



**Nord Anglia Education  
Policy on  
Safeguarding, Child Protection and promoting the welfare of  
children in our care**

**December 2016**

## Section 1.

### Introduction and Context

#### 1.1 Our Principles, Beliefs and Philosophy

Nord Anglia Education's unique philosophy is to 'Be Ambitious', which is underpinned by our belief and commitment that all our students will be supported to realise ambition by learning and thriving in the safest possible environment. Our students are empowered to make decisions for themselves and are supported in this by learning through specific elements of the curriculum, aimed at enabling students to be able to keep themselves safe (e.g. through personal, social and health education, Wellness programmes or similar).

Nord Anglia Education and all our schools recognise that having a safeguarding and child protection policy does not mean that any risk to our students is eliminated. Rather, we expect that all Nord Anglia Education staff, including all staff and volunteers in our schools and any contractors or partner agency staff used by schools, recognise where a student is at risk of, or is actually being harmed and do all they can to reduce further risk or further harm.

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

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

#### 1.2 Aims and objectives

Nord Anglia Education and all our schools aim to:

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

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

### 1.3 Accountability and Ownership

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

### 1.4 Definitions

#### Safeguarding

Safeguarding and promoting the welfare of children refers to the processes of protecting students from harm, preventing the impairment of their health and development, ensuring that we seek to improve the general health and well-being of all students in our care and enabling every student to have the optimum life chances and enter adulthood successfully.

#### Child Protection

Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect.

Note:

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

## Section 2.

### 2.1 Rationale

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

Given our international context Nord Anglia Education recognises and accepts its responsibility to safeguard all students under the UN Convention on the Rights of the Child (1989).

In addition to Nord Anglia Education's commitment to the UN convention on the rights of the child, Nord Anglia Education has used the safeguarding standards set by the international safeguarding organisation "Keeping Children Safe" to benchmark against; and the UK schools'

statutory guidance 'Keeping Children Safe in Education' (September 2016). The policy is also underpinned by the UK multi-agency guidance "Working together 2015" where relevant.

## 2.2 Related Documents

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

## Section 3.

### 3.1 Organisational and Individual Responsibilities

#### Nord Anglia Education Senior Management Responsibilities

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

#### Principals/Head Teachers and Senior Management Team in Schools Responsibilities

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

- Ensure that this policy and 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) Sarah Harley (Assistant Principal) and deputy Designated Safeguarding Lead (dDSL) David Sheehan (Head of Pastoral Care) 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 this policy for their particular school.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's customised version of this policy.
- 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 this policy.

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

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

The designated 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 / Deputy Designated Safeguarding Lead will:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the Principal and Head Teachers, make sure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Have appropriate training in addition to the basic training that all other staff receive.
- Collate and keep accurate and confidential records of any concerns about children.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

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

Responsibilities on all staff (including partner organisations and contractors having unsupervised contact with children)

All staff will:

- Ensure they are familiar with and follow this safeguarding policy and all other safeguarding related policies e.g. Codes of Conduct, guidance for safe working practice.
- Be subject to safe recruitment processes and checks prior to starting at the school/organisation.
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL).
- In NAIS HK, the Designated Safeguarding Lead is Sarah Harley – Assistant Principal Extension – 3003, [sarah.harley@nais.hk](mailto:sarah.harley@nais.hk) and the Deputy Designated Safeguarding Lead is David Sheehan -Head of Pastoral Care – extension 3069, [david.sheehan@nais.hk](mailto:david.sheehan@nais.hk) Both DSL and dDSL are located in the Ground Floor SLT Suite.
- 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 and safe recruitment 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.

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

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

## Section 4.

### Training and Support

Nord Anglia Education and our schools will ensure that:

- All staff and volunteers in schools are provided with appropriate general safeguarding training on joining the organisation and then at least every three years. This training will be available through Nord Anglia University (NAU) or Educare, as well as face-to-face events.
- Relevant policies are made available in a range of relevant languages.
- Staff and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up to date knowledge and that they access appropriate additional and specialist training (approved by the Education Director/Head of Safeguarding. This will be refreshed every two years.
- All staff and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate staff are trained in safe recruitment. This safe recruitment training must be renewed every five years.
- Training for new starters must be complete before any new starter can begin.
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counsellors or external agency input. All Nord Anglia Education schools will hold information in relation to local, regional or national bodies that may be able to offer direct support in these circumstances.

