



LÉMAN CHENGDU  
INTERNATIONAL SCHOOL  
A NORD ANGLIA EDUCATION SCHOOL



# LIS Child Protection and Safeguarding Policy

## 2021-22



## **Child Protection and Safeguarding Policy**

### **The Designated Safeguarding Leads (DSLs) for Lemman International School:**

#### **Overall Head of Safeguarding**

Mr. Tom Ferguson (School Principal)

#### **Chief Designated Safeguarding Lead (DSL)**

Ms. Tracy Connor

#### **Deputy DSL are:**

Tiffany Taylor

Monica Webster

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

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

The Chief DSL reports directly to the Principal, who acts as an impartial voice on safeguarding policy and practice. The Principal does not act as a DSL, except in the absence of the DSL.

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



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

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

## 1. Introduction and Context

### 1.1 Definitions

#### Safeguarding

Safeguarding, and promoting the welfare of children, refers to the processes of protecting students from harm, 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: This policy applies in reference to children in our setting all the way up to end of their education in Secondary School. Students may turn 18 years of age whilst still at BSG, but this policy and its approach still applies as long as they are on roll at our school.*

### 1.2 Context/Rationale

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

- Article 3: the best interests of children must be the primary concern in decision making about them.
- Article 13: children have the right to get & share information as long as it is not damaging to them/others.
- Article 14: children have the right to think and believe what they want and to practise their religion.
- Article 19: children have the right to be protected from hurt and mistreatment, physically and mentally.
- Article 34: Governments should protect children from sexual exploitation and abuse.
- Article 35: Governments take all measures to ensure that children are not abducted, sold or trafficked.
- Article 36: children should be protected from any activity that takes advantage of them or could harm their welfare and development.
- Article 37: no one is allowed to punish children in a cruel or harmful way.

All the UN articles can be found at the following link:

[http://www.unicef.org/crc/files/Rights\\_overview.pdf](http://www.unicef.org/crc/files/Rights_overview.pdf)



### 1.3 Related Documents

This policy should be read in conjunction with the NAE Recruitment Policy, Whistleblowing Policy, Code of Conduct for all employees, Guidance for Safe Working Practice, the NAE Social Media Policy & Managing Allegations Policy and any other related policies (e.g. Visitor Policy, Trip Policy).

### 1.4 Principles, Beliefs and Policy

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

### 1.5 School's Aims and Objectives

The school aims are:

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

### 1.6 What we will do

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

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

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

1. The welfare of the child is paramount.
2. Adults should work and be seen to work, in an open and transparent way. The same



professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity; all students have the same equal rights to protection, but we recognise that we need to do more for some students because of their special educational needs, disability, gender, religion or sexual orientation.

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

### **1.7 Training and Support**

The school will undertake to ensure that all staff:

- read and acknowledge this policy every year (Appendix 4);
- are familiar with, understand and abide by the Code of Conduct (Section 2);
- are provided, through training and support, with the necessary skills to recognise children who are at risk or potentially at risk;
- fully understand the systems and frameworks through which concerns may be raised and addressed;
- are aware of the mechanisms by which this policy and its associated procedures will be applied and monitored and where the levels of accountability lie;
- if they are affected by a safeguarding/child protection issue and this might have had an impact on their mental well-being, they are supported (e.g. via counselling).

Our DSL will have, as a minimum, Level 3 Safeguarding Training.

### **1.8 Co-ordination and Response**

Any person who works with children should be aware of the possibility that a vulnerable or 'at risk' child may choose them to be the first point of contact. It is therefore important that all employees, including external staff and volunteers, are fully aware of the procedures and guidelines relating to reporting and investigation. In addition, we will appoint designated senior staff members (Designated Safeguarding Lead) who will receive additional training so they may guide and support through the reporting and responding process.

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

### **2.1 Purpose of Guidance**

It is important that all adults working with children understand that the nature of their work and the responsibilities related to this, place them in a position of trust. The Code of



Conduct provides clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities, in all settings and in all contexts. The Code aims to:

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

## 2.2 Duty of Care

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

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

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

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

- always acknowledge and maintain professional boundaries.
- clearly understand the need to maintain appropriate boundaries in their contacts with children and young people. Intimate or sexual relationships between children/young people and the adults who work with them will be regarded as a grave breach of trust.
- Be aware that that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Never touch a child in a way which may be considered indecent. Always be prepared to report and explain actions and accept that all physical contact can be open to scrutiny.
- be aware that there is an Intimate Care Policy in place. This policy provides guidelines for adults dealing with intimate care issues (e.g. toileting incidents). Although this policy mostly applies within the Early Years and Primary setting, it is essential that *all* staff are aware of the key policy



guidelines. It is important to remember that all children have a right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, age and maturity should be encouraged to act as independently as possible.

