or School Principal).
- be alert to signs and indicators of possible abuse.
- always acknowledge and maintain professional boundaries.
- clearly understand the need to maintain appropriate boundaries in their contacts with children and young people. Intimate or sexual relationships between children/young people and the adults who work with them will be regarded as a grave breach of trust.
- Be aware that that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Never touch a child in a way which may be considered indecent. Always be prepared to report and explain actions and accept that all physical contact can be open to scrutiny.

- be aware that there is an Intimate Care Policy in place. This policy provides guidelines for adults dealing with intimate care issues (e.g., toileting incidents). Although this policy mostly applies within the Early Years and Primary setting, it is essential that *all* staff are aware of the key policy guidelines. It is important to remember that all children have a right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, age and maturity, children should be encouraged to act as independently as possible.
- be aware and follow the school's behaviour management policies. Adults should not use any form of degrading treatment to punish a child. Adults should not use force as a form of punishment, and should instead try to defuse the situations before they escalate.
- understand that students are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations or a need for intervention to protect the student/s from harm. For example, where there are changing rooms and there is a need to intervene, it is essential to announce intention of entering; report these incidents as soon as possible to a senior manager, who will then follow up on recording procedures.
- follow the guidance on school's e-safety policy (part of Learning Technologies & Digital Literacy Policy). Ensure that children are not exposed to unsuitable material on the internet and that any films or material shown to children and young people are age appropriate.
- be aware of situations which may present risks and manage these.
- plan and organise the work and the workplace so as to minimise risks.
- as far as possible, be visible to other adults when working with children. Avoid meetings with a child or young person in remote, secluded areas.
- never use toilets designated for child use only – even outside of school hours.
- ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed.
- ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged.
- listen to, and take seriously, the views and concerns of students.
- talk to children and encourage them to raise any concerns; empower children - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.
- be familiar with and take responsibility to implement procedures within our school's reporting system for recording and reporting concerns.
- undertake child protection/safeguarding training every two years, and other related training as deemed necessary from Heads of Phase/Departments (e.g. Safe Recruitment, Cyber-Safety), and ensure to attend all induction and safeguarding training sessions taking place onsite.
- respect both professional and social boundaries. Therefore, staff should **not** accept friend requests from former students under the age of 21 on any kind of personal social media/networking sites. This includes students from previous schools that staff have worked at. Staff should not invite former students (regardless of their age) to their personal social media accounts. At all times, staff must ensure their behaviours adhere to the Ethical Code of Conduct.

Please note: For all staff and volunteers, there is an expectation that you will have read part 1 of the UK statutory guidance on safeguarding in schools, *'Keeping Children Safe in Education'*. This document can be found in the resources section of the safeguarding site on NAU but also on the following website:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101457/KCSIE_2022_Part_One.pdf

2.4 In general, it is inappropriate to, and adults should NOT:

- behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model.

- spend excessive time alone with children away from others.
- take children to their home where they will be alone with you. At our school we typically do not visit a child's home. If under exceptional circumstances, this were to be considered, it is essential that the purpose of the home visit must be discussed and approved beforehand with senior management.
- interact with students via social media (staff **should** refer to NAE's Social Media Policy and Guidance for Safer Working Practice for further information and overall guidance).
- give personal contact details to students, including personal mobile telephone numbers and details of any blogs or personal websites.
- accept a current student as a contact on any personal networking platforms (it is best practice to also decline any friend requests from parents on personal social media accounts).
- use their position to intimidate, bully, humiliate, threaten, coerce or undermine children or young people.
- use their status and standing to form or promote relationships which are of a sexual nature, or which may become so. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is unacceptable.
- offer lifts to a child or young person. There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

Note: the school recognises that there will be staff who are also parents/carers of students enrolled at our school and that this might have implications in terms of staff having social contact with other families. Staff must refer to the Guidance for Safer Working Practice for more details. All staff must always ensure to use their best professional judgement at all times and where no specific guidance exists, adults should:

- *Report any actions which could be misinterpreted to their senior manager.*
- *Always discuss any misunderstanding, accidents or threats with a senior manager.*

3. Forms of Abuse and Additional Safeguarding Issues
There are a significant number of ways that students may be exposed to risk and danger. All require a response. Abuse is defined as any form of maltreatment of a child. This can manifest itself as direct harm to a child, or by a failure to take action to protect a child who is at risk of, or already suffering harm.

The more commonly referred to types of abuse are:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise cause harm to a child
- Emotional abuse: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved or valued only in so far as they meet the needs of another person.
- Sexual abuse: involves forcing or enticing a child into sexual activities, whether or not the child is aware what is happening. This includes non-contact activities over social media or the internet.
- Neglect: This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development. The different types of neglect can include 'educational, physical, emotional and medical'; affluent neglect can also fall under this category, where it is defined as 'neglect experienced by children and young people living, or growing up, in more affluent families' and can include, but not limited to, for example, 'present but absent parents; lavish gifts replacing the attention, love and affection for a child; children under extreme pressure to succeed; children who are left unattended and/or alone; emotionally distant parents' (Safeguarding Alliance, 2021).

While the above are the four broad main areas of potential abuse, abuse itself can take many forms involving one or more of these areas. All staff need to be alert to other possible types of safeguarding issues and what to look for as indicators. We also need to know what actions to take when concerned about any of these issues. Some examples of additional safeguarding situations/issues are listed below; however, **we need to be aware that this is not an exhaustive list and that there are many other potential safeguarding risks.**

Forced Marriage (FM)
A Forced marriage is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent. In 2013, the first United Nations Human Rights Council also adopted a resolution against child and forced marriages. This resolution recognises child, early, and forced marriage as involving violations of human rights which "prevents individuals from living their lives free from all forms of violence and has adverse consequences on the enjoyment of human rights, such as the right to education."

As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests. However, the school procedures must be followed in the same way as for any other safeguarding or child protection matter.

Child Sexual Exploitation (CSE)
The sexual exploitation of children and young people under 18 can involve exploitative relationships where young people receive something in return for performing sexual acts. Exploitation of any student can occur on a face-to-face level or through the use of technology, such as mobile phones or computers. In these situations, a student could be encouraged to send or post indecent images of themselves. In all cases the person exploiting children does so by misusing the power they have over them. This power may come through virtue of age, physical strength and/or economic resources. Violence, intimidation and coercion are common in exploitative relationships.

Sexting
Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. Sexting may also be referred to by students as 'trading nudies', 'dirties' or 'pic for pic'. There are many reasons why a student may do this:

- Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.
- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent.

Students often do not realise that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting.

Self-Harm
Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. Therefore, it is important for schools to spot it as early as possible and to do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention but more often a way of coping and releasing overwhelming emotions. Whatever the reason, it should be taken seriously. The exact reasons why children and young people decide to hurt themselves are not always easy to work out, although empirical studies show there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving, or having relationship problems with family or friends. The feelings that these issues bring up can include low self-esteem, low confidence, loneliness, sadness, anger, numbness and lack of control

in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

There are some common themes that may help staff identify concerns including:

- Physical indicators such as unexplained cuts, bruises, burns, bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits, poor school attendance, isolation or withdrawal from usual social group or activities.

If staff suspect that a student is self-harming this must be referred to the Designated Safeguarding Lead who will consider the next steps. It is likely that this will require discussion with the student involved and their parents/carers to agree a course of action or possibly refer to the school counsellor who may be able to support the student or make an external referral to a mental health organisation.

E-Safety
The increasing use of electronic media in everyday life and access to an ever-developing variety of devices creates additional risks for children. Risks and dangers of being online include:

- Inappropriate content
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming)
- Grooming and sexual abuse
- Sharing personal information
- Gambling or running up debts
- Cyber Bullying

Cyber bullying is an increasingly common form of bullying behaviour and is most often related to social networks and mobile phones.

Nord Anglia Education believes that the best way to protect our students is to teach awareness and an understanding of risk, particularly through personal, social and health education, sex and relationship education and wellness programmes. Aspects of the curriculum aim to include appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies and language they need to take appropriate action.

Staff should read through the school's Learning Technologies & Digital Literacy Policy and the NAE Acceptable Use of IT Policy.

Anti-Bullying
Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level should take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve the misuse of social media or other technology or be direct from student to student. Staff should refer to the school's Anti-Bullying Policy which aims to demonstrate a commitment to help resolve specific issues.

Children with Special Educational Needs or Disabilities
All staff should recognise that children with Special Educational Needs and Disabilities can lead to additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it is easy to assume that a child's mood, behaviour or any injury relates to their disability rather

than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted by behaviours such as bullying but they may not show any outward signs. Communication difficulties can make it very challenging for a child to indicate what is happening which in turn can make it very hard to address the underlying issues. Staff should be extra vigilant and report all concerns whilst avoiding making assumptions about the causes of any injury or behaviour.

Peer on Peer Abuse and Peer on Peer Harmful Sexual Behaviour (HSB)
All staff should recognise that children are capable of abusing their peers. Sexual violence and sexual harassment can occur between students of any age and sex, from primary through to secondary. Incidents can occur in school or outside school and can occur through a group of students sexually assaulting or sexually harassing a single student or group. Sexual violence and sexual harassment exist on a continuum which may overlap; they can occur online and face to face (both physically and verbally) but are never acceptable in any situation. Staff in school need to understand the different forms sexually harmful behaviours can include not just sexual violence and sexual harassment but also:
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, and
- Sexting and other forms of inappropriate on-line.

All staff need to understand the different forms that peer on peer abuse can take, such as (list is not exhaustive, KCSIE, 2022):
- bullying (including cyberbullying, prejudice based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexting
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

These/any types of peer on peer abuse/behaviors will not be tolerated.

In recent updates from NAE, there is reference with regards to a need for staff to further understand harmful sexual behaviors, some of these include:

- Better understand the definitions of sexual harassment and sexual violence, including online sexual abuse.
- Identify early signs of peer-on-peer sexual abuse.
- Consistently uphold standards in their responses to sexual harassment and online sexual abuse which are reported to them.
- Know good practice (in relation to hearing disclosures) and supporting children to bring issues to trusted adults.

Staff can refer to the Brook Traffic Light Tool when concerned about potential peer on peer abuse. This tool provides some basic guidance for staff on when to be concerned about the sexualised behaviour of a student. **Staff need to be able to identify sexualised behaviour and know when to refer these concerns to DSLs**. Allegations of peer on peer abuse should be dealt with in the same way as any other safeguarding or bullying concern and followed through with procedures outlined as part of the

Safeguarding and Anti-Bullying policy. Reports regarding sexually harmful behaviours should never be ignored or dismissed. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Students who are victims of sexual violence and/or sexual harassment wherever it happens, will find the experience stressful and distressing and it is possible that this will have a negative impact on their educational attainment which can be exacerbated if the alleged perpetrator(s) attends the same school. Staff should understand that safeguarding incidents and/or behaviours can be associated with factors outside the school.

Under no circumstances should an allegation that one child has possibly abused another be treated "as just children being children" or "experimentation". It is recognised that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". All peer on peer abuse is unacceptable and will be taken seriously. We hold a zero-tolerance approach to this issue and we will address these areas by including appropriate input through the curriculum to educate our students about a variety of issues related to sexually harmful behaviours, including issues such as 'consent' .

