



**Nord Anglia Education
Dalian American International School
Dalian Huamei School**

**Guidance and Procedure for Safeguarding, Protecting and
promoting the welfare of our students**

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Section 1.

Introduction and Context

1.1 Our commitment and guiding principles

Nord Anglia Education's unique philosophy is to 'Be Ambitious', which is underpinned by our belief and commitment that all our students will be supported to realise ambition by learning and thriving in the safest possible environment. Our students are empowered 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, Wellness programmes or similar).

Nord Anglia Education and all our schools recognise that having appropriate safeguarding and child protection procedures does not mean that any risk to our students is eliminated. Rather, we expect that all Nord Anglia Education staff, including all staff and volunteers in our schools 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.

We recognise that our schools are particularly important in protecting our students; they are in the best position to identify concerns early and provide or identify help for students as well as helping to prevent these concerns from escalating. Consequently, Nord Anglia Education and all our schools accept and adhere to these basic principles:

- A child's welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'.
- 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.

1.2 Aims and objectives

Nord Anglia Education and all our schools aim to:

- Provide a world class, safe and happy environment to enable students to thrive and learn.
- Outline the systems and processes we all take to ensure that students remain safe at school.
- Raise awareness to all staff of safeguarding/child protection issues and define their roles and responsibilities in reporting possible cases of abuse.
- Identify students who are suffering, or likely to suffer harm.

- Ensure effective communication between all staff on child protection/safeguarding issues.
- Set effective procedures for staff/volunteers or third- party individuals who encounter any issues in relation to child protection/safeguarding to follow.
- Be clear with all parties, including students and their parents/carers, regarding our approach to safeguarding and child protection, through the provision of clear policies.

1.3 Accountability and Ownership

The Child protection Statement and procedures will be endorsed and adopted at the highest levels, both in our schools and in the organisation. They will be adopted by EXCO (Executive Committee) and signed off by the CEO. These procedures will also be applied to any partner agency with unsupervised access to children and young people through their work with Nord Anglia Schools, as well as any contracted organisation working on any Nord Anglia Education school site.

1.4 Definitions

Safeguarding

Safeguarding and promoting the welfare of children refers to the processes of protecting students from harm, preventing the impairment of their 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:

If school's preventative work around safeguarding issues is not appropriate or extensive enough, students identified as being a concern may move to being identified as at risk of significant harm. Although other factors outside of the schools' control may also influence this, the purpose of these procedures is to ensure that Nord Anglia Education takes whatever measures are possible to avoid this from happening.

Section 2.

2.1 Rationale

Our Child protection and safeguarding statement and procedures set out the principles and expectations, as well as the processes, which must be adopted by all Nord Anglia Education schools and the organisation as a whole. The procedures also describe the steps that are taken in meeting our commitment to safeguarding students, at both school and organisational level.

Given our international context Nord Anglia Education recognises and accepts its 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 Nord Anglia Education and our schools under the following Articles of the UN convention:

Article 3: which states that the best interests of children must be the primary concern in decision making about them.

Article 13: which states that children have the right to get and share information as long as it is not damaging to them or another child.

Article 14: which states that children have the right to think and believe what they want and to practise their religion.

Article 19: which states children have the right to be protected from hurt and mistreatment, physically and mentally.

Article 34: which states that Governments should protect children from sexual exploitation and abuse.

Article 35: which states that Governments should take all measures to ensure that children are not abducted, sold or trafficked.

Article 36: which states that children should be protected from any activity that takes advantage of them or could harm their welfare and development.

Article 37: which states that no one is allowed to punish children in a cruel or harmful way.

All member states of the UN have signed up to the 1989 convention, except for the United States of America.

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 has used the safeguarding standards set by the international safeguarding organisation "Keeping Children Safe" to benchmark against; and the UK schools' statutory guidance 'Keeping Children Safe in Education' (September 2021). The procedures are also underpinned by the UK multi-agency guidance "Working together" (Feb 2019) where relevant.