- be aware and follow the school's behaviour management policies. Adults should not use any form of degrading treatment to punish a child. Adults should not use force as a form of punishment, and should instead try to defuse the situations before they escalate.
- understand that students are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations or a need for intervention to protect the student/s from harm. For example, where there are changing rooms and there is a need to intervene, it is essential to announce intention of entering.
- follow the guidance on school's e-safety policy (part of Acceptable use Policy) Ensure that children are not exposed to unsuitable material on the internet and that any films or material shown to children and young people are age appropriate.
- be aware of situations which may present risks and manage these.
- plan and organise the work and the workplace so as to minimise risks.
- as far as possible, be visible to other adults when working with children. Avoid meetings with a child or young person in remote, secluded areas.
- never use toilets designated for child use only – even outside of school hours.
- ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed.
- ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged.
- talk to children and encourage them to raise any concerns.
- empower children - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.
- be familiar with and take responsibility to implement procedures within our school's reporting system for recording and reporting concerns.

#### **2.4 In general, it is inappropriate to, and adults should not:**

- behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model.
- spend excessive time alone with children away from others.
- take children to their home where they will be alone with you. At BSG we typically do not visit a child's home. If under exceptional circumstances, this were to be considered, it is essential that the purpose of the home visit must be discussed and approved beforehand with senior management.
- interact with students via social media.
- give personal contact details to students, including personal mobile telephone numbers and details of any blogs or personal websites.
- use their position to intimidate, bully, humiliate, threaten, coerce or undermine children or young people.
- use their status and standing to form or promote relationships which are of a sexual nature, or which may become so. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is unacceptable.



- offer lifts to a child or young person. There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

### **3. Forms of Abuse and Specific Safeguarding Issues**

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

#### **3.1 Forms of Abuse/ Risks/Specific Safeguarding Issues:**

The more commonly referred to types of abuse are:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise cause harm to a child
- Emotional abuse: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved or valued only in so far as they meet the needs of another person.
- Sexual abuse: involves forcing or enticing a child into sexual activities, whether or not the child is aware what is happening. This includes non-contact activities over social media or the internet.
- Neglect: This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development.

While the above are the four broad main areas of potential abuse, abuse itself can take many forms, many of which have either an emotional, physical, sexual or neglectful impact (or combination of more than one of these). Some examples of these harmful situations are listed below (note: this is not an exhaustive list).

- Female Genital Mutilation (FGM): FGM is child abuse and a form of violence against women and girls, and should therefore be dealt with as part of existing child safeguarding policies. There is recognition that this is a cultural practice in some countries but is potentially harmful to children both emotionally and in terms of health issues. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the student's best interests.
- Forced Marriages (FM): FM is a marriage conducted without consent of one or both parties, and where duress is a factor. The United Nations Human Rights Council adopted a resolution that recognises child, early and forced marriages as involving violations of human rights. 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.
- Child Sexual Exploitation (CSE): The sexual exploitation of children and young people under 18 can involve exploitative relationships where young people receive something in return for performing sexual acts. Exploitation of any student can occur on a face-to-face level or through the use of technology, such as mobile phones or computers. In these situations, a student could be encouraged to send or post indecent images of themselves. In all cases the person exploiting children does so by misusing the power they have over them. This power may come through virtue of age, physical strength and/or economic resources. Violence, intimidation and





coercion are common in exploitative relationships.

### **Sexting**

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. There are many reasons why a student may do this:

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

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

### **Self-Harm**

Self-harm can take a number of physical and/or emotional forms. Self-harm is often a way for young people to release overwhelming emotions and a way of coping; so, whatever the reason, it should be taken seriously. The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving or having relationship problems with family or friends. The feelings that these issues bring up can include: low self-esteem, low confidence, loneliness, sadness, anger, numbness and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents. There are some common themes that may help staff identify concerns including:

- Physical indicators such as cuts, bruises, burns, bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal.

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

*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 more information, refer to the “Keeping Children Safe in Education” (KCSIE) 2016, which NAE has also benchmarked against to set safeguarding standards.*

*Most updated version, Sept. 2021 (DfE):*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1007260/Keeping\\_children\\_safe\\_in\\_education\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007260/Keeping_children_safe_in_education_2021.pdf)

## 3.2 Specific Safeguarding Issues

### E-Safety

The growth of different electronic media in everyday life and an ever-developing variety of devices create additional risks for our students. 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.

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

### Anti-Bullying

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level should take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve face-to-face contact and/or the misuse of social media or technology.

