



Nord Anglia Education

Guidance and procedures for safeguarding, protecting and promoting the welfare of our students

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**Please note that this procedures manual should be read in conjunction with the more detailed procedures outlined in the following NAE policies (and any local mandatory guidance):

- [NAE Allegations Against Staff Policy](#)
- [NAE Social Media Policy](#)
- [NAE Guidance for Safer Working Practice](#)

Section 1. Context

1.1. The United Nations 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 the UN articles can be found at the following link:

http://www.unicef.org/crc/files/Rights_overview.pdf

In addition to Nord Anglia Education's commitment to the UN Convention on the Rights of the Child, Nord Anglia Education uses the standards outlined by the [International Task Force on Child Protection](#) to benchmark our safeguarding practice against as well as the UK schools' statutory guidance 'Keeping Children Safe in Education' (September 2020- see end of page 5). The NAE procedures are also underpinned by the UK multi-agency guidance "Working together 2018" where relevant.

Section 2.

Organisational and Individual Responsibilities

2.1. Nord Anglia Education Senior Management Responsibilities

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

2.2. Principals/Heads of School and School SLT Responsibilities

The Principal/Heads of School and senior management team in each school must:

- Ensure that this child protection and safeguarding statement, together with these procedures, are implemented across their school and followed by all staff and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and any deputy Designated Safeguarding Lead to carry out their role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the school site is secure.
- Customise these procedures to fit their school and geographical location.
- Ensure that mapping of local legislation, guidance and supportive agencies is undertaken and added to the school's customised version of these procedures (including clarity on legal duties to report any child protection issue to local authorities etc).
- 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 during any outbreak of COVID-19 and/or provision of Virtual Education these procedures continue to underpin our engagement with our students.

2.3. 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/Heads of School on each site. This means that schools with split sites will have more than one Designated Lead for safeguarding. All DSLs 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 the role of DSL requires an element of openness and challenge, this can pose difficulties. Additionally, the Principal would be subject to the same training and requirements as every other Designated Safeguarding Lead. Schools are therefore advised to give careful consideration before choosing the Head teacher/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.
- Make sure that all staff (both teaching and non-teaching) are aware of their responsibilities in relation to safeguarding and child protection, with the support of Principals and Heads of School.
- Have appropriate training in addition to the basic training that all other staff receive. The expectations around appropriate training during COVID outbreaks are covered in section 8 of this document.
- Collate and keep accurate and confidential records of any concerns about children.

- Ensure that the entire school community knows who the DSL is in their setting or, if being supported remotely during a COVID outbreak, who is providing this support and how to contact them.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

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

Responsibilities of all staff, including partner organisations and contractors who have regular unsupervised contact with children (where 'regular' is defined as once a week or more).

2.4. All staff will:

- Ensure that they are familiar with and follow these safeguarding/child protection procedures and all other safeguarding related policies e.g. Codes of Conduct, guidance for safe working practice.
- Be subject to safe recruitment processes and appropriate background checks, including prohibition order checks for EU trained staff, prior to starting at the school/organisation (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed).
- Be alert to signs and indicators of possible abuse.
- Listen to, and take seriously, the views and concerns of students.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL).
- In NAISAK, the Designated Safeguarding Lead(s) is Lydie Gonzalès and the Deputy Designated Safeguarding Lead is Jamie Hughes. They can be contacted on 626 and 603, lydie.gonzales@nais.qa and jamie.hughes@nais.qa, in SG01 and PF19.
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding, safe recruitment and on-line/cyber safety training (and refresher training as required by Nord Anglia Education).
- All staff and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the NAE code of conduct and/or the guidance for safe working practice this may be considered a disciplinary, or even criminal, matter.

Please note: For all staff and volunteers who work in one of our British schools, there is an expectation that you 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 needed for any accreditation inspection in these schools. This document can be found in the resources section of the safeguarding site on NAU but also on the [UK government website](#).

2.5. 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 and understand what is required of them if they have concerns and to whom they should report these.

- 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.
- Read and follow Nord Anglia Education's safeguarding / child protection policies and procedures. 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 statement and procedures. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in these procedures at all times. This includes any specific guidance relating to the provision of virtual education.
- Be provided with guidance on appropriate safe working practice in an NAE school. Principles of this guidance also apply to the provision of virtual education.