2.2 Related Documents

This overarching safeguarding/child protection procedures manual should be read in conjunction with the NAE recruitment policy, whistleblowing policy, code of conduct for all employees, NAE guidance for safe working practice, the NAE social media policy, allegations policy and any other related policies.

Section 3.

3.1 Organisational and Individual Responsibilities

Nord Anglia Education Senior Management Responsibilities

EXCO, the Chief Executive Officer and the Education Director recognise their ultimate responsibility to ensure that the organisation and all Nord Anglia Education schools understand and follow the guidance provided by this and all other safeguarding related policies.

Principals/Head Teachers and Senior Management Team in Schools Responsibilities

The Principal/Head teachers and senior management team in each school must:

- Ensure that this child protection and safeguarding statement, together with these procedures are implemented across their school and followed by all staff and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and any deputy Designated Safeguarding Lead to carry out their role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the school site is secure.
- Customise these procedures to fit for their particular school and geographical location.
- Ensure that mapping of local legislation (including clarity on legal duties to report any child protection issue to local authorities etc), guidance and supportive agencies is undertaken and added to the school's customised version of these procedures.
- Only deploy staff who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in these procedures.

Responsibilities of the Designated Safeguarding Lead (or Deputy) in a school

Every school will identify at least one named person designated as the Safeguarding Lead (DSL), to support the Principal/Head Teachers on each site. This means that schools with split sites will have more than one Designated Safeguarding Lead. This person/people will: receive appropriate safeguarding training to equip them to undertake their role: be given sufficient time in the working day to undertake the role: and be able to prioritise safeguarding when necessary.

The Designated Safeguarding Lead may in theory, be the Head teacher/Principal of a school. However, as principals tend to spend more time out of school than others and as the role of DSL

requires an element of openness and challenge, in particular, is made more difficult if the DSL is the principal. Additionally, the principal would be subject to the same training and processes as every other Designated Safeguarding Lead. Schools are therefore advised to give careful consideration before choosing the Principal to act as the Designated Lead for Safeguarding and this should be the exception rather than the rule.

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 Lead 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.
- Collate and keep accurate and confidential records of any concerns about children.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All staff have the responsibility to report to the Designated Safeguarding Lead any concern they have about the safety of any child in their care. The Designated Safeguarding Lead's responsibility is to make decisions about what to do next and then to take appropriate action.

Responsibilities on all staff (including partner organisations and contractors having regular unsupervised contact with children (where regular is defined as once a week or more)).

All staff will:

- Ensure they are familiar with and follow this safeguarding/child protection procedures and all other safeguarding related policies e.g. Codes of Conduct, guidance for safe working practice.
- Be subject to safe recruitment processes and appropriate background checks, including prohibition order checks for EU trained staff, prior to starting at the school/organisation (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed).
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL).
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding, safe recruitment and on-line/cyber safety training (and refresher training as required by Nord Anglia Education).

- All staff and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the NAE code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

Please note: For all staff and volunteers who work in one of our British schools, there is an expectation that all will have read part 1 of the UK statutory guidance on safeguarding in schools, "Keeping Children Safe in Education". Evidence of this requirement may be required for any accreditation visit to these schools. This document can be found in the resources section of the safeguarding site on NAU but also through the link below.

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

All staff who have occasional or supervised contact with children (including staff from partner and contracted organisations) will:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- Provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these staff, (appropriate to the role and contact they will have with children), before they commence their role on any Nord Anglia Education school or organisation site. Where these staff or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the Principal/Head teacher/ Designated Safeguarding Lead to assess this risk, not individual members of staff or partner organisations themselves.
- Where partners/contractors do not have their own safeguarding or child protection policy or procedures, Nord Anglia Education will provide a copy of Nord Anglia Education's own statement and procedures and ask partners/contractors to read and follow this. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in these procedures at all times.
- Be provided with guidance on appropriate safe working practice in an NAE school.

Section 4.