### 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.



### **Allegations made by a child about another child (Peer on peer abuse)**

Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. Peer on peer abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse. Examples can include girls being touched/assaulted inappropriately by boys, or boys themselves being subject to initiation violence. KCSIE (2019), as part of their updated guidance, has included 'upskirting' within a kind of harassment also. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm' (KCSIE, 2019). These types of peer on peer behaviours/abuse will not be tolerated.

Under no circumstances should an allegation that one child has possibly abused another be treated "as just children being children" or "experimentation". If the alleged actions are unwanted or involve minors who may not be able to give consent by virtue of their age or any disability, then this is potentially abusive and the school procedures should be followed in the same way as for any other safeguarding or child protection matter.

### **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. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

*Note: As part of updated guidance from KCSIE (2019), Serious Violence is now also considered as a specific safeguarding issue. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendship or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.*

### **Physical Intervention/restraint**

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



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

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

The Principal will require the adult(s) involved in any such incident to report the matter to him or her immediately, followed by providing a description and full account of the incident. Where intervention has been required a senior member of staff should be asked to debrief the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept and the student checked for any injuries. Parents/carers should always be informed on the same day when an intervention has been necessary.

U.K. government guidance has been issued in relation to the use of reasonable force and can be used as best practice advice. <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

### **Domestic Abuse**

The accepted definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.

### **Whistleblowing**

Nord Anglia Education recognises that we cannot expect children to raise concerns in an environment where adults fail to do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are 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. Nord Anglia has a Whistleblower Protection Policy available to all staff.

### **Support**

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

## **4. Staff Responsibilities**

### **4.1 Responsibilities and expectations**

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

- that the school adopts appropriate policies and procedures to safeguard children in the school;
- that these policies are implemented by all staff, including volunteers and third-party staff;
- that all school staff complete the Introduction to Safeguarding Course through NAU every 2 years;
- that sufficient resources and time are allocated for staff to carry out their responsibilities effectively;
- that all staff and adult helpers in the school are able to voice their concern if they feel that a child is vulnerable, or that there are any particular practices that are unsafe.



### **Third Party and External Staff**

It is required that all third-party and external staff fulfill and comply with HR procedures, including providing relevant documents and appropriate checks are undertaken. In addition, it is an expectation that all third-party staff comply with the following policy guidelines:

All English-speaking staff will need to complete our Introduction to Safeguarding course on Moodle via the guest portal; this applies to all staff who support the Cambridge English School. The aim will be for also local academic staff to complete the online training who support key departments such as SEN, PE, Music, and who are ASA providers as there are now options for training in several languages, including Mandarin. Their training credentials will be valid for 2 years. Head of Departments will be contacted by HR to follow up on this procedure and will be requested to support in ensuring that policies and procedures are followed up on.

1. All staff will have to read through and sign on our own Child Protection and Safeguarding Policy (English or Chinese).
2. Will have undertaken a safeguarding briefing/induction before commencing their role at school from the relevant Head of Department to understand what is required of them if they have any concerns and to whom they should report (an abridged safeguarding presentation is available upon request from the Chief DSL).
3. Will sign on a register stating that they have read through our policy and have had a debrief from the relevant Head of Department. Chief DSL will check in with HR and key departments on a termly basis with regards to any additional training needs, which the Chief DSL can support with.
4. Wear an ID badge and lanyard at all times. Only exception to staff not wearing an ID badge are those staff who wear uniform in school (e.g. security guards, cleaners, canteen staff, etc.).

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

### **Parent and Other Volunteers**

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

1. Provide a copy of their passport to HR.
2. Will have to read through and sign on our own Child Protection and Safeguarding Policy (English or Chinese).
3. Will have undertaken a safeguarding briefing/induction before commencing their role at school from the relevant Head of Department to understand what is required of them if they have any concerns and to whom they should report (an abridged safeguarding presentation is available upon request from Chief DSL).
4. Will sign on a register stating that they have read through our policy and have had a debrief from the relevant Head of Department.
5. Wear an ID badge and lanyard at all times.



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

#### **4.2 Designated Safeguarding Leads (DSLs)**

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

- In accordance with the Children Act, the welfare of the child is always paramount.
- Regular is defined as volunteers who support school once a week or more.
- Confidentiality should be respected as far as possible.
- All DSLs, including Deputies, must complete the self-study course on NAU: 'Safeguarding for DSLs'.

All staff have a responsibility to report to the designated person any concern they have about the safety of any child in their care.

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

### **5. Employment and Recruitment**

#### **5.1 Safe Recruitment and Selection**

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

#### **6. Procedures to be followed by any staff member or external staff/volunteer who is concerned about any student**

All adults in our school share responsibility for keeping our children safe. Staff must disclose any child protection and/or safeguarding concerns. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm.

