

# HARROW NANNING

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## SAFEGUARDING AND CHILD PROTECTION POLICY AND GUIDELINES



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**HARROW**  
NANNING 哈罗南宁

*\*Standards Reference HS13*

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## Section 1: Introduction and Context

### 1.1: Harrow Nanning safeguarding philosophy and vision

Harrow Nanning's (hereafter, HNN) unique philosophy is '*Educational Excellence for Life and Leadership*'. This drives the school's mission of ensuring that students are supported and empowered to achieve their academic and personal potential. The foundation for enabling this to be realised is our strong commitment to ensuring the highest standards of safeguarding and our active promotion of the welfare of children and young people. Safeguarding is a key component of the ethos of the school and there is an expectation that all stakeholders in our school community share and understand this commitment.

HNN fully recognises its moral and statutory responsibility in China as well as meeting international standards to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that receive effective support, protection, and justice.

HNN's philosophy and vision are aligned with those of the United Nations Convention on the Rights of the child (UNCRC). Central to this is the acknowledgment that every child has fundamental rights. These include the right to:

- **life, survival, and development**
- **protection** from **violence, abuse, or neglect**
- an **education** that enables children to **fulfil their potential**
- be **raised by**, or have a **relationship with, their parents**
- **express their opinions** and be **listened to**.

Therefore, the welfare of the child is paramount;

- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- All members of staff have equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- Children and staff involved in child protection issues will receive appropriate support.

This document outlines the various procedures we have implemented to make sure your child remains safe and happy. It applies to staff, volunteers and contractors working with pupils on school premises or away from the school on an activity, visit or other educational pursuit. This policy therefore compliments and supports a range of other policies (e.g., Complaints, Safer Recruitment, Health and Safety).

When undertaking development or planning of any kind, the school will consider safeguarding aspects. The school's safeguarding arrangements are inspected by the Council of International Schools standards. The school will conform to the National Minimum Standards for Boarding Schools in the UK.

### 1.2: What is safeguarding?

#### 1.2.1: Key definitions

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Key Terminology
<b>Safeguarding and promoting the welfare of children</b> refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
<b>Child protection</b> refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.
<b>Child</b> includes everyone under the age of 18. However, our duty to promote the welfare and health and safety applies to all students in our care whether they are under or over the age of 18.
<b>Parent</b> refers to birth parents and other adults who are in a parenting role, for example step-parents, guardians, foster carers and adoptive parents.
Members of <b>staff</b> refers to all those working for or on behalf of the school, full time or part time, including contracted staff such as cleaners and kitchen staff, temporary or permanent, in either a paid or voluntary capacity

### 1.2.2: Safeguarding at HNN



This includes:

- ensuring pupil health and safety;
- referring concerns or allegations about a child to the appropriate bodies promptly;
- bullying;
- all forms of abuse, including domestic abuse;
- harassment and discrimination;
- use of physical intervention;
- meeting the needs of pupils with medical conditions;
- providing first aid;
- drug and substance misuse;
- educational visits;
- intimate care;
- internet safety;
- issues which may be specific to a local area or population, for example gang activity; and
- school security.

### 1.3: Designated Safeguarding Leadership Team

#### 1.3.1: Designated Safeguarding Leadership Team at HNN:

Executive Designated Safeguarding Lead	Joanne Dunphy Head Master	<a href="mailto:Jdunphy@harrownanning.cn">Jdunphy@harrownanning.cn</a>
Designated Safeguarding Lead for Primary School	Annabel Smyth Head of Primary School	<a href="mailto:asmith@harrownanning.cn">asmith@harrownanning.cn</a>
Designated Safeguarding Lead for HLL	Roxanne Clark Head of HLL	<a href="mailto:rclark@harrownanning.cn">rclark@harrownanning.cn</a>
Designated Safeguarding Lead for Boarding	Vismantas Zaras	<a href="mailto:vzaras@harrownanning.cn">vzaras@harrownanning.cn</a>
Child Protection Officer (CPO) (Chinese Representative)	Meredith Li Chinese Principal	<a href="mailto:mli@harrownanning.cn">mli@harrownanning.cn</a>
Child Protection Officer (CPO) (Upper School)	Letty Liang PA. To Lower School	<a href="mailto:Lliang@harrownanning.cn">Lliang@harrownanning.cn</a>
Child Protection Officer (CPO) (Upper School)	Chelsea Fu	<a href="mailto:cfu@harrownanning.cn">cfu@harrownanning.cn</a>
Child Protection Officer (CPO) (Upper School)	Niyang Wang School Counsellor	<a href="mailto:Nwang@harrownanning.cn">Nwang@harrownanning.cn</a>
Child Protection Officer (CPO) (Primary School)	Joanne Liang	<a href="mailto:jliang@harrownanning.cn">jliang@harrownanning.cn</a>
Child Protection Officer (CPO) (EYC)	Tina Quan	<a href="mailto:tquan@harrownanning.cn">tquan@harrownanning.cn</a>
Designated Governor	TBC	TBC

#### 1.3.2: Safeguarding Taskforce Members

In addition to the DSL Team noted in 1.3.1, all Homeroom teachers, BCTs and pastoral tutors play a large role in the Safeguarding membership, ensuring that concerns are raised appropriately and punctually.

The chairperson of the safeguarding taskforce is the executive designated safeguarding lead, Ms Emily Gallagher (Whole School Deputy Head).

#### 1.3.3: Key safeguarding contacts:

##### External Contacts:

Council of International Schools: Safeguarding  
SRE in Schools  
Local Police Service  
Government Offices and Agencies  
National Embassies in Guangxi/Guangdong  
Save the Children  
Olivia's Place

### 1.4: Our safeguarding guiding principles

#### 1.4.1: Core safeguarding principles

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The School's core safeguarding principles are:

- the School's responsibility to safeguard and promote the welfare of children is of paramount importance;
- safeguarding children is everyone's responsibility. Everyone who comes into contact with children and families has a role to play in keeping children safe;
- listening to children and to all members of the community is fundamental to safeguarding and is in the best interest of the child
- HNN is committed to a 'speak up culture' and believes in the notion that if you see something or sense something then you should say something – no concern is considered too small. If concerns are raised early then help can be provided at an early stage
- early indication that a child may need help is critical and a crucial part of our 'speak up culture'.
- all staff must have the attitude of 'it could happen here' with regard to safeguarding.
- safer children make more successful learners;
- representatives of the whole School community will be involved in safeguarding policy development and review;
- and policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.
- Stakeholders, including school governors and trustees will be kept informed of changes to the HNN policy.

#### 1.4.2: Core operational principles

This policy applies to all students in the School policy but legally as some students will be 18 years and over they may be treated differently outside of school. Any student under the age of 18 will be regarded as a child for the purpose of this policy.

- All staff have a responsibility for the implementation of this policy;
- Any concerns regarding safeguarding and/or child protection must be reported using the safeguarding reporting procedure (log on iSAMS) as soon as practicable and within 6 hours.
- Any concerns where a child is at an immediate risk of harm or has disclosed abuse should be reported immediately to a member of the Safeguarding Taskforce and followed up with an iSAMS Report as soon as practicable and within 6 hours.
- If a crime has been committed, it should be reported to the Safeguarding Taskforce immediately and followed up with an iSAMS Report as soon as practicable and within 6 hours.
- All staff must have read, completed an assessment on and act in accordance with Part One of the DfE Statutory Guidance Keeping Children Safe in Education (2022);
- All staff must know who the members of the Safeguarding Taskforce are;
- All safeguarding and child protection concerns must be treated in the utmost confidence;
- The Safeguarding Taskforce must report all concerns in line with the requirements of the People's Republic of China and in line with best practice as defined in the UK and through organisations such as CIS.
- Allegations of abuse in relation to adults must be dealt with in line with the associated policy.

#### 1.5: Aims of the policy

- To raise awareness of all school staff of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse.

- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To provide all staff with the necessary information to enable them to meet their child protection responsibilities;
- To promote safe practices and challenge poor and unsafe practices.
- To provide an environment where pupils feel safe, secure, valued and respected; confident to talk openly and sure of being listened to.
- To demonstrate the School's commitment with regard to child protection to students, parents and other partners.