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

Please remember unless you are specifically asked to do so, never carry out an investigation about any suspected abuse. This can be highly specialist work and could interfere with a criminal investigation if this were required and appropriate under local laws.

## Section 5.

### 5.1 Forms of Abuse

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

The more commonly referred to types of abuse are:

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

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

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

#### Female Genital Mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and we acknowledge the risk to our girls and always act in the best interest of the pupil.

We recognise that this is cultural practice in some countries and not always seen as abusive. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the pupil's best interests.

#### Forced marriages (FM)

A Forced marriage (FM) is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the pupils' best interests. However, the school procedures must be followed in the same way as for any other safeguarding or child protection matter.

## Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously. We are aware of the signs of this and ensure staff are trained to recognize these.

There are some common themes that may help staff identify concerns including:

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

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

## Sexting / Banter

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 pupil 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.

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

Note:

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

## 5.2 Specific Safeguarding Issues

## E safety – linked to E Safety Policy

The growth in electronic media in everyday life and an ever-developing variety of devices create additional risks for children. Risks and dangers of being online include:

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

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

Nord Anglia Education believes the best way to protect our pupils is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. Each school's curriculum includes appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies and language they need to take appropriate action.

## Photographs for School Publications:

- Photographs of pupils being used by staff for learning or marketing are only taken on school cameras/devices.
- Images should be saved on a secure server/database and printed copies only used within the school for purposes such as displays, records and learning journals. Images to be used for marketing need to be agreed with parents/carers before use.
- Staff personal phones should not be used in classrooms and learning areas when students are present except where required as a response to emergency planning.
- Visitors and parents/carers should be asked not to use mobile devices within the school, 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 to sign a disclaimer if they do not wish their child's image to be used externally.

## Allegations against staff and volunteers

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

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

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

In the event of an allegation being made against a member of the school staff (or a volunteer helper), it will always be 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. In all cases

(criminal or not) the Principal of the school and the Head of Safeguarding for Nord Anglia Education (Barry Armstrong – [barry.armstrong@nae.com](mailto:barry.armstrong@nae.com)) must be informed as soon as possible and certainly within 24 hours. HR must also be informed by contacting the regional HR Director (Michelle Zhang) as soon as possible. In the case of the allegation being against the Principal, the Regional HR Director and the Regional Managing Director, (Mike Embley)– as well as the Head of Safeguarding should be informed.

No action to investigate the concern should be taken before consultation with the Head of Safeguarding and HR, and agreement reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are needed, then the member of staff may be suspended. Suspension is a neutral act, and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the Regional HR Director/Head of Safeguarding (Barry Armstrong - [barry.armstrong@nae.com](mailto:barry.armstrong@nae.com)) 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.

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

#### Whistleblowing - linked to Whistleblowing Policy

Nord Anglia Education and our schools recognise that we cannot expect children to raise concerns in an environment where adults fail to do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are considered to be a protected disclosure and, even if proven to be unfounded, no action will be taken against the whistle-blower.

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

#### Anti-Bullying – link to Anti Bullying Policy

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 either face-to-face or the misuse of social media or technology. Each school should have its own policy and approach to restorative practices and all our schools will demonstrate a commitment to help resolve specific issues.

#### Children with Additional Support Needs or Disabilities

All staff should recognise that children with Special Educational Needs and Disabilities can mean additional safeguarding challenges. Depending on the nature of a child’s special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it is easy to assume that a child’s mood, behaviour or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted on by behaviours such as bullying but they may not show any outward signs. Communication difficulties, in particular, can make it very difficult for a child to indicate what’s happening and, therefore, may make it very difficult to

overcome any such barrier. Staff should be extra vigilant and report any and all concerns, avoiding making assumptions about the causes of any injury or behaviour.

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

Nord Anglia Education and all our schools recognise that children are capable of abusing their peers. 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.

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 – Prevent Duty

Nord Anglia Education Schools value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

Staff are offered Prevent Duty Training online.