Safeguarding students who are vulnerable to extremism
Nord Anglia Education Schools value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

Note 1: As part of the guidance from KCSIE (2022), 'Serious Violence is now also considered as a specific safeguarding issue. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation'.

A short awareness course on Extremism can be found at the following link:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

Physical Intervention/restraint
There may be times when adults in schools, in the course of their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm or harming others. These include circumstances in which adults working with children displaying extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions. The use of physical intervention should, wherever possible, be avoided (staff should always seek to diffuse situations). It should only be used to manage a child or young person's behaviour if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances. When physical intervention is used, it should be undertaken in such a way that maintains the safety and dignity of all concerned.

Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation. Under no circumstances should physical force or intervention be used as a form of punishment. The duty of care which applies to all adults working with children and young people requires that reasonable measures are taken to prevent children being harmed.

With children where restrictive physical interventions may need to be employed regularly, e.g. where adults are working with children with extreme behaviours associated with a learning disability, key staff should implement processes as part of a wider behaviour management policy that address the specific needs of the student. This includes individual care/behaviour plans, drawn up in consultation with parents/carers and where appropriate, the child, that should set out the strategies and techniques to be used and those which should be avoided. Risk assessments should be carried out where it is foreseeable that restrictive physical intervention may be required.

The Principal will require the adult(s) involved in any such incident to report the matter to him or her immediately, followed by providing a description and full account of the incident. Where physical intervention has been employed, the incident and subsequent actions should be documented and reported (this should include written and signed accounts of all those involved, including the student) by a senior member of staff who will also be asked to debrief the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept and the student checked for any injuries. Witnesses to the incident should be identified where possible.Parents/carers should always be informed on the same day when an intervention has been necessary.

U.K. government guidance has been issued in relation to the use of reasonable force and can be used as best practice advice.

https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools.

Domestic Abuse
The accepted definition of domestic violence and abuse is:
Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional forms. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can occur within their personal relationships as well as in the context of their home life.

Whistleblowing
Nord Anglia Education recognises that we cannot expect children to raise concerns in an environment where adults fail to do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are a protected disclosure and, even if proven to be unfounded, will not result in action taken against the whistle-blower. Malicious whistleblowing, however, will be seen as a potential disciplinary matter. Nord Anglia has a Whistleblower Protection Policy available to all staff.

Mental Health
All staff should 'also be aware that mental health problems/issues can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children on a day-to-day basis and identify those whose behaviour suggests they may be experiencing a mental health problem or risk of developing one. At our school, we have the School Counsellor who can guide on mental health issues and, unless it places a child at greater risk, early contact should always be made with the child's family and agreement reached about access to the appropriate external professional body reached where possible.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following our procedures on our safeguarding policy and reported to DSLs (Keeping Children Safe in Education, DfE, 2021). The DfE has published advice and guidance, including Mental

Health and Behaviour in schools (DfE, November 2018), which has notes on 'Identifying children with possible mental health problems'. The guidance states the following:

Negative experiences and distressing life events can affect mental health in a way that can bring about changes in a young person's behaviour or emotional state, displayed in a range of different ways, all of which can be an indication of an underlying problem. This can include:
• Emotional state (fearful, withdrawn, low self-esteem)
• Behaviour (aggressive or oppositional; habitual body rocking)
• Interpersonal behaviours (indiscriminate contact or affection seeking, overfriendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).

Support
The school, through its Learning Support Department and Pastoral/Welfare
Teams (i.e., School Counsellor), are able to provide contacts in and around Guangzhou should a student and/or family seek/benefit from a referral for support to address any child protection and/or safeguarding issues from external professionals/organisations (e.g., mental health professionals, psychologists, etc.). Our school also has a counsellor on site and is able to provide related support in conjunction with the Whole School Counselling Policy.

NAE recognises its duty of care to its employees and where staff have been involved in reporting and responding to abuse, it is recognised that this can be very difficult to deal with in isolation. Should staff need support as such, this can be discussed with the School Principal and DSL to support with next steps.

Social Media
When used appropriately, social media can be a very powerful and effective method of communication and in order to make best use of the many educational and social benefits of technologies, students need opportunities to use and explore the digital world, using multiple devices from multiple locations. As with all technologies however, we need to be aware of the potential dangers and boundaries for the use of social media in schools. We also need to recognise that the risks associated with the use of social media and all technology, is not with the technology itself but with the user. To equip students to use these technologies safely, schools should consider opportunities to educate students in the safe use of technology. This may be through the curriculum or by external/specialist provision. Schools should also make students aware that if they are concerned about anything they encounter, through social media that worries them, should be reported to school staff. Communicating with both current and former students via personal social networking sites or via other non-school related mechanisms such as personal e-mails and text messages can lead to employees being vulnerable to serious allegations concerning the safeguarding of children and young people. All communication with students via any personal page or elsewhere should be avoided and where there is an exception this must be agreed with a member of the school SLT.

In general, staff should **not** accept friend requests from former students under the age of 21 on any kind of personal social media/networking sites. This includes students from previous schools that staff have worked at. Staff should not invite former students (regardless of their age) to their personal social media accounts. At all times, staff must ensure their behaviours adhere to the Ethical Code of Conduct.

Adults working in this area must therefore ensure that they establish safe and responsible online guidelines and acceptable user policies. All staff must refer to the school's acceptable user's policy. Various learning platforms are now widely established and clear agreement by all parties about acceptable and responsible use is essential.

This means for our students, they should:

- Not sign up to social media sites that have an age restriction on them until they reach the appropriate age.
- Not post anything which is offensive to any other student, parent or staff member, either in their own name or anonymously.
- Avoid attempting to send friend requests to a member of staff.
- Be provided with guidance and training on the safe use of social media and other technologies.
- Report anything of concern that someone sends them through social media (or other technology).

Adults should:
- follow the school's ICT Acceptable Use Policy (AUP) and related e-safety policies, ensuring communication between students and adults, by whatever method, takes place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messages, e-mails, digital cameras, video, webcams, websites and blogs.
- ensure that all communications are transparent and open to scrutiny.
- ensure that personal social networking sites are set at private and students are never listed as approved contacts.
- never use or access social networking sites of students unless requested to do so by a member of SLT.
- not give their personal contact details or any other personal information to students, including mobile telephone number.
- only use equipment e.g. mobile phones, provided by school/service to communicate with children, making sure that parents/line manager have given permission for this form of communication to be used.
- only make contact with children for professional reasons and in accordance with any school or NAE policy. Adults *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.
- recognise that text messaging should only be used as part of an agreed protocol and when other forms of communication are not possible.
- not use web-based or any other communication channels to send personal messages to a child/young person or their families without express permission of your line manager or the Principal/Headteacher.
- avoid any form of on-line, electronic (or otherwise) relationship with former students unless this is as part of planned and agreed engagement with Alumnae. This is especially important with ex-students who are still under 18.
- be professional in their communications with students to avoid any possible misinterpretation of motives or any behaviour which could be misconstrued.
- Above all do nothing that is likely to bring into question your suitability to work for Nord Anglia Education or your suitability to work with children or young people in a Nord Anglia School.

Internet and e-mail systems should only be used in accordance with the Nord Anglia/school policy.

Note: in the context of these procedures, the term adult is used rather than employees because in schools the policy should be applied to all adults whether employees, volunteers or contractors.

Support
The school, through its Learning Support Department and Pastoral/Welfare
Teams (i.e., School Counsellor), are able to provide contacts in and around Guangzhou should a student and/or family seek/benefit from a referral for support to address any child protection and/or safeguarding issues from external professionals/organisations (e.g., mental health professionals, psychologists, etc.).
Our school also has a counsellor on site within Secondary and is able to provide related support in conjunction with the Whole School Counselling Policy.

NAE recognises its duty of care to its employees and where staff have been involved in reporting and responding to abuse, it is recognised that this can be very difficult to deal with in isolation. Should staff need support as such, this can be discussed with the School Principal and DSL to support with next steps.

4. Responsibilities (School Principal, SLT, DSLs, Third Party Staff and Parents/Volunteers)

4.1 Responsibilities and expectations

It is the responsibility of the Principal and senior management to ensure all of the following:

- that the school adopts appropriate policies and procedures to safeguard children in the school;
- that these policies are implemented by all staff, including volunteers and third party staff;
- that all school staff complete the Introduction to Safeguarding Course through NAU every 2 years;
- that sufficient resources and time are allocated for staff to carry out their responsibilities effectively;
- ensures a culture of the school facilitates concerns being raised and handled sensitively, where all staff and adult helpers in the school are able to voice their concern if they feel that a child is vulnerable, or that there are any particular practices that are unsafe;
- ensure that safeguarding is addressed through the curriculum;
- ensure the school site is secure;
- customise procedures to fit school and geographical location;
- support ongoing efforts to ensure mapping of local legislation/guidance and support agencies is considered and added to school's customised version of these procedures (including seeking/further understanding clarity on legal duties to report any child protection issue to local authorities, etc.); see section 11 for more information;
- only deploy staff who will have unsupervised contact where safe recruitment procedures have been followed;
- maintain a record of all training undertaken by staff in relation to safeguarding and child protection, which should be made available for any inspecting during audits and reflect time scales for renewal identified within these procedures;
- ensure that during any provision of Virtual Education these procedures continue to underpin our engagement with our students.

4.2 Designated Safeguarding Leads (DSLs)

There is a Whole School named person (Chief DSL) and at least one named person per phase/campus as DSL to support the Principal, who has prime responsibility for Child Protection and Safeguarding. The designated staff role is guided by two principles:

- The welfare of the child is always paramount.
- Confidentiality should be respected as far as is reasonably possible.

Being guided by these principles, the Designated Safeguarding Leads will:
- play a key role in ensuring that the school takes action to support any student who may be at risk.
- with the Principal and Head Teachers, make sure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- have appropriate training in addition to the basic training that all other staff receive. All DSLs are required to have undertaken the NAE specialist (Level 3) training or have an agreed date to undertake this training (this training will be refreshed every 2 years). This training must include awareness of offender behaviour/safe recruitment. In addition, all DSLs are required to complete the NAU courses on: 'Role of the DSL', 'Safeguarding for Recruiters' and 'Introduction to Safeguarding'.
- collate and keep accurate and confidential records of any concerns about children.
- be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters. Aim to consider and better understand local expectations around safeguarding, who to contact, what agencies exist and how to contact them (this must be coordinated with the support of the Chief DSL and Head of Admin.)

- ensure that the entire school community knows who the DSL is in their setting/phase or, if being supported remotely, who is providing this support and how to contact them.

*Note 1: For DSLs with children who are enrolled at the school and who would otherwise have oversight on child protection/safeguarding records/alerts, the Chief DSL will set up a parent restriction function. CPOMS allows for staff members in positions of responsibility for safeguarding to be blocked from viewing their own child/ren's records (for OP, similar setting will be in place for other platforms). It must be noted that staff can override this function on CPOMS should they manually type a name onto the alert box of an incident for a student who has a parent restriction in place. **Staff are advised not to override this function**. If staff are unsure, advice must be sought from the Chief DSL or School Principal. This stance is recommended in order to maintain confidentiality. If this situation arises, the Chief DSL will follow up with the School Principal/Senior member of staff to ensure continuity of care.*

Note 2: To assist DSLs carry out their tasks and actions on related next steps, at times this might require a translator to support when working with students and families. Given our community, the school will do its best to appoint a Key Chinese Speaking Translator to support in these instances. The Chief DSL will work with the key translator to ensure that aspects of sensitivity and confidentiality are maintained as outlined on this policy.