There are seven main elements to our policy:

- 1) Establishing a safe environment in which students can learn and develop; include in the curriculum activities and opportunities, which equip children with the skills needed to stay safe from abuse and will develop resilience and realistic attitudes to the responsibilities of adult life;
- 2) Ensuring the governance of safeguarding and promotion of welfare is fully embedded within the school;
- 3) Raising awareness of child protection issues and ensuring staff, volunteers and contractors working at the school are fully aware of presenting issues and how to act in the event of concerns being raised;
- 4) Ensuring staff recruitment practice is safe and fully accords with the requirements of Keeping Children Safe in Education and Harrow Standards so the school operate safe recruitment procedures and makes sure that all appropriate checks are carried out on new staff and volunteers who will work with the children;
- 5) Supporting pupils who need protection or require additional help to achieve good outcomes, creating positive actions to deal with disadvantages that children might face;
- 6) Listening to the children in our care and ensuring that children know that there are adults in the School whom they can approach if they are worried or are in difficulty, as the ethos is one where children feel secure and are encouraged to talk, and are listened to;
- 7) Creating an open-culture where staff feel confident to speak-up whenever they have concerns about a child or a particular adult, and are aware of how and when to act on concerns that they have and work in a safe and appropriate manner at all times.

#### **1.6: Confidentiality and information sharing**

HNN recognises that all matters relating to child protection are highly confidential. The Head Master or the Safeguarding Taskforce will share that information on a 'need to know, what, and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the School unless in confidential meetings for that purpose.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence. Members of staff should only discuss concerns with the Safeguarding Taskforce, the Head Master or Designated Governor (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with UK Data Protection Act 1998 principles.

Information is:

- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;

- kept no longer than necessary;
- processed in accordance with the data subject's rights; and
- secure.

Child Protection Records and other written information will be stored in a locked facility and any electronic information such as on iSAMS will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. When members of staff write up safeguarding concerns on their laptops etc. once the files are sent to the DSL or logged on iSAMS they must be deleted from their email accounts and own computers.

If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Child protection information will be stored separately from the child's and the file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the UK Data Protection Act. This means that students and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Head Master. The UK Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

#### **1.7: Key safeguarding policy links**

Throughout this policy we refer to the following policies:

- Keeping Children Safe in Education (DfE, 2022)
- The Education (Independent School Standards) Regulations (DfE, 2014)
- The Education Act (DfE, 2002)
- The Non-Maintained Special Schools Regulations (DfE, 2015)
- The Teacher Standards (DfE, 2012)
- Working Together to Safeguard Children (DfE, 2018)
- Prevent Duty Guidance (DfE, 2015)
- United Nations Convention on Rights of the Child (UNCRC, 1990)
- The PRC Law on the Protection of Minors (PRC, 1991)
- Boarding Schools: National Minimum Standards (2022)

## **Section 2: Safeguarding Legislation, Guidelines and Procedures**

### **2.1: Safeguarding legislation, guidance, and compliance**

HNN is committed to being compliant with all standards for safeguarding in China, in line with UK and the standards of the Council of International Schools (CIS). Due to their day-to-day contact with students, members of staff in schools and colleges are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that members of school staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The School will act on identified concerns and provide early help to prevent concerns from escalating.

#### **The UK**

Section 94 of the Education and Skills Act 2008 requires the Secretary of State to prescribe standards for independent educational institutions to safeguard the welfare, health and safety of children. The relevant standards are set out in the Education (Independent School Standards) Regulations (the ISS Regulations 2014).

The statutory guidance *‘Keeping Children Safe in Education’ (KCSIE) (2022)* is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise, such as in conflict with the requirements of the PRC and as a result of the differing social services provisions in China compared to the UK.

**All members of staff are required to have signed a Code of Conduct in relation to Safeguarding which includes a clause to confirm that they have read and understood at least Part One of the KCSIE (2022) guidance.**

This guidance underpins HNN’s commitment to safeguarding.

The *Teacher Standards 2012* state that teachers, including head teachers, should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The statutory guidance *Working Together to Safeguard Children* (DfE, 2018) covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children.

Prevent Duty Guidance 2015: With effect from 1st July 2015 all schools became subject to a duty under Section 26 of the Counterterrorism and Security Act 2015 in exercising their functions “**to have due regard to the need to prevent people from being drawn into terrorism**”. The School recognises that “**safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm**”.

The NSPCC estimates that over half a million children are abused in the UK each year. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period, rather than being a one-off event, and it can increasingly happen online.

### **The People’s Republic of China**

The People’s Republic of China (PRC) declares that it protects a wide range of children’s rights through domestic legislation and by ratifying and joining the relevant international treaties such as the UNCRC. The PRC Constitution provides for the state protection of children and prohibits maltreatment of children. Among many laws and regulations providing children’s rights protection, the primary law in this field is The PRC Law on the Protection of Minors (first passed in 1991, revised in 2006) (Minors Protection Law). The revised Minors Protection Law entered into force on June 1, 2007. This law sets up responsibilities of the families, the schools, and the government regarding the protection of children’s rights, and judicial protection, as well.

China has ratified major international documents regarding children’s rights protection. China’s domestic legislation also provides protection for a wide range of children’s rights. The reality, however, is disputable. Few accurate statistics can be obtained directly from the official source. In practice, enforcement of the treaty obligations and the legislative declarations remains a huge problem.

However, prior to and during the 2017 Nation People’s Congress some deputies were highlighting the scale of children suffering abuse and the high numbers of vulnerable children. The Government is working with UNICEF on the Barefoot Social Worker Programme due to the shortages of social workers in China. This is

to raise awareness among parents about good practices to raise children. There are also moves to make sexual abuse awareness education compulsory in schools and establishing a proper custody system for minors.

## **2.2: Child protection procedures**

Providing early help is more effective in promoting the welfare of children than reacting later. We are aware that all our members of staff have a responsibility in school to identify the symptoms and triggers of abuse and neglect, to share information and work together to provide children and young people with the help they need.

KCSIE (2022) states that: 'Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.'

Sometimes a single traumatic event may constitute significant harm, such as poisoning or a violent assault. However, more often it is a compilation of significant events, both acute and longstanding, which can change or damage a child's physical and psychological development. Some children have a family and/or social circumstances where their health and development are neglected. For them it is the corrosiveness of long-term neglect, emotional, physical, or sexual abuse that causes impairment to the extent of constituting significant harm.

### **2.2.1: Recognising abuse**

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm (for example by leaving a small child home alone or leaving knives or matches within reach of an unattended toddler). Abuse may be committed by adult men or women and by other children and young people. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). Internet abuse is a growing concern and schools should be vigilant to this.

The categories of abuse are **physical abuse, domestic violence, psychological or emotional abuse, sexual abuse, financial or material abuse, modern slavery, discriminatory abuse, organisational or institutional abuse, neglect and self-neglect**. All staff should be aware that abuse, or safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

According to research done by China's Agricultural University for the World Health Organisation in 2015, 9.5 per cent of girls and 8 per cent of boys have suffered some form of sexual abuse. In China that means up to 25 million people under the age of 18 could be victims.

#### **Physical abuse**

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### **Domestic Violence**

Children may be witnesses or victims to domestic violence within their own home or neighbourhoods. This includes any behaviors that frighten, intimidate, terrorize, manipulate, hurt, humiliate, blame, injure, or wound someone. Domestic abuse can happen to anyone of any race, age, sexual orientation, religion, or gender. It can occur within a range of relationships including couples who are married, living together or dating.

**Psychological or Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's psychological state and emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Financial or material abuse**

This abuse can happen to the child themselves or impact their family. It includes using money or gifts for grooming purposes, whilst also the misuse of a person's finances. This can mean fraudulent activity, not using money for appropriate care, undue pressures or threats regarding money and denying access to funds.

**Modern Slavery**

Modern slavery includes human trafficking, forced labour, sexual exploitation or being forced to work in order to pay back unrealistic debts.

**Discriminatory abuse**

This is when person/ persons are treated unequally based on their age, gender, disability, race, religion, beliefs and sexuality. This includes denying access to provision offered to others, not providing a form of communication and verbal, physical or emotional abuse aimed at the protected characteristics.

**Organisational or Institutional abuse**

This would refer to unfair or poor management and provision from the school or boarding house. This could include lack of access to drink, food and other essential items. It also refers to the failure to respond to abuse in a timely manner or with suitable care and diligence. Misuse of medication or denying access to hearing aids, glasses or other medical needs would also be part of organisational abuse.