If staff suspect that any student in their care may be a victim of or is at risk of abuse/other form of harm, they should not try to investigate. They should immediately report this to the DSL, who will follow up and advise with next steps, including communicating with the



parents/family as deemed appropriate. In many cases a student will not make a direct disclosure, but staff will be concerned because of a physical or emotional indicator. In these circumstances staff should still proceed and report this to the DSL as per our reporting procedure outlined below.

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

If a child alleges abuse against any adult working at school, including volunteers, the Principal must be informed immediately without involving other adults in the discussion. If the Principal cannot be contacted, this should be reported to the Vice Principal (see section 7 below).

## **7. Allegations Against Staff and Volunteers**

*This section refers solely to allegations involving children. For allegations about an adult towards another adult, please see the Allegations Policy posted on all staff noticeboards.*

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

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

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

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

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

If an allegation is made against a member of the school staff (or a volunteer/third-party member), this should be immediately reported to the Principal who will investigate further and inform the Head of Safeguarding for NAE and HR headquarters if required. In the case of the allegation being against the Principal, this should be reported to the Regional Managing Director.

The Principal will work with the relevant members of SLT (Head of Phase and/or Deputy DSL) to ensure that the child is safe and at no further risk; they will investigate and decide on next steps of action.





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

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the NAE's Code of Conduct and Guidance for Safe Working Practice.

It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated or considered.

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

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

### **8. Record Keeping and Confidentiality**

The school will regard all details relating to individual child protection concerns, disclosures and allegations as confidential and sensitive information, and we treat it accordingly. The information will be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it will not be shared more widely than that.

All records relating to safeguarding and child protection issues will be logged via a dedicated programme (CPOMS). All school staff have access to record incidents on CPOMS and all concerns will only be sent to relevant Deputy DSLs and Chief DSL. Only the School Principal and Chief DSL will have full access to all records.

Any concern a member of staff (including volunteers and external/third-party staff) has of the welfare or well-being of a child must be followed up as soon as possible either on CPOMS or by filling out a record of concern which can be provided from the relevant DSL

The Chief DSL keeps a separate log of all child protection/safeguarding concerns and consults with the relevant DSL at the start of the new academic term to ensure that any staff who need to be made aware of any concerns are consulted accordingly. Admissions will inform the Chief DSL of any returning students. The Chief DSL will then follow up with



the relevant Deputy DSL to ensure communication is kept ongoing and if needed further actions will be carried out (e.g. prompting other staff to be aware of any concerns).

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

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

Any historical paper records that were held prior to the academic year 2019 will be destroyed as all information has now been securely transferred to CPOMS. As per guidance based from the Data Protection Toolkit for Schools (DfE, 2018), all our records will be retained for 25 years from the child's date of birth (this also includes students who are not on roll-their records are moved to an Archive section within CPOMS). Given our child protection and safeguarding records are on CPOMS, this procedure will be followed up via this system with processes in place, including notifying identified key staff one week before to review if these files are needed before they are deleted.

With any child protection records relating to historical investigations, including and especially any records about child sexual abuse, these records should not be destroyed (some guidance is noted from IRMS, Toolkit for Schools, <https://irms.org.uk/page/SchoolsToolkit>). The recommendation is to consider retaining a copy of these records even if the child has been transferred to another school.

## Sharing Information

Should other schools request for Safeguarding/Child Protection information about ex-students no longer at LIS, the Chief DSL will firstly be contacted and will liaise with the Principal to approve of any information being forwarded. If there are concerns noted about a student, the Principal will consult with the Chief DSL and relevant Head of Phase/DSL before sending any information.

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

All information must:

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



- be shared in a methodical and systematic fashion with a clear audit trail.
- be factually based, accurate and free from unsupported judgements. This underlines the importance of keeping accurate records.

We are currently in process of looking at arrangements for seeking child protection and safeguarding information from other schools, which includes considering aspects of local laws and regulations as part of this initiative. In the meantime, if we do receive any information from other schools, we will respect utmost confidentiality as outlined within this policy.

### **9. Photography/Mobile Phone and Camera Usage**

The school recognises that use of photography must be implemented in a responsible way and we respect children and parents' rights of privacy. Every reasonable effort will be made to minimise risk by securing parental consent for the use of photographs/videos (i.e. as part of the Conditions and Declaration form upon the admissions stage). Where a parent does not wish for their child's image to be used externally, they should contact the school to discuss the practicalities of this arrangement.