Section 3. 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 thereafter. This training will be available through Nord Anglia University (NAU) and face-to-face events. In addition, all staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins or staff meetings) to provide them with relevant up-to-date skills and knowledge to safeguard children effectively. As a minimum, this should be provided annually.
- 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 students who are at risk or potentially at risk and take the appropriate action.
- The Designated Safeguarding Lead in schools has appropriate and up-to-date knowledge and access to additional training such as on-line safety and specialist (level 3) training, which is approved by the Education Director/Head of Safeguarding. This will be refreshed every two years. (**please note during COVID 19 some of these expectations have been amended-see section 8)
- All staff and volunteers are subject to a full induction which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate staff are trained in 'safe recruitment'. This safe recruitment training must be renewed every five years.
- Training for new starters must be complete before any new starter can have unsupervised contact with students.
- Any student who has suffered 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 and 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 may therefore be able 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.

It is imperative that you do not carry out an investigation about any suspected abuse before being clear on the legal obligations to refer (or otherwise) to local authorities within your specific country/region unless you are specifically asked to do so. This can be highly specialist work and could interfere with a criminal investigation (if this were required and appropriate) under local laws.

Section 4.

Forms of abuse and additional safeguarding issues

4.1. Key Forms of Abuse

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

The more commonly referred to types of abuse are:

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

While the above are the 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 alert to other possible types of safeguarding issues and what to look for as indicators. We also all need to know what actions to take when concerned about any of these issues. The sections below provide some examples of additional safeguarding issues but please be aware that this is not an exhaustive list and there are many other potential safeguarding risks that DSLs should make themselves aware of.

4.2. Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. Therefore, it is important for schools to spot it as early as possible and to do everything possible to

help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. 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 themselves might not 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 the sense of a 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 and bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, 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 a referral to an organisation that may be able to support the student.

4.3. 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 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.

4.4. Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages.

Sexting may also be referred to by students as ‘trading nudies’, ‘dirties’ or ‘pic for pic’.

There are many reasons why a student may 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.

4.5. E-Safety

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

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

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

Nord Anglia Education believes that the best way to protect our students is to teach awareness and an understanding of risk, particularly through personal, social and health education, sex and relationship education and wellness programmes. 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.

4.6. Mobile phones 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 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 on personal equipment should be sought from the Designated Safeguarding Lead or Head Teacher for the school.

Photographs for School Publications:

- Photographs of students being used by staff for learning or marketing should only be taken on school cameras/devices. Where school devices are not available and personal equipment is used, this is permissible so long as the images are then only stored and shared through a school-based system and never a personal social media account or other medium.
- Images should be saved on a secure server/database. Images used for marketing or any other purpose need parental agreement before use.
- Generally, 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 or as an interim support to learning as per the first bullet above.
- Visitors and parents/carers should be asked not to use mobile 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 to be used for publicity purposes and sign a disclaimer if they do not wish for their child's image to be used externally.

4.7. Allegations against staff and volunteers

The full detail on handling allegations is set out in the [NAE Allegations Policy](#) available on NAU.

In summary:

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

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

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

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

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

No action to investigate the concern should be taken before consultation with the Head of Safeguarding, HR and Group Legal to verify if Legal Privilege is to be maintained and an agreement is reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are needed then the member of staff may be suspended. Suspension is a neutral act and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the Regional HR Director/Head of Safeguarding before acting and will comply with national and locally agreed guidance on these matters. Each school is expected to have researched and mapped the local arrangements and guidance for dealing with allegations and these should be reviewed at this stage.

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations set out within the Nord Anglia Education Code of Conduct for Staff and Volunteers and the NAE Guidance for Safe Working Practice.

4.8. 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 a protected disclosure and, even if proven to be unfounded, will not result in action taken against the whistle-blower.

Malicious whistleblowing, however, will be a potential disciplinary matter. See Nord Anglia Education's Whistleblowing Policy.

4.9. 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 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.