In addition, the Chief DSL will:

- support and make sure that all staff (both teaching and non-teaching) are aware of their responsibilities in relation to safeguarding and child protection**,** with the support of the Principal, Head Teachers and Deputy DSLs.
- keep a log and registers for any related information, including sharing information, any records of deletion and also ensuring to check any hard copies/documents on the school server/TEAMS/other platforms are under protected access of child protection/safeguarding information as per the retention period.
- work with the school's Head of Administration to make ourselves more familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.
- take responsibility for overall management of CPOMS as key administrator and maintain ongoing communication with the CPOMS key representative to ensure that the system is running smoothly, including taking responsibility of essential features on the system (i.e., Data Destruction, links with Sharing Information noted below). This will also include student transfer information/records between BSG and OP if relevant.

All staff have a responsibility to report to the designated person any concern they have about the safety of any child in their care. The DSL's responsibility, with the support of related staff, is to make decisions about what to do next and then take appropriate actions.

In addition, DSLs will support key staff in ensuring links with other policies are implemented in relation to overall safeguarding procedures (e.g., Trips Policy).

Third Party Staff

It is required that all third party staff/any individuals who work with or students in an unsupervised capacity **must** fulfil and comply with HR procedures on safe recruitment procedures, including providing relevant documents and that appropriate checks are undertaken. In addition, it is an expectation that all third party staff comply with the following policy guidelines:

1. All English-speaking staff will need to complete our Introduction to Safeguarding course on NAU via the guest portal; this applies to all staff who support the Cambridge English School. The aim will be for outsourced nurses and local *academic* staff who support key departments such as, SEN, PE, Music, and who are ASA providers to also complete the online NAU course as there are options available in several languages, including Mandarin. Their training credentials will be valid for 2 years. Heads of Phase/Departments will be contacted by HR and will be requested to

support in ensuring that policies and procedures are followed up on (HR will keep all the related documentation for these members of third party staff).

Note: For 'other' local third party staff (Bus Supervisors, Cleaners, Canteen Staff, Gardeners, Security Guards, Uniform Shop Staff), Head of Facilities will oversee training and will maintain records, where it will be compulsory for these staff members to have an annual face to face training session (links with key policy guidelines, including Allegations Policy and Guidance for Safer Working Practice).

2. All staff will have to read through and sign on our own Child Protection and Safeguarding Policy (English or Chinese).

The above 2 criteria must be completed prior to any individual starting work at our school who has unsupervised regular contact with our students (this includes regular volunteers also).

3. Ideally, will have undertaken a safeguarding briefing/induction before commencing their role at school from the relevant Head of Department to understand what is required of them if they have any concerns and to whom they should report (an abridged safeguarding presentation with key messages will be available from the DSL team). Upon request, the Chief or Phase DSL can support in providing the debrief. At most, this procedure must be completed within 2 weeks from the start date of the person working at school. For *other local staff*, this refers to the face-to-face training session.

4. Will sign on a register stating that they have read through our policy and have had a debrief from the relevant Head of Department or DSL. Chief DSL will check in with HR and key departments on a termly basis with regards to any additional training needs, which the Chief DSL can support with.

5. Wear an ID badge and lanyard at all times. Only exception to staff not wearing an ID badge are those staff who wear uniform in school (e.g., security guards, cleaners, canteen staff, etc.).

These guidelines apply to third party staff involved in ASAs, Weekend Academies, PE, SEN, Music, Cambridge English School, Bus Company, Canteen, Cleaning Agency, etc.

Note: For any kind of academies, it would be the person in charge of this group who would be considered in this instance the HoD and link to safeguarding procedures to support the DSLs.

Note 2: Safeguarding debriefs can take place face-to-face, via TEAMs or through watching a pre-recorded video from the DSL team where staff will be asked to acknowledge having gone through all information (e.g., via Microsoft form).

Parent and Other Volunteers

These are volunteers who come into school on a regular basis[1] to support educational purposes (e.g, reading with students) and/or who are a part of a school related group/community who work with our students. These include: classroom-based learning volunteers, Parent Support Group committee members, exam invigilators, admin-based volunteers, etc. They *must never be left unsupervised* with students and are required to comply with the following:

1. Provide a copy of their passport to HR (if these are parents, a copy of their passport should already be in school as part of the Admissions process).
2. They must be referred to our school website which has our full and abridged versions of our policy and related documents (e.g., Guidance for Safer Working Practice).
3. Will have undertaken a safeguarding briefing/induction before commencing their role at school from the relevant Head of Department or DSL to understand what is required of them if they have any concerns and to whom they should report (an abridged safeguarding presentation is available upon request from Chief DSL). This training will also include NAE guidance on appropriate safe working practice. At most, this procedure must be completed within 2 weeks from the start date of the person working at school.
4. Will sign on a register after they have had a debrief from the relevant Head of Department or DSL.

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[1] Regular is defined as volunteers who support school once a week or more.

5. Wear an ID badge and lanyard at all times.

The above procedures will be renewed at the start of every new academic year to ensure that HR have all updated documents. It will the responsibility of Heads of Phase/Department to provide a list of names to HR and to keep them updated on any changes that occur within the school year.

Note 1: for any regular volunteers/supply teachers/any other adults working onsite who have unsupervised contact with our students, they must follow the procedures as noted above for Third Party Staff and will need to fulfill all requirements (including providing all documentation as part of safer recruitment procedures).

Note 2: There is an <u>abridged version of the school's Child Protection & Safeguarding Policy and also NAE's Guidance for Safer Working Practice</u> on the school's website (under Parent Essentials).

5. Employment and Recruitment

Safe Recruitment and Selection
The school will do all it can to ensure that all those working with children in school are suitable people. In order to do this, all staff who will work in an unsupervised capacity with children or young people will be recruited using safe recruitment procedures as outlined by Nord Anglia Education's/BSG' Recruitment Policy and Background Checking Policy. All staff involved in interviewing candidates for teaching and non-teaching posts at our school will have undertaken safe recruitment training.

6. Procedures to be followed by any staff member or external/third party staff/volunteer who is concerned about any student
All adults in our school share responsibility for keeping our children safe. Staff must disclose any child protection and/or safeguarding concerns. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm.

If staff suspect that any student in their care may be a victim of or is at risk of abuse/other form of harm, they should not try to investigate. They should immediately report this to the relevant DSL, who will follow up and advise with next steps, including communicating with the parents/family as deemed appropriate. In many cases a student will not make a direct disclosure, but staff will be concerned because of a physical or emotional indicator. In these circumstances staff should still proceed and report this to the DSL as per our reporting procedure outlined below.

Where any student makes any form of direct disclosure, the guidelines under Appendix 1 (Dealing with Disclosure) should be followed.

If a child alleges abuse against any adult working at school, including volunteers, the School Principal must be informed immediately without involving other adults in the discussion.

7.Allegations Against Staff and Volunteers

The full detail on handling allegations is set out in the NAE Allegations Policy and **all staff must refer to this policy for further guidance.**

In summary:
An allegation can be made against a staff member or volunteer at any point. It is important that any such allegations are treated seriously and appropriate procedures followed.

An allegation is different to a complaint and can be defined as follows:

- Where someone has behaved in a way that has harmed or may have harmed a child.

- Where someone has possibly committed a criminal offence against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.

If the allegation is made by a student it is important:

- That the allegation is taken seriously.
- That the student is listened to and responded to with empathy.
- That only questions that are required to establish the basic facts are asked.
- That the student is provided with reassurance about doing the right thing.
- That all decisions made in relation to the allegation should be recorded.

In the event of an allegation being made against a member of staff (or a volunteer/third party member), this should immediately be reported to the School Principal who will investigate further and follow up with next steps. If a criminal act has been committed, the School Principal, with the support of our school's Head of Administration (Ms. Ada Huang), will refer the matter to the local authorities where appropriate and necessary. If the Principal deems the allegation to be of a safeguarding nature (criminal or not) the Head of Safeguarding for Nord Anglia Education will be informed as soon as possible and within 24 hours as a minimum. HR must also be informed by contacting the regional HR Director and the Group HR Director as soon as possible. In the case of the allegation being against the Principal, the Regional HR Director, the Regional Managing Director, the Head of Safeguarding and the Group HR Director should be informed.

For serious allegations, the matter must always be reported as soon as possible to the Director of Education, the Group HR Director and the Chief Executive Officer, and the regional emergency plan should be deployed.

The Principal will work with the relevant members of SLT (Head of Phase and/or Deputy DSL) to ensure that the child is safe and at no further risk; they will investigate and decide on next steps of action. No action to investigate the concern will be taken before consultation with the Head of Safeguarding, HR and Group Legal to verify Legal Privilege to be maintained and an agreement is reached about how best to approach and investigate the concern.

If it is felt, after these initial investigations, that a further enquiry is needed, then the member of staff may be suspended. Suspension is a neutral act, and in no way implies that the person is guilty of any wrongdoing. However, it is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the Regional HR Director/Head of Safeguarding before acting and will comply with national and locally agreed guidance on these matters.

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the NAE's Code of Conduct and Guidance for Safe Working Practice.
It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated or considered.

The local legal requirements (Regulations on Protection of Minors in Guangdong) will be coordinated by the Principal, Head of Administration (Ms. Ada Huang), HR or Regional Managing Director at the time of a reporting.

Parents and carers should be made aware of the need to maintain and respect confidentiality about any allegations made against staff whilst investigations are ongoing so as not to impede any investigation. Parents should also be informed of any local regulations governing confidentiality in such cases.

8. Record Keeping and Confidentiality

All records of child protection concerns, disclosures or allegations will be treated as sensitive information and will be kept together securely and separately from the child's general school records. We will regard all information relating to individual safeguarding/child protection issues as confidential and will treat it accordingly. The information will be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it will not be shared more widely than that (for example, DSLs can also alert staff members, always depending on a need to know basis, via CPOMS).This stance includes a further discussion in terms of sharing more detailed/full information with our School Counsellor if he/she is involved as part of any follow-up in terms of support for the student/family.

All records relating to safeguarding and child protection issues will be logged via a dedicated programme, CPOMS (this only applies to BSG; OP will ensure to have secure systems in place via TEAMS where only designated staff, i.e., School Principal, Chief and OP DSL will have access to these records-see Appendix 2). All BSG school staff have access to record incidents on CPOMS and all concerns will only be sent to relevant Deputy DSLs and Chief DSL. Only the School Principal and Chief DSL will have full access to all records. Heads of Phase will have access to records within their respective year groups (without the alert function activated). It will be the responsibility of DSLs to action and manage records and keep Heads of Phase involved on a need to know basis to better support the students as part of our overall stance in working with students and families.

Any concern a member of staff (including volunteers and external/third party staff) has of the welfare or well-being of a child must be followed up as soon as possible either on CPOMS or by filling out a record of concern which can be provided from the relevant DSL (i.e., OP staff and other staff/volunteers). Other staff can seek guidance from their direct line manager, who will redirect them to the appropriate DSL to follow up.