### **Neglect and Self-neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The above categories are identified by the NSPCC, and definitions have been taken from *Working Together to Safeguard Children* (DfE, 2018) and KCSIE (DfE, 2018).

Self-neglect refers to the lack of self-care and personal hygiene. It can also be demonstrated in the inability to seek help or to prevent self-harm. Within a boarding setting, this is an area that needs to be monitored closely by boarding staff and others.

#### 2.2.2: Specific safeguarding issues

All staff should have an awareness of safeguarding issues-some of which are listed below:

- bullying including cyber bullying
- children missing/ frequently absent from education
- child missing from home or care
- child sexual exploitation (CSE)
- Child-on-child abuse
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage-and Annex A
- gangs and youth violence
- gender based violence/violence against women and girls (VAWG)
- hate
- mental health
- absent children and adult's strategy
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking

Annex A of KCSIE (2022) contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff that work directly with children should read the annex. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting.

Staff should be clear as to HNN's policy and procedures with regards to peer-on-peer abuse.

### 2.2.3: Bullying

Bullying is defined as: when an individual or group of people with more power, repeatedly and intentionally cause hurt or harm to another person or group of people who feel helpless to respond. Bullying is not:

- single episodes of social rejection or dislike
- single episodes or acts of nastiness or spite
- random acts of aggression or intimidation
- mutual arguments, disagreements, or fights.

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures. Housemasters will keep records of bullying-type behaviour through iSAMS, which should be submitted termly to the EDSL. The School's Anti-Bullying Policy is annually reviewed and published to all children at the start of each academic year.

The subject of bullying is addressed at regular intervals via the school's policies and curriculum for Personal Development. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Head Master and the EDSL will consider implementing child protection procedures.

### 2.2.4: Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that members of staff are also aware of the range of behavioural indicators of abuse and report any concerns following the School's safeguarding concern reporting procedure.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- show signs of not wanting to go home;

- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- or display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the Safeguarding Taskforce to decide how to proceed. It is therefore essential that staff report their concerns. Staff do not need ‘absolute proof’ that a child is at risk but should act on any hunches or worries in the knowledge that they will be supported in their safeguarding role. Reports made in good faith will always be dealt with in accordance with the School’s Whistleblowing Policy, regardless of outcome.

#### 2.2.5: Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

#### 2.2.6: ‘It could happen here’ culture

Any child, in any family, in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”. Key points for staff to remember for acting are:

- in an emergency take the action necessary to immediately help the child;
- follow the School’s safeguarding reporting procedure.
- do not start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- seek support for yourself, if you are distressed.

### 2.3: Safeguarding reporting procedure

#### 2.3.1: What to do if you have a safeguarding concern about a child

There will be occasions when a member of staff may suspect that a child may be at risk but have no ‘real’ evidence. The child’s behaviour may have changed, their actions may reveal confusion or distress, or physical but inconclusive signs may have been noticed. The child may have a sign, or their behaviour may indicate possible abuse. In this circumstance, where the child is NOT at immediate or significant risk of harm, the following action should be taken by the member of staff:

<b>Harrow Nanning Safeguarding Concern Reporting Procedure:</b>
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Staff member is concerned about a child’s physical and emotional wellbeing due to a sign/symptom/evidence.
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Staff member should **log in to CPOMs**(available from the Staff Portal)  
This should be done as soon as practicable and **BEFORE** the child leaves school that day.

Once logged in to CPOMs the staff member should:  
Click on 'Add Incident'  
Complete the 'Add Incident' form  
Click on the 'Submit' button

Once you have submitted your concern it is immediately delivered to the Safeguarding Taskforce for their attention and action as appropriate.

It is not the role of staff members to commence their own investigations into safeguarding concerns. This must be the role of the Safeguarding Taskforce. The staff member can, however, provide the child with an opportunity to talk. This information should then be included in your iSAMS Report.

#### 2.3.2: What to do if a child discloses abuse or significant harm to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the child know that they must pass the information on – **staff are not allowed to keep secrets and must never promise to do so**. The point at which they tell the child this is a matter for professional judgement. If they jump in immediately, the student may think that they do not want to listen. If left until the very end of the conversation, the child may feel that he has been misled into revealing more than he would have otherwise.

During their conversations with the children members of staff will:

- allow them to speak freely;
- remain calm and not overreact – the child may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- not be afraid of silences – members of staff must remember how hard this must be for the child;
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the student's parent(s) think about all this;
- at an appropriate time tell the child that in order to help them, the member of staff must pass the information on;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but could be interpreted by the child to mean that they have done something wrong;

- tell the child what will happen next. The child may agree to go to see the DSL. Otherwise let the child know that someone will come to see them before the end of the day;
- report verbally to the DSL, even if the child has promised to do it by themselves;
- write up an accurate and objective account of the conversation as soon as possible.
- once you have spoken to the DSL and handed over your written account, complete an iSAMS report.
- seek support from the School Counsellor or a member of the DSL team if you feel distressed.

**In summary, if a child makes a disclosure of abuse and/or significant or possible immediate harm then the following actions should be taken:**

Harrow Nanning Safeguarding Concern Reporting Procedure  
Child Disclosure/Significant/Immediate Risk

Staff member should immediately inform a member of the Safeguarding Taskforce in person.

Staff member should provide a verbal summary of the disclosure/significant and immediate risk along with any evidence.

Safeguarding Taskforce will then act as appropriate.

Staff member completes CPOMS Report/ Add Action

#### 2.3.3: Notifying parents about safeguarding concerns

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively. A member of the Safeguarding Taskforce will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the School believes that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought from other agencies where possible.

#### 2.3.4: Children and families requiring external/additional support

As distinct from cases where a child has suffered or is likely to suffer significant harm, where children and families need support from agencies beyond our School, we will respond according by consultation with the Safeguarding Taskforce Team. We will liaise closely to co-ordinate support, with the agreement of the child and their parent/carer(s), and in accordance with local children's social care procedures in China where available.

### Section 3: Specific Safeguarding Issues:

#### 3.1: Children with sexually harmful behaviour

Staff will be sensitive to the nature of relationships within a boarding setting which will be different to students in a day school and respond accordingly. It is important to recognise the potential for abuse by peers. With regards to student-on-student abuse staff will refer such abuse to the Safeguarding Taskforce using the safeguarding concern reporting procedure. The Safeguarding Taskforce will consult with external professional and/or agencies where there is a risk of significant harm. Allegations of student-on-student abuse will involve parents being contacted.

Staff will be aware of harm caused by bullying and will use the School's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex. The School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Members of Staff, who become concerned about a child's sexual behaviour, should follow the School's safeguarding concern reporting procedure.

### **3.2: Sexual exploitation of children**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported following the safeguarding reporting procedure.

### **3.3: The Prevent Duty**

The Prevent Duty is the duty in the UK Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. This is a concern of the PRC as well. The UK Prevent Duty Department of Education advice for schools and childcare providers, June 2015, states that, 'School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.'

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Members of staff, who have concerns about a pupil, will make these concerns known following the School's safeguarding reporting procedure. The EDSL will then make a judgement as to whether or not it is appropriate to make a referral to external agencies in China or the appropriate embassies for foreign nationals.

#### **3.3.1: Signs of vulnerability to terrorist influence/attraction or radicalisation**

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase the risk.

Signs of vulnerability include:

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events
- religious conversion
- change in behaviour

- extremist influences
- conflict with family over lifestyle
- confused identify
- victim or witness to race or hate crimes
- rejection by peers, family, social groups or faith

### 3.3.2: Indicators of radicalization or extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views or anti-Chinese views
- advocating violence towards others

### 3.4: Female Genital Mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Members of staff should recognise the possibility that a girl may disclose information relating to a sibling or close friend who has suffered abuse in the form of FGM. In the UK, staff members would alert the authorities directly under the mandatory reporting requirement. At HNN any disclosures of information or concern regarding possible FGM should be reported to the Safeguarding Taskforce immediately following the procedure for disclosure/immediate and significant harm reporting.

## Section 4: Roles and Responsibilities

### 4.1: Professional expectations

At HNN safeguarding is the responsibility of all staff members. Their primary duty is to ensure the safety and well-being of our students.