4.10. Children with Special Educational Needs or Disabilities

All staff should recognise that children with Special Educational Needs and Disabilities can lead to additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it may be assumed that a child's mood, behaviour or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted by behaviours such as bullying but they may not show any outward signs. Communication difficulties can make it very challenging for a child to indicate what is happening which in turn can make it very hard to address the underlying issues. Staff should be extra vigilant and report all concerns whilst avoiding making assumptions about the causes of any injury or behaviour.

4.11. Safeguarding students who are vulnerable to extremism

Nord Anglia Education Schools value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. 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 provided by the UK government on Extremism can be found at the following link: <http://www.elearning.prevent.homeoffice.gov.uk/>

This short course is helpful as it raises awareness about the issue but the links and 'prevent duty' concept are UK orientated so of limited use to the international context.

4.12. Domestic Abuse

The accepted definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to, psychological, physical, sexual, financial and emotional forms. Exposure to domestic abuse and/or violence can have serious and long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can occur within their personal relationships as well as in the context of their home life.

4.13. 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. 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 application forms, the interview process, the verification of identity and qualifications, obtaining appropriate references and undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks.

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

Any disclosure from the criminal records checking process will lead to a risk assessment being completed prior to appointment including cautions, convictions or soft information. This risk assessment will be signed off by the Principal or Regional HR Manager.

4.13.(i). Single central record

Schools should maintain a single central record of all staff pre-appointment checks as a register for best practice.

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

The central record must cover all staff and volunteers including teacher trainees, agency and third-party supply staff who work at the school.

The single central record must document the background checks carried out, the appropriate certificates obtained and whether the following information has been collected:

- 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 a role. Make sure the original certificate proving the qualification is seen and recorded.
- EEA/prohibition order checks, (undertaken by regional HR team on all teachers who qualified within the EU area. Regional HR would need to provide schools with evidence that these checks have been undertaken).

- Section 128 check (Only applies to EU citizens who are taking up positions as Principals or senior leaders). This check is an EU wide check to see if any senior leader who has worked in the EU area is barred from taking up a leadership position. Regional HR should undertake these checks on school's behalf.
- Background checks (must cover a 10-year period and all countries lived in over the last 10 years. This requirement applies to 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.

4.14. Peer on Peer Abuse

All staff should recognise that children are capable of abusing their peers.

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.

There should be clear processes as to how victims, perpetrators and any other child affected by peer on peer abuse will be supported and a clear statement that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. All peer on peer abuse is unacceptable and will be taken seriously.

Staff in school need to understand the different forms that 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
- Sexting

Schools with boarding have additional factors to consider regarding safeguarding. Schools that provide such residential accommodation should be alert to inappropriate pupil or student relationships and the potential for peer on peer abuse, particularly in schools and colleges with a significant gender imbalance.

Schools may wish to use the [Brook Traffic Light Tool](#) when concerned about potential peer on peer abuse. This tool provides some basic guidance for staff on when to be concerned about the sexualised behaviour of a student.

Section 5. The Provision of Virtual Education

5.1. Basic expectations:

During the COVID pandemic, the 3-month period between March to June 2020 saw a 45% increase in inappropriate images of children appearing online in the UK alone. There is nothing to suggest that the UK would be any different to any other country.

This increase can potentially be put down to the conditions being ideal: With more students at home for longer and increased on-line activity, the potential for being manipulated by someone is greater.

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

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

To this end, staff should be aware that:

- With virtual education provision, the ability to use both video and to be able to chat with students through remote platforms is important and may often involve one to one contact. This type of one to one contact is permissible to support an interactive learning experience, so long as professionalism is always maintained and that some basic expectations are observed that will help to protect both staff and students. It is important to recognise that the NAE Code of Conduct and especially the [NAE Guidance for Safer Working Practice](#) should remain as the go-to guidance in all interactions with students. This guidance sets out the expectations on staff in a variety of situations, not just virtual education.
- During lessons, video calls or chat the activity should be managed appropriately, regardless of the device being used. For example, staff should ensure that any non-work-related applications, files and apps are closed and avoid the use of emojis and GIFs.
- The recording of a lesson/video call is permissible if parents of the students involved are aware and happy with the recording happening. Any recording should only be made on, and uploaded to, NAE business systems. The recording of sessions should only take place when necessary to meet specific learning objectives.
- Normal professional boundaries apply. Staff should dress appropriately and ensure that the environment they deliver lessons from is suitable to remain professional in all engagements with students and parents. When delivering virtual lessons, staff should ensure that the room used is fit for purpose.
- On-line contact with students should be planned and ideally timetabled, much like a physical school environment. Staff should avoid calls and lessons to students on an ad hoc basis. By timetabling contact with students and requesting approval from SLTs, staff avoid the potential for ad hoc contact and help to protect themselves and students.
- As much as possible parents should be made aware of the lesson/contact timetable so they can ensure that their children know when and how to join in. This is particularly important for the parents of younger students.
- The use of personal mobile phones should be avoided. Contact through school online platforms 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 objective for the call shared.
- Where mobile phones have been used to contact students, colleagues should ensure that any student's personal numbers stored in their personal phones or other personal equipment are deleted when they are no longer required.
- The use of personal social media platforms to deliver or communicate with students should be avoided.
- Staff should not accept requests from or send any friend requests to students. All continued virtual contact should be through platforms that SLTs in schools have approved.

- Concerns about the safeguarding of any of our students should be dealt with in the same way as in the physical school environment. All concerns should be referred to the school's DSL or their deputy as soon as possible.
- A record of non-attendance should be kept for every lesson. Attendance at all lessons is important for continued learning but could also be a sign of a potential wellbeing issue. Staff should follow up any absence in the same way as if they were in a physical environment.

For Students:

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

Below are some of the basic rules and expectations on students accessing virtual education:

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

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

Nord Anglia Education will:

- Provide guidance through our schools to parents and students about cyber-security and staying safe on-line as part of our virtual education offer.

Nord Anglia Schools will:

- Ensure that they have acceptable user guidance in place for all students and staff.
(See - link to guidance on NAU when available)

Section 6.

Reporting Procedures

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 any other form of harm, they should not try to investigate. Rather, they should inform the Designated Safeguarding Lead (DSL) about their concerns as soon as possible.

Staff must disclose any concerns that they have about the possibility of a student being abused or 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 to 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 use the Record of Concern Form in Appendix 1 and the Body Map in Appendix 2 (if appropriate) to make a report to the Designated Safeguarding Lead.

When 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 the 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:

If a child asks to speak to someone in confidence about a problem, staff should be clear that they cannot promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.

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

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 cannot 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. Do not 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 location as well (see the Record of Concern Form in 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 written/typed account of the concern (ideally using the form in Appendix 1) should be passed to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed Body Map (which can be found at Appendix 2).

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal/Head Teacher in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then review 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 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 considered 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 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 Head of Safeguarding for NAE: Barry Armstrong, barry.armstrong@nordanglia.com, phone: +44 (0)1235 355848 or mobile: +44 (0)7710 086737.

Section 7.

Record Keeping and Confidentiality

7.1. 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 only be shared with those who need to have it to enable them to take appropriate steps to safeguard the child or carry out their own duties but it should not be shared more widely than that.

- Child protection records should be stored in a secure (i.e. locked) filing cabinet or in a secure electronic system, accessible through the Designated Safeguarding Lead (or their deputy) and other senior staff in larger schools to ensure reasonable access.
- Records of any child disclosure should be clearly dated and filed without future amendment.
- Child protection records should be separate to the general education file but the child's general school record file should be marked to indicate that a child protection file exists (e.g. red star or similar). All staff who may need to consult a child's school file should be made aware of what the symbol means and who to consult if they see this symbol.
- A child protection file (electronic or otherwise) should be started for an individual student as soon as the school is aware of any child protection concerns about that student. This may arise in several ways e.g.
 - Where any adult raises a concern.
 - Where any student raises a concern about themselves or another student.
 - If information is forwarded to the school by a previous school attended by the child.
 - If the school is alerted by another agency of child protection concerns about that child.

- Members of staff should make a written/typed account of any concern they have regarding the welfare or well-being of a child using the school's pro forma (see Appendix I). This record should be passed to the Designated Safeguarding Lead 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 has not been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from a file (electronic or otherwise) for any reason, a dated note should be placed in the file indicating who has taken it, why and when.
- The record pro forma should include (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 where they were returned to at the end of the disclosure.

7.2. Confidentiality

Our schools should regard 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/Heads of School/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.