Concerns, which initially seem trivial, may turn out to be vital pieces of information later so it is important to give as much detail as possible. A concern raised may not progress further than a conversation with the DSL but could also potentially lead to matters being dealt with through a legal system. If there has not been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.

The DSLs have provided some guidance in terms of what information can be recorded on CPOMS (**the list is not exhaustive**)-refer to Appendix 6. It is imperative to note that if staff are unsure, they must first speak to the DSL who can provide advice in terms of next steps and reporting on appropriate platforms, including noting down concerns on CPOMS/Record of Concern Form.

The Chief DSL keeps a separate log of all child protection/safeguarding concerns and consults with the relevant DSL at the start of the new academic term with regards to then deciding if any other staff need to be made aware of any concerns and/or whom to contact. Admissions will inform the Chief DSL of any returning students. The Chief DSL will then follow up with the relevant Deputy DSL to ensure communication is kept ongoing and if needed further actions will be carried out (e.g. prompting other staff to be aware of any concerns if needed).

In the case of a disclosure, remember the record you make should include:

1. As full an account as possible of what the child said (in their own words).
2. An account of the questions put to the child.
3. Time and place of disclosure.
4. Who was present at the time of the disclosure.
5. The demeanor of the child, where the child was taken and where returned to at the end of the disclosure.

Students with any child protection and/or safeguarding records who left us before January 2019, when CPOMS was launched at BSG, have now been added to the system with a note stating that there was a concern and that records are kept as part of Chief/Whole School DSL files. As part of the procedures

when Admissions contacts the Chief DSL for any returning students who left our school prior to January 2019, a process will be in place where if there are previous child protection/safeguarding records, these documents will then be added to CPOMS. The only exception for not adding these records to CPOMS is related to these incidents not falling within the policy in terms of record keeping (e.g., other incidents that fall more towards behaviour/sensitive notes, etc.). The Chief DSL will have the overall responsibility of managing records, including any paper records. As per UK based guidance based from the Data Protection Toolkit for Schools (DfE, 2018), all our records will be retained for 25 years after the child's date of birth as noted on CPOMS (this also includes students who are not on roll-their records are moved to an Archive section within CPOMS). With all child protection and safeguarding records on CPOMS, this procedure will be followed up via this system with processes in place, including notifying identified key staff before any files are deleted. Once the data is removed via CPOMS, it cannot be retrieved (Chief DSL will also oversee records and retention period in the same way for any paper-based records). As per current settings on CPOMS that was set at the start of the academic year of 2020-21, the Chief DSL will be alerted 4 weeks prior to the files being deleted and it will be the responsibility of the relevant DSLs to ensure a review is in place to decide if the files proceed with the deletion or if there needs to be a consideration to retain records. With any child protection records relating to historical investigations, including and especially any records about child sexual abuse, these records should not be destroyed (some guidance is noted from IRMS, Toolkit for Schools, https://irms.org.uk/page/SchoolsToolkit). The recommendation is to consider retaining a copy of these records even if the child has been transferred to another school.

When we reach our first cycle of deletion on CPOMS, it will be the responsibility of the Chief DSL to follow up with the CPOMS company to explore an option of creating another category on the system (under Data Destruction) of 'Archive-Cause for Concern-Sexual' as this would match the need to retain these records as per the guidance noted above.

Note: Once the Data Destruction Policy is set on CPOMS, the system allows key Admin. Users (i.e., Chief DSL and Principal) to have the ability to Delete or Edit the policy at any time.

Sharing Information

Our school regards information relating to individual safeguarding/child protection issues as confidential, and we treat it accordingly. Information with other schools will be passed on to appropriate persons only at the discretion of the Principal/ and Designated Safeguarding Lead/s and this will always be based on the need to know basis.

Should other schools request for safeguarding/child protection information about ex-students no longer at our school, the Chief DSL will firstly be contacted and will liaise with the Principal to approve of any information being forwarded. If there are concerns noted about a student, the Principal will consult with the Chief DSL and relevant DSL (and if appropriate, Head of Phase), before sending any information.

Sharing information about students who, based on the available evidence, would appear to be suffering or likely to suffer significant harm, is essential to enable appropriate intervention and help keep children safe. Basic principles will be applied and NAE's Guidance on Child Protection & Sharing Information (July 2019) will be used as our reference to further guide with next steps in these instances. The school will continue to further work with the Head of Administration on a clearer stance with regards to better understanding local laws and regulations around sharing information and data protection (including considering GDPR restrictions). Some of the principles are noted below:

   All information must:
- have regard to proportionality i.e., sharing no more information than is necessary and that can be legally shared, whatever the potential risk. In some areas this may require us to report a student's movements to local authorities.
- only be shared without parental agreement where a student has suffered or may suffer significant harm. The threshold for sharing is therefore high and there must be an evidence trail that supports the

judgement. Where possible, information should be shared in a transparent way with the consent of parents/carers. This should always be the first option.
- be shared in a methodical and systematic fashion with a clear audit trail.
- be factually based, accurate and free from unsupported judgements. This underlines the importance of keeping accurate records.

Note 1: Should we become aware of any student who is on our safeguarding/child protection register who is leaving our school, the DSLs involved will meet with the School Principal and Head of Admin. (Ms. Ada Huang) to discuss this on a case to case basis, where consideration will be given to sharing any child protection records with receiving schools (this will involve also taking into consideration local laws and data protection regulations, where advice will be sought as needed either from the Education Bureau or advised by links with our Regional Lawyer); reference will also be made to with regards to taking into account the guidance provided from NAE in terms of sharing any child protection information (see above). As part of this stance, and where students who turn 18 years old, there will also be a discussion and consideration about involving the student in terms of seeking their consent.

Note 2: In the first instance, School DSL team will also try their best to arrange an exit meeting, ensuring that we pass on key messages to the parents about following up with the next school (this is as part of our duty of care).

Note 3: Where a school requests us to share safeguarding information for a previous student, in the first instance and if the parents/guardians were already informed of the incident, an email will be sent to the parents to seek permission. If the parents do not respond or do not provide consent to share information, this will be discussed with the School Principal who will then support with next steps, considering our local guidance and regulations around this area also. In general, our stance on sharing information with other schools will be looked into if this falls within one year since the child has left our school (this will also only be considered as part of ensuring we have parent consent).

Note 5: As part of safeguarding requests from other schools, if there are concerns noted for a previous student, we are generally looking at around 24 months in terms of this being relevant/recent information that we will consider to share with the new school. If there are more serious concerns, the overall limit of 24 months will not be applied and we will consider longer time frames in some cases.

As part of our updated procedures, once a student has been enrolled at our school and their admission has been confirmed (i.e., fees have been paid), our online safeguarding information child protection/safeguarding and pastoral/welfare form will be sent to the child's previous school. Any responses that alert concerns will be passed onto the Chief DSL who will then work with the Deputy DSL to follow up on and provide related support as per our safeguarding policy.

9. Photography/Mobile Phone and Camera Usage – Taking and Storing Photo and/or Video material
The school recognises that use of photography must be implemented in a responsible way and we respect children and parents' rights of privacy. The school also acknowledges that the level of acceptable use of camera phones and other personal devices has evolved over recent years.

Every reasonable effort will be made to minimise risk by securing parental consent for the use of photographs/videos (i.e. as part of the Terms and Conditions form upon the admissions stage). Where a parent does not wish for their child's image to be used externally, they should contact the school's admissions department to discuss the practicalities of this arrangement.

Safeguarding measures are in place to protect students and staff.
It is safer for all concerned if staff always use school devices to photograph activities involving BSG staff and/or students and to avoid using personal equipment to capture images/videos of children. However, we acknowledge that this is not always possible or convenient. Therefore, to record spontaneous moments or

at times when school devices are not readily or easily available, teachers may use personal devices to photograph or record learning activities involving fellow staff and/or students.

If personal equipment is used to capture child images/videos/audio recordings, this should be contextually appropriate, and staff must take every sensible measure to ensure photos of students are not stored on their personal devices beyond a period in which they could reasonably be uploaded to an official BSG platform and then immediately deleted from all personal equipment (including cloud storage).

It is usual for parents to take photographs and videos of their child/children at calendared school events. Any objections to this policy should be addressed to the Principal.

9.1 Photographs for School Publications and Sharing Photos/Videos with Parents

It is important to continue to celebrate achievements of students through the appropriate use of photography in communicating with parents and the community. It is, however, essential to do this safely. All learning platforms, where photos and videos will be shared with parents and the community, must be approved by the senior management team. Any external links that are used to share photos/videos of students must also be approved by the senior management team, and protocols must be in place to ensure maximum security settings are in place (e.g.sharing photos/videos for residential trips).

- Photographs of students being used by staff for learning (e.g., Class Dojo, Tapestry) or marketing should preferably be taken on school cameras/devices however, we acknowledge that this may not always be possible, therefore images/videos taken from school devices and/or personal equipment must be deleted as soon as is reasonably possible after uploading them to the appropriate school-based system or agreed platform, and never uploaded to a personal social media account or other medium.
- Images should be saved on the school's secure server/equivalent and printed copies only used within the school for purposes such as displays, records and learning journals.

9.2 Further Guidelines for Staff on the Use of Photography, Audio and Videos (Guidance for Personal Devices and Camera Images):

Specific measures intended to keep students and staff safe are as follows:

- If staff are using personal equipment, this should only be related to learning and exceptions are made in this situation when a school device is not easily accessible.
- Images must be uploaded to the school server or designated and agreed platform as soon as possible (from school and personal devices).
- Once uploaded to the appropriate area of the school network/platform, images must be deleted immediately from the device, including any memory cards, cloud storage etc.
- Images must never be uploaded to the internet other than to published school platforms (Class Dojo, Tapestry, Teams – a full list is attached). Uploads to open access social media platforms, including Facebook, Instagram, Twitter etc. is not permitted by anyone other than The Marketing Department. See above (9.1) guidance for uploading any images by staff onto the internet. Exceptions may be pre-approved by the Principal or Heads of School, only under certain circumstances, for example during residential trips and overseas expeditions.
- Avoid taking images in one-to-one situations or which show a single child with no surrounding/context.
- Ensure students understand why the images are being taken and that they are appropriately dressed.
- Photographs of BSG staff taken at any kind of social event may not be shared online in any form without the express consent of the member of staff involved and every care must be taken to ensure that any such images reflect positively on BSG and NAE and could not possibly harm the reputation of the individual concerned, BSG or NAE.
- Report any concerns about any inappropriate or intrusive images found.

Note 1: Staff should refer to NAE's Social Media Policy and the school's Learning Technologies & Digital Literacy Policy for further guidance on usage of photography.

Note 2: Should a member of staff want to take photos/videos for other reasons other than stated above/as agreed by parents under our Terms and Conditions form, it is imperative that this is discussed firstly with their line manager and approval is sought then from senior management and parents. The request should ideally be made at least one month in advance. Once approved, staff should contact the Deputy DSL in their phase who can support with next steps and provide further guidance. It is essential that documentation must be provided that comprises of clear reasons and justifications, and specifically noting down what protocols are in place to ensure that we safeguard our students.

10. Monitoring and Review

To support the implementation of our Safeguarding and Child Protection Policy and as part of NAE's approach, we will be provided with a self-assessment tool to enable review of our safeguarding arrangements.

Our school has an annual Safeguarding Action Plan that is led by the Chief DSL.