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

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

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

- Photographs of students being used by staff for learning or marketing are only taken on school cameras/devices and deleted soon after being uploaded to the appropriate place on the school server or agreed platform (e.g. Firefly, etc.).
- Images should be saved on the school's secure server and printed copies only used within the school for purposes such as displays, records and learning journals.

#### **9.2 Guidelines for Staff on the Use of Photography, Audio and Videos:**

It is never acceptable for staff to take photographs/videos of students for their personal use. For legitimate professional use, the following guidelines must be adhered to:

- Only ever use equipment provided by the school, not personal devices.
- Images must be uploaded to the school server or designated and agreed platform as soon as possible.



- Once uploaded to the appropriate area of the school network/platform, images must be deleted immediately from your school device, including any memory cards, etc.
- Images must never be uploaded to the internet by anyone other than The Marketing Department. See above (9.1) guidance for uploading any images by staff onto the internet under certain circumstances, this must be approved by senior management.
- Avoid taking images in one-to-one situations or which show a single child with no surrounding/context.
- Ensure students understand why the images are being taken and that they are appropriately dressed.
- Report any concerns about any inappropriate or intrusive images found.

*Note 1: Staff should refer to NAE's Social Media Policy for further guidance on usage of photography.*

*Note 2: Should a member of staff want to take photos/videos for other reasons other than stated above/as agreed by parents under our Conditions & Declaration form, it is imperative that this is discussed firstly with their line manager and approval is sought then from senior management and parents. Documentation must be provided that comprises of clear reasons and justifications, and specifically noting down what protocols are in place to ensure that we safeguard our students.*

## **10. Monitoring and Review**

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

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

This policy is reviewed annually.

## **11. Local Safeguarding Agencies/Advice**

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

## **12. Parental/Visitor Code of Conduct**

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



arranged.

All LIS parents and visitors must follow the Code of Conduct guidelines outlined below and all staff should positively encourage and ensure these are adhered to. This is displayed in all reception areas.

*When you visit LIS, you will be treated with integrity, care and respect.*

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

*On entry to our school, you must:*

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

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

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

## **9. Tutoring**

In line with other NAE schools, staff are not allowed to tutor children on the school premises and will not be given approval for tutoring outside of school hours. It is important to understand that anyone found to be tutoring will be in breach of the terms of their contract.

## **10. Summer School**

Before summer school commences, the Chief DSL will liaise with HR to ensure we are clear on which staff will be on site (LIS and external/3<sup>rd</sup> party). All external/3<sup>rd</sup> party staff will have to follow our regular procedures noted above, including the person responsible for running the summer programme to also provide a debrief to these staff members who are new to our school. The Chief DSL will liaise with the main person responsible for summer school to go through key safeguarding policy information and if needed, delegate some responsibility (e.g. ensuring to find a way to communicate with DSLs/Principal or Head of Admin. during this period) to address any concerns that may require immediate/urgent attention.

## **Appendix 1: Reporting Procedure, Dealing with Disclosure and Further Action**



The following guidance is based on best practices for all staff.

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

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



when following the framework and procedure for disclosure, reporting and further action. As international schools (as per NAE guidance) we:

- often reside in cities and countries that offer little external support.
- recognise the limitations in the areas of child protection.
- need to assess the quality and skills of counsellors and other support staff in dealing with children who have suffered harm or self-harm, in order to determine the boundaries of their work.
- need to act in accordance with local legislation as well as the principles and practices outlined in this policy.

### Additional/Key Points

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

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

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

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

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

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

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



- **Do not reveal details of the allegation or identify of individuals or staff concerned** other than to a DSL or the School Principal respectively – that may put a child at further risk. Child Protection and Safeguarding issues should remain confidential to those designated as responsible for dealing with them. An individual member of staff who has heard a child's disclosure may feel underpressure from colleagues to explain but should be aware they are under a contractual obligation to maintain the circle of trust.
- **Do not investigate the case yourself.** Discuss the allegation or suspicion immediately with the nominated DSL or Principal as outlined per this policy (unless you are the subject of the allegation in which case refer to the Principal).
- **Ensure that you have read through the Keeping children safe in education Part 1 (2019) document by the DfE in conjunction with this policy** (*please note that this document is to be used as a reference for further understanding of safeguarding practice in the U.K.*)
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/836144/Keeping\\_children\\_safe\\_in\\_education\\_part\\_1\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/836144/Keeping_children_safe_in_education_part_1_2019.pdf)





## Appendix 2: CPOMS (Guidelines)

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

### Key Messages with the usage of CPOMS at LIS:

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

### Logging incidents: Things to remember

LIS CPOMS Login A/C: <https://lischengdu.cpoms.net/>

#### Student

Year Group will be specified;

#### Incident

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

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

#### Category

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

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



## Body Map Guidance for Schools

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

### Date/Time

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

### Alert Staff Members

The Chief DSL will be alerted at all times as per CPOMS settings.