Everyone who comes into contact with our children and their families has a role to play in safeguarding children. We place a high priority on identifying concerns early and provide help for children, to prevent concerns from escalating. We do this because we are acutely aware that we play a vital role in the wider safeguarding system

for children. Together with our colleagues in the police, health and other children's services, we promote the welfare of children and protect them from harm.

All our staff are aware that Teacher Standards (2012) states that teachers, including Heads, should safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties. These standards also apply to trainees, inductees and Newly Qualified Teachers and we fully adhere to these standards with rigour; applying our school disciplinary procedures, where appropriate, in cases of misconduct.

#### **4.2: The Executive DSL and The Designated Safeguarding Leads (DSL)**

- has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff;
- receives updated child protection training at least every two years;
- acts as a source of support and expertise to the School community;
- encourages a culture of listening to children and taking account of their wishes and feelings;
- is alert to the specific needs of children in need or those with Special Educational Needs;
- has a working knowledge of HNN procedures;
- has been trained in the Prevent Duty and how to make referrals to the appropriate agencies or Channel in the UK;
- has an understanding of locally agreed processes for providing early help and intervention;
- keeps detailed records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from the child's general file;
- immediately refers cases of suspected abuse to local services or the Police as appropriate;
- where students leave the School, ensures the child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file;
- attends and/or contributes to child protection conferences;
- coordinates the School's contribution to child protection plans;
- develops effective links with relevant statutory and voluntary agencies
- ensures that all staff sign to indicate that they have read and understood the Child Protection Policy and safeguarding code of conduct;
- ensures that the Child Protection Policy is regularly reviewed and updated annually;
- liaises with the Nominated Governor and the Head Master as appropriate;
- ensures that a record of staff attendance at child protection training is kept;
- makes the Child Protection Policy available publicly, on the School's website or by other means;
- ensures parents are aware of the School's role in safeguarding and that referrals about suspected abuse and neglect may be made;
- in the Head Master's absence, ensures cases concerning a member of staff are referred appropriately to the Chair of Governors and/or the Disclosure and Barring Service (DBS);
- and submits an annual report to the Governing Body about how the School's duties have been carried out. Any reported weaknesses will be rectified by the DSL without delay.

#### **4.3: The Deputy Designated Safeguarding Lead (DDSL)**

- The DDSL must be appropriately trained in child protection at least every two years. In the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of the boys.
- the DDSL must have the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff .

- in the event of the long-term absence of the designated person, the DDSL will assume all of the functions as for the DSL, above.

#### **4.4: The Governing Body**

- will appoint a Governor for child protection who will undertake training in inter-agency working, in addition to basic child protection training;
- will ensure that the School has a Designated Safeguarding Lead (DSL), whose role is explicit in the role holder's job description;
- will ensure that the School has a child protection policy and procedures, including a staff safeguarding code of conduct, that are consistent with UK and China statutory requirements, as well as CIS standards, reviewed annually and are signed off by the Chairman of Governors;
- will ensure that the School's child protection policy and procedures are made available publicly on the School's website or by other means;
- will ensure that the School has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head Master and allegations against other children;
- will ensure that the School follows safer recruitment procedures that include statutory checks on staff suitability to work with children;
- will ensure that the School develops a training strategy that ensures all staff, including the Head Master, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated in line with any changing statutory and CIS requirements
- will ensure that the School makes all contract staff, temporary staff and volunteers aware of the School's arrangements for child protection;
- will ensure that the School contributes to any inter agency working and plans;
- will ensure that the School provides a coordinated offer of early help when additional needs of students are identified;
- will ensure that the School considers how students may be taught about safeguarding, including online, as part of a broad and balanced curriculum; and
- will address and rectify without delay any deficiencies or weaknesses in the School's child protection and safeguarding policy and procedures, which are brought to the attention of the Governing Body.
- The Governing Body nominates a member (normally the Chair) to be responsible for liaising with the agencies on strategic issues of child protection, and in the event of an allegation being made against the Head Master or a member of the Governing Body. It is the responsibility of the Governing Body to ensure that the School's safeguarding, recruitment and managing allegations procedures are in accordance with the Independent Safeguarding Standards (ISS) Regulations (UK) and CIS and national guidance both in China and the UK.

#### **4.5: The Head Master**

- ensures that the Child Protection Policy and Safeguarding Procedures are implemented and followed by all staff ;

- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures;
- ensures that children are provided with opportunities throughout the curriculum and in Personal Development to learn about safeguarding, including keeping themselves safe online;
- liaises with the Chair of Governors where an allegation is made against a member of staff or of the Governing Body; and
- ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service, if a UK national, or to the relevant embassy for other foreign nationals.

#### **4.6: The Safeguarding Support Committee (whole school)**

- will include in its membership the Safeguarding Taskforce
- will be chaired by EDSL
- will help to coordinate arrangements for the longer-term protection and support of each child who
- has made allegations of abuse, or is alleged to have suffered from abuse, taking his/her wishes into account;
- will make arrangements where feasible for any child who has been the subject of abuse to receive necessary counselling and support by agreement with his parents, where appropriate;
- will support any child who is subject to a Child Protection Plan; and
- will ensure through a Housemaster/class teacher that appropriate support and safeguards are in place together with a Care Plan.

##### 4.6.1: Functions of the Safeguarding Support Committee

- *Communication:* to work with all stakeholders in communicating the needs of the child, focusing on the continuum between academic progress and student well-being. To maintain a flow of information into the committee about the different needs of students and the flow of information out to different stakeholders about supporting those needs.
- *Discussion:* the scope and scale of the committee will involve different staff at different times depending on the agenda. The professionals consider a 360 review of the child.
- *Administration:* to work with all stakeholders in keeping all relevant material, notes and documents relating to the work the SSC does.
- *Support and guidance:* to design and implement support plans and provide guidance for students that are a safeguarding concern.
- To provide support for class teachers and specialists in dealing with and anticipating the more serious pastoral or academic issues referred to it.
- To track patterns of bullying across the School and co-ordinate anti-bullying strategies.
- To agree referrals to a Counsellor.
- To ensure effective co-ordination of action and communication of information in dealing with pastoral and academic issues to the relevant adults in the School or, if required, external organisations.

#### **4.7: Residential Boarding Staff (Housemistress/masters, Matrons and Assistant Housemistress/master)**

All residential staff, principally Housemistress/masters, and Assistant Housemistress/masters will be trained to Level III safeguarding. Matrons will undergo internal safeguarding training and dependent on English levels will complete at least to level 2 training.

HNN recognises that, as a boarding school, as well as a day school, Housemasters, Assistant Housemasters and Matrons are likely to be on the frontline in terms of safeguarding and child protection. Housemasters, Assistant Housemasters and Matrons will report all child protection and safeguarding concerns using the appropriate safeguarding reporting procedure. HNN has a procedure for dealing with a lost or missing child.

In addition to the Safeguarding policy, reference can be made to the Attendance policy. A Housemistress/master or a duty member of the boarding staff is most likely to deal with such instances. The procedure is contained in the Boarding Handbook.

#### **4.8: Senior students in positions of responsibility**

Senior children who hold positions of responsibility over other children (e.g. School Prefects) will be briefed on appropriate action to take should they have concerns or receive any allegations of abuse. This training will be provided by the EDSL within 4 weeks of appointment/election. Senior students and the house council will meet with the EDSL at least annually to review and reflect upon safeguarding issues through the lens of the student body.

#### **4.9: School doctors and the clinic staff**

The Clinic will hold copies of Working together to Safeguard Children (DfE, 2018) and Keeping Children Safe in Education (DfE, 2018) and have its own protocols for recognising and acting upon signs of child abuse.

These will include RCN *Safeguarding children and young people (2014)*. Nurses will work in accordance with the *Nursing & Midwifery Council's Code of Conduct*. They will liaise closely with the Safeguarding Taskforce.

The School Doctor will have his/her own legal and contractual obligations to report the same, either to the Head Master or hospital. Clinic staff will undergo annual safeguarding training delivered by the school's EDSL and will be invited to participate in any school CPD that is concerned with the welfare and protection of children.

### **Section 5: Good practice guidelines and staff code of conduct**

#### **5.1: Staff professional conduct**

To meet and maintain our responsibilities towards the students HNN will agree standards of good practice, which will be published as professional guidelines in the relevant handbooks. These include guidelines on physical contact, use of reasonable force, visiting students' rooms and other sensitive areas, language, searching and confiscation, when and where to meet students, alcohol, social events, communications, use of sanctions, bullying and psychological abuse, favouritism, gifts and hospitality.

