



Nord Anglia Education

Policy and Procedures for Safeguarding, Protecting, and promoting the welfare of our students.

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www.nordangliaeducation.com

Section 1 - Introduction and Context

1.1 Our commitment and guiding principles

Nord Anglia Education's unique Education philosophy is underpinned by our belief and commitment that all our students will be supported to realise their full potential 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 alongside the NAE policy and procedures will be endorsed and adopted at the highest levels, both in our schools and in the organisation. As much as possible they will be adopted by EXCO (Executive Committee) and signed off by the CEO. In as much as it is possible within regional regulatory variations 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:

[UN Convention on the Rights of the Child - UNICEF UK](#)

In addition to Nord Anglia Education's commitment to the UN convention on the rights of the child, Nord Anglia Education has used the UK schools' statutory guidance 'Keeping Children Safe in Education' (September 2025) and the International Child protection standards to benchmark against. This policy and procedures are also underpinned by the UK multi-agency guidance "Working together" (Dec 2023) where relevant.

2.2 Related Documents

This overarching safeguarding/child protection policy and procedures manual should be read in conjunction with other NAE safeguarding related policies including: 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.

Section 3

3.1 Organisational and Individual Responsibilities

Nord Anglia Education Senior Management Responsibilities

All members of NAE's EXCO and Chief Executive Officer recognise their ultimate responsibility to ensure that staff across organisation and all Nord Anglia Education schools understand and follow the guidance provided by this and all other safeguarding related policies.

Regional managing Directors, through their teams and supported by the head of safeguarding will hold responsibility for ensuring that all schools in each region adopt and comply with all NAE safeguarding guidance and procedures and will have oversight of safeguarding incidents and practice in their schools.

Principals/Head Teachers and Senior Management Team in Schools Responsibilities

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

- Ensure that the schools own child protection policy (If different to this NAE document) together with this policy and procedures document and the NAE safeguarding statement are implemented across their school and followed by all staff and volunteers.
- Ensure that the schools child protection policy reflects local arrangements, including local risks specific to the region, agencies and bodies to whom the school must or can liaise in a suspected case of abuse.
- 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 all staff have seen and read the updated 2025 version of NAE guidance for safer working practice (amended where necessary for any regional regulatory compliance requirements).
- Ensure that all staff are aware of the NAE policy for dealing with allegations about staff. (updated 2025)
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the school site is secure.
- Ensure that the school risk assesses activities, trips, and areas in the school. This should include a local areas risk assessment (LARA).
- Ensure that the schools child protection policy reflects their school's geographical location and reflects local arrangements, including identification of any local risks specific to the region.
- 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.
- Ensure that the schools policy identifies those in school with responsibility for safeguarding i.e. Designated safeguarding leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs).
- 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.
- Ensure that principals, RMDs, RSDs, SLT and DSLs understand the need to escalate cases and incidents based on the criteria outlined in this policy. All cases and incidents categorised as “High Escalated” must be escalated to:

RMD, Chief Ed Officer, Group Head of Safeguarding, COO and CEO

- Ensure that as part of the escalation process staff understand the need to categorise incidents in line with the guidance below in table A.

The escalation criteria are as follows:

Note: all “High Escalated” level incidents will be escalated to RMD, Chief Ed Officer, Group Head of Safeguarding, COO and CEO.

Low Existing	An incident that is deemed to be a one-off, may be upsetting for a student (s) but won't have a lasting impact, is not unlawful, and does not involve any outside agencies or parents. Very little risk of negative publicity
Medium	A situation or incident that has been ongoing and is having a detrimental impact on a student/s and/or caused significant disruption within the school. A student (s) may have missed school because of the situation. Parents and possibly external agencies have become involved. Advice may have been sought from the central Safeguarding team and or local legal services or central services.
High	A serious incident, allegation, or situation. This could include situations where a child has been seriously hurt, or at risk of being seriously hurt. An issue that has been life-threatening, including mental health issues such as attempted suicide.
High/Escalated	A serious incident, allegation, or situation which is or could escalate to become unlawful, has or will have a significant detrimental impact on a student or students, is or will be talked about or reported in the local community, nationally or internationally or based on local legal expectations, requires local authority involvement. This must include any situation where a child has been seriously hurt or the issue has been life-threatening, including mental health issues such as attempted suicide or suicides.

Categorisation Table A: Category

NAE Anxiety NAE Depression NAE Other Mental Health NAE - FGM NAE Emotional abuse NAE Drug use NAE Sexual assault including verbal NAE Sexual exploitation NAE Neglect NAE Radicalisation NAE Attendance below 80% NAE Staff to student safeguarding NAE Parental issue	NAE Bullying NAE Racist behaviour NAE Online conduct NAE Online content NAE Online contact NAE Online commerce NAE Trafficking NAE Criminal exploitation NAE Sexual abuse NAE Physical abuse NAE Self Harm NAE Suicide Ideation NAE Eating Disorders NAE Physical interventions by staff NAE Pending category
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Important Please Note:

Principal's and SLT need to ensure that the email system is never used to report or share any confidential or personal information relating to a student either across school or outside school.

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 of the school's sites. This means that schools with split sites will have more than one Designated Safeguarding Lead or deputy 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, child protection and student wellbeing.
- Access 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.
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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. This does not ignore the duties under any mandatory reporting requirements but can simply complement this requirement. Staff holding the concern would still be obliged to refer this concern to appropriate authorities.

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 policy and procedures and all other safeguarding related policies e.g. Codes of Conduct, guidance for safe working practice etc.
- Be subject to safe recruitment processes and appropriate background checks, including prohibition order checks for any staff member who trained and /or worked in

the UK 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 aware of and 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 and any school specific 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 and wellbeing/suicide prevention training as well as any other appropriate training identified by the schools DSL and or SLT (including 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.
- In (name of school)
the Designated Safeguarding Lead(s) is..... (name of DSL and any deputy)
and they can be contacted on..... (insert contact number/email/office location).

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.

[Keeping children safe in education 2025](#)

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, policy 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.
- All DSLs and deputy DSLs must undertake the NAE higher (level 3) face to face safeguarding training, usually delivered on a regional basis. This training should be refreshed every two years.
- All staff and volunteers are subject to a full formalised induction, which includes an overview of what to do and who to contact if concerned about a student. Completion of this should be recorded on the staff personal file.
- 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. Schools 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 note unless specifically asked to do so, never carry out an investigation about any suspected abuse before being clear on the legal obligations to referring (or otherwise) to local authorities within your specific country/region where they exist. 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

(Note this is not an exhaustive list merely examples of things to consider)

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 to a course of action or referral to an organisation that may be able to support the student.

Mental Health/Wellbeing

Nord Anglia is committed to the Wellbeing of young people. Data tells us that more and more children are reporting significant wellbeing and mental health issues.

Our schools need to be able to recognise and act appropriately for students whose wellbeing is suffering especially where this is having a negative impact on any student.

Training and support are available to all schools through the resources in NAU much of which is provided for us by specialist organisations. Schools should also identify training and support which meets the needs of young people in their setting.

Additionally, 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.

Affluent Neglect

What is Affluent Neglect?

Affluent neglect refers to the neglect experienced by children in wealthy families. Often, neglect in wealthier families can be more difficult to spot, as the type of neglect experienced by children and young people in these circumstances is often emotional.

There are a huge number of risks that face children from all walks of life and being a child in an affluent family is often perceived to protect those children from some of these dangers. In reality, children from affluent families aren't as sheltered from neglect as some of us may think.

In wealthy families, it can be the case that parents work long hours, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling lonely, with their emotional needs unfulfilled by their parents.

It has also been suggested that as well as not spending quality time with their children, affluent parents may put a high amount of pressure on their children to succeed academically, which can sometimes lead to psychological and emotional problems for children.

There are several barriers that may prevent children, from more affluent homes, who are experiencing these types of neglect from accessing the support they need. Firstly, their symptoms of neglect may be harder to spot. The nature of emotional neglect can make it much harder to identify than other types of neglect. For example, due to the family having hired help to care for the children they may present as clean, tidy, well-dressed, and properly fed when they are actually experiencing emotional neglect.

Also, staff training often focuses on case studies looking at children from poor or working-class families, so staff in educational settings may not be adequately trained to identify and intervene with cases of neglect among their wealthier families.

It is also often the case when working with poorer families that they are already known to external agencies, so it is easier to know who to look out for. The same cannot be said for wealthy families, as often they are not 'on the radar' of external services (where these exist). Even where external agencies do exist, there may also be increased hostility towards these agencies from more affluent families, making it more difficult to improve outcomes for children in these circumstances.

There is also a case to be made for the role of unconscious bias when working with children from wealthier families. Schools and school staff may miss important pieces of the puzzle when they assume that children from wealthy families are less at risk than those from poorer backgrounds. These children may be coming in with new clothes and fancy designer labels – not signs you would usually associate with a case of parental neglect.

It can be even harder to identify and intervene in neglect cases when a child is attending boarding school, or their parents are living out of the area or even overseas. This adds another layer of complexity and can prove challenging, not only for identifying home issues but also for communicating with parents to improve outcomes for the child.

What is the potential Impact?

The emotional neglect and lack of supervision sometimes faced by children from affluent families are considered to be adverse childhood experiences (ACEs) [What are ACEs?](#). ACEs can affect brain development and change how a person's body will respond to stress. They have a lasting impact on an individual and the consequences of these adverse experiences can lead to long-term mental and physical health problems, as well as substance misuse and addiction in adulthood.

ACEs are preventable and by ensuring staff in your organisation are trained to spot affluent neglect, and have the appropriate tools to report, record, and manage these concerns, your organisation can be proactive in improving outcomes for this often-overlooked group of young people.

By preventing ACEs from occurring, your organisation will be able to lower the risk for serious and long-term health conditions such as depression and cancer in adulthood. They will also be able to intervene and reduce behaviours like smoking and heavy drinking, improve a child's

ability to thrive at school, and ultimately prevent ACEs from being passed from one generation to the next.

Some fundamental steps for ensuring no child (no matter what their background) goes unseen:

- Ensure staff regularly receive up-to-date, good quality, and thorough safeguarding training.
- Encourage staff to identify and question their own unconscious biases.
- Put in place robust and easy-to-use safeguarding reporting systems.
- Create a culture in your organisation that puts safeguarding first.

Managing Cases of Affluent Neglect

Farrer & Co (UK legal Firm) have created a helpful document to support schools in handling cases of affluent neglect.

You can find it [here](#).

