



Child Protection and Safeguarding Policy

Title (or name) of Current Owner	Monica Daryani
Category	Health & Safety
Extent	Whole School
Date Implemented	August 2013
Standard Review Period	Annual
Last Reviewed by	Monica Daryani
Approved by	BSG SLT
Next Scheduled Review Date	June 2020

NOTES:

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



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Child Protection and Safeguarding Policy

The Designated Safeguarding Leads (DSLs) for The British School of Guangzhou are:

Overall Head of Safeguarding

Mr. Mark Thomas (School Principal)

Chief Designated Safeguarding Lead (DSL)

Ms. Monica Daryani (SENCO)
[directly reports to VP-Garry Russell]

Deputy DSLs are:

Lakefront Early Years Campus

Ms. Danielle McKenna (Head of Early Years)

Primary

Lauren Brophy (Primary)

Secondary

Ms. Sarah Newton (Secondary Deputy Head)

External contact in case of need is the Regional Managing Director (China), Mike Embley.
Contact details: Mike.Embley@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 Phase DSLs are there to directly support with concerns within their respective phases and, if unavailable, the Chief DSL can be contacted. 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 Vice Principal, who acts as an impartial voice on safeguarding policy and practice. The VP does not act as a DSL, except in the absence of the Principal.

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), Mike Embley, 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) 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 and share information as long as it is not damaging to them or 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 should 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

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 and any other related policies.

1.4 Principles, Beliefs and Policy



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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 from abuse 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 ensure, 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:

1. A child's welfare is paramount and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender or culture; we recognise that we need to do more for some students because of their special educational needs, disability, gender, religion or sexual orientation.
2. All students need to be safe and feel safe in school.
3. Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
4. Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
5. We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
6. Our guiding principle throughout is 'the best interests of the students'.
7. We take seriously any concerns raised, including listening to the views of the children;



8. 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 3)
- 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
- provide counseling where involvement in a child protection case has impacted on a member of staff's mental well-being

All DSLs 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 are fully aware of the procedures and guidelines relating to reporting and investigation. In addition, we will appoint designated senior staff members (Designated Safeguarding Leads) who will receive additional training so they may guide and support any employee through the reporting and responding process.

In order to both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special/additional needs, medical/psychological conditions, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

2. Code of Conduct

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. This 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.



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- 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 adults on site must wear an ID badge at all times.

2.3 Staff and others must never:

- hit or otherwise physically assault or physically abuse children;
- develop physical/sexual relationships with children;
- develop relationships with children which could in any way be deemed exploitative or abusive;
- act in ways that may be abusive or may place a child at risk of abuse;
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- behave physically in a manner which is inappropriate or sexually provocative;
- have a child, with whom they are working, visit or stay at their home alone;
- do things for children of a personal nature that they can do for themselves;
- condone, or participate in, behaviour of children which is illegal, unsafe or abusive;
- act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse;
- discriminate against, show differential treatment, or favour particular children to the exclusion of others.

This is not an exhaustive or exclusive list. The principle is that staff should avoid actions or behaviour that may constitute poor practice or, potentially, abusive behaviour.

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

- 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
- 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 about their contact with staff or others and encourage them to raise any concerns;



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- empower children - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem;
- 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.

2.5 In general it is inappropriate to:

- spend excessive time alone with children away from others;
- take children to your home where they will be alone with you;
- 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.

3. Forms of Abuse and Specific Safeguarding Issues

3.1 Forms of Abuse/ Risks/Specific Safeguarding Issues:

The more commonly referred types of child 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



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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, although, ideally, guidance 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.

Note:



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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” 2016, which NAE has also benchmarked against to set safeguarding standards.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741315/Keeping_Children_Safe_in_Education_2018_Part_One_14.09.18.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. The school’s Anti-Bullying Policy is located here: [smb://bgzfse01/School_Policies/Whole_School_Policies/Student_Welfare / Anti-bullying Policy.doc](smb://bgzfse01/School_Policies/Whole_School_Policies/Student_Welfare/Anti-bullying_Policy.doc)

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

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



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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. This type of peer on peer behaviour 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.

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. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation. UK government guidance has been issued in relation to the use of reasonable force and can be used as best practice advice.

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

The Principal or Vice 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 when an intervention has been necessary.

Domestic Abuse

The accepted definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: • psychological; • physical; • sexual; • financial; and • emotional. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.



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 Learning Support Department (SENCO), is able to provide contacts in and around Guangzhou should a student and/or family seek/benefit from a referral for support to address any child protection and/or safeguarding issues from external professionals/organisations (e.g. mental health professionals, psychologists, etc.). Our school also has a counsellor on site within Secondary and is able to provide related supported 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:

1. English speaking staff will need to complete our Introduction to Safeguarding course on Moodle via the guest portal; this will be valid for 2 years. Head of Department will be contacted by HR to follow up on this procedure.
2. All staff 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 the 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. These will be held termly.
5. Wear an ID badge at all times.



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This applies to external staff involved in ASAs, PE, SEN, Music, Cambridge English School, Bus Company, Canteen, Cleaning Agency, etc. (this list is not exhaustive).

Parent and Other Volunteers

These are volunteers who come into school on a regular basis¹ 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, PSG 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 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 between the school year.