Elements of safeguarding practice will also be included in the quality assurance framework and will continue to be a part of the health and safety review and NAE's audit process.

This policy is reviewed annually.

11. Local Safeguarding Agencies/Advice

Should there be a more serious cause for concern about a well-being of a student, where we find reason to make a referral to the local authority or refer to any local laws for protection of the child, the School Principal and Chief DSL will firstly consult with the Head of Administration at our school (Ms. Ada Huang). Ms. Ada Huang will be able to provide guidance on next steps and if needed, will be able to contact to the Education Bureau in Guangzhou for further advice, including taking into consideration the international context and possibly linking with relevant consulates and the police if required. Ms. Ada Huang can provide details of local agencies and the police if required/requested. If required, the school will also seek advice as needed from NAE's Head of Safeguarding.

Appendix 4 outlines a flowchart that can be referred to in terms of school's stance in responding to more serious concerns relating to child protection/safeguarding matters (links with local mapping).

Note: As part of our understanding of our local context, our duty of care remains at all times, including when the school team becomes aware of situations that contravene safeguarding local guidance, where the school will try its best to work with families and related teams to ensure that we always place the welfare of the child as paramount.

12. Parental/Visitor Code of Conduct

All adults on site, including visitors, must wear an ID badge/lanyard at all times. This may be the school's 'Visitor' badge that is distributed by security. If you encounter an adult on site that you do not recognise and is not wearing a badge, it is your duty to challenge them. If necessary, accompany them to the nearest reception area where a visitor's badge can be arranged.

All parents and visitors must follow the Code of Conduct guidelines outlined below and all staff should positively encourage and ensure these are adhered to. This is displayed in all reception areas and is also embedded as part of the Safety First Charter within all sites (all visitors will need to acknowledge points noted below).

It is the responsibility of all parents/guardians to ensure that they communicate with the school team should they not be contactable and/or if they are out of the country. It then remains the parents' responsibility to ensure an emergency contact is sent to the class teacher (Primary) or form tutor (Secondary) in such instances.

When you visit our school, you will be treated with integrity, care and respect.

The school has a strong commitment to ensuring that we provide a safe environment for all of our students. We expect that all visitors support us by following the code of conduct outlined below:

On entry to our school, you must:

• not take photographs or videos of any child without the permission of the School Principal or relevant Head of Phase, unless during school events where it is okay for parents to take photographs and videos of their child/children.
• only use the designated adult toilets whilst on campus and under no circumstances enter the changing room areas.
• not enter classrooms without permission from a member of staff.
• not be alone or in close proximity with any other child.
• not touch or invade the personal space of any other child.
• not share and or accept personal information from any student.

If, during your visit, you have any reason to be concerned about the safety of a student, please contact the relevant Designated Safeguarding Lead.

Please note that CCTV cameras are in operation at all times across the campus.

13. Tutoring

In line with other NAE schools, staff are not allowed to tutor children on the school premises and will not be given approval for tutoring outside of school hours. It is important to understand that anyone found to be tutoring will be in breach of the terms of their contract. Staff must not use their access to students/staff to arrange tutoring for partners. This would be deemed unethical.

14. Summer School and Weekend School Academies

Before summer school commences, the Chief DSL will liaise with HR to ensure we are clear on which staff will be on site, including any third party staff. All third party staff will have to follow our regular procedures noted above, including the person responsible for running the summer programme to also provide a debrief to these staff members who are new to our school. The Chief DSL will liaise with the main person responsible for summer school to go through key safeguarding policy information and if needed, delegate some responsibility to them (e.g. ensuring to find a way to communicate with the Chief DSL/Principal or Head of Admin. during this period) to address any concerns. If there is a need and with the approval of the School Principal, an acting DSL can also be appointed who can support during Summer School. The Chief DSL will ensure arrangements are made prior to the start of the programme with regards to the DSL and overall safeguarding support available.

For students who are not otherwise enrolled in our school and only attend Summer School and/or Weekend Academies, child protection/safeguarding procedures must still be followed through as outlined on this policy. All concerns (details to be shared to a minimum) must be directed towards the key person/lead, who will then follow up with the appropriate DSLs (or acting DSL)/Principal/Head of Administration in terms of next steps. The Record of Concern form must be completed as a hard copy (Appendix 5) and be passed onto the DSL or acting DSL only. If a student is enrolled in our school, the report must be made on CPOMS, as outlined on this policy (for OP students, a paper record must be completed).

*Note: If the concern regards a student that is **not** registered in our school (i.e. Summer School, Cambridge English School), records will be retained as per our overall retention period (see Section 8). The Chief DSL will keep records on a separate register. The Chief DSL will work with the Summer School and Weekend Academy Leads to have a system to check for returning students. The Chief DSL will then follow up with the Summer School/Weekend Academy Leads if needed and on a case-case basis should other staff be aware of any concerns.*

15. Student internships/work experiences and safeguarding considerations

These guidelines apply to school-arranged internships/ work placement opportunities.

For our Sixth Form students, there might be opportunities relating to internships and work experiences outside of school; in these situations, there must be processes in place that consider safeguarding protocols. Before any student internship/work experience is finalised, a preliminary visit to the organisation is required. Thereafter and before the internship/work experience starts, we must ensure the following procedures are in place:

➢ The following policies should be shared with the key point of contact for the work placement.

- *Abridged Safeguarding Policy (Eng/Chn)*
- *Abridged Guidance for Safer Working Practice (Eng/Chn)*

The full policy can be found on our school website. All documents can be found on:
https://www.nordangliaeducation.com/en/our-schools/guangzhou/parent-essentials/school-policies

➢ An additional letter covering the following points should be sent to the provider and a signature should be obtained from the external work place, acknowledging the key points (template can be provided by Secondary DSL):

-Photography and Videos

We accept that photographs and videos might be taken to document the experience and for marketing purposes; however, the following points should be noted:

- Photographs and videos of students should not be for personal use of the provider's employees.
- Photographs and videos should be appropriate and take into account the age of the student in relation to the activities shown. E.g., Working in a bar.
- Photos used for marketing should be cleared by the BSG marketing team prior to publication and should only be taken for this purpose (all photos taken on any device, should thereafter be removed immediately, including from cloud storage).

-Communication with Students

- During the internship/ work placement, it is understood that WeChat communication is likely to be used (a BSG staff member must also be present within any platform of communication with our students). Parents will be informed where this happens. These groups/ chats should be deleted, and students removed after the placement has ended.
- Communication between students and professionals in the workplace should be directly related to the internship/ work placement.
- Employees at the internship/ work placement should not add students as personal friends on WeChat or any other social media platform.

Note: For any Secondary student internships taking place at school (e.g., Summer School Secondary Student Internships, Enrichment Programme for Secondary Students, ASAs, etc.), **DSLs should be made aware of these arrangements prior to the start date (at least 3 weeks in advance) to support in terms of providing advice for our staff and students. The following guidance is in place for internal student placements at our school and will also be shared with staff who wish to organise such experiences for our Secondary students:**

- *Students will be provided with a face to face debrief from the relevant DSL to go through potential areas of concerns (these will be put together in a handbook for Secondary students, including highlighting the main four categories of abuse) and an overview of some key aspects from our Guidance for Safer Working Practice.*
- *The class teacher (or designated staff member in charge) is responsible for overseeing and supervising our interns and not leaving them unsupervised with other children and providing direct guidance on their roles in terms of their internship experience.*
- *Ensuring that students supporting a work experience at school know that they should speak to the class teacher in charge if they have any concerns about another student they are working with as part their student internship or if another student discloses any information that seems as a concern. This should be reported immediately and only to the class teacher and not be discussed with any anyone else. It will the responsibility of the class teacher to report the concern/incident based on our reporting systems in place. If needed, DSLs can also then support the student intern with any follow up discussions.*
- *Ensuring student interns understand that they should not get too close to any students (being mindful especially of personal space and physical contact). In Early Years, separate toilets are being designated for any students going to this campus.*
- *Students will be expected to follow all guidelines in terms of our student code of conduct as outlined as part of Secondary expectations (e.g., no personal devices should be used).*

It is essential to note that if staff are involved in organising any internal student internships, it will be their responsibility to also check in on a fortnightly basis to review how things are going.

References

The Safeguarding Alliance (2021) *Affluent Neglect [Information Booklet*]. The Safeguarding Alliance.

Department for Education, DfE, (2021) Keeping children safe in education 2021 (Part 1). U.K. Crown Copyright 2021. Department for Education.

Appendices

Appendix 1:
Reporting Procedure, Dealing with Disclosure and Further Action
General Principles:
If a child asks to speak to someone in confidence about a problem, staff should be clear that they cannot promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.

The following guidance is based on five key practices for all staff.

When a disclosure is made, consider the 5 R's:

- **Receive**: Where possible always **stop and listen** to a child who wishes to speak in confidence. Responding to an allegation or suspicion of abuse of a child immediately takes priority. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say, "I can't stop now but come and see me in my office at….". Where possible during any disclosure try to listen, allow silences and try not to show shock or disbelief.
- **Reassure**: Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. **Do not promise confidentiality** or agree to "keep it a secret". Action will have to be taken if you believe that any child is suffering, or is likely to suffer significant harm. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.
- **React**: React to what the child is saying only in as far as you need to for further information. **Do not ask leading questions**. Keep questions open like… "is there anything else you need to tell me?". Avoid expressing opinions beyond the facts. Leading questions and anything likely to suggest ideas or interpretations could damage subsequent investigations. Try not to criticise the alleged perpetrator as this may be a family member whom the child will still have feelings for.
- **Record:** Make brief notes about what the child says during the conversation but if this is not possible make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Use exact words where possible. Record the time date and place as well. Follow through our reporting procedure as outlined under Appendix 2.
- **Report**: Where a student makes any disclosure or where you have safeguarding concerns for any reason, it is very important that the procedures outlined in this policy are followed. All staff have access to our school's online safeguarding programme (CPOMs) and all student concerns should be logged onto the system. Other staff (OP staff, external/third party staff and volunteers) who do not have access to CPOMS, will need to fill out a record of concern which can be provided from the relevant DSL. If there is a more serious concern, staff should speak to a DSL at the earliest opportunity. Where a child has made a disclosure and alleges abuse, the DSL or Principal (if allegation is against any member of staff/volunteer) should be informed as soon as possible. The DSL/Principal will follow up on next steps and if/as needed will ensure to seek advice from the Head of Administration regarding any involvement with local authorities. It is recognised by NAE that as an international school organisation, that our school also operates within a diverse and complex local context. Therefore, the following principles are taken into account when following the framework and procedure for disclosure, reporting and further action. As international schools (as per NAE guidance) we:
  - often reside in cities and countries that offer little external support.
  - recognise the limitations in the areas of child protection.
  - need to assess the quality and skills of counsellors and other support staff in dealing with children who have suffered harm or self-harm, in order to determine the boundaries of their work.
  - need to act in accordance with local legislation as well as the principles and practices outlined in this policy.

In the case of disclosure, remember the record you make should include:

- As full an account as possible of what the child said (in their own words).
- An account of the questions put to the child.
- Time and place of disclosure.
- Who was present at the time of the disclosure?
- The demeanour of the child, where the child was taken and where returned to at the end of the disclosure.