They suggest you create a whole school environment which is “trauma informed”

A school environment which is trauma informed assumes that an individual is more likely than not to have a history of trauma and that, without interventions and supportive factors in place, the cycle of ACEs, trauma and adversity, is more likely to continue in future generations.

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”

(2025 latest version). 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

In the 2025 edition of "Keeping Children Safe in Education," online safety is divided into four main areas: **Content**, which covers harmful or inappropriate material; **Contact**, focusing on interactions with potentially harmful individuals; **Conduct**, addressing behaviours like cyberbullying and online harassment; and **Commerce**, which deals with risks related to online transactions like scams.

Additionally, it's crucial for schools to understand emerging AI-related risks, such as AI-driven misinformation, privacy concerns, biased or unethical outputs, and the rise of deepfakes.

It is important that schools spend time to understand these online risks to young people and ensure that staff receive proper training. Equally, curricula should be developed to help students navigate the online environment safely.

- **Deepfakes and Misinformation:** Deepfake technology can create highly realistic, but fake, videos and audio recordings. These can be used to spread false information, leading to potential harm to students, such as reputational damage or emotional distress. For example, a deepfake video could falsely depict a student in a compromising situation, which could lead to bullying or emotional harm.
- **AI-Generated Grooming and Predation:** AI can be used to create convincing fake identities or chatbots that mimic real people. This can lead to the grooming of students online, where predators use AI to manipulate or exploit young people. For instance, an AI-driven chatbot could engage a student in seemingly harmless conversation, gradually leading them into risky situations.

Internet filtering and Monitoring

This needs to be an increased focus on online safety and ensuring that staff in schools understand what **filtering** and **monitoring** is, and that it is in place to prevent children accessing inappropriate and harmful content online while pupils are in school. This is a clear safeguarding and welfare concern and not just a matter for the IT team. The DSL should take lead responsibility for understanding the filtering and monitoring systems in place at the school.

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). A template is available from NAE.
- 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 this policy and 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 be 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 for full detail)

In short:

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.
- Where someone has behaved or may have behaved in a way that indicates they may not be suitable to work with 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 Group 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/or the Chief HR Officer 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 Chief HR Officer should be informed.

For serious allegations, in addition to the above, the matter must always be reported as soon as possible to the Chief HR Officer, the Chief Operating Officer and the Chief Executive Officer.

No action to investigate the concern should be taken before consultation with the Head of Safeguarding, HR colleagues, RMD and where necessary Group Legal have been consulted (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 in certain circumstances. 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.

All schools should take account of and adopt the NAE safer working practice guidance. This document should be amended where necessary to take account of local regional restrictions. The guidance should form part of any new members of staff's induction and should also be made available to all existing staff and all those with unsupervised contact with students including 3rd parties. (Abridged versions can be created for 3rd parties).

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.

It is essential that schools fully understand the additional needs of their young people and ensure that appropriate provisions and support mechanisms are in place. Failing to do so could be seen as neglectful, as it can lead to educational disadvantage for these students, preventing them from reaching their full academic potential. By prioritising understanding and support, schools will create a more inclusive and equitable learning environment for all students.

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

[Prevent duty training](#)

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).

[DfE advice](#)

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.

When a physical intervention is required, it is vital that a senior member of staff debriefs the student involved, allowing them the opportunity to describe what happened. This account should be included in the recording of the intervention. It is also important that the student receives a medical check and that their parents are promptly informed about the incident.

It is essential to maintain thorough records of every physical intervention, documenting details such as the students involved, the staff members present, and the circumstances. Regular reviews of these records should be conducted to identify patterns and work towards reducing the need for physical interventions in the future.

All physical interventions should be recorded on CPOMS or iSAMs, and it is crucial that such incidents are treated with the utmost seriousness.

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 (except in the USA where this will be 7 years), as well as some additional recruitment checks.

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 record of all the recruitment checks undertaken on all staff. This record will include details relating to the DBS (Disclosure and Barring Service check or ICPC 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.

Please note that the requirement for background checks applies to any adult whom a school allows to have regular unsupervised contacts with their students. This therefore also includes any 3rd party or contractor, including bus drivers, security, catering, cleaners etc.

Where 3rd parties are provided by an external company, for these staff it would be sufficient for the company to provide a letter of confirmation to say that all staff deployed to our school hold clear background checks and they should provide us with reference numbers as confirmation rather than copies of the checks themselves.

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

It is a mandatory requirement for UK based schools to keep a single central record (which is a comprehensive record of all recruitment checks). This register can however be seen as a model of best practice for any school.

Additionally, the single central record should be created and held by all schools which identify as "British" schools, as this will potentially 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.
- Prohibition order checks, (undertaken by regional HR team on all teachers who qualified or worked in the UK. (Regional HR would need to provide schools with evidence that these checks have been undertaken)
- Section 128 check (Only applies to UK citizens who are taking up positions as Principals or senior leaders). This check is undertaken on any individual taking up a leadership position in one of our schools. Regional HR should undertake these checks on school’s behalf.
- Background checks which must cover 10-year period (except in the USA) 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 abuse and 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 care.

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.

Available here:

https://www.nordanglia.university/lms/index.php?r=course/deeplink&course_id=1763&generated_by=13045&hash=28f3086a52dc9a250e90459409040b154d388a4e

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.

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 use the record of concern form at appendix 1 and the body map at appendix 2 (if appropriate), to make a report to the Designated Safeguarding Lead.

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 account of the concern 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 possible all schools should adopt and use one of 2 electronic safeguarding software systems to support safeguarding reporting and monitoring in then school. These systems are either IASMs wellbeing manager or CPOMs.

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.

Schools are reminded that they can seek advice or guidance from the Group Head of Safeguarding for NAE: Robert Leigh; Robert.leigh@nordanglia.com.

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.

For this reason, we want all schools to adopt where possible, one of the recommended safeguarding software systems mentioned above.

Over 2024 all schools should be using one of the preferred software system, not just because they are more secure but also because the central safeguarding team needs to be able to collect safeguarding data from schools to report on to both EXCO and the board. This will enable both EXCO and the board to have oversight and perform governance functions around safeguarding in our schools.

- Child protection records should be stored within the secure electronic system or as a minimum in a secure (i.e. locked) filing cabinet if still in transition to a secure electronic system. All information should only be accessible through the Designated Safeguarding Lead (or their deputy) and other senior staff as appropriate.
- Records of any child disclosure should be clearly dated and kept without future amendment.
- Child protection records will be separate to any 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 report of any concern they have regarding the welfare or well-being of a child, using the school's system and pro forma. This record should be passed as soon as possible to the Designated Safeguarding Lead or entered into the software system as soon as possible. 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.
- Any written pro forma should include (see appendix 1):
 - A record of the child's details: name, date of birth, address, and family details.
 - Date and time of the event/concern.
 - The nature of the concern raised.
 - The action taken and by whom: Name and position of the person making the record.
- 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 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.

Never share this or any other confidential or personal student information on email.

Section 8

8.1 Auditing, Reporting, Review and Sign off

To support the safeguarding and child Protection agenda and to enable schools to undertake a 'Safeguarding Health Check', schools will be provided with a self-evaluation tool to enable an annual review of their safeguarding arrangements. It is expected that all schools will undertake and submit this evaluation together with proposed actions for improvement to the Group Head of Safeguarding every year. A random selection of schools will be reviewed in more depth. Schools may be supported by the Regional safeguarding directors or Group Head of Safeguarding to both complete the evaluation and plan actions where necessary.

Elements of safeguarding practice in schools will also be included in the safeguarding quality assurance framework and reviews 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. This policy and procedures document will be translated into key languages as appropriate through schools.

This policy and procedures document will be reviewed and updated on a regular basis but at least every three 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

Appendix 1

Exemplar Record of Concern Form

Student's Name:		
Student's Address:		
DOB:		
Is the student aware this form is being completed	Yes	No
	..	..
If not, why not?		
If yes, student reaction		
Your Name:		
Date:		
Time:		
Signature:		
Concern:	Date:	
Signed:	Date:	
Initial Actions:	Date:	

Signed:	Date:	
Follow up:	Date:	
Signed:	Date:	
Conclusions/Outcome:	Date:	
Signed:	Date:	

Appendix 2.

Body Map Guidance for Schools

Body Maps should be used to document and illustrate visible signs of harm and physical injuries. These should be drawn up and sent to the Designated Safeguarding Lead at the same time as completing the record of concern form at appendix 1. Even if the injury to the child has a plausible explanation, a completed body map helps track a history or pattern of repeated injuries. A copy of the body map should be kept on the child's concern/confidential file.

Always use a pen (never a pencil) or type the document and do not use correction fluid or any other eraser.

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. Body maps such as those shown below should be used. If you notice an injury to a child, try to record as much of the following as possible in respect 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 as a result 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?

Importantly the date of the recording must be noted as well as the name and designation of the person making the record. Add any further comments as required.

Where any child has any form of injury that requires attention, please ensure that first aid is applied where necessary.

Name of the person completing the body map:

.....

Role of the person completing the body map:

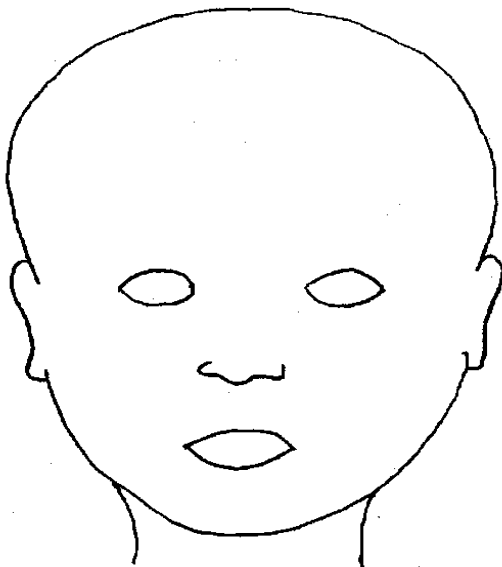
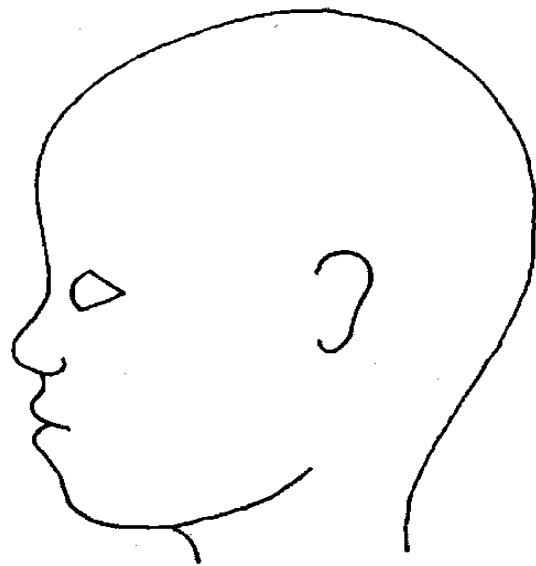
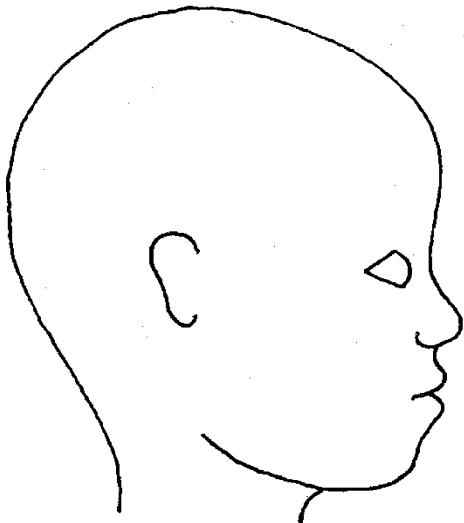
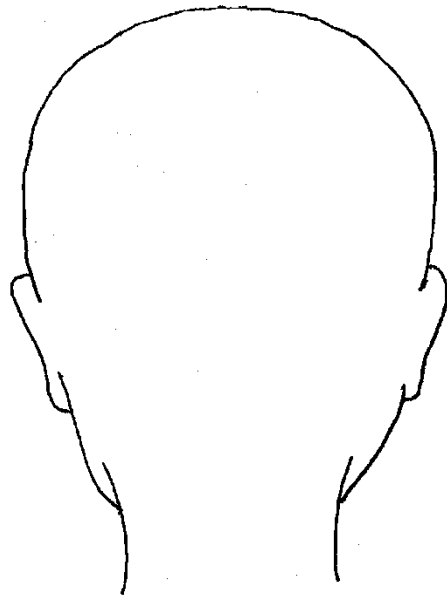
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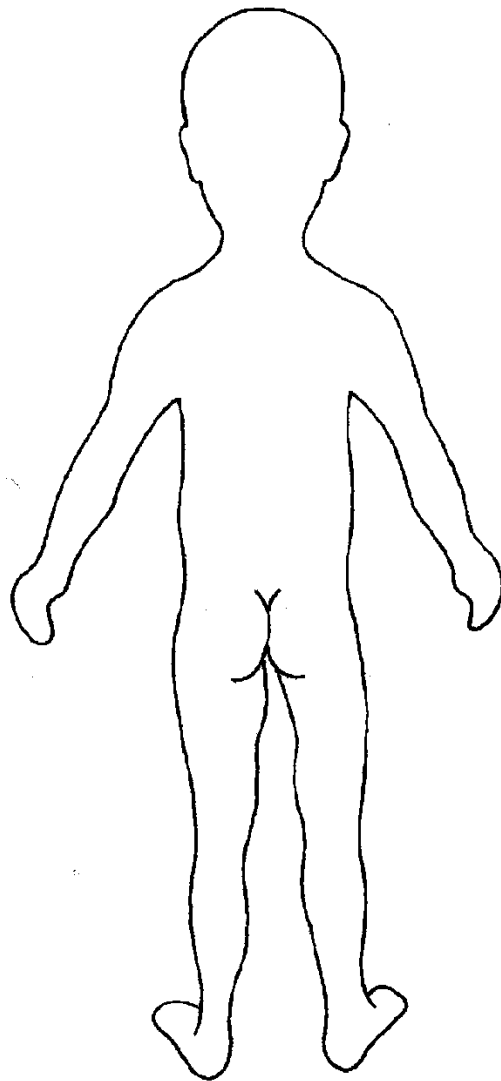
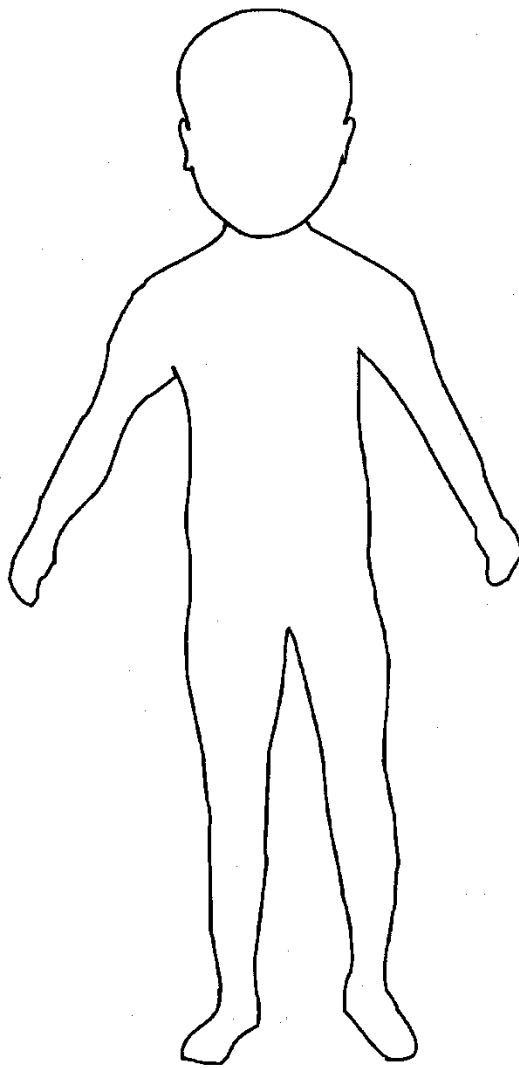
Date of injury and form being completed:

.....

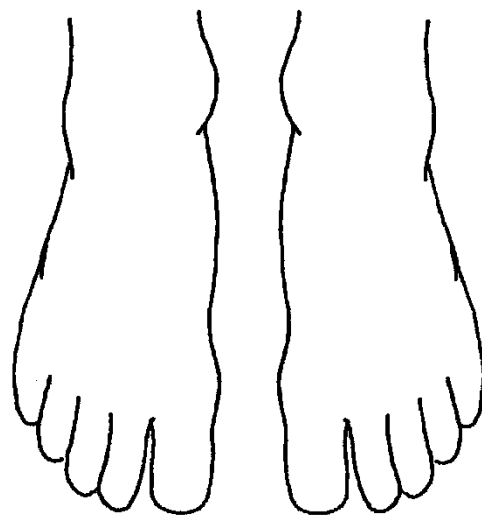
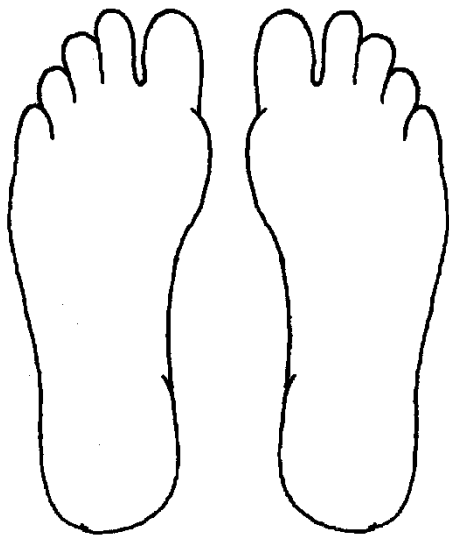
Date this form was completed and returned to DSL (if different):

.....

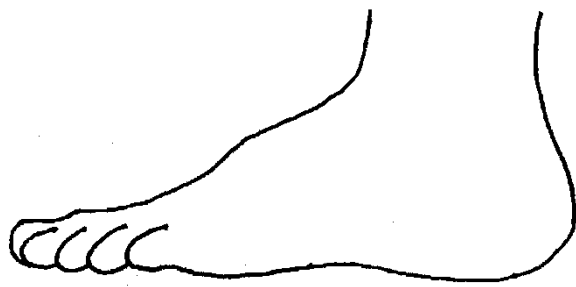




Sole of Feet



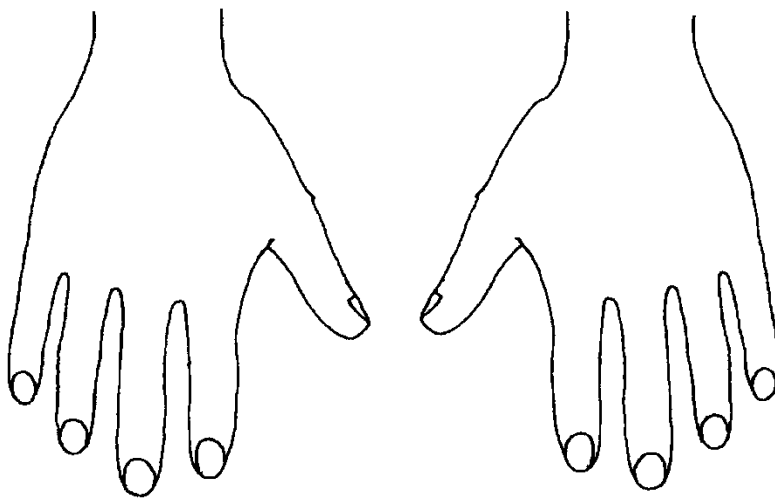
Top of the Feet



Left Foot



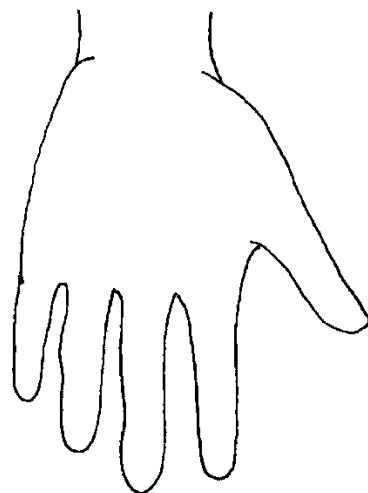
Right Foot



top of hand



Palms



Appendix 3

In the unlikely event of having to return to on-line teaching this guidance will also apply

Direct Communication with Students

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.

With developments through our Ed tech strategy and our education strategy it is likely that the provision of remote education will be here to stay for some at least if not all and given this on top of all our other procedures the remote provision for our students needs to be thought about in the context of safety as well as quality.

The following are some straight forward points to consider and follow in all our virtual /remote communications and interaction with students. This guidance is not exhaustive by any means.

In the physical surroundings of a school building there is normally no need, and we would avoid one-to-one video or chat with single students, as this is unnecessary because teachers have regular direct contact with students anyway.

With remote schooling however, the ability to use both video and to be able to chat with students through remote platforms becomes important.