Members of staff are expected to follow the guidance given in the document 'Guidance for Safer Working Practice for Adults who Work with Children and Young People' (DfE, 2009) and Working Together to Safeguard Children (DfE, 2018).

Good practice includes:

- treating all children with respect;
- setting a good example by conducting themselves appropriately;
- involving children in decisions that protect them;

- encouraging positive, respectful and safe behaviour among children;
- being a good listener;
- being alert to changes in children's behaviour and to signs of abuse and neglect;
- recognising that challenging behaviour may be an indicator of unhappiness or abuse;
- reading and understanding the School's Child Protection Policy and guidance documents on wider safeguarding issues, including: Anti-Bullying, Behaviour, Expeditions, E-Safety, First Aid, Health & Safety, Confidentiality & Information-sharing, Drugs & Legal Highs;
- asking the child's permission before initiating physical contact, physical support during PE, touching during music lessons for the purposes of demonstration or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language;
- meeting with a child in a room where the teacher can be seen so that a child is never a risk or the teacher open to false allegations
- ensuring that students bathrooms and changing rooms are never used or frequented by adults and staff being aware that the personal and family circumstances and lifestyles of some children may lead to an increased risk of abuse;
- applying the use of reasonable force/restraint only as a last resort and in compliance with the School policy on Safer Restraint;
- referring all concerns about a child's safety and welfare using the appropriate reporting procedure;
- following the School's rules with regard to communication with children and use of social media and online networking;
- following the School's policy on Screening and Searching students in Behaviour Management Policy;
- and following the School's Transport and Bus Policy.

All staff will be expected to sign a Professional Code of Conduct and also a Safeguarding Code of Conduct at the start of each academic year and at the commencement of their employment.

## 5.2: Abuse of trust

All members of staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards children must be beyond reproach.

In addition, members of staff should understand that, under the UK Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have any kind of sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the School staff and a student under 18 would be a criminal offence, even if that student is over the age of consent. It is also offence for minors to distribute child pornography to each other including photos and sexting including through social media.

Members of staff must not use their status and standing to form or promote relationships with students which are of a sexual nature, **or which may become so once the student leaves the school**. Therefore, sexual relationships with former students once they leave school, may be open to scrutiny that the member of staff was grooming the person while they were a student of the school and constitute an abuse of trust.

In China having sexual intercourse with a girl under fourteen years of age is statutory rape, with a sentence of heavier punishment within the range of punishments for rape. Committing rape in China may result in sentencing of a fixed-term imprisonment from three years to ten years, and if one of a list of "serious circumstances" spelled out in the PRC Criminal Law happens, a fixed-term imprisonment from ten years up

to the death penalty may be imposed. Indecent assault against a woman's will, or by force, may result in up to five years imprisonment. If the offence happens in public, the sentence may be over five years. Sodomy committed against minors under fourteen years old may result in heavier punishment. The PRC Criminal Law does not specifically regulate child pornography. Distributing pornography to minors under age eighteen is punishable by a heavier penalty within the punishments for distributing pornography.

### **5.3: Children who may be particularly vulnerable**

Some children may be at an increased risk of abuse. It is important to understand that this increase in risk is more likely due to societal attitudes and assumptions, and failures to acknowledge children's diverse circumstances, rather than the individual's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that our children receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs;
- young carers at home during term time, pauses and holidays;
- living in a domestic abuse situation;
- affected by parental substance misuse;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- involved directly or indirectly in sexual exploitation; or who whose level of English makes it more difficult for them to express themselves to staff in school.

This list provides examples of particularly vulnerable groups but is not exhaustive. These students are monitored primarily through the PSC (LS) and SSC (US). They are discussed at bi-termly Safeguarding Taskforce meetings and information on their well-being is provided through our close, personal approach to tutoring.

### **5.4: Children Absent from Education**

The School will follow its robust procedures for registration and attendance to ensure the safety of all children and to carry out its duty of care. The School recognises that a child being absent from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore, members of staff will respond promptly to absences and follow the School's Children Absent from Education procedures, which are part of the Attendance Policy as appropriate. The DSLs, through the Housemasters, will monitor any unauthorised absence at the start or end of any leave period, and will be particularly cautious if a child goes missing on repeated occasions.

The School recognises the duty to inform the parents of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period as determined in the Attendance Policy. In some cases this may involve informing the Education Committee in Guangxi if a child has a file number. If concerns are raised then the EDSL may inform the police or, if foreign children, the embassies.

The Governing Body recognises that it should put in place appropriate safeguarding responses to children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

#### **5.5: Helping children to keep themselves safe**

Children are taught to understand and manage risk through numerous programmes (for example Anti- Bullying Workshops, Health Education, the Pants Programme,) some of which are part of the Personal Development Programme and through all aspects of their life at the School. Children are encouraged to think about risks they may encounter and to work out how such risks can be overcome. These discussions are empowering and enabling. They aim to promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves in a safe and responsible manner. They are also regularly reminded about E-Safety and counter-bullying procedures. The School continually promotes an ethos of care and respect for others. Children are encouraged to speak to a member of staff in confidence about any worries they may have.

#### **5.6: Support for those involved in a child protection issue**

Child abuse is devastating for the child. It can also result in distress and anxiety for staff who become involved. The School will support children, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (normally the DSL) who will keep all parties informed and be the central point of contact;
- where a member of staff is the subject of an allegation made by a child, separate (independent) link people will be nominated to avoid any conflict of interest and appropriate support provided for him or her;
- responding sympathetically to any request from children or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of help lines, counselling or other avenues of external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures; and
- cooperating fully with relevant statutory agencies.

### **Section 6: Staff training and complaints procedure**

#### **6.1: Staff training**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. Academic staff have access to online training through Hayes and will be expected to undertake regular training in this on specific modules.

All staff have face to face training annually to ensure that they understand KCSIE (part 1) and our safeguarding procedures at HNN.

- New staff and governors will receive an explanation during their induction, which includes the School's child protection and safeguarding policy and procedures, reporting and recording arrangements, professional guidelines and the staff code of conduct.
- All staff will receive an electronic version of Part 1 of KCSIE (2018) as part of their induction and/or annually as part of their safeguarding training. Each staff member must complete an electronic form to indicate their understanding of the document and its application to HNN.

- All staff will attend an annual safeguarding procedure update, for which a paper register is taken, that will cover the following content:
  - What Is safeguarding and child protection
  - The membership of the Safeguarding Taskforce
  - What are the types of abuse
  - What are the signs and indicators of abuse
  - How to report safeguarding concerns about students and staff
  - How to respond to student disclosures of abuse or significant harm
  - The School's safeguarding reporting procedure
  - Context important safeguarding issues
  - Whistle blowing procedures
- All staff, including the Head Master and governors will receive training that is regularly updated, in line with advice from the relevant statutory bodies in the UK and internationally and must read at least Part One of KCSIE (2018);
- The EDSL, DSL, DDSL and other staff as appropriate will receive child protection training updated at least every two years, including training in inter-agency procedures as appropriate in an international setting;
- Temporary staff and volunteers in regulated activity will have receive safeguarding training at induction and annual refresher.
- Visitors and visiting staff will be supervised by a member of the School staff at all times;
- All staff supplied by other bodies will be made aware of the School's procedures, policy and the contact details of the Safeguarding Taskforce.

## **6.2: Safer recruitment**

The School endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in '*Keeping Children Safe in Education*' (DfE, 2022) and the School's own policies and procedures together with procedures pertaining to contractors, coaches and partners etc.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children; check verbally at least one of these references.
- provide evidence of identity and qualifications;
- be checked in accordance with the Disclosure and Barring Service (DBS) if worked in the UK and other agencies for other foreign nationals , meeting regulations as appropriate to their role;
- include prohibition checks with the NCTL for teaching staff;
- provide evidence of their right to work in the China to obtain the working visa; and
- be interviewed.