Additional/Key Points

o **Consider whether a child needs immediate protection.**

Consider both the child who has told you of concerns, and any other child, in the light of what you have been told or suspect. Initiate or take the necessary temporary protective action – e.g. by staying with the child until satisfactory arrangements for the child are made. You can ask and take into account the child's wishes about any immediate protection. You should aim to transfer protection of any child into the normally expected arrangements as soon as you are satisfied these are safe.

o **Action to take if, as a member of staff, you observe abuse whilst it is taking place in this school.**

You must do all you can to stop this immediately without putting yourself and the person being abused at further risk. Inform the perpetrator of your concerns. Advise them to stop the action immediately. Ask them to remove themselves and advise them that you will immediately be informing the appropriate/designated staff. If they fail to stop, you must immediately seek for help. Accompany the victim to a place of safety away from the perpetrator and leave them in the care of a responsible adult. Inform the Principal/DSL immediately of the action you have taken and why. The Principal/DSL will then support in follow-up procedures, including informing the perpetrator of the actions that will be taken in accordance within this policy.

o **When a child has made a disclosure and alleges abuse.**

When this occurs, the DSL (or Principal), should be informed as soon as possible. The DSL/Principal will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The DSL/Principal will then consider and where necessary, consult on the information available. It is the role of the DSL and/or Principal to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

Remember, even if there are doubts, and whether or not you personally believe it, the benefit of the doubt must always be in favour of making the report.

o **Do not reveal details of the allegation or identify individuals or staff concerned** other than to a DSL or the School Principal respectively – that may put a child at further risk. Child Protection and Safeguarding issues should remain confidential to those designated as responsible for dealing with them. An individual member of staff who has heard a child's disclosure may feel under pressure from colleagues to explain but should be aware they are under a contractual obligation to maintain the circle of trust.

o **Do not investigate the case yourself.** Discuss the allegation or suspicion immediately with the nominated DSL or Principal as outlined per this policy (unless you are the subject of the allegation in which case refer to the Principal).

o **Ensure that you have read through the Keeping children safe in education Part 1 (2022) document by the DfE in conjunction with this policy** *(please note that this document is to be used as a reference for further understanding of safeguarding practice in the U.K).*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101457/KCSIE_2022_Part_One.pdf

Appendix 2: CPOMS (Guidelines)
A training session on CPOMS will be held at the start of every academic year for all new staff (recap for all existing staff) to ensure that everyone at school is confident to access and use the system.

Note 1: For any external/3rd party staff/volunteers-the Record of Concern form will be used (Appendix 5) This form should also be used for any students who are not enrolled in our school (e.g. Summer School/Weekend Academies).

Note 2: For Olympic Park staff, more information on recording will be provided early in Term 1. Chief/NAIS DSL will create a separate register and folder on TEAMs with protected access. OP staff will have to directly contact the OP DSL who will provide a Record of Concern Form that will need to be completed.

All record of concern forms must be completed as a hard paper record (not electronically) and should be handed directly to the appropriate DSL. It will be the Chief DSL's responsibility to keep these records securely on the designated folder with protected access.

Key Messages with the usage of CPOMS:

1.All BSG staff (Academic and Non-Academic) will have access to CPOMS. Staff need to ensure that they have they registered onto the system. Any related questions, this can be addressed with the Chief DSL.
2.We are currently only using CPOMS to report child protection and safeguarding concerns.
3.No information on any allegations against staff (including volunteers and third-party staff) are to be logged onto CPOMS.

Logging incidents: Things to remember

BSG CPOMS Login A/C: https://bsg.cpoms.net/

Student
Year Group will be specified; this will ensure the relevant Phase DSL is alerted.

Remember to choose appropriate DSL group (EYs, Primary, Secondary).

Incident
When noting this down, remember to include key details, including any actions already taken.

1. *Record and ensure to put down notes about what the child said during the conversation, and upload to CPOMS within 24 hours. If it is a serious concern that needs immediate attention, speak to the DSL/Principal immediately, CPOMS note can be followed up and should be made then within 24 hours.*
2. *Make sure to record exactly what the child says and not your interpretation of what is said (keep this objective).*
3. *Record the time, date and place as well.*

Category
Emotional, Neglect, Sexual and/or Physical: any concern related to either of these, ONLY DSLs must be alerted for this kind of information.

Other: can be defined where the concern does not fit any other category as listed above. Staff may, at times, choose to alert another member of staff in this instance (see below under *Alert Staff Member* for more information).

Body Map Guidance for Schools
Body Maps should be used to document and illustrate visible signs of harm and physical injuries. Even if the injury to the child has a plausible explanation, a completed body map helps track a history or pattern of repeated injuries. Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment. At no time should staff seek to record injuries on photographic equipment. If you notice an injury to a child, try to record as much of all the injuries you can see.

- Exact site of injury on the body, e.g., upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted because of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Where any child has any form of injury that requires attention, please ensure that first aid/medical care is sought as soon as possible.

Date/Time
Ensure the date and time are accurate when the incident was noted.

Alert Staff Members
Ensure that the relevant DSL is alerted for *all* concerns (Early Years, Primary or Secondary). The Chief DSL will be alerted at all times as per CPOMS settings.

Relevant DSL will follow up and action next steps and if needed, will prompt staff to take further action.

If adding another staff member (*only under OTHER category*), a system alert will pop up to ensure that you want this person to be notified also. Consider very carefully if you choose to alert another member of staff. Depending on the concern, this could be typically the Head of Year, Student Welfare Leader and/or Assistant Head. **Ensure to alert DSL/Chief DSL for these incidents also.**

Attached Files
Attachments would be rare to upload as relevant information should be noted under **Incident box**. DSLs will follow up with actions/next steps and will upload information as needed. If uploading/scanning any files, ensure that originals are destroyed/shredded.

Appendix 3: Virtual School Experience/Remote Learning (Child Protection & Safeguarding Guidelines)
As professionals working with and for our students, even in exceptional circumstances, we need to maintain the normal boundaries and behaviours that help to keep our staff and our students safe.

Due to the event of a school closure for face to face learning, NAE has now launched teaching and learning via Virtual School Experience (VSE) and it is imperative that we take into consideration all aspects of safeguarding and how to provide education for our students safely.

Staff should be aware that by spending long periods of time on-line, whether for virtual education purposes or not, students are exposed to an increased risk of abuse. Whilst every effort is made to educate both parents and students on keeping themselves safe on-line, staff also need to make sure that during engagement with students they leave nothing to question.

All staff engaging with students on-line should understand the need for professionalism and strict boundaries to ensure that their behaviour is not misinterpreted.

Along with additional guidelines to be taken into consideration as part of VSE, it is essential that all staff still follow our overall Child Protection & Safeguarding Policy, including reporting any child protection/safeguarding incidents or potential concerns as per protocol to the appropriate DSL. NAE safeguarding guidelines on virtual schooling also notes that the
NAE code of conduct and the NAE guidance for safer working practice remains the go to guidance in all interactions with students and families. All staff should continue to report any child protection and safeguarding concerns as per our reporting procedures (online via CPOMS and for OP to contact the relevant DSL) or contact the DSLs if there is a more serious concern. If staff are unable to access CPOMS from their home, they must email their Deputy DSL and Chief DSL to provide brief notes, and a contact number in case the DSLs needs follow up via a phone conversation to gain more details. Staff are to ensure that the same policy applies with regards to reporting any concern as soon as possible, and without delay. Where staff are concerned about an adult (re: allegations), the same policy must be applied with the School Principal being contacted as soon as possible

In the event of school closure and VSE, the DSLs will communicate early on with staff to ensure there is a clear message about the above and note any changes within the DSL structure, given those circumstances.

Guidelines for Direct Communication with students during the provision of the NAE Virtual School Experience.

Staff Guidelines
- As within the normal school context, communication with a student, by whatever method, should take place within clear and explicit professional boundaries.
- Staff should not share their personal contact details, including e-mail, telephone numbers, WeChat, Skype details, etc. with students or parents.
- It is important that communication with students and families is carried out via school-based email accounts and/or approved platforms only. It is also important that staff, as a first option, should use school devices for VSE. If they are using their personal device due to unavoidable circumstances (e.g., poor network or they don't have a school device at home), they must inform their Head of Phase and seek approval. Contact through school online platforms allows monitoring and therefore protects teachers. Where phone calls to students/parents are necessary, these should be coordinated and agreed through SLT members and the reasons and objective for the call shared. If approved to make these calls, staff must ensure if they have used a personal device, they must delete these numbers from their device.
- Any online conversations with students must be professional and related only to the task at hand.
- Any images/videos/audio shared must be appropriate to the task.
- Staff should not share any personal information with a student.

Online Live Meetings:
- ➢ Mode of Communication: TEAMS has been agreed as the platform for any kind of communication, including virtual meetings and video/voice calls with staff and students.

➢ There will be a Parent & Student Guidance letter, that includes information on how best parents can support their children to attend and engage within virtual meetings, ensuring safeguarding protocols are being adhered to. The Chief DSL will liaise with Deputy DSLs to ensure these letters are drafted and shared with Heads of Phase early on in the event of VSE. Heads of Phase/Department must ensure that guidance is sent to parents and students (depending on age).

➢ We will **not** be recording any live sessions.

➢ Parents must be made aware of all online sessions being arranged (lessons/times/dates). These should be arranged ahead of time and timetabled.

➢ Staff should read and go through information on updated Parent/Student Guidelines for online virtual meetings. If there are any questions, please follow up with HoP or DSL.

➢ **No 1:1 sessions should be taking place** *(the only exception for 1:1 sessions can be with direct consent and approval from the School Principal who will discuss with DSL/s concerns that reach a threshold where if a student is considered vulnerable and requires support during VSE, for example via counselling where the situation deems a 1:1 situation for this kind of service; within this arrangement and also within the Counselling Policy guidelines, parental consent should be taken into consideration-this may depend on whether a student is in Early Years/Primary or Secondary).*

Note 1:
-In Primary, staff should not be capturing photos/screenshots as part of the live lessons. If staff would like to share images of Class Dojo portfolios pictures of students as part of parent updates with the wider community, this may be considered appropriate for sharing if:

- Images have been shared by students or parent/carers (i.e. submitted to portfolios)
- Student locations are not identifiable
- Student names are omitted
- Permission is granted by the parents/carers (in the first instance, the class teacher should contact parents if they want to use pictures on the Primary Update; the Primary academic secretary can support if needed/cannot easily contact parents due to a language barrier).

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-In Secondary and upon SSLT guidance, if staff are taking any screenshot photos during live lessons, they must ensure that this is of a group (no individual photos must be taken) and must follow normal protocols (e.g., not on personal devices, **clear rationale** [newsletter updates/marketing purposes], students should be dressed appropriately, screenshots should be deleted as soon as possible, staff must check the images before they are used). However, this must be kept to a minimum and with consent. Students must also be aware that a photo is being taken and the purpose for this.

Note 2:
Families/students themselves should not be taking images/screenshots/videos during VSE lessons (updated parent/student guidance will include this message). If staff become aware this has happened, they should follow up with relevant leadership team.

Some additional guidelines for staff to follow:

➢ During any lessons, ensure device is being managed and that any non-work related applications, files or apps are closed. Avoid use of emojis, GIFs during any chat with students.
➢ Normal professional boundaries apply, including how we dress. It is an understanding that staff and children must wear suitable clothing/be dressed appropriately (e.g., no pyjamas), including anyone else in the household who are around.
➢ Being mindful about the environment we use to deliver our lessons from. Ensuring if we are delivering lessons via our homes, for example, we ensure that the room is fit for the purpose.