This type of one-to-one contact is acceptable to support an interactive learning experience but to be done safely requires some basic rules to be observed.

It is important to recognise that the NAE code of conduct and the NAE guidance for safer working practice (<https://intranet.nae.school/Document-Library/Safeguarding/Guidance-for-Safer-Working-Practice>) should remain as the go to guidance in all interactions with students and families but as a quick guide, the following are some simple pointers to consider.

For staff:

- During lessons, video calls or chat what- ever device is being used, this needs to be managed appropriately. For example, ensure that any non- work-related applications files or apps are closed. Avoid the use of emojis and GIFs.
- If recording any lesson/video call. This is permissible, as long as parents of the students involved are aware and happy with the recording happening and any recording is made on or only uploaded to NAE business systems. Recording sessions should only take place when necessary to meet specific learning objectives.
- Remember that normal professional boundaries apply. This means that we need to think about how we dress and the environment we use to deliver our lessons from. Learning may be provided through a virtual environment, and we may be working from differing locations, but we are still “at work.” Students and their parents expect us to remain professional in all our engagements with them. This should mean that when delivering virtual lessons, we ensure that the room used is fit for purpose. It would be less than ideal to deliver a lesson to a class group, with our laundry strung out in the background!
- During the corona virus restrictions on our schools or with any other issue that means we are providing a remote education, we use a variety of platforms to support our work. Whichever platform we use, contact with students should be planned and ideally timetabled, much like a normal school environment. We should avoid calls and lessons to students on an ad hoc basis. By timetabling contact with students and by this being agreed with SLTs, we avoid the potential for any ad hoc contact, and we help to protect ourselves.

- As much as possible parents should be made aware of the lesson/contact timetable, so they can ensure that their students, especially the younger students, know when and how to join in.
- As much as possible we should avoid the use of personal mobile phones. Contact using school online platforms, for example, allows monitoring and therefore protects teachers. Where phone calls to students are necessary, these should be coordinated and agreed through SLT members and the reasons and objectives for the call agreed.
- Where mobile phones have been used to contact students in a crisis, colleagues should ensure that any student's personal numbers stored in their personal phones or other personal equipment, are deleted.
- Avoid the use of personal social media platforms (unless with good controls – see below). Do not accept requests from or send any friend requests to students. All continued virtual contact should be through platforms that SLTs in your schools have approved.
- Concerns about the safeguarding or wellbeing of any of our students should be dealt with in the same way as if we were all in the physical school environment. All concerns should be referred to your school's DSL/wellbeing lead or their deputy, as soon as possible.
- 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 a potential wellbeing issue.

For Students:

Undertaking lessons remotely should be as much of a positive experience for our students as any other form of learning offered.

This means that we should expect a professional approach to teaching from our staff but also that we expect high standards of behavior and engagement from all our students which means observance of the basic requirements for the safe, efficient, and congenial running of the virtual school. This includes 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 that we expect all our students to follow:

- Bullying or discrimination of any form will not be tolerated and will be addressed through the school's behaviour policy.
- School uniform: While there is no expectation that students will wear a uniform to attend virtual lessons, all students should join lessons properly dressed and ready to learn.
- Punctuality: All virtual lessons will be appropriately timetabled, and all students made aware of this timetable. It is the students and their parent's responsibility to ensure that they join these lessons on time and ready to learn.
- Sickness and other absences: Sickness should be reported to tutors at the earliest stage possible and ideally on day one of any absence. Reporting of illness should be through parents to tutors directly.
- As with the physical environment of school buildings, 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. Tutors would need to make contact with the parent/carers 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 registered schools behaviour policy.
- It is recognized that repeated or extreme behaviours can be a symptom of a student experiencing emotional difficulties and where this is the case every effort will be made to support the student and their family.

Streaming and Recording Live lessons

Acceptable Users Policy

All schools must have in place an acceptable user's policy. This policy should make clear the expectations on staff, students, and parents in relation to the safe and appropriate use and access to Nord Anglia's virtual education experience. In addition, this policy should make clear to parents and students that there will be occasions when lessons will need to be recorded and shared with others.

Livestreaming and recording sessions.

Staff should 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.

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. This is acceptable so long as this is done with data protection and safeguarding in mind.

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.

Your schools AUP (acceptable users' policy) should make clear that 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.

staff should be reminded of the guidance for safer working practice and /or your schools code of conduct and provided with clarity on how they should be expected to behave/dress.

Most lessons will be streamed from (or recorded in) a classroom environment but If lessons are recording or live streaming 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.

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 your schools AUP (Acceptable users' policy).

Staff should also think about how your staff will check on children's wellbeing when students are at home. Consider how best to do this in a way that is appropriate and avoids being overly intrusive.

School staff should only contact children during normal school hours, or at times agreed by the school leadership team.

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

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.

Appendix 4 - Safeguarding Standards

PURPOSE

This guidance is intended to support all schools within the Nord Anglia Education (NAE) group in delivering and sustaining high-quality provision that ensures a safe and nurturing environment for students. It is designed to safeguard students in the broadest sense, promoting their wellbeing, supporting their holistic development, and protecting their rights.

It is important to note that this guidance does not replace or supersede the Nord Anglia Education Safeguarding Policy, which remains the overarching and most authoritative policy across all schools.

Instead, this document is designed to accompany and strengthen the implementation of that policy by providing a shared framework that supports consistency, encourages best practice, and fosters continuous improvement.

While this guidance outlines a common approach, it is not intended to standardise practice or constrain the creativity that characterises many of our schools. We encourage schools to use this document alongside local policies and frameworks to ensure relevance and alignment with their specific contexts.

The twelve standards are each introduced with a statement that defines “What we are trying to achieve.” Beneath each standard, a set of implementation points provides clear guidance on how schools can embed key principles and practices, and how they can demonstrate evidence of meeting the standard.

Please note, these standards represent baseline expectations, and we encourage and expect schools to continually strive to exceed them.

Standard One- safeguarding culture and leadership

What are we trying to achieve: We want all NAE schools to be safe, open environments where children are empowered to reach their full potential. It is essential that the leadership of the school actively champions the welfare of young people by fostering a culture of vigilance, student participation and professional curiosity. Leadership should also commit to continuous improvement and utilising quality assurance processes, such as the safeguarding self-assessment audit, to enhance standards each year.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- The school promotes a culture where safeguarding and promoting the welfare of children is embedded in all aspects of school life.
- The school has clear, accessible and regularly updated policies and procedures which are understood and followed by permanent, temporary and contract staff.
- All staff, including temporary, voluntary, and support staff, understand and implement the school's safeguarding policies and procedures.
- Safeguarding is prioritised in school improvement planning, leadership meetings and performance management.
- It is clear to all students, staff, parents and visitors how to raise a concern, with multiple accessible pathways available. The school actively works to reduce both physical and cultural barriers to reporting. Concerns, complaints and suggestions are responded to as promptly as possible, with issues and outcomes recorded.

Standard Two- safer recruitment

What are we trying to achieve: Safer recruitment practices are vital to ensuring that all adults working with, or who have any contact with our children and/or their information are trustworthy and safe. We expect schools to undertake all reasonable and practical measures to thoroughly assess individuals who may interact with our students, including contractors, volunteers, visitors, and parents.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- All adults working with children are subject to rigorous safer recruitment checks prior to appointment, including police checks. Details of which are documented within the NAE safer recruitment policy. **
- The school maintains an accurate and up-to-date Single Central Record of recruitment and vetting checks.
- Staff members responsible for recruitment receive training in safer recruitment practices.
- Induction for new staff includes safeguarding and child protection as a fundamental component.
- The school's leadership ensures that no adults have regular, unsupervised contact with children unless and until they have successfully completed all required safer recruitment checks.

Standard three- Designated Safeguarding Leadership

What are we trying to achieve: The designated safeguarding lead (DSL) plays a critical role in safeguarding children and proactively promoting a safe and positive school environment. It is essential that schools allocate sufficient time, resources, and authority to enable DSLs to fulfil these responsibilities effectively. While the DSL is central to safeguarding efforts, their role extends to supporting all staff in understanding *their* responsibilities and ensuring a collective commitment to student protection and well-being.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- The school has a Designated Safeguarding Lead (DSL) with the appropriate authority, dedicated time, training and support to perform the role effectively.
- A clear safeguarding framework is in place, with designated deputy DSLs (DDSLs) available to assume responsibilities in the absence of the lead DSL.
- The DSL and DDSLs complete Level 3 NAE Safeguarding training, with refresher updates every two years. In addition, they engage in ongoing professional development and regularly participate in safeguarding updates, including regional Community of Practice (CoP) meetings, to ensure their knowledge and practice remains current.
- The DSL takes the lead in implementing a whole-school approach to safeguarding, collaborating with school leaders, curriculum leaders, pastoral staff, and external agencies as appropriate to ensure comprehensive student protection.
- The DSL is responsible for reporting any concerns related to the safety of young people to the principal or Head of School. The principal is required to take immediate action to safeguard children. If this does not occur, DSLs must escalate the matter by contacting the Regional Safeguarding Director or, if they are unavailable, the Group

Head of Safeguarding.

- DSLs should conduct regular meetings to review cases and address general safeguarding and child protection matters.
- DSLs must use data and the evidence available to anticipate issues and track evolving trends. This should be recorded in the regular DSL /DDSL meetings. DSLs must utilise data and available evidence to identify potential issues and monitor emerging trends. These insights should be documented during regular DSL and deputy DSL meetings and discussed with the Regional Safeguarding Director as appropriate.



Standard four- Training and development

What are we trying to achieve: Nord Anglia Education is committed to safeguarding children and prioritising student welfare and wellbeing. Given the complex and evolving nature of safeguarding risks, it is vital that DSLs, staff, and the wider organisation remain informed about the contexts in which students live and learn.

Schools should identify local risks and provide appropriate training that builds staff capacity. From core safeguarding awareness for all staff to more specialised, role-specific training for those in leadership, pastoral, or high-risk roles. This ensures everyone is equipped to protect and support students effectively.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- All staff receive safeguarding training on induction, and every three years. Regular updates are delivered at staff meetings and on professional development days.
- Training should include recognising physical and behavioural signs of abuse, responding to disclosures, and understanding specific safeguarding risks, such as child sexual exploitation, radicalisation, and child on child abuse
- Staff receive training and guidance on how to support children in the digital environment, including recognising and responding to online harms.
- All staff working with children must have a clear understanding of key safeguarding concepts, including child-on-child abuse, harmful sexual behaviours, bullying, racism, and exploitative relationships. School leadership is responsible for regularly assessing staff understanding to ensure ongoing awareness and effective safeguarding practices. This will be supported by the regional and central safeguarding teams.
- The school evaluates the impact of training and tests the staff attitude, skills and

knowledge to safeguarding. It does this at different times and in different contexts, and not just at times of crisis or when incidents have occurred.