### Safe Recruitment and Selection

Nord Anglia Education and all our schools will do all they can to ensure that all those working with children in our schools and across the whole organisation are suitable people. In order to do this, all staff who will work in an unsupervised capacity with children or young people will be recruited using safe recruitment procedures.

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

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

## Section 6.

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

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

Staff must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm. In many cases a student will not make a direct disclosure, but staff will be concerned because of a physical or emotional indicator. In these circumstances staff should still use CPOMS to record this.

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

## 6.2 Dealing with Disclosure, Reporting and Further Action

### General Principles:

Note: Be aware that if a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.

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

#### Receive

Where possible always stop and listen to a child who wishes to speak in confidence. Where possible during any disclosure try to listen, allow silences and try not to show shock or disbelief.

#### Reassure

Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.

#### React

React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as... "is there anything else you need to tell me?".

#### Record

Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date and place as well.

#### 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 policy are followed. A full written/typed account of the concern should be recorded on CPOMS and the Designated Safeguarding Lead alerted as soon as possible.

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or dDSL in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then consider. It is the role of the Designated Safeguarding Lead to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

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

As International Schools we:

- often reside in cities and countries that offer little external support.
- recognise the limitations in the areas of child protection.
- need to assess the quality and skills of counsellors and other support staff in dealing with children
- need to act in accordance with local legislation as well as the principles and practices outlined in this policy.

[Local Safeguarding Agencies/Advice](#)

[Social Services / Police](#)

Schools are reminded that they can seek advice or guidance from the Head of Safeguarding for NAE: Barry Armstrong; [barry.armstrong@nordanglia.com](mailto:barry.armstrong@nordanglia.com) Phone: +44 (0)1235 355848 or mobile: +44 (0)7710 086737.

## Section 7.

### 7.1 Record Keeping and Confidentiality – use of CPOMS

#### Record Keeping

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept together securely and separately from the child's general school records. The information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it should not be shared more widely than that. All staff should record concerns and incidents via the CPOMS system.

- Child protection records should be stored in a secure (i.e. locked) filing cabinet or in a secure electronic system, accessible through the Designated Safeguarding Lead (or their deputy) and other senior staff in larger schools to ensure reasonable access.
- Records of any child disclosure should be clearly dated and filed without future amendment.
- Child protection records should be separate to the general education file, but the child's general school record file should be marked to indicate that a child protection file exists (e.g. red star or similar). All staff who may need to consult a child's school file should be made aware of what the symbol means and who to consult if they see this symbol.
- A child protection file (Electronic or otherwise) should be started for an individual child as soon as the school is aware of any child protection concerns about that child. This may arise in a number of ways e.g.:
  - If a member of staff raises a concern about the welfare or well-being of a child – this should be recorded in writing (see below for guidance).
  - If information is forwarded to the school by a previous school attended by the child.
  - If the school is alerted by another agency of child protection concerns about that child.
- Members of staff should make an entry of any concern they have regarding the welfare or well-being of a child, using the school's CPOMS system. This will then immediately be sent to the Designated Safeguarding Lead. Concerns, which initially seem trivial, may turn out to be vital pieces of information later. So, it is important to give as much detail as possible. A concern raised may not progress further than a conversation with the Designated Safeguarding Lead, but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from a file (electronic or otherwise) for any reason, a dated note should be placed in the file indicating who has taken it, why and when.
- The record on CPOMS should include
  - 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 returned to at the end of the disclosure.

### Confidentiality

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

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

## Section 8.

### 8.1 Auditing, Reporting, Review and Sign off

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

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

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

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

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

Signed and dated by School Principal

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Signed and dated by the school  
Designated Lead for Safeguarding

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## Appendix 1.

### Exemplar Record of Concern Form

<b>Pupil's Name:</b>		
<b>Pupil's Address:</b>		
<b>DOB:</b>		
<b>Is the Pupil aware this form is being completed</b>	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
<b>If not, why not?</b>		
<b>If yes, pupil reaction</b>		
<b>Your Name:</b>		
<b>Date:</b>		
<b>Time:</b>		
<b>Signature:</b>		
Concern:	Date:	
Signed:	Date:	
Initial Actions:	Date:	

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