Further information in relation to [sharing information](#) can be found on NAU.

Section 8. Safeguarding in times of Coronavirus

8.1. Points to think about and reinforce:

COVID-19 has had a major impact on all schools around the globe with many being closed and having to adapt to virtual education provision as an alternative. As schools slowly begin to reopen, they need to be conscious that the threat from COVID has not gone away. There have already been and are likely to continue to be subsequent waves, albeit that these may be more localised. The implications of this are significant across the whole school environment, including the safeguarding and child protection arena.

In addressing concerns around COVID, it may be helpful to consider the following:

- The continued importance of all staff, contractors and any volunteers acting immediately on any safeguarding concerns, especially new concerns where students are returning after a long period away.
- The importance of ensuring relevant safeguarding and welfare information held on all students (including returning students) remains accurate and up to date. Where possible schools should seek any additional information from parents.
- DSL (and deputy) arrangements. We would expect all schools to have at least one NAE level 3 trained staff member on each school site. When a lockdown due to the pandemic impacts these arrangements and there are displacements of staff from schools, this expectation can be relaxed due to the exceptional circumstances. However, schools should make arrangements for a trained DSL (or deputy) from the school or another school in the group to be contactable via phone or online video should concerns about a child be reported. The Head of Safeguarding, Barry Armstrong, is happy to act remotely in this role for any school.
- Where a trained DSL (or deputy) is not on site, a senior leader should take responsibility for co-ordinating safeguarding on site, in addition to one of the above options.
- Whatever the scenario, it is important that all schools, staff, contractors or volunteers have access to a level 3 trained DSL (or deputy) and know, on any given day, who that person is and how to speak to them.
- As a result of the travel restrictions during the COVID outbreak, access to the NAE face to face level 3 training is restricted. For the foreseeable future, we are revising the need for all DSLs to access face to face training every 2 years and instead moving this to every 3 years. In making this change, we now require DSL's, their deputies and any new DSL or deputies in post to undertake the NAU training courses on: 'Role of the DSL', 'Safeguarding for Recruiters' and 'Introduction to Safeguarding'.
- A revised process may be required for managing any report of Peer on Peer abuse given the different circumstances schools may be operating in.
- Any changes to what staff, contractors and/or volunteers should do if they have concerns about another staff member or volunteer.
- What arrangements are in place to keep students not physically attending the school safe, and how concerns about these students should be progressed.

- It is important that all staff and volunteers are aware of the additions or changes to the Safeguarding/Child Protection statement and procedures and are kept up to date as it is revised. The revised documentation should continue to be made available to all.

Section 9. Auditing, Reporting, Review and Sign off

To support the implementation of the Safeguarding and Child Protection Procedures and to enable schools to undertake a 'Safeguarding Self Evaluation', schools will be provided with a self-assessment tool. It is expected that all schools will undertake and submit this assessment to the Head of Safeguarding every year. A random selection of schools will be reviewed in more depth. Schools may be supported by the Head of Safeguarding to both complete the assessment and put in place strengthened practice.

Elements of safeguarding practice in schools will also: be included in the Education Team's more general quality assurance framework; will continue to be an element of the school's Health and Safety review; and continue to be part of 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 through the school's own website and the Nord Anglia Education website, as well as in hard copy where requested. The procedures will be translated into key languages through schools.

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

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

Signed and dated by the CEO (or
delegate) on
behalf of Nord Anglia Education

Signed and dated by School Principal

Signed and dated by the school
Designated Lead for Safeguarding

Appendix 1- Exemplar Record of Concern Form

Pupil's Name:		
Pupil's Address:		
DOB:		
Is the Pupil aware this form is being completed	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
If not, why not?		
If yes, pupil 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 in 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 because of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

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:

.....