- Staff with specific roles, such as school nurses, PE teachers, nursery assistants, and other designated personnel, should receive tailored training to ensure they understand what safeguarding means within the context of their responsibilities.

Standard FIVE- Student voice and participation

What are we trying to achieve: Evidence and best practice demonstrate that involving young people in their own environments, both in learning and living spaces, significantly enhances their safety and well-being. This includes enabling them to make suggestions, raise concerns, influence school life, and disclose important issues. Such involvement must be meaningful, with clear evidence that it occurs consistently and across all areas, fostering a culture of open communication and active participation

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- The school actively seeks the views of children on matters that affect them, including (but not limited to) safeguarding, risk, wellbeing, food, and recreation.
- School Leadership actively promotes a culture of mutual respect, ensuring that students feel empowered to participate and that their views are valued and considered.
- All adults in the school should actively promote the idea of student participation and voice and seek ways in which to embed this within their scope of work.
- Children are involved in shaping safeguarding practice and risk management through feedback groups, involvement in policy development and review, surveys, school councils, and peer-led initiatives.
- The school respects, listens to and acts upon student concerns in a timely and transparent manner, including responding to escalations.
- The school offers simple, accessible, and engaging channels for children to make complaints, provide comments, report concerns or abuse, and share information about their lives. This should include access to trusted adults within the schools.
- School leadership should provide an independent person whom students can contact freely. This individual should act as an advocate, supporting students in raising concerns or seeking guidance.

Standard six- online safety

What are we trying to achieve: The online and digital environment are very real places that children and young people occupy. They present significant risks to young people, including targeted exploitation by adults, scams, AI-related crime, and media content that can impact their well-being. These risks can manifest as immediate incidents or be cumulative, having long-term effects on mental health. Given the complex and culturally specific context of the area, it is crucial that schools understand these risks and actively support students in navigating the digital world. Schools must ensure they do not normalise or downplay these dangers, maintaining a proactive approach to safeguarding in digital spaces.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- Digital safety is embedded across the school's safeguarding strategy, curriculum and policies ensuring consistent awareness and protection for all students, staff and parents at all times and in all areas.
- The school employs robust filtering and monitoring systems to protect children from inappropriate or harmful online content. Data from these systems must be used to inform and shape the digital safety curriculum and safeguarding practices.
- Staff, students, and parents receive age-appropriate training on online risks including grooming, exploitation, cyberbullying and misinformation, to promote awareness and foster safe digital engagement.
- The school promotes a balanced approach to digital wellbeing, encouraging safe, respectful and responsible use of technology among all members of the school community.
- School staff actively implement policies, systems and school rules to safeguard children in the digital environment. Online safety is recognised as a manageable priority and not an "impossible problem to tackle."

Standard seven- curriculum and safeguarding education

What are we trying to achieve: Evidence indicates that educating young people about risks in their lives significantly reduces those risks. It is essential that this education is delivered through engaging and diverse methods, with the school actively monitoring students' attitudes, skills, and knowledge. When staff recognise risky behaviours, they take appropriate action to support and work with children to mitigate these risks. Schools with boarding facilities understand the additional challenges of living away from home and provide staff with targeted training to address these specific risks.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- The curriculum provides opportunities for children to learn about personal safety, healthy relationships, consent, and understanding risk, fostering their wellbeing and resilience.
- Safeguarding themes are embedded across the curriculum and revisited regularly, not solely within specific curriculums such as PSHE.
- Children are taught how to seek help, make informed decisions, and manage their own safety – both online and offline.
- Curriculum planning reflects the diverse needs and experiences of students, helping to reduce vulnerability and promote resilience.

Standard eight- responding to concerns and allegations

What are we trying to achieve: Serious case reviews, lessons learned and our own organisational experiences tell us that, the way a school or children's service responds to allegations and concerns has a significant impact on the safety of students, staff and the organisation. It is essential that all Nord Anglia schools understand this link and put policy process and practice in place and actively promote this culture. The leadership of the school should follow any NAE guidance on allegations and escalations. We must never let culture get in the way of following NAE and school policy.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- All staff have a basic understanding of the issues and risks that young people face at school, in the community at home and online.
- The school provides, and actively promotes, a reporting and recording system which gives the best possible chance of collecting both small, and significant concerns about students and adults. All staff have access to this and actively contribute (this is tested and checked by the leadership team regularly)
- Staff have a basic understanding of how to handle disclosure and what to do.
- Records of concerns and decisions are clear, accurate, securely stored, and shared appropriately.
- All safeguarding concerns, disclosures and allegations are responded to swiftly and in accordance with School and NAE policy (and local procedures if in addition and if differs).
- Allegations against staff or volunteers are managed in line with NAE guidance, involving the Regional Managing Director (RMD) and central teams if required after consultation with the principal.
- If an allegation concerns a principal or senior leader, the RMD must be consulted along with the Group Head of Safeguarding.
- The school supports children involved in disclosures or safeguarding incidents in a trauma informed way, ensuring they feel supported, heard, protected whilst avoiding re-traumatisation.
- The school has a duty of care to all parties involved in any allegations, whether historical or current.

Standard nine- working with stakeholders

What are we trying to achieve: The benefits of working in partnership are well understood and are considered best practice within the safeguarding arena. Working in partnership should be considered in its widest sense and examples might include students, parents, support organisations, health, statutory services, police, etc. We know that in some of our regions there are sensitivities in this type of working, however efforts should be made to forge relationships with stakeholders. Culture should not be used as a way of dismissing this essential part of working together to safeguard children

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

- The school will work in partnership with parents, students, health services and other relevant professionals to promote children's welfare.
- Safeguarding records are transferred promptly when a child moves school, in accordance with local laws. The school should do its best to ensure child protection (CP) records follow the child. This includes ensuring the school has sought CP records from new students' previous schools.
- Information sharing is conducted legally, ethically, and in the best interest of the child.
- The school will work with Regional and central safeguarding teams to ensure children are protected.
- When the school recognises that they may not have the required knowledge or skills to support young people, they should ensure that they work with parents to find the support which is needed. The leadership team has a duty of care to all of its students, and this extends to transitions and seeking external help.

Standard ten- safe environments

What are we trying to achieve: We have a duty of care to all young people, which includes ensuring that our physical environments are thoughtfully designed, safe, and appropriate for the student population. These environments should actively promote safety and support the wellbeing of children and young people.

It is essential that all areas, activities, and situations are subject to thorough risk assessment, with appropriate measures implemented to manage identified risks. Wherever possible, students should be involved in this process to foster awareness and shared responsibility. Risks within the local area must also be considered, and a Local Area Risk Assessment (LARA) should be developed and maintained accordingly.

Staff must be familiar with relevant risk assessments and apply them consistently during trips, activities, lessons, and when using equipment. Risk, when well-managed, can be a valuable part of learning and development. Therefore, risk assessments should not be used to unnecessarily restrict students' educational or recreational experiences, but rather to ensure these experiences are undertaken safely and responsibly.

To achieve this, Nord Anglia schools should meet, and be able to demonstrate and evidence the following standards:

- The school ensures the premises are safe, secure and appropriately supervised.
- Risk assessments are in place for all relevant activities, including educational trips, technology use and visitors. These risk assessments are reviewed regularly to ensure suitability.
- Any educational trips deemed as 'high risk', should follow the appropriate extra protocol and sign off procedures.
- The physical building safety is reviewed regularly, with student input used to inform safety decisions where appropriate.
- Where schools have Boarding facilities refer to Nord Anglia Education boarding standards.
- The school should meet and look to exceed the Nord Anglia requirements for Health and Safety.

Standard eleven- monitoring, evaluation and review

What are we trying to achieve: Safeguarding is an ever-evolving field, and it is essential that Nord Anglia Education and its schools strive to uphold the highest standards by staying informed of the latest research and best practices. Evidence shows that both internal and external quality assurance processes play a vital role in helping organisations improve. Schools should have clearly documented quality assurance procedures, along with evidence of how they have responded to identified areas for improvement. Reviews of safeguarding systems should be conducted regularly and involve all stakeholders, including regional and central teams. Schools should adopt a mindset of continuous improvement, always asking “what’s next?” rather than settling for “we are excellent.”

To achieve this, Nord Anglia schools should meet, and be able to demonstrate and evidence the following standards:

- The school regularly audits its safeguarding provision and acts upon the findings to improve practices. Schools will develop improvement plans in conjunction with Regional Safeguarding Directors based on annual and ad hoc audit processes.
- The safeguarding policy is reviewed at least annually and updated in line with national guidance, local procedures and Nord Anglia expectations.
- The Senior Leadership Team within a school conducts an annual safeguarding review identifying trends, strengths, and areas for improvement, this is then sent to the regional, and then central safeguarding team.
- Where required, there is a clear improvement plan for safeguarding which is developed in conjunction with the Regional Safeguarding Directors. The plan is clear, achievable and accountable, with an ability to track progress.
- Schools should regularly gather feedback from its community (students, parents, staff and contractors) in a variety of ways (surveys, focus groups etc), and this feedback from should inform ongoing safeguarding evaluations.
- The school actively seeks quality assurance feedback to continuously drive excellent standards for children.
- The DSL team meet regularly to review cases and general themes and risks to young people. These meetings are sensitively documented, with notes held securely.

Standard twelve- safeguarding data, trends and intelligence

What are we trying to achieve: Given the large number of students attending Nord Anglia Education schools, it is not possible to instinctively identify issues or emerging trends. It is therefore essential that schools implement strong systems to collect, analyse, and respond to data in a timely and effective manner. Senior Leadership Teams should use this data to guide organisational change and to identify concerning patterns among groups or individual students.

Staff play an important role as evidence collectors, contributing to a broader understanding of the school environment, much like assembling pieces of a jigsaw puzzle. It is vital that schools and staff remain mindful of the children represented by the data. Any information actively gathered from young people must be reviewed by an adult and not left unexamined in a database. This review should take place as soon as it is practicably possible.

To achieve this, Nord Anglia schools should meet, and be able to demonstrate and evidence the following standards:

- The school collects, analyses and uses safeguarding data to identify patterns, recurring issues, and emerging risks.
- Information gathered from concerns, disclosures, attendance, behaviour, exclusions and wellbeing data is used to inform the wider safeguarding strategy.
- Data is disaggregated to identify 'at risk' groups and inform targeted intervention.
- Analysis of safeguarding trends is reported regularly to leadership teams within schools and also Nord Anglia Education to support accountability and continuous improvement.
- Data is handled in compliance with local and Nord Anglia Education data protection policies, with appropriate redaction, anonymisation and confidentiality measures in place at all times.