➢ Any computers/devices used should be in appropriate areas, for example, not in bedrooms and where possible against a neutral background (applies to staff and students).

➢ There is an understanding that language amongst staff and students must be professional and appropriate, including any family members in the background.

➢ Keep track of students who do not attend the lesson. Attendance at all lessons is important for continued learning but could also be a sign of something of a potential wellbeing issue.

➢ Screen sharing: make sure your students don't take control of the screen and prevent them from sharing random content by limiting screen sharing, so only you as the teacher (host) can present to class.

➢ Avoid the use of personal social media platforms. Do not accept requests from or send any friend requests to students. All continued virtual contact should be through platforms that SLT have approved.

➢ Where school devices are not available and staff require to use personal devices, they must bring this to the attention of their Head of Phase for approval.

➢ Where mobile phones have been used to contact students in a crisis, colleagues should ensure that any students personal numbers stored in their personal phones or other personal equipment, are deleted. This must also be discussed/approved by a senior member *before* taking this action.

Protocols and updated guidance of TEAMS will be provided either from NAE and/or from our school team should there be a need for VSE.

<u>For Students:</u>

Attending lessons as part of the Nord Anglia Education virtual school should be as much of a positive experience for our students as any other form of learning we offer. We expect a professional approach to teaching from our staff and high standards of behaviour and engagement from all our students. This requires observance of the basic requirements for the safe, efficient and congenial running of the virtual school. This covers general behaviour, personal appearance, regular attendance, observance of boundaries and respect and co-operation with staff.

Below are some of the basic rules and expectations on students accessing virtual education (based on NAE Guidance):

- Use technology in appropriate ways.
- Never post anything related to other students or staff on social media (or any other platform) without permission from school staff.
- Do not share passwords and be careful of unexpected contact from unknown individuals.
- Follow any guidance and advice provided by NAE to keep safe while on-line.
- Report to parents or school staff any concerning on-line contact.
- Bullying or discrimination of any form will not be tolerated and will be addressed through the school's behaviour policy.
- There is no expectation that students will wear a uniform to attend virtual lessons but all students should join lessons properly dressed and ready to learn (phases will advise if students need to wear uniform).
- All virtual lessons should be appropriately timetabled and all students made aware of this timetable. It is the student and their parent's responsibility to ensure that they join these lessons on time and ready to learn.
- Sickness and other absences should be reported to class teacher/tutors at the earliest stage possible and ideally on day one of any absence. The reporting of illness should be through parents to class teachers/tutors directly.
- The NAE virtual school will monitor all student's attendance. Where a student does not join a lesson as expected this will require follow up. Class teachers/tutors would need to contact the parent/carer and a reason for absence identified. In the case of consistent patterns of absence, this will be escalated to appropriate SLT members for further consideration.
- All forms of misdemeanor from students will be dealt with in line with the school's behaviour policy.

It should be recognised that repeated or extreme behaviours can be a symptom of a student experiencing emotional difficulties and, where this is the case, every effort should be made to support the student.

Students should not be permitted to:

- chat directly with internal or external users
- initiate or receive direct voice/video call from internal or external users
- create new team, or new teams calendar meetings
- delete, or edit sent messages within team channel
- use "giphys", "memes", or "URL previews within team channel
- route inbound calls to call groups
- delegate inbound and outbound calls

Teachers however will be able to:

- Create new team and new teams calendar meetings
- chat directly with internal or external users (not students)
- initiate or receive direct voice/video call from internal or external users (not students)
- delete, or edit sent messages within team channel
- As owners of a team, can delete sent messages
- Use memes in conversations (avoid within student meetings)
- Use stickers in conversations (avoid within student meetings)
- Use Giphys in conversations (Giphy content rating set to "Moderate"-avoid within student meetings). URL previews will be enabled
- Students can share resources in any virtual meeting but should not share their entire desktop. Limit screen sharing, so only you as the teacher (host) can present to class.

Note: NAU also offers ongoing guidance to all staff (linked with safeguarding protocols); some information with regards to Microsoft TEAMS can be accessed on the NAU platform.

Parent/Guardian & Student Guidelines
- Acknowledgment that an online platform is not a 100% secure network.
- It is agreed that TEAMS will only be utilised for educational/learning purposes (no personal information must be shared).
- Students who have a school email address (Y6 onwards) must make sure the **joining email is from our school email address**, this will prevent any impact from phishing emails where people try to get you to click on a fraudulent email. For our younger students, where families are supporting to connect to live meetings for learning, please ensure when logging in, your child's full name appears.
- It is agreed that TEAMS will only be utilised for educational/learning purposes (no personal information must be shared).
- If needed, students can share their resources via virtual meetings, but should not share their entire desktop. It is important that students do not take control of the screen and to prevent random content being uploaded, teachers will limit screen sharing.
- It is essential that parents support in providing children with a workspace that is quiet and free from distractions with an adult nearby if necessary, this should not be the child's bedroom. For our younger students, there might be an expectation that as part of any live meetings being arranged a parent/carer must support within these sessions; this will be communicated by the school team. Any computers/devices being used for these meetings, if possible, should be against a neutral background.
- It is an understanding that staff and children must wear suitable clothing/be dressed appropriately (e.g., no pyjamas), including anyone else in the household who are around/supporting within the lessons if needed. Cameras should be on, and students should be ready to learn.

- Ensuring that face to face communication is only between the teacher and students as the main focus. Any direct parent to teacher communication should be in the usual manner, via email. There is an understanding that language amongst staff/students must be professional and appropriate, including any family members in the background.
- No photos/images/screenshots or videos should be taken by the students and family during VSE lessons.
- Punctuality: All virtual lessons will be appropriately time-tabled. It is the students and their parents' responsibility to ensure that they join these lessons on time and are ready to learn.
- Absences: If a student is unable to attend a lesson, please ensure a parent contacts the relevant teacher.
- If you have any questions/concerns about this arrangement, please contact the teacher at least 24 hours before the scheduled meeting and we will try our best to address any queries.

Note: For students receiving 1:1 support where there is an external contract between parents and 1:1 TAs, e.g., as part of services from the Learning Support Department, safeguarding guidance and advice is as follows for VSE:

It will be the responsibility of the Line Manager from the LS Team to consider this guidance:

-Parents to be notified via email about these arrangements taking place (copying in LM and relevant teachers if deemed necessary).
-Parent/carer should attend the session.
-Ensuring timing of sessions falls within school hours.
-LS TAs to send a brief summary via email of the session afterwards to LM and relevant teachers if deemed necessary.

Streaming and Recording Live Lessons

Staff should also refer to the Acceptable User Policy as part of this approach.

Livestreaming and recording sessions
Should staff plan for livestreaming and recording of sessions, assemblies, or other activities via any online platform, risks should be considered and assessed any identified risks addressed to minimise any potential harm to staff or students or breaches of data protection legislation. This arrangement must be made and confirmed by the relevant Head of Phase and DSL within each phase. We need to think about how to carry out remote sessions in a way that meets and the needs of all the students you are working with. With remote education we have options to do a livestream or record a session for students to watch later. There is no reason why we cannot record lessons in some specific circumstances, so long as some basic rules are followed.

Recording of sessions may be required where students need flexibility about when they learn at home and/or may be necessary to help students meet specific learning objectives. There may be other circumstances too where recording is necessary. The current virtual accreditation process for CIS for example, requires schools to send CIS examples of lessons. To do this, CIS requires lessons to be recorded. This is acceptable so long as this is done with data protection and safeguarding in mind (for this reason, *approval must be sought from SLT-see Section 9.2., Note 2*) .
Where lessons are recorded, we should ask students to turn off video, so that only the recording of the teacher delivering the lesson is available to be seen. Where possible avoid using students' full names and avoid any identification of students whose parents/carers have asked for this anonymity.
Any any recording provided to students should not be shared further through any other platform either by them or any members of their family. Even when livestreaming a lesson or activity, think about whether you need students to turn their cameras on. Not all sessions with students will require students to have cameras on although some clearly will. From a safeguarding perspective it is important to see all the students at some point just to make a visual assessment of their wellbeing. If a child does not want to turn

their camera on, try to find out why. Consider whether you need to check in with them and/or their family separately to make sure everything is okay. Make sure all staff are clear on the child protection procedures to follow if they are concerned about anything they have seen or heard on a video call. Teaching online is different to teaching face-to-face but nevertheless, staff should always maintain professional relationships with students.

Most lessons will be streamed from (or recorded in) a classroom environment but if lessons are recorded or live streamed lessons from another environment, staff should be in a neutral area where nothing personal or inappropriate can be seen or heard in the background. Ensure appropriate ratios are maintained. The number of adults needed for online lessons will vary depending on the children's age and stage of development, and the activities being carried out (Head of Phase and DSLs will advise of these ratios). For example, if you are using 'breakout rooms' on an online platform, consider how/if these need/will be supervised, especially if students are able to chat with each other.

Contacting children at home
Sometimes staff might need to contact students individually, for example to give feedback on a student's work. This is acceptable but should always be with be with parents and senior team's knowledge and reflected in the school's AUP (Acceptable users' policy) and as per agreed professional protocols. Consider how best to do this in a way that is appropriate and avoids being overly intrusive; at the same time, staff should consider children's wellbeing when students are at home.

School staff should only contact children during normal school hours, or at times agreed by the school leadership team. Ideally use school accounts to communicate via email or online platforms, never teachers' personal accounts. If necessary, staff can use parents' or carers' email addresses or phone numbers to communicate with students unless this poses a safeguarding risk.

If using personal equipment (phones) make sure any phone calls are made from a blocked number, so teacher's personal contact details are not visible (if using a personal number, seek approval beforehand from a senior member of school and immediately delete the number and also let the family know they must do the same).

Any one-to-one sessions should be risk assessed and approved by the school's leadership team.
If staff members are accessing families' contact details at home, ensure they comply with the Data Protection requirements.

Some further guidance is provided below:

Recording:
To record in Microsoft Teams:
1. In the meeting, click 'More options' (the 3 dots) > 'Start recording'.
2. Wait for the recording to start (you will get a notification saying 'Recording has started')
3. When you finish, click 'More options' > 'Stop recording'.
4. Wait for the recording to be saved in Microsoft Stream (whoever started the recording will get an email notification when it is ready to watch).

To record a **live event** in Teams, check the 'Recording available to producers and presenters' setting when you schedule your live stream. You can make the recording available for pupils too, by checking 'Recording available to attendees'. The recording will be available for 180 days after the event ends.
During lessons: create a safe environment.
No matter which digital platform you are using, chat functions can be a distraction from learning and/or lead to bullying. Accept where necessary to support learning chat functions should be turned off.
If students are permitted to chat and comment, set ground rules. Tell students they will be muted, if necessary, i.e., they will be stopped from posting or commenting, if they post anything that is inappropriate or bullying in nature and that the school will follow its behaviour/disciplinary policy if bullying does occur.
Follow these platform-specific steps to help you keep communication focused, safe and happy.
Decide whether you will let students use chat in Microsoft Teams.

To disable chat for students, you need to create a 'messaging policy' in Teams and then assign it to students.