For local staff:

- Last two employers' employment certificate showing the employment duration and the roles you once took in these places
- Social insurance participation history matching your employment as above (previous two employers)
- Name and contact details of someone we can contact for an oral check in your two previous posts
- Updated non-criminal history check by the police – HR will contact you if you haven't provided a recent update (within the last 12 months)

Safer recruitment also means that the School will ensure that:

- the candidate's mental and physical fitness to carry out their work responsibilities is verified;
- at least one member of each recruitment panel will have attended safer recruitment training;
- all new members of staff undergo an induction that includes familiarisation with the School's Child Protection and Safeguarding Policy and Procedures and identify their child protection training needs;
- all staff sign to confirm they have received a copy of the Child Protection and Safeguarding Policy and Procedures; which is part of the Safeguarding Code of Conduct
- and written confirmation is obtained from supply agencies that agency staff have been appropriately checked.

Full details of the School's recruitment procedures are to be found in the Safer Recruitment Policy.

#### 6.2.1: Volunteers and supervised volunteers

Volunteers, including governors, will undergo checks commensurate with their work in the School and contact with the children.

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, in accordance with the School's risk assessment process and statutory guidance.

#### 6.2.2: Contractors

The School checks the identity of all contractors working on site and requests police checks where appropriate.

### 6.3: Complaints Procedure

The School's complaints procedure will be followed where a student or parent raises a concern about poor practice towards a pupil that does not initially reach the threshold for child protection action. Examples of poor practice include unfairly singling out a student or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Such complaints are managed by Heads of Department, Housemasters, members of the Senior Management Team, and Governors.

Complaints from staff are dealt with under the School's Complaints and Disciplinary and Grievance procedures for the relevant contractor.

### 6.4: If a staff member has concerns about a colleague

A member of staff who is concerned about the conduct of a colleague towards a child is undoubtedly placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all staff must remember that the welfare of the child is paramount. The School's Whistleblowing Policy, enables members of staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported directly to the Head Master. If the Head Master is unavailable you should consider reporting to the EDSL. Complaints about the Head Master should be reported to the Chair of Governors.

### 6.5: Allegations against staff

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals can pose a serious risk to children and we must therefore act on every allegation. Members of staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff – including members of the Safeguarding Taskforce - should be reported to the Head Master. If the Head Master is absent, allegations against all staff should be reported to the Chair of Governors. Allegations against the Head Master or a member of the Governing Body should be reported to the Chair of Governors. The full procedures and UK statutory guidance for dealing with allegations against staff can be found in KCSIE (DfE, 2022).

## **Section 7: Site Safety and Security**

### **7.1: Campus Access, Site safety and Security**

HNN is an enclosed site. However once on the site, the buildings allow access to all areas of the school during the school day. All members of the school's community are required to take responsibility for site security and remain vigilant about trespassers. The School's Security Department provides oversight of the site and can be contacted 24/7 in the event of an emergency via Customer Service and the School Operations team.

There is a clear procedure for the admittance of staff, students and external visitors to the school that applies to all members of staff, visitor, parents, contractors and conforms to the School's Child Safeguarding and Protection Policy.

The school has responsibility for its students during normal school hours and after school hours for boarding students. The policy applies to:

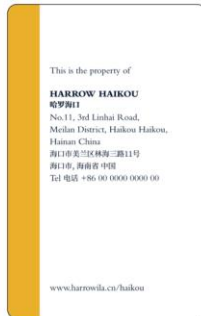
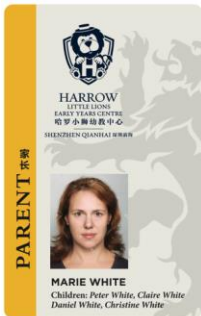
- All teaching and non-teaching staff employed by the school.
- All families of members of staff living on-site.
- All external visitors entering the school site (including peripatetic tutors, sports coaches, and topic related visitors e.g., authors, journalists).
- All parents.
- All students; and
- Building & Maintenance Contractors (including Ayis).

### **ID Card and Lanyard System**

The Harrow Nanning access card system protocol can be seen below. Staff at Harrow Nanning should actively ask adults in the school to put on their access card if it cannot be visibly seen.



back



back



back

ID Card	ID Colour	Lanyard Colour	Photo	Accompanied	Access Limitation
Staff	Very Dark Blue	Very Dark Blue	Yes	No	24hr
Student	Light Blue	Light Blue	Yes	No	Mon-Fri: 07:45 – 17:00 Weekend: No access unless advance notice given
Boarder	Light Blue	Light blue	Yes	No	Mon-Thurs: 24hr based on boarding type /7 days for ASEAN Scholars Friday: Until 16:30 Saturday: No access unless advance notice given Sunday: From 19:00

Parent	Yellow	Yellow	Photo of Child	No	Mon-Fri: 07:45 – 17:00 Weekend: No access unless advance notice given
Resident (non-staff)	Dark Blue	Dark Blue	Yes	No	24hr
On-site Service Provider	Green	Green	No	No	School hours as required
Maintenance Contractor	Green	Orange	Yes	No	24hr
Visitor	Dark Red	Dark Red	No	Yes	As required
Resident Ayi	Green	Green	Yes	No	As required

#### **Members of School Staff**

All members of school staff must always show their staff card at the school entrance and wear their lanyard while on campus.

Members of school staff shall not visit unauthorised areas e.g., members of staff that do not have access to the boarding facilities should not enter boarding without the escort of an authorised person.

#### **Students**

All students must enter and leave the School in full School Uniform, dressed smartly and appropriately. All students must always show their ID card at the school entrance and wear their lanyard while on campus.

Any student late to the School must register at the main reception of the School upon their arrival.

Students leaving the School early must obtain an early leave card from the School Office and present it to the guards at the gate before leaving the Campus, even if they are being escorted by their parents.

Boarders shall not be allowed to leave the campus at any time except Friday Dismissal Time unless they have the relevant signed documentation from their parents and House Master/Mistress.

#### **Visitors with appointments to the School**

When a visitor is invited to the School, the Facilities Management team & Receptionist should be informed by the member of staff responsible for the visitor as soon as possible, explaining the relevance and purpose of the visit, and the intended date and time.

Visitors to the School should be asked to bring formal identification with them at the time of their visit and be informed of the procedure for visitors as set out below.

All visitors must report to security at the main gate before accessing any other part of the School. At the security desk, all visitors must state the purpose of their visit and the member of staff who has invited them. They should be ready to produce formal identification. All visitors will be required to wear the visitor pass (Red Lanyard) issued by the School. Visitors will then be escorted to the Receptionist and their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site. On departing the school, visitors should leave via the main reception/gate and return the visitor's pass to security. If a visitor is driving to the School, the inviting member of staff must also provide their car registration number.

#### **Visitors to the School without appointments**

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Visitors coming to the School without any appointment should register with the security at the main gate and be issued with a visitor pass. The visitor should be escorted to the Receptionist before accessing any area of the School to ensure that they have a genuine purpose for visiting the School.

Any visitor to the School site who is not wearing a visitor pass should be challenged politely to enquire who they are and their business on the School site. They should then be escorted for registration and be issued with a visitor pass.

On departing the School, visitors should depart via the main gate/reception and return the visitors' passes to security. If any visitor refuses to comply, he/ she should be asked to leave the site immediately and the Head, and/or Chinese Principal should be informed promptly. The Head, and/or the Chinese Principal will consider the situation and decide if it is necessary to inform the police.

If any visitors become abusive or aggressive, they will be asked to leave the site immediately and warned that if they fail to leave the School grounds, police assistance will be called for.

#### **Contractors and/or External Service Providers**

Staff of onsite External Services Providers, e.g., Facilities Management Company, Catering Services Provider, Health Care Centre, must wear their lanyards (Green Colour) with their identity cards.

All peripatetic teachers, sports coaches, other ECA providers must wear their temporary staff card issued to them by the School.

All visiting contractors or visitors of the onsite service providers (Facility Management Company, Catering Company etc) must follow the registration procedures as stated above and wear their lanyard (Orange Colour).

Any contractors without a Contractor's Pass must be removed from the site.

#### **Drop Off and Pick Up Arrangements**

Staffing of student arrival and departure shall be considered as part of regular duties. Specific arrangements to be confirmed

#### **Family Members and Guests of Staff living on site**

All family members of staff living on site shall wear their Resident Card with lanyard (Light Blue Colour) when they visit the School Campus or other facilities during school hours. When a guest is expected, a member of staff should send an email to the Facilities Management Team explaining length of their stay, date and time. All staff guests (including any unexpected guests) should report to the security at the gate to staff entrance. A guest not staying overnight should be registered in accordance with the policy for 'visitors with appointment'. A guest staying overnight will be issued with a guest pass for the period of his/her stay. All guests should wear the pass when walking through the campus and present it at the gate when re-entering the campus. The FM team should inform the Head of Operations/Chinese Principal and Head of Boarding if any visitors are staying overnight in the boarding block.