Appendix 5 - Boarding Standards

PURPOSE

This document outlines a standalone set of standards specifically designed for schools with boarding provision. While comprehensive in scope, these standards must be read in conjunction with the **Nord Anglia Education Safeguarding Standards**, which provide the overarching framework for ensuring the safety and wellbeing of all students across **all** of our schools. Together, these documents form a cohesive approach to safeguarding and quality assurance within the boarding context.

These boarding standards are not intended to impose uniformity or limit the creativity that defines many of our schools. Instead, they offer structured guidance to help schools achieve and maintain a consistently high standard of boarding provision—one that ensures Nord Anglia Education (NAE) students experience a positive, enriching childhood and are safeguarded in the broadest sense.

The standards are organised into nine thematic sections. Each begins with a clear statement of intent, “What are we trying to achieve?”, followed by a set of quality benchmarks that should be demonstrably met by all schools offering boarding.

These standards are supplementary and do not override any applicable local legislation or regulatory requirements, including those related to health and safety, fire protection, medical care, or child welfare. Schools operating in the United Kingdom must continue to comply with the **National Minimum Standards (NMS) for Boarding Schools**.

This guidance sets out a baseline expectation. We actively encourage and expect schools to exceed these standards, reflecting our collective commitment to excellence, innovation, and continuous improvement in the care and education of our students.

MANAGEMENT AND LEADERSHIP

What are we trying to achieve: Nord Anglia Education schools, and their leaders must ensure a safe, nurturing, and high-quality boarding environment. Effective boarding provision requires a clearly defined management structure that outlines specific areas of responsibility, supports professional development and career progression, and consistently delivers excellence in care and provision.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard 1- statement of boarding principles and practice

- All Nord Anglia boarding schools are required to produce a ‘Boarding Statement of Principles and Practice’. This document should clearly articulate the nature of the boarding provision, including key details such as the age range of boarders, staffing ratios, boarding locations, approaches to behaviour management, recreational opportunities, and wellbeing support.
- The statement must be clear, concise, and accessible, ideally presented on a single side of A4 to ensure ease of reference and consistency across schools.
- Best practice would see a child-friendly/accessible version of this document clearly visible and accessible to all boarders.

Standard 2- management and development of boarding

- The school regularly evaluates the effectiveness of leadership, management, and the delivery of its boarding provision, taking timely and appropriate action when necessary to ensure continuous improvement.
- School leaders and managers possess the necessary skills and knowledge for their roles and engage in relevant professional development and training as required.
- Boarding provision is guided by a clearly defined leadership and management structure, with strong collaboration between academic and residential staff to support holistic student development.
- Leadership and management consistently fulfil their responsibilities to ensure that all boarding standards are met and maintained.
- Robust internal and external quality assurance mechanisms are in place, and feedback is actively addressed by the boarding leadership team.
- The wellbeing of pupils is actively promoted through the leadership and management of the school, reflecting a culture of care and support.
- Senior boarding staff are experienced and well-trained in the management and practice of boarding. Their expertise is applied to safeguard and enhance the welfare of all boarders.
- The school adheres to and maintains all policies and documentation outlined in Appendix A.
- Records specified in Appendix B are accurately maintained, regularly reviewed, and acted upon as appropriate to ensure compliance and accountability.

BOARDING PROVISION

What are we trying to achieve: The school fosters a warm, welcoming, and homely environment where boarders feel safe, secure, and comfortable. Their privacy is respected, and the accommodation is designed to be both enjoyable and adaptable, allowing students to personalise their living spaces. Boarders are given opportunities to contribute to decisions regarding food provision and feel confident that their personal belongings are protected and valued.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard three- Inclusion, Equality and diversity

- Boarders are treated equitably and without discrimination. Individual characteristics, such as cultural and linguistic background, special educational needs, or academic and sporting ability, are thoughtfully considered in the care provided, ensuring that support is responsive to diverse needs and fosters an inclusive school environment.
- Students are actively supported in expressing their cultural and religious identities through participation in relevant activities, celebrations, and events.
- The boarding provision incorporates strategies that equip all staff, including leadership, to recognise and value cultural diversity and understand its significance in promoting the wellbeing and safeguarding of children and young people.
- The school encourages and facilitates boarders' ability to express their cultural identity and exercise their cultural rights in a respectful and affirming manner.
- Staff implement clear measures to identify, challenge, and prevent racism. Any incidents are addressed promptly and appropriately, reinforcing a zero-tolerance approach to discriminatory behaviour.

Standard four- boarding accommodation

- Boarders are provided with high-quality sleeping accommodation that is well-organised and effectively managed. Regular, documented risk assessments are conducted, and any identified issues are promptly addressed to ensure the safety and wellbeing of all boarders. Accommodation offers appropriate privacy, with consideration given to sex, age, and individual needs. Where bedrooms are shared, boarders are given the opportunity to express preferences regarding their roommates.
- Comfortable and well-equipped living spaces are available to boarders, including reliable internet access to support both structured and independent study outside of school hours, as well as social interaction.
- Adequate toilet and washing facilities are provided, featuring high-quality fixtures, fittings, and access to hot water. These facilities are easily accessible from sleeping areas and are designed to meet the needs of boarders, taking into account gender, age, and any specific requirements.
- Boarding houses and associated accommodation are well-lit, appropriately heated and ventilated, and maintained to a high standard of cleanliness. Air conditioning is provided where necessary to ensure comfort.
- Accommodation is suitably furnished and proportioned to meet the needs, ages, and number of boarders. Clear separation is maintained between student and staff living areas, and bedding is clean, warm, and comfortable.
- Boarders are encouraged to personalise their living spaces with appropriate personal items, fostering a sense of ownership and comfort.
- Boarding accommodation is exclusively reserved for designated students and is safeguarded against unauthorised access. Use of school facilities by external individuals or groups is managed to prevent unsupervised access to boarders or their living areas while occupied.
- Where boarders are unable to maintain acceptable standards of cleanliness or hygiene in their personal areas, staff intervene to ensure these spaces remain clean, safe, and respectful of communal living standards.

Standard five- Boarders' possessions

- Boarders have access to a reliable and well-managed laundry service for clothing and bedding. Items are securely stored during the laundering process and returned to the correct student in a timely manner. Alternatively, appropriate facilities are available for boarders to launder their own belongings. Where students are unable to maintain cleanliness independently, staff intervene to ensure that all boarders have access to clean clothing and bedding.
- The school provides effective safeguards for boarders' personal possessions, including any money or valuables entrusted to staff. Secure systems are in place to protect these items from loss or unauthorised access

Standard six- Food and Nutrition

- All boarders are provided with high-quality, nutritionally balanced meals that offer variety, choice, and adequate portion sizes. This includes appropriate accommodations for students with specific dietary, medical, or religious requirements.
- The school ensures that facilities for the hygienic preparation, serving, and consumption of meals meet high standards. These facilities may be located within the main school building, provided they are conveniently situated near the boarding accommodation.
- Beyond scheduled meals, boarders have access to safe drinking water and to food or facilities for hygienic food preparation at reasonable times. The school remains attentive to individual preferences and needs in this regard.



HEALTH AND WELLBEING

What are we trying to achieve: Boarders' health needs are comprehensively addressed, with proactive support for their physical, emotional, social, and mental wellbeing. Any healthcare provided is guided by the principle of acting in the child's best interests, ensuring their safety, dignity, and overall development.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard seven- Boarders' health and wellbeing

- The school maintains and effectively enforces comprehensive policies for the care of boarders who are unwell or have medical conditions. These policies ensure the promotion of boarders' physical and mental health, emotional wellbeing, and guarantee prompt intervention when health concerns arise.
- Boarders receive guidance and education to help them understand their physical and health needs. They are supported in developing healthy lifestyles and making informed choices about their personal wellbeing.
- Robust arrangements are in place to care for boarders who are ill or injured. Where necessary, students are accommodated separately to ensure appropriate care or to prevent the spread of contagious conditions. When boarders require temporary accommodation away from their usual residence, they are provided with high-quality facilities, including toilets and washing areas, that are appropriately staffed and offer suitable privacy, with consideration given to age, gender, and any specific needs.
- The school ensures boarders have appropriate access to local medical, dental, and optometric services. It also maintains effective collaboration with healthcare professionals, including specialist providers, to meet individual health needs.
- All medication is stored securely, and detailed records of its administration are maintained. Staff responsible for administering medicines are properly trained and competent. Prescribed medication is given only to the boarder for whom it is intended. Boarders permitted to self-medicate are assessed for their ability to do so responsibly, with documented evidence of the risk assessment.
- The school upholds boarders' rights to confidentiality, privacy, and dignity in all matters relating to their health and medical care.

SAFEGUARDING

What are we trying to achieve: Boarders are kept safe both within the school's boarding accommodation and during activities or time spent away from the premises. Robust safeguarding measures are in place to prevent harm, and any incidents that arise are reported in line with the NAE Safeguarding Policy, managed swiftly and effectively to ensure the continued protection and wellbeing of all students.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard eight- Safeguarding and Student protection

- The school must establish and effectively implement robust arrangements to safeguard and promote the welfare of all pupils. It is essential that every member of staff, across both the school and boarding settings, understands that safeguarding is a shared responsibility and remains vigilant in protecting children from harm.
- Protecting children from harmful and inappropriate online content is a critical aspect of safeguarding. The school's strategy for online safety must be clearly articulated within its child protection policy and aligned with Nord Anglia Education guidance.
- The safeguarding policy must be transparent, accessible, and communicated clearly to both boarders and staff. It should explicitly outline:
 - The school's approach to preventing and responding to child-on-child abuse, with sensitivity to the unique risks posed by shared overnight accommodation in boarding settings
 - Measures in place to safeguard pupils in contexts where there is a significant gender imbalance
 - Protocols for managing boarders' personal devices, including procedures for monitoring harmful content already stored on devices, and mitigating risks associated with mobile networks that may bypass the school's filtering and monitoring systems.