4.2 Designated Safeguarding Leads (DSLs)

There is a Whole School named person and at least one named person per phase 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.
- 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.

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

¹ Regular is defined as volunteers who support school once per week or more



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Nord Anglia Education's/BSG's Recruitment Policy and Background Checking Policy. All staff involved in interviewing candidates for teaching and non-teaching posts at BSG 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 concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm.

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

Where any student makes any form of direct disclosure, the guidelines under the 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 allegation is taken seriously
- That the student is listened to and responded to with empathy



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- 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 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 (Mike Embley).

The Principal will work with the relevant members of SLT (Head of Phase and/or Phase DSL) to ensure that the child is safe and at no further risk; they will investigate and decide on next steps of action. If the Principal cannot be contacted, this should then be reported to the Vice Principal.

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 Admin (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 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. Parents should still be asked to respect confidentiality.

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 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 DSLs and Whole School DSL. Only the School Principal, Vice Principal and Chief DSL will have full access to all records.

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

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.

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 prior to March 2019 (before the official launch of CPOMS), will be kept until the student is of school age (18 years) and on roll. Any records that are no longer of school age and of students not on roll, will be destroyed. CPOMS records are kept live until 5 years after the student has left BSG, after which they are automatically and permanently deleted.

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

We will also proactively seek out any child protection and/or safeguarding records from a new student's previous school. The Chief DSL will work with our school's Admission team to obtain the appropriate contact of the previous school to try to gain such information.

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 Vice-Principal.

9.1 Photographs for School Publications



- Photographs of students being used by staff for learning or marketing are only taken on school cameras/devices and deleted soon after.
- 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 as soon as possible.
- Once uploaded to the appropriate area of the school network, 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.
- 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: Staff should refer to NAE's Social Media Policy and BSG's Learning Technologies & Digital Literacy Policy for further guidance on usage of photography.

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.

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

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

This policy is reviewed annually.

11. Local Safeguarding Agencies/Advice

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

12. Parental/Visitor Code of Conduct



THE BRITISH SCHOOL OF GUANGZHOU

A NORD ANGLIA EDUCATION SCHOOL

All adults on site, including visitors, must wear an ID badge at all times. This may be the BSG 'visitors' 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 visitors badge can be arranged.

All BSG parents and visitors will be presented with the following code of conduct that all staff should positively encourage and enforce. It is displayed in all reception areas.

When you visit BSG, 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.*
- use the designated adult toilets whilst on campus and under no circumstances enter the changing room areas.*
- not be alone or in close proximity with any other child.*
- not touch any other child or invade their own, personal space.*

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.



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:

- **Receive:** Where possible always **stop and listen** to a child who wishes to speak in confidence. Responding to an allegation or suspicion of abuse of a child immediately takes priority. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say "I can't stop now but come and see me in my office at...". Where possible during any disclosure try to listen, allow silences and try not to show shock or disbelief.
- **Reassure:** Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. **Do not promise confidentiality** or agree to "keep it a secret". Action will have to be taken if you believe that any child is suffering, or is likely to suffer significant harm. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.
- **React:** React to what the child is saying only in as far as you need to for further information. **Don't ask leading questions.** Keep questions open like... "is there anything else you need to tell me?". You do not need full details. 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 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.

Consider whether a child now 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.



Additional/Key Points

- **Decide whether the allegation or suspicion indicates that a child is suffering, or is likely to suffer, significant harm.** The Principal/Designated Safeguarding Lead will consider whether:
 - the allegation or suspicion appears to be seriously meant
 - if true, it would constitute or seriously risk a child suffering, or being likely to suffer significant harm
 - the actual or likely harm is of a sexual, physical, emotional or neglect nature, sufficient to affect the child's normal physical, sexual, emotional, educational or social development

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 the staff or individuals concerned** other than to a DSL – that may put a child at further risk. Child Protection and Safeguarding issues should remain confidential to those designated as responsible for dealing with them. An individual member of staff who has heard a child's disclosure may feel under pressure from colleagues to explain but should be aware they are under a contractual obligation to maintain the circle of trust.
- **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).
- **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 the abuse immediately without putting yourself or the person being physically, sexually or emotionally 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:

- ring or call/shout for help

If they do stop, 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. Inform them of the actions you now need to take in accordance with the above procedures.

- **Ensure that you have read through the Keeping children safe in education Part 1 (2018) 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/741315/Keeping_Children_Safe_in_Education_2018_Part_One_14.09.18.pdf



Appendix 2: CPOMS (Guidelines)

A training session on CPOMS will be held at the start of every academic year to ensure that all BSG staff are confident to access and use the system.

Key Messages with the usage of CPOMS at BSG:

1. All BSG staff (Academic and Non-Academic) will have access to CPOMS. Staff need to ensure that they have they have a login and have registered. 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

Student

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

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

Incident

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

1. *Record*
2. *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.*
3. *Make sure to record exactly what the child says and not your interpretation of what is said (keep this objective).*
4. *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

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

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

If adding another staff member (*only under OTHER*), 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.

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

Child Protection and Safeguarding Policy (Signature Page)

I (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.

Name of child (if applicable):

Class:

Signed: _____

Date: _____