- On departure, guests should return the guest pass to the security.
- For fire safety reasons, all onsite residents including domestic helpers should be registered with the Head of Operations/Chinese Principal by completing the Onsite Resident Form. Any changes should also be reported.

- The FM team should also be informed if a member of staff living on site is expecting a delivery of goods.

#### **Delivery of Goods**

The FM team should also be informed if a member of staff living on site is expecting a delivery of goods.

#### **Events & Functions**

A guest list should be provided to the security team at least 24 hours before the event and they will register all guests at the gate.

#### **7.2: Third Party use and off-site arrangements**

The School's facilities, particularly sporting facilities, may be hired by Third Party Users (TPUs), including children's clubs, and under these arrangements the School has no control over, and assumes no liability for the conduct of individuals from TPUs. However, the School will ensure, as far as it is able, that TPUs have appropriate child protection and safer recruitment procedures in place. TPUs are also made aware of the School ground areas which are out of bounds, including specific parts of the building such as the boarding houses.

TPUs will be required to provide the School with a copy of the organisation's Child Protection Policy prior to approval being given for their use of the School's facilities and all TPUs providing activities, which involve children, will be required to sign a declaration to confirm that:

- the TPU has a child protection policy in place;
- safer recruitment procedures are followed for the TPU's staff and volunteers; and
- all staff and volunteers are appropriately trained in child protection and safeguarding procedures.

The Head Master or the EDSL will be informed of any child protection allegation or incident which takes place on the School premises during use by that organisation.

#### **7.3: Procedure for dealing with an allegation of abuse by an individual or third party user using the School's facilities**

If an allegation of abuse is made about an adult in a TPU, the organisation's Safeguarding Officer must notify the Head Master or the EDSL on the same day as the incident occurred or the disclosure was made, or as soon as possible. The School expects the TPU to follow its own Child Protection Policy and the Head Master will require confirmation that appropriate action has been taken before further use of the School's facilities will be allowed.

#### **7.4: External organisations who have responsibility for children on another site**

When our children attend offsite activities, including day and residential visits and work-related activities, we will check that child effective child protection arrangements are in place, as outlined in the School's trip risk assessments.

#### **7.5: Children staying with host families**

The School may in the future make arrangements for children to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the School follows the guidance in 'Keeping Children Safe in Education' (DfE, 2022), Annex C to ensure that hosting arrangements are as safe as possible.

#### **7.6: Photography and images on site**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect our children we will:

- seek parental consent for photography of our students through the School's Terms & Conditions when children are admitted to the School;
- seek parental consent for photography of students which may be extraordinary e.g. photos of children in advertising, a staff member's portfolio of drama productions;
- demonstrate respect, care and caution when including photographs of students in Newsletters, Blogs and any other School publication; and
- encourage children to tell us if they are worried about any photographs that are taken of them.

#### **7.7: E-safety (including staff use of social media – see Appendix)**

Children increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

The Prevent Duty requires the School to safeguard vulnerable individuals from being radicalised or drawn into extremism through the internet or social media.

The School's e-safety policy is incorporated in the Student ICT Acceptable Use Policy, and Students ICT Acceptable Use Policy Wi-Fi Version. This explains how we try to keep children safe in School. Cyber-bullying and sexting by children, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our anti-bullying procedures. The following measures are in place to promote e-safety within the School:

- **ICT Acceptable Use Policy** - protects all parties by clearly stating what is acceptable and what is not. Children are expected to sign up to this at the start of each academic year and before access can be given to the School's ICT facilities.
- **Induction and Education** - all children are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. Subsequently, House Tutors remind children at the start of each academic year about their obligations and code of conduct. This is reinforced by a presentation in Houses about E-Safety.
- **Monitoring** - the School will exercise its right to monitor the use of computer systems, including the monitoring of internet use, interception of e-mails and the deletion of inappropriate materials at all times. In circumstances where the School believes unauthorised use of the computer system is, or may be taking place for unlawful purposes, the School reserves the right to inform appropriate authorities and provide documentary evidence. The computer network is owned by the School and may be used by children to advance and extend their knowledge and understanding.
- Members of Staff also receive advice regarding the use of social networking and electronic communication with children, which follows the guidance given in the document '*Guidance for Safer Working Practice for Adults who Work with Children and Young People*' (DfE March 2009) and the School Communications Policy.

#### **7.7.1: Direction for staff on e-safety**

Staff should:

- ensure that personal social networking sites are set at private and students are never listed as approved contacts;
- never use or access social networking sites of students;
- should not take photographs of students on their personal devices;
- should not give their personal contact details to students, including their mobile telephone number;
- only use equipment e.g. mobile phones, provided by the School to communicate with children such as on field trips and expeditions;
- only make contact with students for professional reasons and in accordance with the School's policy and this should be through the school's MIS or the school's Outlook account;
- recognise that text messaging or social messaging should only be used as part of an agreed protocol and when other forms of communication are not possible; and
- not use internet or web-based communication channels to send personal messages to students.

## **APPENDIX A: SAFEGUARDING TASKFORCE**

### **1.1. Members**

The school's safeguarding committee members for the 2021-22 academic year are:

1. Joanne Dunphy– Head Master(EDSL)
2. Annabel Symth– Head of Lower School (DDSL)
3. Roxanne Clark- Head of HLL (DDSL)
4. **Vacancy** - Head of Upper School (DDSL)
5. Vis Zaaaras – Head of Boarding (DDSL)
6. Meredith Li Chinese Principal (DDSL)
7. Chelsea Fu- Teaching Assistant (DDSL)
8. Tina Ouyang- BCTC, HLL (DDSL)
9. Niyan Want, School Counsellor (DDSL)
10. Letty Laing, PA to Lower School (DDSL)

### **1.2. Terms of reference**

The committee is responsible for:

- the development and regular review of the school's policies and procedures regarding safeguarding
- the development and delivery of relevant and up-to-date safeguarding policy training for all staff
- the safe storage of all confidential safeguarding documents
- ensuring easy access to the safeguarding policies, procedures, and guidance for all staff

Safeguarding and Child Protection Policy and Guidelines

- the committee meets, as a minimum, once every half-semester.

## **APPENDIX B: INFORMATION FOR PARENTS**

### **CHILD PROTECTION: SAFEGUARDING STUDENTS – INFORMATION FOR PARENTS**

Harrow Nanning aims to safeguard and promote the welfare of the children in its care and protect them from serious harm. This applies to the boarding and day environment and all the activities the school undertakes. Staff and volunteers are vetted for their suitability to work with children prior to appointment. They receive training in safeguarding and child protection. They will report any concerns in accordance with official local safeguarding procedures. The school has a child protection and safeguarding policy, which is regularly reviewed and this is available on the school's website.

It is important for parents to be aware that:

- staff and volunteers in the school have a duty to report concerns about a child, whether this means the child may be in need of additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of harm. There are four categories of abuse: physical, sexual, emotional, neglect.
- in some cases the school is obliged to refer cases to external agencies so that a child's needs are assessed and to consider whether an investigation into possible child abuse is required. In many cases there will already have been discussions between the school and the parents of a child, and the situation and concerns will not come as a surprise to the parents. However, parents may not be told that the school has referred their child to external agencies if it is thought that this might either put the child at risk or it is in the best interests of the child for the parents not to be told.
- if you think your child may have been abused you can contact the school for support and advice. If you think the abuse may have happened in school (or during expeditions or extra-curricular activities), you should contact the EDSL, who is Ms Emily Gallagher. If the allegation of abuse involves a member of staff you should contact the Head Master directly, or if the Head Master himself is involved, the governor responsible for safeguarding (details are available on the school's website).
- if members of the school's staff need to express concerns about a child and refer a child to the DSL, it is understood that this can cause distress for the child's parents. It is important that all parties – parents and members of the school's staff – try to discuss these matters as calmly and sensibly as possible.
- senior school prefects are given basic training in child protection at the start of the academic year. There is also a programme of peer mentoring available to senior school students

## **APPENDIX C: STAFF SOCIAL MEDIA USE POLICY**

### ***A. Purpose and principles***

- To provide guidelines for the use of social media by school employees.
- It is crucial that pupils, parents and the general public have confidence in the school's decisions and standards. The principles set out in this policy are designed to ensure that staff members use social media responsibly so that confidentiality of pupils and other staff and the reputation of the school are safeguarded.
- The school recognizes – embraces even – the potential of social media and other web 2.0 technologies to impact positively on education and the workplace.
- Nonetheless, there are pitfalls. This policy aims to draw attention to these and to guide staff appropriately so that their use of social media is judicious and edifying.
- Not least, staff members must be conscious of the need to keep their personal and professional lives separate at all times. The unique context within which we operate in Harrow Nanning can blur some of these lines. Staff, spouses and dependents are expected to be appropriately mindful of this complexity.