HEALTH AND SAFETY

What are we trying to achieve: Boarders are safeguarded at all times, whether on school grounds, within boarding accommodation, or while participating in off-site activities under the school's supervision, such as educational visits. The school implements robust risk management strategies to prevent harm and responds promptly and effectively to any incidents that may arise

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard Nine- Safety of Boarders

- The school complies with all relevant local and Nord Anglia health and safety guidance through the development and effective implementation of a comprehensive written health and safety policy. Staff receive appropriate training to ensure the policy is consistently applied in practice.
- The school premises, boarding accommodation, and associated facilities are maintained to a standard that ensures, as far as reasonably practicable, the health, safety, and welfare of all pupils. A secure and supportive environment is provided in which students can live and learn.
- The welfare of boarders is safeguarded through a written risk assessment policy that is actively implemented. Identified risks are addressed through timely and appropriate actions to minimise potential harm.

- As part of its health and safety framework, the school has established clear written procedures for responding to major incidents. This includes contingency plans for overnight emergencies requiring evacuation, ensuring boarders' safety and wellbeing are prioritised.
- The school maintains proportionate and well-considered procedures to protect boarders during off-site activities under its supervision, such as organised visits. These procedures are based on thorough risk assessments and are designed to manage potential hazards effectively.

Standard ten- fire and emergency precautions and drills

- All boarders and staff are familiar with emergency procedures and can be safely evacuated in the event of an incident.
- The school adheres to Nord Anglia Education guidance, ensuring that alarm and alert systems are accessible to all, and that evacuation plans are clearly defined and responsive to the individual needs of every child.
- Fire drills are conducted regularly during boarding hours, with a minimum frequency of once per term. Additionally, at least one overnight drill should be carried out annually, unless a formal welfare assessment determines that this would adversely affect boarders.
- For schools accommodating 'flexi' boarders, additional fire drills may be required based on a school-specific risk assessment. These drills ensure that all pupils with flexible boarding arrangements are adequately prepared for emergency situations.

BOARDERS' RIGHTS, ADVOCACY AND COMPLAINTS

What are we trying to achieve: Boarders are actively supported in expressing themselves, building positive relationships with staff, and maintaining meaningful connections with their families or carers—unless restricted by legal circumstances. The school ensures that boarders' views, wishes, and feelings regarding their boarding experience are regularly sought, genuinely valued, and thoughtfully considered in decision-making and day-to-day practice.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard eleven- boarders' induction and individual support

- A structured and supportive induction process is in place to help new boarders settle into school life and understand key routines, expectations, and sources of support.
- The school will work collaboratively with parents and carers to establish clear arrangements for the collection and transportation of boarders (including international students) at the beginning and end of each term, as well as during any temporary absences. Responsibilities are clearly defined to ensure safe and coordinated transitions.
- Boarders are encouraged and empowered to approach any member of staff with personal, academic, or welfare concerns. All staff are equipped with the knowledge and guidance to respond appropriately and sensitively when a boarder seeks support.
- The school designates at least one trusted adult, independent of the boarding team, whom boarders can contact directly about personal issues or concerns. Often referred to as the 'independent person', this individual is well known to students, easily accessible, and someone they feel comfortable speaking with. This role may be fulfilled by a staff member within the school who is not directly involved in boarding provision.
- Boarders are provided with contact details for at least two child-specific support services. In areas where such services are unavailable, the school ensures that an independent person is appointed to act as a student advocate, offering impartial guidance and support

Standard twelve- contact with parents/carers

- Schools ensure that boarders are able to communicate privately with their parents, carers, and families at mutually convenient times, with consideration given to international time zones where applicable. Proportionate systems are in place to monitor and manage electronic communications, aimed at identifying and preventing abuse, bullying, or unsafe behaviour. Schools remain sensitive to individual circumstances, including any legal or welfare-based restrictions on family contact, and act in accordance with those needs.

Standard thirteen- complaints

- The school maintains and adheres to a clear and effective policy for recording and responding to parental complaints. This policy outlines the process for submitting a complaint, how it will be managed, and the expected timescales for resolution.
- A transparent and easily accessible process is in place for boarders to raise concerns or complaints specifically related to boarding provision. The school's procedures clearly define how such complaints will be addressed, and boarders are assured that they will not face any repercussions for raising a concern in good faith.
- The school keeps a detailed written record of all complaints, including those related to boarding provision. This record includes the nature of the complaint, any actions taken in response, regardless of whether the complaint was upheld, and complaints that were later withdrawn. The school regularly reviews these records to identify and respond to any emerging patterns or recurring issues.
- Boarders are actively encouraged to share their views on the boarding experience. The school provides clear and accessible channels for boarders to express feedback and raise concerns. These views are considered in decisions affecting the operation of boarding provision, and boarders receive feedback on how their input has been considered. No boarder is penalised for raising a concern in good faith.
- The school offers a mechanism through which boarders can raise concerns or complaints anonymously, ensuring that all students feel safe and supported in voicing their experiences.

PROMOTING POSITIVE BEHAVIOUR AND RELATIONSHIPS

What are we trying to achieve: Boarders demonstrate positive conduct and cultivate respectful, healthy relationships with both peers and staff. The school actively promotes and celebrates positive behaviour and interpersonal respect. Where sanctions are necessary, they are proportionate, clearly communicated, and applied consistently and fairly across the boarding community.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard fourteen- promoting positive behaviour

- The school maintains and consistently applies a comprehensive written policy to promote positive behaviour among all pupils, including boarders. This approach is clearly visible to anyone joining or visiting the school and is reflected in the conduct and communication of staff and students alike. The behaviour policy includes:
 - A clear objective to foster a safe, inclusive environment where all pupils—day and boarding—can thrive and achieve their full potential, in alignment with the school's values and ethos
 - Defined roles for designated staff, including school leaders, in upholding consistent behavioural expectations
 - Expectations for pupil behaviour, emphasising dignity, kindness, and respect, alongside systems for positive reinforcement, rewards, and proportionate consequences

- Provisions to ensure all members of the school community feel safe and supported, with zero tolerance for bullying, physical threats, or abuse
- Clear rules, routines, and behavioural expectations that apply both within school and in external or online contexts
- Support structures for pupils with additional needs that may impact behaviour, including the responsibilities of designated staff
- Preventative measures and response protocols for child-on-child abuse, including appropriate disciplinary action
- Guidance on the use of restraint or reasonable force, and the management of any necessary physical contact
- Procedures for recording searches of students, their possessions, or rooms, with clear guidance on the rationale, authority, and timing of such actions
- Senior leaders are responsible for monitoring the use of restraint or physical interventions and must take prompt action to prevent inappropriate use. Where restraint has been used inappropriately or occurs with concerning frequency, the leadership team must respond effectively. Detailed records must be maintained, including:
 - Date and time of the incident
 - Type of restraint or physical hold used
 - Staff and student involved
 - Antecedent behaviour and conclusions
 - Medical checks and parental communication
 - Any injuries sustained by staff or students
 - Plans to reduce future reliance on physical intervention
- Any student subject to restraint must have a behaviour management plan, personal handling plan, or care plan in place. These records must be accessible to the safeguarding team and retained in accordance with the school's data retention policy.
- In schools with both day pupils and boarders, boarders are actively supported in forming and maintaining respectful friendships within and beyond the boarding community.
- Staff are equipped to help boarders understand and develop healthy, nurturing relationships. They are trained to recognise signs of harmful or exploitative relationships—including teenage relationship abuse, criminal exploitation, sexual exploitation, and child-on-child abuse—and to respond appropriately when concerns arise.

Standard fifteen- bullying

- The school actively works to prevent all forms of bullying, including cyberbullying, prejudice-based, and discriminatory behaviour, through the development and implementation of a proactive and effective anti-bullying strategy. This strategy must include clear, accessible, and confidential systems that enable pupils to report concerns safely and without fear.
- All incidents of bullying are addressed promptly and effectively. Staff take appropriate steps to support affected pupils and help them recover from the emotional and social impact. All members of staff are trained to recognise signs of bullying and understand the procedures for reporting and responding to concerns.
- The school's anti-bullying strategy recognises the unique vulnerabilities of boarders, who may be unable to distance themselves from bullying behaviours due to the residential nature of boarding. The strategy must reflect this reality and include specific measures to protect boarders and ensure they feel safe and supported at all times.

BOARDERS' DEVELOPMENT

What are we trying to achieve: The boarding experience plays a vital role in supporting and enriching pupils' personal development. It fosters age-appropriate growth in social interaction, independent living skills, and emotional resilience. Through structured routines and guided challenges, boarders learn to navigate risk responsibly within a safe and supportive environment.

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard sixteen- Enrichment, recreation and access to the wider world

- Schools must provide a stimulating and age-appropriate environment that supports the development of key skills. This environment should be inclusive and responsive to any specific needs or requirements of individual pupils.
- Boarders should have access to a broad and varied programme of activities beyond the classroom, including well-balanced and appropriately timed periods of free time each day. All activities are subject to thorough risk assessments, which are implemented effectively to safeguard pupils, without unnecessarily limiting opportunities for challenge, adventure, or personal growth.
- A range of safe recreational spaces, both indoors and outdoors, must be available to boarders. These areas should encourage social interaction among peers while also offering quiet, private spaces for those who wish to spend time alone.
- In schools where boarders face unusual or particularly demanding expectations, such demands must be appropriate to the pupils' age and capacity and must not compromise their overall wellbeing.
- Boarders should be able to access age-appropriate information about current events and developments beyond the school community, as well as make use of suitable local facilities to support their engagement with the wider world.

STAFFING, GUARDAINS AND PREFECTS

What are we trying to achieve: Boarders are cared for by a team of well-trained, experienced, and competent staff who have undergone thorough vetting to ensure their suitability for working with children. Staffing levels are sufficient to meet the needs of all boarders, with strong continuity to foster stable and trusting relationships. Where prefects are involved in supporting younger pupils, their roles are clearly defined, age-appropriate, and carefully supervised to ensure safe and effective practice

To achieve this, Nord Anglia Education schools should meet, and be able to demonstrate and evidence the following standards:

Standard seventeen- safer recruitment in boarding settings

- Schools must follow safer recruitment practices in accordance with Nord Anglia's safeguarding guidance, ensuring that all staff are appropriately vetted prior to employment.
- Safety checks, aligned with Nord Anglia guidance, must be conducted for all individuals aged eighteen and over who reside in staff households but are not employed by the school or listed on its staff register. This applies to anyone living on premises shared with boarders, such as teacher housing located within the school grounds and accessed via common entry and exit points.
- A formal written agreement must be in place between the school and any adult not employed by the school but residing on the same premises as pupils. This agreement must outline:
 - Terms of accommodation
 - Expectations regarding contact with pupils

- Responsibilities for supervising their own visitors
 - A clause stating that accommodation may be withdrawn if the individual is deemed unsuitable for regular contact with children. Additionally, these individuals must notify a designated senior member of staff, who is not personally connected to them, if they are charged with or convicted of any offence.
- All visitors to boarding or staff accommodation, including contractors, delivery personnel, and other external individuals, must be supervised appropriately to prevent any unsupervised access to boarders or their living spaces.