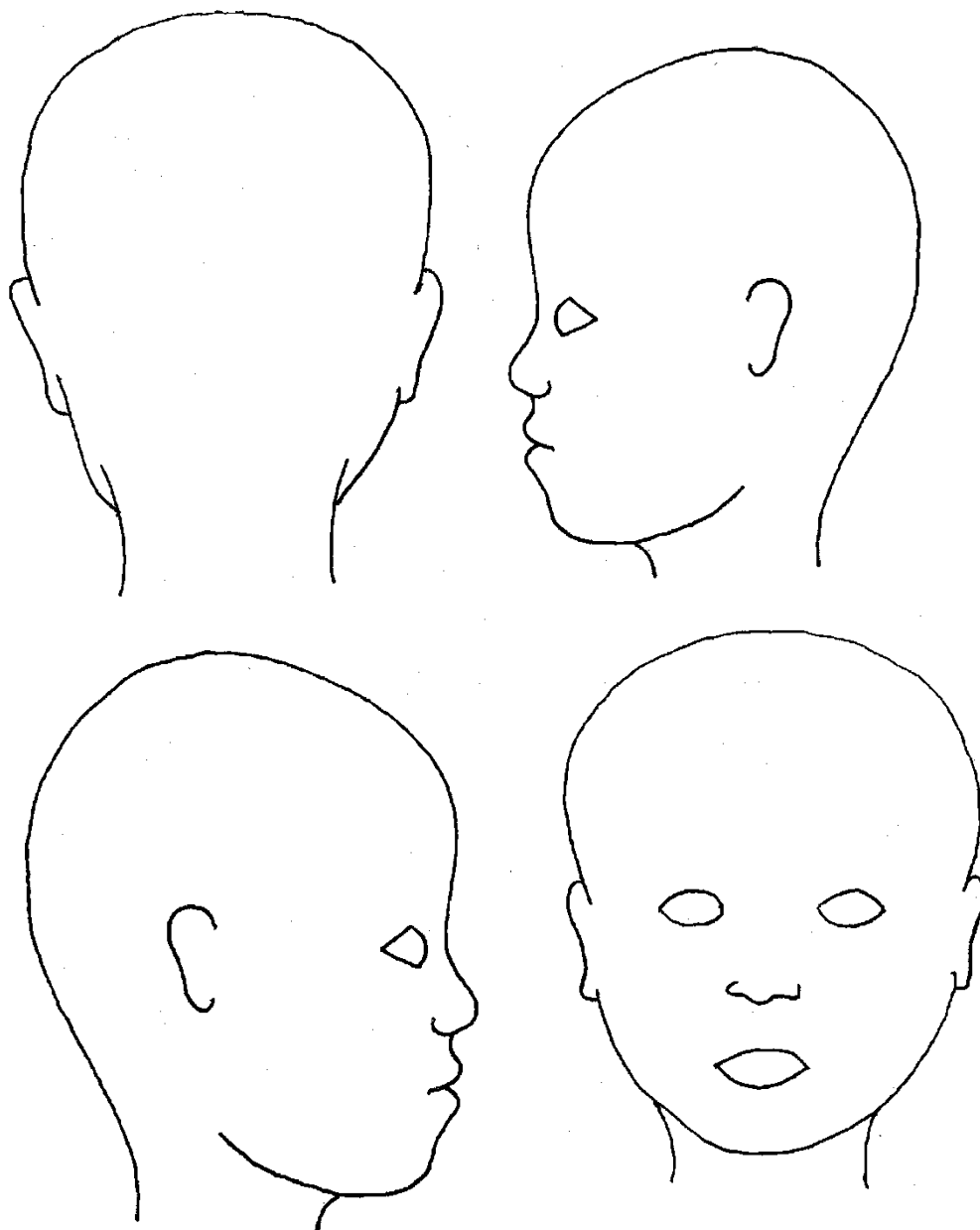
Role of the person completing the body map:

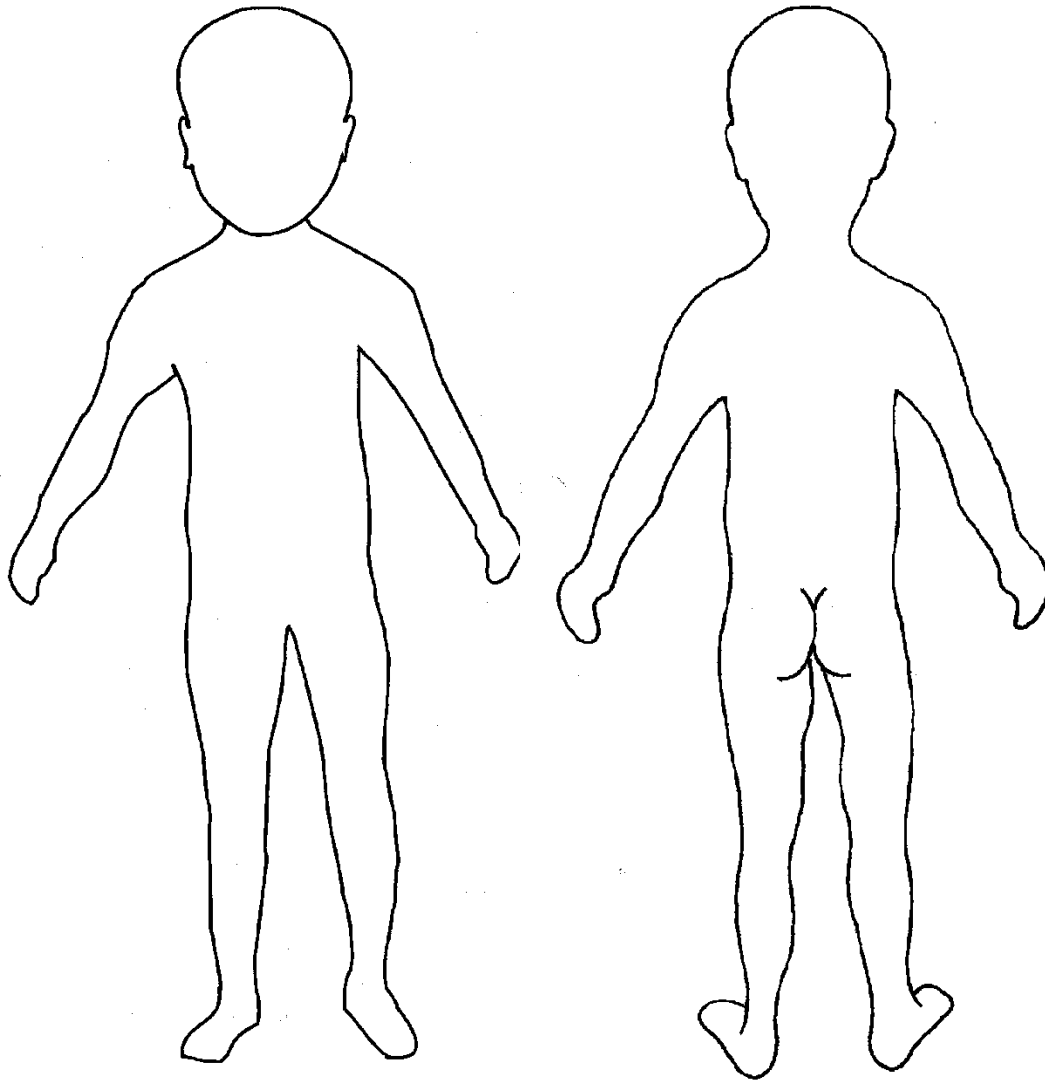
.....

Date of injury and form being completed:

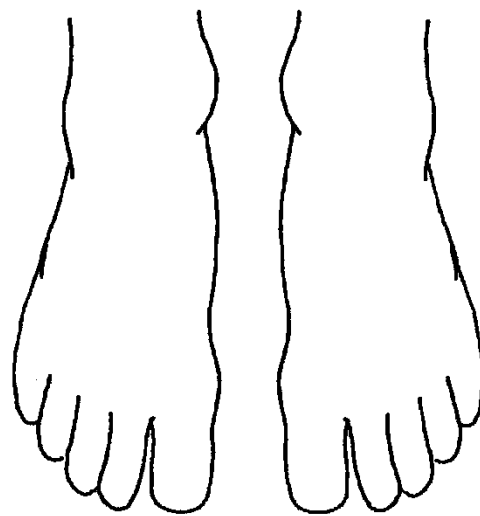
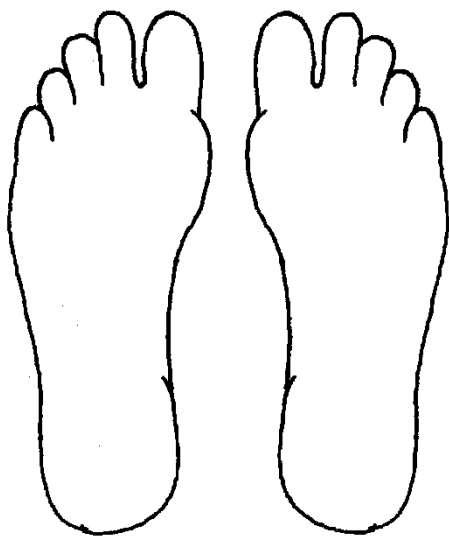
.....