Training and Support

Schools supported by colleagues from Central teams will ensure that:

- All staff and volunteers in schools are provided with appropriate general (basic) safeguarding training on joining the organisation and then at least every two years. This training will be available through Nord Anglia University (NAU), as well as face-to-face events. In addition, all staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- These procedures and other relevant policies are made available in a range of relevant languages.
- Staff and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up to date knowledge and that they access appropriate additional (on-line safety training for example and specialist (level 3) training, (approved by the Education Director/Head of Safeguarding). This will be refreshed every two years.
- All staff and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate staff are trained in safe recruitment. This safe recruitment training must be renewed every five years.
- Training for new starters must be complete before any new starter can have unsupervised contact with students.
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counsellors or external agency input. School's should hold information on local, regional or national bodies that may be able to offer direct support in these circumstances.

Nord Anglia Education and our schools recognise our duty of care to our employees and where staff have been involved in reporting and responding to abuse, we recognise that this can be very difficult to deal with in isolation. Nord Anglia Education's schools will therefore be in a position to offer or broker appropriate external support or counselling for any staff member affected by a safeguarding issue. Nord Anglia Education's schools will keep a list of organisations (such as law firms, hospitals and counsellors, which can be made available to staff on request).

Please remember unless you are specifically asked to do so, never carry out an investigation about any suspected abuse before being clear on the legal obligations to refer (or otherwise) to local authorities within your specific country/region. This can be highly specialist work and could interfere with a criminal investigation if this were required and appropriate under local laws.

Section 5.

5.1 Forms of Abuse

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 causing 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 to take part in sexual activities, whether or not the child is aware of what is happening. This form of abuse can involve direct contact activities but also 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.

While the above are the broad four main areas of potential abuse, abuse itself can take many forms involving one or more of these areas.

Organisational and school staff need to be aware of what to look for and what actions to take when concerned about any of these issues (or any other concerns).

Forced marriages (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 recognizes 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.

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. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, 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. In fact, they might not even know exactly why they do it, but 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 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 and isolation or withdrawal.

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 referral to an organisation that may be able to support the student.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff in schools are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing some form of mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware for some children their experiences can impact on their mental health, behaviour, and education. Schools may not have the expertise or resources to address any 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.

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 and game consoles. In these situations, a student could be encouraged to send or post indecent images of themselves.

In all cases the person exploiting students 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 nudes, dirties or pic for pic.

There are many reasons why a student may want to send a naked or semi-naked picture, video or message to someone else:

- 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.

Note:

The above is not an exhaustive list of all the potential forms of abuse which staff may have to deal with on occasions. For information please see “Keeping Children Safe in Education” 2016. This is a UK publication, but the types of abuse discussed are valid and can apply to any country around the world.

5.2 Additional Safeguarding issues

E safety

The continued growth in electronic media in everyday life and an ever-developing variety of devices create 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 the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and

relationship education or wellness programmes. Each school's curriculum includes 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.

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.

Schools may adopt their own social media policy in addition to that of NAE, but these procedures should be seen as the guide to safeguarding both staff and students, in this area and the guidance should be followed at all times.

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.

Adults working in this area must therefore ensure that they establish safe and responsible online guidelines and acceptable user policies. All schools must therefore have an acceptable user's policy. This policy/ guidance must detail the way in which all technologies may and may not be used and identify the potential sanctions for misuse. 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).

Nord Anglia Education and all our schools should:

- have in place an ICT Acceptable Use Policy (AUP).
- self-review E-Safety policies regularly in the light of new and emerging technologies.
- have a clear policy which specifies acceptable and permissible modes of communication.
- ensure 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.

- They should not request or respond to any personal information from the child/young person other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should:

- 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.
- 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.
- Adults should ensure that all communications are transparent and open to scrutiny.
- Adults should 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.

Mobile phone and Camera Images

It is our policy that practitioners, teachers and visitors to our Early Years settings should not use personal mobile phones to take images of children.