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

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

### Attached Files

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



### **Appendix 3: Virtual School Experience (Child Protection & Safeguarding Guidelines)**

As professionals working with and for our students, even in exceptional circumstances as much as is possible, we need to maintain the normal boundaries and behaviours that help to keep our staff and our students safe.

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

In the physical surroundings of a school building there is normally no need and we would avoid video or chat with students (one to one and in groups), as this is unnecessary because teachers have regular direct contact with students anyway. With virtual 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 with students at these times is permissible to support an interactive learning experience, so long as some rules are observed that will help to protect both staff and students.

Given this is a fairly new initiative and with the launch of VSE only in 2019, the guidance below is not exhaustive and over time, there might be changes that can be implemented. The Chief DSL, with the support of the Principal and Heads of Phase, will ensure key changes are communicated with all staff. The Chief DSL will utilise a NAE checklist to ensure that we comply with regulations and seek advice as part of our efforts to embed safeguarding within our VSE.

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

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

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

##### Staff Guidelines

- As within the normal school context, communication with a student, by whatever method, should take place within clear and explicit professional boundaries.
- It is important that communication with students and families is carried out via school-based email accounts and/or approved platforms only.



- Staff should not share their personal contact details, including e-mail, telephone numbers, WeChat, Skype details, etc. with students or parents.
- Any online conversations with students must be professional and related only to the task at hand.
- Any images/videos/audio shared must be appropriate to the task.
- Staff should not share any personal information with a student.

#### Group and 1:1 Online Live Meetings:

- Mode of Communication: Beginning of August 2020 TEAMS has been agreed as the platform for any kind of communication, including virtual meetings and video/voice calls with staff and students.
- There will be a Parent & Student Guidance letter, that includes information on how best parents can support their children to attend and engage within virtual meetings, ensuring safeguarding protocols are being adhered to. The Chief DSL will ensure these letters are drafted and sent firstly to VP for approval, and then to Heads of Phase early on in the event of VSE. Heads of Phase/Department must ensure that guidance is sent to parents and students (depending on age).
- All live sessions must be recorded (Group and 1:1) and then stored on TEAMS (*this is not to be shared with students/parents, including screenshots*). Once uploaded to the designated folders, all recordings must then be deleted from the staff's personal/school device. **It is important to note that Heads of Phase and relevant Heads of Department are to ensure that a specific/designated folder for all live recordings should be created onto TEAMS within their phases/departments. The location of these folders must be shared with the Chief DSL from the onset of VSE.** Once videos have been uploaded to the designated folder on TEAMS, staff should not go back to view these recordings (theirs or others). We are not at this stage using these recordings for learning review, sharing good practice, training or other purposes. The recordings are solely being saved for safeguarding purposes. To ensure compliance of data retention policies, these recordings will only be kept for 6 months. The only designated persons who (if appropriate) can view the recordings should be the DSLs and/or School Principal (this will depend on the nature of a safeguarding or child protection concern with regards to the recording). Any recordings which then has to be deleted (due to any child protection concerns, e.g. indecent images captured during recordings), can be followed up with the support of the Chief DSL and Deputy DSL; any deletion of records must be discussed and approved by the Vice Principal. Reason of deletion must be noted (Chief DSL has created a register for this purpose as part of record-keeping that is securely saved on the school server).  
*Note: It is not compulsory to record parent meetings, however it is essential that if these are being recorded, these must be done so with parental permission.*
- Parents must be made aware of all online sessions being arranged (lessons/times/dates). These should be arranged ahead of time and timetabled.
- Staff should read and go through information on updated Parent/Student Guidelines for online virtual meetings. This information will be sent to all HoP. If there are any questions, please follow up with HoP or DSL.



- Group sessions: HoP to firstly send out email to parents with implied consent for any live sessions taking place and notifying parents about these sessions being recorded. If arranging for 1:1 sessions, it is the responsibility of the teacher to ensure that parents are aware about the sessions being recorded.
- 1:1 Sessions: See below

1. Should staff want to communicate with students and families via voice-call/video conferencing, they must continue to follow steps outlined below:

- (i) discuss this with their line manager and Head of Phase to approve (providing rationale for this particular mode of communication).
- (ii) communicate with parents to make them aware and *seek their direct approval*. Screenshot of the email should be saved and sent to Head of Phase/Dept.

2. Once approved by LM/HoP, next steps are:

-Send email to parents to seek parental consent (via email) and parent/student guidance letter for live video/voice conference calls.