First, **create your new messaging policy**:
1. Log in to the Microsoft Teams admin centre.
2. Click 'Messaging policies' on the left-hand side.
3. Click 'New policy' and give it a name (e.g., 'Disable chat')
4. Select the 'Chat' setting and turn it off.
5. Click 'Save'

Then, **assign this policy to students**:
1. Log in to the admin centre.
2. Click 'Messaging policies' on the left-hand side.
3. Click on the policy you have just made, then 'Manage users'.
4. Search for the user you want to add, click on their name, and then click 'Add'.
5. Repeat step 4 until you have added all your students.
6. Click 'Save'

To disable chat for students during a **live stream**, uncheck the 'Q&A' setting when you schedule your live stream.

How to upload YouTube videos safely

If teachers have a personal account where they have created playlists etc, ask them to set up a separate work account.

When uploading videos to YouTube, ask teachers to: Set their videos to 'Unlisted' so that only people who have the link will be able to see the video. Set the audience as 'Made for kids', so that adverts will not appear at the start of the video, and comments will be disabled (seek further guidance and clarity from Phase DSL and IT Team).

VSE and Transitioning back Face to Face Learning (some additional child protection and safeguarding information to consider):

During VSE, DSLs will ensure to communicate with each other via team meetings and will provide feedback and guidance respectively within their phases and collectively as a school. The Chief DSL will closely work with Deputy DSLs and will take into account any students who are noted as especially vulnerable, with an attempt to try to find some ways to further support them during those circumstances (e.g. keeping links open with those families and students if/as appropriate).

Within school closure and during VSE, some particular safeguarding and child protection issues to consider that might arise could be related to online safety, domestic abuse, peer on peer abuse and emotional health and wellbeing (these are a few examples, the list is not exhaustive). Given some ongoing discussion and research within the area of having a prolonged absence from school, it should be acknowledged that students who return back to school will need to be supported in various aspects, well-being being key in this respect.

Safeguarding Training and Induction

During school closure, DSL training will unlikely take place. For this period, any DSL who has been trained will continue to be classed as trained DSL even if they miss their refresher training. Once school resumes, efforts will be made to ensure training needs are followed up on.

Any new staff who join our school in the midst of school closure and who are supporting with any VSE, there will be a process in place that will be supported by our HR team to ensure that in the interim period, they must comply with certain documentation to submit (i.e. Checklist for Starters where there is a delay in receiving an updated or new Criminal Records Check); this will also include the member of staff confirming that they have read through our Child Protection & Safeguarding policy. HR will continue to be in contact with the Chief DSL to update on any new staff who join our school. The Chief DSL will follow up to ensure that some materials are sent to new staff during school closure (e.g. induction PowerPoint

presentation and key safeguarding messages). Once school resumes, and given circumstances, efforts will be made to make up any induction training session. Once the member of staff returns to school, HR will follow up with new staff to obtain hard copies of all required documentation.

Appendix 4

Local Mapping (Child Protection/Safeguarding)

- This comprises of some information with regards to local legislation, guidance and supportive agencies that we aim to embed as part of our procedures when dealing with **more serious concerns relating to child protection/safeguarding concerns** at our school where a child needs immediate protection.
- There are ongoing efforts to further 'include clarity on legal duties to report any child protection issue to local authorities etc.' See section 8 on 'Sharing Information'.

Designated Safeguarding Leads (DSLs) alerted with the child protection/safeguarding concern.

↓

Chief DSL will immediately inform Head of Safeguarding at School (School Principal).

↓

School Principal to make a decision if the school should seek advice from NAE's Head of Safeguarding. Key staff involved at this stage should only be *DSLs and School Principal, in consultation with Head of Admin if needed*. Decision on next steps will be made depending on the situation/concern.

↓

| School Principal to contact NAE Head of Safeguarding (BAr). Should NAE Head of Safeguarding provide information and advise of getting local authorities involved, School Principal & Chief DSL to update and consult with Head of Admin. (Ada Huang) who has links with the Local Education Bureau and Police. AHu will coordinate next steps. | If the decision is made to instead seek some general advice from local authorities (no details of concern will be shared), Chief DSL & School Principal to discuss with Head of Admin. (Ada Huang), who will contact the Education Bureau for advice we should consider taking. School Principal and DSL/s to discuss appropriate next steps. At this stage, Ada Huang to advise if we should seek advice from Regional Lawyer. | If there is a serious criminal offence, School Principal to coordinate with Head of Admin. (Ada Huang) who will contact the local authorities, i.e. Local Police, Education Bureau. School Principal to keep Head of Safeguarding, Barry Armstrong, informed as soon as possible and w/in 24 hours. |

Appendix 5-Record of Concern Form (to be used for staff who do not have access to CPOMS and/or for students who are attending Summer School/Weekend Academies who are not enrolled in our school)

### <u>Child Protection/Safeguarding Record of Concern Form</u>

Please fill out as many sections as possible with as much detail as you can.
(Always use a pen [never a pencil] or type the document and do not use correction fluid or any other eraser.)

Student's Name:	
DOB:	
Your Name and Post at School:	
Date:	
Time:	
Signature:	

Concern (**Details of Concern/Suspicion/Incident-Emotional, Neglect, Physical, Sexual, Other)**
Were there any linked students (if yes, provide name of the other student/s):

Initial Actions:	Date:	

Note down the name (and role/title) of the member of staff that was alerted:		
Signed:	Date:	
Follow up (to be completed by the Safeguarding Team):	Date:	
Signed by Safeguarding Team:	Date:	
Conclusions/Outcome (to be completed by the Safeguarding Team):	Date:	

Body Marking Record
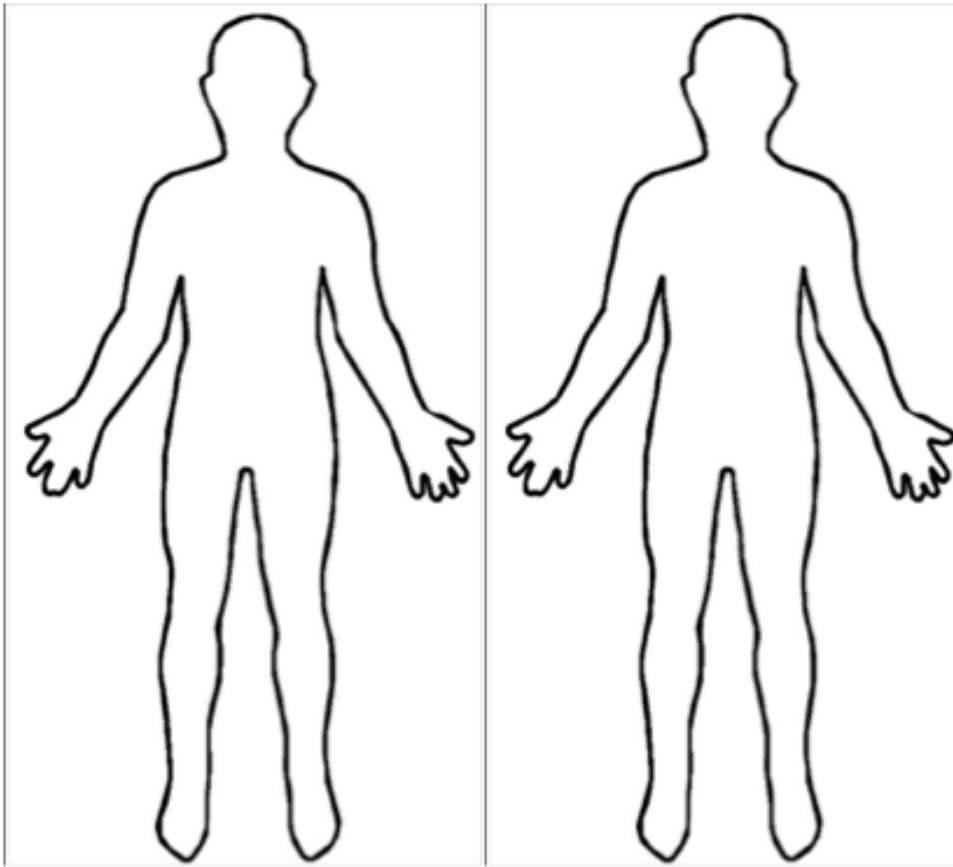
FRONT   BACK

Name of the person completing the body map:

……………………………………………….

Role of the person completing the body map:

……………………………………………….

Date of injury and form being completed:

………………………………………………

Date this form was completed and returned to DSL (if different): ………………………………

Appendix 6: Recording Guidance (iSAMS, Sensitive Information, CPOMS)

Behaviour & non-confidential concerns (ISAMS notes)	Sensitive Information (Year Lead / HOY Record)	Safeguarding and Child Protection (CPOMS)-list is not exhaustive
- Medication - Disruptive behaviour - Friendship issues - Bus behaviour - Parent contact - Fighting - Abusive language (swearing or being unkind) - Refusal to follow instructions or walking away from an adult - Leaving classroom without permission - Damage to property - Persistent uniform concerns - Low level persistent behaviour issues - Personal organisation concerns - Behaviour support or interventions - Persistent homework issues - Multiple Minor Behaviour Incident (MBI)	- Details of confidential medical concerns - Mental health (depending on concern, DSL to decide if this needs to go on CPOMS) - Bullying (DSL to escalate to CPOMS upon further investigation) - Inappropriate language (e.g., threatening nature) - Family circumstances – divorce, separation, new partners, etc. - Inappropriate internet searches (DSL to escalate to CPOMS upon further investigation) - Viewing inappropriate content (consider context and age of child (DSL to escalate to CPOMS upon further investigation) - Bereavement - Sexism - Theft - Intentional injury of others - Abuse (including verbal) or assault against staff - Referral for counselling service as part of a follow up action - Intimate care required - Soiling or toileting concern beyond age-related expectations - Physical intervention required - Notes about parent support where there are concerns	- Neglect - Physical abuse - Sexual abuse - Emotional abuse - Mental health (with safeguarding concern) - Bullying (escalation: reported by YL, HoY), including cyber-bullying, homophobic, faith/religious, racial or any kind of discrimination bullying - Malicious allegations - Radicalization/extremism - Sexual exploitation - Sexualised language - Inappropriate physical/sexual behaviour/interaction - Incidents of self-harm - Possession of weapons - Possession or use of drugs, including alcohol and tobacco products - E-Safety issues (some examples below): - Inappropriate internet searches of an explicit nature - Sharing inappropriate content - Ignoring age restrictions and communicating with unknown adults or other children. - Grooming - Sexting - Domestic abuse - Peer on peer abuse ***List is NOT exhaustive.**
	For all sensitive information, a record should be made on ISAMS – "See HOY/YL Record of Concern" (note type CONCERN)	

Allegations against staff must be reported directly and immediately to the School Principal. Such allegations are not recorded on staff accessible systems such as CPOMS or ISAMS.

If unsure whether an incident is a Safeguarding/Child Protection matter and/or to be shared with YL/HOY, please seek guidance from DSL.

Appendix 7

Child Protection and Safeguarding Policy Signature Page

I (Full Name of Person)

_____

have read and fully understand the terms and conditions of the school's Child Protection and Safeguarding Policy.

I will abide by the regulations and procedures stated in this policy and uphold a commitment to protecting children with/for whom I work.

Signed: _____

Date: _____