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

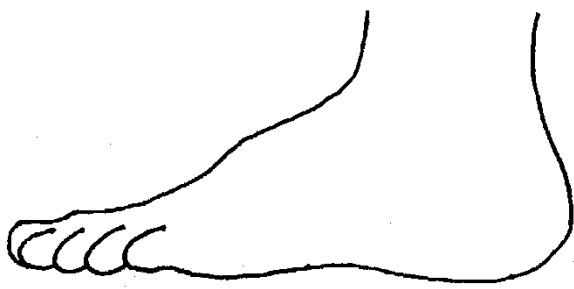




Sole of Feet



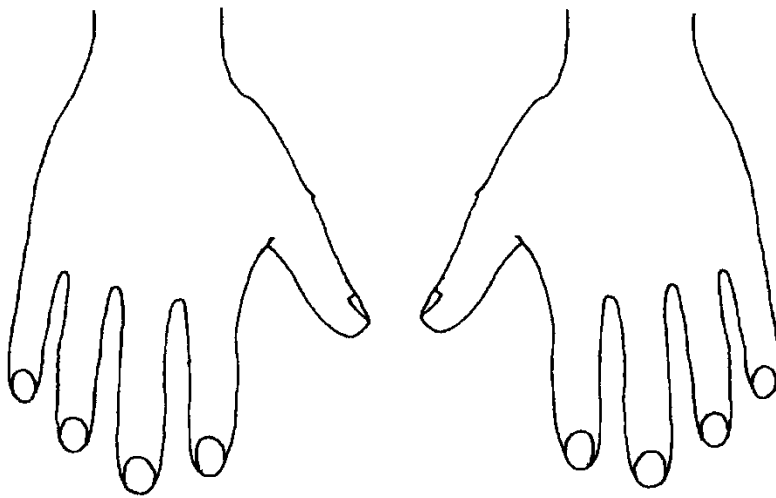
Top of the Feet



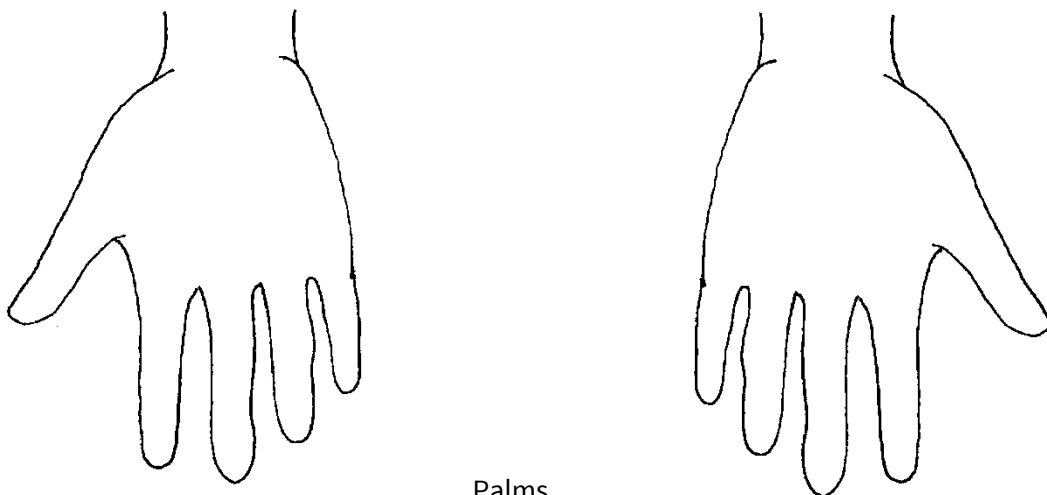
Left Foot



Right Foot



top of hand



Palms