Standard eighteen- staffing and supervision

- All staff members and volunteers working with boarders must have a clearly defined job description outlining their responsibilities. Upon appointment, they receive induction training specific to boarding and are provided with ongoing opportunities for professional development, including regular reviews of their boarding practice.
- The roles of spouses, partners, and other adult members of staff households within boarding houses must be clearly communicated and understood.
- Staff supervising boarders outside of teaching hours must be sufficient in number, appropriately trained, and experienced to meet the age, needs, and number of boarders, as well as the nature of the activities and locations involved.
- Boarders must always be under the care of a designated member of staff who is suitably qualified and experienced. As far as possible, staffing should be consistent to promote stability and trust.
- Staff must be aware of the whereabouts of boarders in their care at all times, or know how to promptly determine their location.
- All staff must understand and follow the school's policy and any local protocols regarding missing boarders. They must be proactive in locating missing pupils, including liaising with police when necessary.
- Each boarding building must have an appropriate number of staff—at least one—on duty or sleeping on-site overnight, who is responsible for the boarders and available to respond to their needs.
- Boarders must be able to easily contact a member of staff in their building during the night and be clearly informed of how to do so.
- Residential staff must be provided with suitable accommodation, including areas for dining, living, sleeping, and access to appropriate toilet and washing facilities. This accommodation must be clearly separated from the areas used by boarding pupils.
- Boarders must not access staff residential accommodation except in exceptional circumstances. In such cases, one-to-one situations must be avoided, and another adult should always be present. Staff must maintain professional boundaries, avoiding any form of inappropriate favouritism or personal contact.

Standard nineteen- prefects

- Any prefect system (or equivalent student leadership structure) must assign clearly defined duties and responsibilities that are appropriate to the age and maturity of the students involved.
- Prefects must receive suitable training and operate under adequate staff supervision. Safeguards must be in place to prevent any misuse or abuse of authority.
- Prefects must not be placed in supervisory roles within boarding houses, ensuring that responsibility for boarders remains solely with trained and vetted staff.

CHILDREN ACCOMMODATED OFF SITE

What are we trying to achieve: Boarders placed in off-site accommodation under the care of a third party must be safeguarded to the same high standards as those upheld within the school. All relevant policies, procedures, and practices must be consistently applied to ensure their safety and protection from harm at all times.

To achieve this, Nord Anglia schools should meet, and be able to demonstrate and evidence the following standards:

Standard twenty- Lodgings and host families

- The school clearly communicates to parents whether pupil lodgings are arranged by the school or are the responsibility of parents.
- Any lodgings arranged by the school must offer high-quality accommodation and appropriate supervision. These lodgings are subject to thorough checks prior to use and are monitored regularly, with formal inspections conducted at least once per term.
- Lodgings provided or arranged by the school must meet standards comparable to those of the school's own boarding facilities.
- All adults providing lodgings on behalf of the school must complete safeguarding training at least every two years and demonstrate a clear understanding of the school's missing boarder policy and their role in its implementation.
- Adults offering accommodation arranged by the school are subject to the same safer recruitment procedures as school staff, ensuring suitability and safety.
- A formal written agreement must be in place between the school and each adult providing lodgings. This agreement outlines expectations, responsibilities, and safeguarding obligations.
- Once per term, a senior member of staff must meet individually with each boarder living in lodgings arranged by or on behalf of the school to discuss their experience and wellbeing.
- The school provides comprehensive written guidance to host families accommodating boarders. This guidance includes clear expectations around safeguarding and covers key risks such as passive smoking, medication management, internet access, exposure to age-restricted content (e.g. movies rated 18), and access to alcohol.

APPENDIX A: REQUIRED POLICIES AND DOCUMENTS

THE SCHOOL MUST MAINTAIN AND REGULARLY REVIEW THE FOLLOWING POLICIES AND DOCUMENTS TO ENSURE THE SAFETY, WELLBEING, AND EFFECTIVE CARE OF BOARDERS:

CORE POLICIES

1. ANTI-BULLYING POLICY, INCLUDING CYBERBULLYING AND INITIATION/HAZING-TYPE BEHAVIOURS
2. SAFER WORKING PRACTICES FOR STAFF, WITH SPECIFIC GUIDANCE FOR BOARDING STAFF
3. SAFEGUARDING AND CHILD PROTECTION POLICY
4. BEHAVIOUR POLICY, INCLUDING SANCTIONS, REWARDS, AND USE OF RESTRAINT
5. STAFF DISCIPLINARY, GRIEVANCE, AND WHISTLEBLOWING PROCEDURES
6. MEDICAL CARE POLICY FOR BOARDERS, COVERING FIRST AID, EMERGENCIES, AND MEDICATION (PRESCRIBED AND NON-PRESCRIBED)
7. HEALTH AND SAFETY POLICY
8. POLICY ON PUPIL ACCESS TO AN INDEPENDENT ADULT OUTSIDE THE SCHOOL STAFF GROUP
9. PROVISION FOR PUPILS WITH SPECIFIC RELIGIOUS, DIETARY, LINGUISTIC, OR CULTURAL NEEDS
10. ONLINE SAFETY AND DIGITAL WELLBEING POLICY

SUPPORTING DOCUMENTS

11. STAFF HANDBOOK OR BOARDING STAFF GUIDANCE (MAY INCORPORATE SEVERAL POLICIES ABOVE)
12. STATEMENT OF THE SCHOOL'S BOARDING PRINCIPLES AND PRACTICES
13. COMPLAINTS PROCEDURE
14. PROCEDURE FOR PUPILS TO RAISE CONCERNS WITH ANY MEMBER OF STAFF
15. RISK ASSESSMENTS AND CONTINGENCY PLANS FOR FORESEEABLE CRISES
16. STAFF INDUCTION, TRAINING, AND PROFESSIONAL DEVELOPMENT PROGRAMME
17. PREFECT ROLES, RESPONSIBILITIES, AND BOUNDARIES
18. KEY WRITTEN INFORMATION FOR NEW BOARDERS
19. JOB DESCRIPTIONS FOR STAFF WITH BOARDING AND SAFEGUARDING RESPONSIBILITIES
20. GUIDANCE ON STAFF CONDUCT WHILE RESIDING IN SCHOOL ACCOMMODATION
21. RISK ASSESSMENTS FOR SPECIFIC AREAS, TRIPS, ACTIVITIES, OR SITUATIONS
22. STAFF DUTY ROTAS AND LOGS OF ON-DUTY PERSONNEL, INCLUDING OVERNIGHT SUPERVISION

ADDITIONAL DOCUMENTS (AS REQUIRED)

23. CLARIFICATION OF ROLES AND RESPONSIBILITIES FOR EDUCATIONAL GUARDIANS AND HOMESTAYS
24. WRITTEN AGREEMENTS WITH EDUCATIONAL GUARDIANS AND HOMESTAYS
25. CLARIFICATION OF SCHOOL RESPONSIBILITIES FOR LODGINGS ARRANGED BY THE SCHOOL
26. WRITTEN AGREEMENTS WITH ADULTS PROVIDING LODGINGS ON BEHALF OF THE SCHOOL

APPENDIX B: REQUIRED RECORDS

THE SCHOOL MUST MAINTAIN THE FOLLOWING RECORDS TO SUPPORT SAFEGUARDING, WELFARE, AND OPERATIONAL OVERSIGHT:

1. RECORDS OF CHILD PROTECTION CONCERNS OR ALLEGATIONS
2. DOCUMENTATION OF MAJOR SANCTIONS APPLIED
3. RECORDS OF INCIDENTS INVOLVING REASONABLE FORCE
4. COMPLAINTS AND THEIR OUTCOMES
5. INDIVIDUAL BOARDER RECORDS, INCLUDING PERSONAL, HEALTH, AND WELFARE INFORMATION
6. CONFIDENTIAL RECORDS OF MEDICATION ADMINISTRATION, TREATMENT, FIRST AID, AND ANY MEDICATION ERRORS
7. RECORDS OF SIGNIFICANT ILLNESSES
8. DOCUMENTATION OF SIGNIFICANT ACCIDENTS AND INJURIES
9. PARENTAL CONSENT FOR MEDICAL/DENTAL TREATMENT, FIRST AID, AND NON-PRESCRIPTION MEDICATION
10. RISK ASSESSMENTS AND ACTIONS TAKEN IN RESPONSE
11. STAFF RECRUITMENT AND VETTING RECORDS, INCLUDING CHECKS ON INDIVIDUALS WITH UNSUPERVISED ACCESS TO CHILDREN OR RESIDENTIAL AREAS (IN LINE WITH NORD ANGLIA GUIDANCE)
12. STAFF DUTY ROTAS AND WORK RECORDS
13. STAFF APPRAISALS AND TRAINING RECORDS
14. FIRE SAFETY TESTS AND DRILL LOGS
15. MENUS AND DIETARY PROVISION RECORDS
16. PARENTAL CONSENT FOR HIGH-RISK ACTIVITIES
17. ASSESSMENTS OF OFF-SITE ACCOMMODATION USED BY THE SCHOOL
18. RECORDS CONFIRMING THE SUITABILITY OF GUARDIANSHIP ARRANGEMENTS

MONITORING AND REVIEW

ALL RECORDS LISTED ABOVE MUST BE REGULARLY REVIEWED BY THE HEAD OR A DESIGNATED SENIOR MEMBER OF STAFF. THIS REVIEW SHOULD:

- IDENTIFY TRENDS, GAPS, OR AREAS REQUIRING IMPROVEMENT IN WELFARE PRACTICES
- BE DOCUMENTED WITH EVIDENCE OF ACTIONS TAKEN OR POLICY UPDATES MADE
- INCLUDE DATED REVIEW LOGS, MEETING MINUTES, OR AUDIT CHECKLISTS TO DEMONSTRATE ACTIVE OVERSIGHT

TO PROVE ONGOING REVIEW, SCHOOLS SHOULD MAINTAIN A RECORD OF MONITORING ACTIVITY, SUCH AS:

- A TERMLY SAFEGUARDING AUDIT
- A WELFARE REVIEW SCHEDULE
- ANNOTATED POLICY DOCUMENTS SHOWING UPDATES
- STAFF MEETING NOTES DISCUSSING RECORD FINDINGS AND FOLLOW-UP ACTIONS