-For students Y5 and below, all invites should be sent to parents. From Y6 onwards, teachers can email students on school email address, *but parents must be copied in*.

-Any 1:1 sessions being scheduled, the HoD/HoY and class teacher (for EYs & Primary) should also be copied in.

3. All 1:1 video/voice call conference invites should be sent out at least 24 hours in advance, to ensure that if any parents/students have any concerns/questions about the arrangement, they have enough time to address this with the relevant teacher/HoD.

Some additional guidelines for staff to follow:

- During any lessons, ensure device is being managed and that any non-work related applications, files or apps are closed. Avoid use of emojis, GIFs during any chat with students.
- Normal professional boundaries apply, including how we dress. It is an understanding that staff and children must wear suitable clothing/be dressed appropriately (e.g. no pyjamas), including anyone else in the household who are around.
- Being mindful about the environment we use to deliver our lessons from. Ensuring if we are delivering lessons via our homes, for example, we ensure that the room is fit for the purpose.
- Any computers/devices used should be in appropriate areas, for example, not in bedrooms and where possible against a neutral background (applies to staff and students).
- There is an understanding that language amongst staff and students must be professional and appropriate, including any family members in the background.
- Keep track of students who do not attend the lesson. Attendance at all lessons is important for continued learning but could also be a sign of something of a potential wellbeing issue.
- Screen sharing: make sure your students don't take control of the screen and prevent them from sharing random content by limiting screen sharing, so only you as the teacher (host) can present to class.
- Avoid the use of personal social media platforms. Do not accept requests from or send any friend requests to students. All continued virtual contact should be through platforms that SLT have approved.



Protocols and specific use of TEAMS will be further elaborated and shared with all staff in the upcoming year. In the meantime, NAE have put some guidelines (these can change over time) to ensure safeguarding protocols are in place within this system:

- Think about the functionality of the platform you are using to deliver lessons. For example, within “Teams”, there is the ability to chat with students and for them to chat with each other but... this chat facility is open to anyone who uses teams, which means that anyone on teams could make unsolicited contact with one of our students. To address this, we intend to lock down the chat facility within teams to add an extra level of safety for our students. It could be argued that by locking this facility, it may cause some disruption to their work, but teachers will still be able to chat to students privately although will need to set up a separate channel for each chat. Colleagues should still be able to chat with the whole class without problem.

Students should not be permitted to:

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

Teachers however will be able to:

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

#### Parent/Guardian & Student Guidelines

- Acknowledgment that an online platform is not a 100% secure network.
- It is agreed that TEAMS will only be utilised for educational/learning purposes (no personal information must be shared).
- If needed, students can share their resources via virtual meetings, but should not share their entire desktop. It is important that students do not take control of the screen and to prevent random content being uploaded, teachers will limit screen sharing.
- It is essential that parents support in providing children with a workspace that is quiet and free from distractions with an adult nearby if necessary, this should not be the child's



bedroom. For our younger students, there might be an expectation that as part of any live meetings being arranged a parent/carer must support within these sessions; this will be communicated by the school team. Any computers/devices being used for these meetings, if possible, should be against a neutral background.

- It is an understanding that staff and children must wear suitable clothing/be dressed appropriately (e.g. no pyjamas), including anyone else in the household who are around/supporting within the lessons if needed.
- Ensuring that face to face communication is only between the teacher and students as the main focus. Any direct parent to teacher communication should be in the usual manner, via email. There is an understanding that language amongst staff/students must be professional and appropriate, including any family members in the background.
- Punctuality: All virtual lessons will be appropriately time-tabled. It is the students and their parents' responsibility to ensure that they join these lessons on time and are ready to learn.
- Absences: If a student is unable to attend a lesson, please ensure a parent contacts the relevant teacher.
- If you have any questions/concerns about this arrangement, please contact the teacher at least 24 hours before the scheduled meeting and we will try our best to address any queries.

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

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

After staff return from any school closure where VSE was in place, DSLs will work together with Heads of Phase/Departments to ensure that all recordings or any content that has been stored on personal and/or school devices, must be uploaded to the appropriate TEAMS folder, school server or agreed portal. HR will support, through documentation, to ensure that all leaving staff will have deleted all VSE content from personal/school devices as part of their exit procedure from school.

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

#### **Safeguarding Training and Induction**

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

Any new staff who join our school in the midst of school closure and who are supporting with any VSE, there will be a process in place that will be supported by our HR team to ensure that in the interim period, they must comply with certain documentation to submit (i.e. Checklist for Starters



where there is a delay in receiving an updated or new Criminal Records Check); this will also include the member of staff confirming that they have read through our Child Protection & Safeguarding policy. HR will continue to be in contact with the Chief DSL to update on any new staff who join our school. The Chief DSL will follow up to ensure that some materials are sent to new staff during school closure (e.g. induction PowerPoint presentation and key safeguarding messages). Once school resumes, and given circumstances, efforts will be made to make up any induction training session. Once the member of staff returns to school, HR will follow up with new staff to obtain hard copies of all required documentation.