In our primary and secondary schools, if personal equipment is used to capture child images, this should be an exception and these images should be uploaded to the schools' system as soon as possible and immediately deleted from personal equipment. Permission to capture images, videos or audio recordings should be sought from the Designated Safeguarding Lead or Head Teacher for the school.

Photographs of Students:

- Photographs of students being used by staff for learning, marketing or any other purpose should only taken on school cameras/devices (any exception to this should require agreement with a member of schools SLT).

- Images taken should be saved on the school's server/database and never uploaded to any personal equipment.
- Staff personal phones should not be used in classrooms and learning areas when students are present except where required as a response to emergency planning.
- Visitors and parents/carers should be asked not to use mobiles devices within the school and/or early years setting, except where permission has been granted to capture images of their own child or children.
- All parents/carers must give permission for photographs (usually through PICS) to be used for any purpose and to sign a disclaimer if they do not wish their child's image to be used.

Allegations against staff and volunteers

(Please see the NAE allegations policy on NAU -

https://university.nae.school/pluginfile.php/27293/mod_glossary/attachment/1939/Allegations%20policy%20%20Feb%2018.docx . You will need to log into NAU to access this).

In short, however.

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.

In the event of an allegation being made against a member of the school staff (or a volunteer helper), it will always be referred to and investigated by the Principal unless a criminal act has been committed, in which case the matter should be referred to the local authorities where appropriate. If the Principal deems the allegation to be of a safeguarding nature (criminal or not) the Head of Safeguarding for Nord Anglia Education must be informed as soon as possible and certainly within 24 hours. 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 and the Regional Managing Director, as well as the Head of Safeguarding and 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.

No action to investigate the concern should be taken before consultation with the Head of Safeguarding and HR, and Group Legal to verify if Legal Privilege is to be maintained, and agreement reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are 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. 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. Each school is expected to have researched and mapped the local arrangements and guidance for dealing with allegations, and these should be reviewed at this stage.

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the Nord Anglia Education code of conduct for staff and volunteers and the NAE guidance for safe working practice.

Whistleblowing

Nord Anglia Education and our schools recognise 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 considered to be a protected disclosure and, even if proven to be unfounded, no action will be taken against the whistle-blower.

Malicious whistleblowing, however, will be seen as a potential disciplinary matter. (see Nord Anglia Education's whistleblowing policy).

Anti-Bullying

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level will 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 and/or be direct from student to student. Each school must have its own anti-bullying policy and approach to restorative practices and all our schools will 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 mean 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 on by behaviours such as bullying but they may not show any outward signs. Communication difficulties, in particular, can make it very difficult for a child to indicate what's happening and, therefore, may make it very difficult to overcome any such barrier. Staff should be extra vigilant and report any and all concerns, avoiding making assumptions about the causes of any injury or behaviour.

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. Both 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. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

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. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation. UK government guidance has been issued in relation to the use of reasonable force and can be used as best practice advice. (Schools may wish to add their own local best practice advice and guidance here if available).

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

The Principal/Head teacher should require any adult involved in any such incident to report the matter to him/her as soon as possible. The staff member is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified where possible.

Where intervention has been required a senior member of staff should 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.

Parents/carers should always be informed when an intervention has been necessary.

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. 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 also occur within their personal relationships, as well as in the context of their home life.

Safe Recruitment and Selection

Nord Anglia Education and all our schools will do all they can to ensure that all those working with students in our schools and across the whole organisation 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. (see Nord Anglia Education's recruitment policy and background checking policy).

Safe Recruitment involves scrutinising applicants through the interview process and application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks.

From July 2017, at least one member of every interview panel at both the organisational and school level, who are interviewing for a post or posts that may have unsupervised contact with children, will have undertaken safe recruitment training. All schools will keep a central record of all the recruitment checks undertaken on all staff. This record will include details relating to the DBS (Disclosure and Barring Service check - for anyone who has lived or worked in the UK only), i.e. date completed and number, other countries criminal records checks or certificates of good conduct, qualifications, prohibition order checks etc.

Where information is disclosed as part of the criminal records checking process, whether this is information about cautions, convictions or soft information, any disclosure will lead to a risk assessment being completed prior to appointment. This risk assessment will be signed off by the Principal or Regional HR Manager.

Single central record.

Best practice for all schools, would suggest that schools should maintain a single central record of all staff pre-appointment checks, as a register. This is more commonly known as the single central record.

The single central record must be created and held by all schools which identify as “British” schools, as this will be one area of focus for any accreditation process.

The central record must cover the following:

- all staff/volunteers, including teacher trainees, agency and third-party supply staff who work at the school.

The single central record must indicate whether the following information has been collected and background checks carried out (and appropriate certificates obtained).

The record must also show the date on which each check was completed/certificate obtained and who saw them:

- Start date of employment
- Role

Identity:

- Name
- Address
- Date of Birth
- Evidence of photo ID, date seen and who checked by. Record what was seen (passport/ driving licence etc). Ideally schools should also see a birth certificate to match against the photo ID

Background checks:

- Evidence of qualification, date seen and who they were checked by. Record “no” if qualifications are not needed for role. Make sure the original certificate proving the qualification is seen and recorded
- EEA/ prohibition order checks, (undertaken by regional HR team on all teachers who qualified within the EU area. Regional HR would need to provide schools with evidence that these checks have been undertaken)
- Section 128 check (Only applies to EU citizens who are taking up positions as Principals or senior leaders). This check is an EU wide check to see if any senior leader who has worked in the EU area, is barred from taking up a leadership position. Regional HR should undertake these checks on school’s behalf.
- Background checks (must cover 10-year period and cover all countries lived in over the last 10 years, include 3rd parties who have regular unsupervised contact with students)

Right to work:

- Visa etc – date seen and who checked by

References:

- There should be a minimum of 2 references. References should be followed up by phone or email to confirm the author, with the date of the follow up recorded.

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.

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 including intimate personal

Staff in schools need to be able to identify concerning sexualised behaviour and know when to refer these concerns to the DSL. Schools need to ensure that staff know how allegations of peer on peer abuse will be recorded, investigated and dealt with in the same way as any other safeguarding or bullying concern.

All schools need to have clear processes as to how victims, perpetrators and any other child affected by sexually harmful behaviours will be supported and a clear statement that abuse is abuse and will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

Staff in school need to understand the different forms peer on peer abuse can take, such as:

- sexual violence and sexual harassment.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, and
- sexting.

Schools with boarding schools have additional factors to consider regarding safeguarding.

Schools that provide such residential accommodation should be alert to inappropriate student relationships and the potential for peer-on-peer abuse.

In assessing and addressing this issue NAE schools are advised to undertake the NAE sexually harmful behaviour audit .

Schools should take a zero-tolerance approach to the issue and include appropriate input through the curriculum to help educate students about a variety of issues related to sexually harmful behaviours including issues such as consent.

All schools need to understand that local procedures should always be followed (where they exist) when dealing with a case of sexual assault or harassment between students.

Remote Learning

6.1 Procedures to be followed by any staff member or volunteer who is concerned about any student

If staff suspect that any student in their care may be a victim of abuse or is at risk of abuse or other form of harm, they should not try to investigate, and inform the Designated Safeguarding Lead (DSL) about their concerns as soon as possible.

Staff must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. 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. 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 follow the reporting procedures shown in Appendix 1.

Where any student makes any form of direct disclosure, the guidelines under the heading 'Dealing with Disclosure' below should be followed.

Please note that for schools in a region where a mandatory duty to report places a duty on an individual, the DSL in the school should still be informed about the concern and in many circumstances will support individuals to undertake their mandatory duty to report.

6.2 Dealing with Disclosure, Reporting and Further Action

General Principles:

Note: Be aware that if a child asks to speak to someone in confidence about a problem, no one should ever 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:

Receive

Where possible always stop and listen to a child who wishes to speak in confidence. 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. 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. Don't ask leading questions. Keep questions open such as... "is there anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.