**Appendix 4:**

**Child Protection and Safeguarding Policy (Signature Page)**

I (Full Name of Person)

\_\_\_\_\_

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

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

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

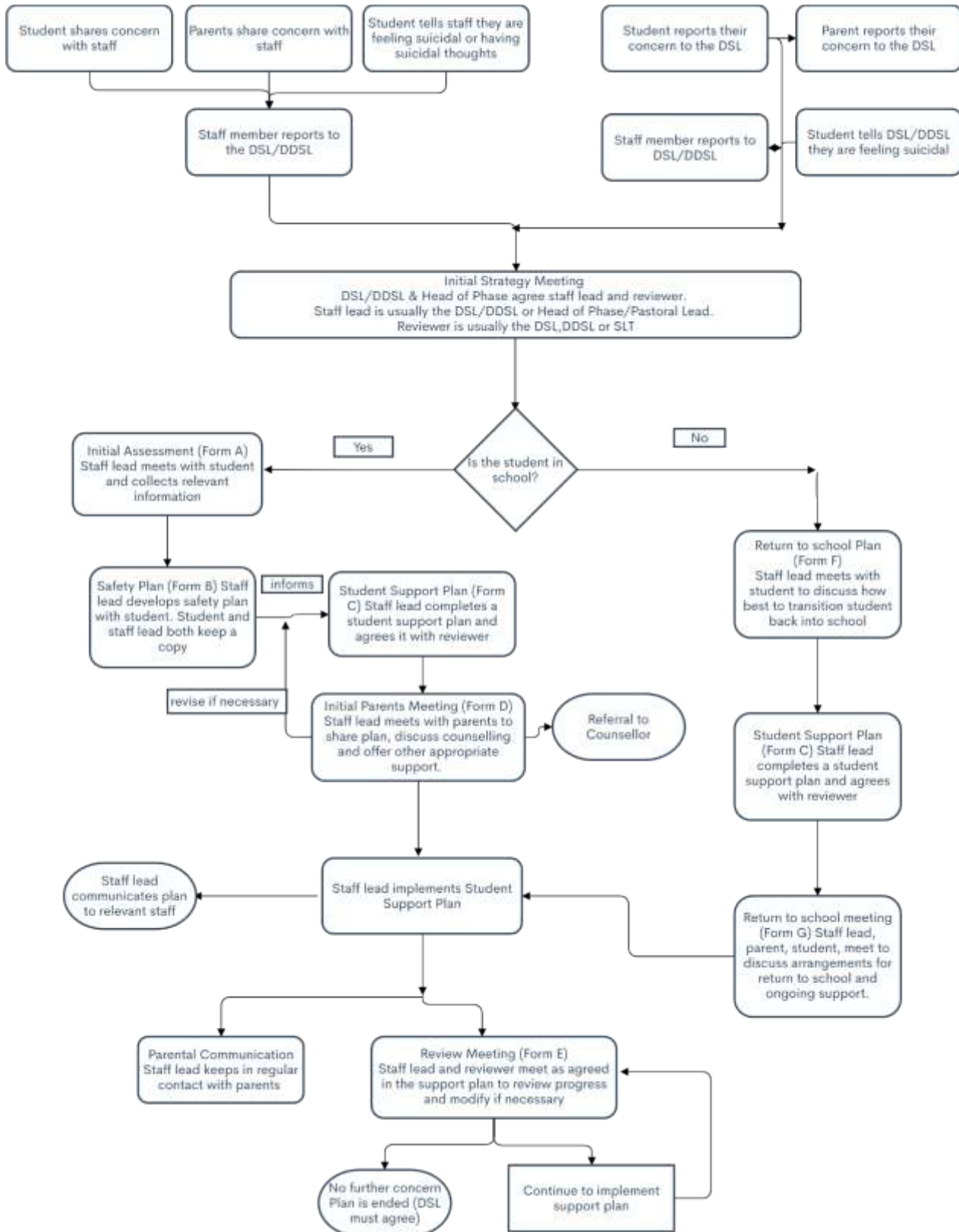
***Note: If you are a parent volunteer, kindly fill in the information below:***

*Name of child:*

*Class*



## Appendix 5: Student Intervention Flow Chart and Guidance





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*Please see Document named “ Serious Incident/Concern - Student Intervention forms” For the accompanying forms.*