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. Record the time, date and place as well (see the record of concern form at appendix 2).

Report

Where a child makes any disclosure, or where you have concerns for any reason, it is very important that the procedures outlined in this document are followed. A full written/typed account of the concern (ideally using the form at appendix 1) should be passed to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed body map (which can be found at appendix 2).

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal/Head Teacher in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then consider and where necessary, consult on the information available. It is the role of the Designated Safeguarding Lead 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.

As an International Schools organisation, Nord Anglia recognises the diverse and complex local contexts our schools operate in. Therefore, the following principles are taken into account when following the framework and procedure for disclosure, reporting and further action:

As International Schools 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 these procedures.

Section 7.

7.1 Record Keeping and Confidentiality

Record Keeping

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept together securely and separately from the child's general school records. The information should 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 should not be shared more widely than that.

- Child protection records should be stored in a secure (i.e. locked) filing cabinet or in a secure electronic system, accessible through the Designated Safeguarding Lead (or their deputy) and other senior staff in larger schools to ensure reasonable access.
- Records of any child disclosure should be clearly dated and filed without future amendment.
- Child protection records should be separate to the general education file, but the child's general school record file should be marked to indicate that a child protection file exists (e.g. red star or similar). All staff who may need to consult a child's school file should be made aware of what the symbol means and who to consult if they see this symbol.
- A child protection file (Electronic or otherwise) should be started for an individual child as soon as the school is aware of any child protection concerns about that child. This may arise in a number of ways e.g.:
 - If a member of staff raises a concern about the welfare or well-being of a child – this should be recorded in writing (see below for guidance).
 - If information is forwarded to the school by a previous school attended by the child.
 - If the school is alerted by another agency of child protection concerns about that child.
- Members of staff should make a written/typed account of any concern they have regarding the welfare or well-being of a child, using the school's pro forma. This record should be passed as soon as possible to the Designated Safeguarding Lead. 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 Designated Safeguarding Lead but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from a file (electronic or otherwise) for any reason, a dated note should be placed in the file indicating who has taken it, why and when.
- The record pro forma should include:
 - A record of the child's details: name and grade.
 - Date and time of the event/concern.
 - The nature of the concern raised.

In the case of disclosure, remember to try and make notes on:

- 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.

Confidentiality

Our schools should regard all information relating to individual Safeguarding/child protection issues as confidential and should treat it accordingly. Information should be passed on to appropriate persons only at the discretion of the Principal/Head teacher/Designated Safeguarding Lead and this should always be based on the need to know.

All records relating to child protection should be secured appropriately. Such information can be stored electronically but contemporaneous notes should be scanned and kept in original format.

Section 8.

8.1 Auditing, Reporting, Review and Sign off

To support the implementation of the safeguarding and child Protection procedures and to enable schools to undertake a 'Safeguarding Health Check', schools will be provided with a self-assessment tool to enable review of their safeguarding arrangements. It is expected that all schools will undertake and submit this assessment to the Head of Safeguarding every year. A random selection of schools will be reviewed in more depth. Schools may be supported by the Head of Safeguarding to both complete the assessment and plan actions where necessary.

Elements of safeguarding practice in schools will also be included in the quality assurance framework and will continue to be an element of the school's Health and Safety review and NAE's audit process.

Our child protection statement and procedures are owned by all our schools and are made available to students and parents/carers alike in hard copy where requested, but also through the school's own website and the Nord Anglia Education website. The procedures will be translated into key languages through schools.

These procedures will be reviewed and updated on a regular basis but at least every two years.

Senior staff in schools should adopt and sign the updated procedure document after each update. A copy of the revised procedures should be made available to all staff, volunteers, parents/carers and students.

Signed and dated by the CEO (or delegate)

On behalf of

Nord Anglia Education

Signed and dated by School Principal

Signed and dated by the school

Designated Lead for Safeguarding