### **B. Scope**

- This policy applies to Harrow NN teaching and other staff employed directly by the school, their spouses, partners and dependents, external contractors providing services on behalf of the school (such as school trip/ expedition external providers, pcs, consultants, “chaperones”, etc.), teacher trainees and other trainees, volunteers and other individuals who work for or provide services on behalf of the school. These individuals are collectively referred to as ‘staff members’ in this policy. Essentially, if you are an adult on campus, whether employed or not by the school, this policy applies to you.
- This policy covers personal use of social media as well as the use of social media for official school purposes, including sites hosted and maintained on behalf of the school.
- Harrow Nanning could be held vicariously responsible for acts of their employees in the course of their employment. For example, staff members who harass students, parents, co-workers online or who engage in cyber bullying or discrimination on the grounds of race, sex, disability, etc. Or who defame a third party while at work may render Harrow Nanning liable to the injured party.

### **C. Specific guidance**

- As in all your interactions with others, whether on or offline, be professional, responsible and respectful.
- When using social media, be conscious at all times of the need to keep your personal and professional life separate.
- You should not put yourself in a position where there is a conflict between your work for the school and your personal interests. Err on the side of caution.
- You must not engage in activities involving social media which might bring Harrow NN into disrepute.
- You must not represent your personal views as those of Harrow NN on any social medium.
- You must not discuss personal information about Harrow NN pupils, staff and other professionals you interact with as part of your job on social media.
- You must not use social media and the internet in any way to attack, insult, abuse or defame pupils, their family members, colleagues, other professionals, other organisations or Harrow NN as an institution.
- You must be accurate, fair and transparent when creating or altering online sources of information on behalf of Harrow NN.

- Staff members must not edit open access online encyclopedias such as wikipedia in a personal capacity at work. This is because the source of the correction will be recorded as the employer's IP address and the intervention will, therefore, appear as if it comes from the Harrow NN itself.
- Staff must not upload any content regarding Harrow NN students and parents to their own personal social media accounts.

#### **D. Personal use of social media**

- Staff members must not identify themselves as employees of Harrow NN or service providers for the school in their personal web space (use of professional web space such as linkedin is up to the user's discretion, keeping in mind that anyone such as parents, students and colleagues can access your profile). This is to prevent information on these sites being linked with the school and to safeguard the privacy of staff members, particularly those involved in providing sensitive front line services.
- Staff members must decline 'friend requests' from current pupils they receive in their personal social media accounts.
- Staff members must not 'check in' or tag their photos/videos at Harrow NN (this includes, but is not limited to, facebook, instagram, twitter, pinterest).
- Harrow NN only permits limited personal use of social media while at work. Staff members are expected to devote their contracted hours of work to their professional duties. Personal use of the internet or social media should not occur during contact time (for teachers and teacher assistants). Caution is advised when inviting work colleagues to be 'friends' on personal social networking sites. Consider carefully the amount of personal information you want to disclose to those you work with on a daily basis.
- Staff members are strongly advised to ensure that they set the privacy levels of their personal sites as strictly as they can and opt out of public listings on social networking sites in order to protect their own privacy.

#### **E. Communication**

- School email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such media. The use of a school email addresses to create or join a school sanctioned social media site is, however, appropriate. Staff should refer to the staff code of conduct.
- On leaving the service of Harrow NN, staff members must not contact Harrow NN's current pupils by means of personal social media sites. Similarly, staff members must not contact current pupils from their former schools by means of personal social media unless they are family-related/close friends with parents. You are advised to maintain professional conduct while communicating with former students for work or personal reasons
- Staff members must not have any contact with pupils' family members through personal social media if that contact is likely to constitute a conflict of interest or call into question objectivity.
- Staff members must not have contact through any personal social medium with any current pupils, whether from Harrow NN or any other school, unless it is for professional contact or the pupils are family members.
- If staff members wish to communicate with pupils through social media sites or to enable pupils to keep in touch with one another, they may only do so with the approval of the school and through official school sites created according to the requirements in the appendix.
- Staff members using social networking tools to support professional practice must thoroughly research the privacy settings, follower options and linking opportunities of the proposed social medium and ensure the safety and reputation of the school, and those associated with it, as outlined within this policy.

## **F. Photographs, Videos**

- Photographs, videos, or any other types of images of pupils must not be uploaded onto personal social media unless family consent has been given. For example if your child is friends with a fee-paying student whose parents have agreed to the upload of pictures of the children, then this is acceptable. If not, then it is not.
- Staff may often find themselves organizing events at which parents wish to take photographs of children. We do not prevent parents from doing this – indeed we encourage it: childhood is fleeting and special. The principal exception to this liberal approach to photography is around the swimming pool and in any other areas of the school where children may be in partial states of dress (signs are often posted in such areas). Nonetheless, we advise staff to read out this statement, or something very similar, before a given event begins:

“Please do to take photographs during today’s proceedings. However we ask that, as a matter of courtesy, you do not post photographs of other people’s children onto publicly accessible sites unless you have actively sought permission to do so”.

- We do not proscribe the taking of photographs and videos on a personal device (special moments that merit capturing often occur at unexpected moments), however we ask that staff delete such photos from their devices and any personal cloud storage within 72 hours of being connected to the school network.

## **G. Examples of do’s and don’ts (for further clarification)**

Do:

- take a photo of your own child winning an award
- take a photo of Harrow NN with captions “it’s a beautiful day!”
- use your harrow email account to communicate with students at their harrow email account
- use your school-sanctioned social media account to post asynchronously about off-site trips and events

Don’t :

- take a photo of your class in school or on a school trip and upload it on social media, whilst indicating the location of where the picture has been taken
- take a photo of Harrow students and ‘check in’ or indicate that you are at Harrow NN or elsewhere
- use social media (such as facebook, instagram, twitter, youtube, etc) or chat (imessage, whatsapp, snapchat, line, etc) to communicate with students for non-professional purposes or in ways which contravene safeguarding best practice.

## **H. Child protection and social media**

- Any images of students that are of sexual nature, whether distributed on social media or stored privately, are child abuse images (child pornography). Staff who are aware of any student possessing such images should confiscate the device that contains the images and immediately report this to the relevant CPO.
- Any member of staff found in possession of such images will immediately be referred to the Chinese Police Authorities where criminal proceedings will begin.
- Please refer to our safeguarding policy for further clarification.

## **I. Using social media on behalf of Harrow NN**

- Staff members can only use officially sanctioned school social media tools for communicating with pupils or to enable pupils to communicate with one another. Staff must follow the procedures outlined in the appendix when setting up these accounts.

- There must be a strong pedagogical or business reason for creating official school social network sites to communicate with pupils or others. Staff must not create sites for trivial reasons which could expose the school to unwelcome publicity, unsuitable material, or damage its reputation.
- Official school sites must be created according to the requirements specified in the appendix of this document. Sites created must not breach the terms and conditions of social media service providers, particularly with regard to minimum age requirements. Staff members must not mention names or places when posting photographs. If posting a photograph of a student, they must not be posted at the time of the event nor specify location.
- Staff members must always act in the best interests of children and young people when creating, participating in, or contributing content to social media sites. We are responsible for the safeguarding and protection of children.

#### **J. Breaches of policy**

- any breach of this policy may lead to disciplinary action being taken against the staff member/s involved, in line with Harrow NN disciplinary policy and procedures.
- a breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of Harrow NN or any illegal acts or acts that render Harrow NN liable to third parties may result in disciplinary action.

#### **K. Social media site creation approval form**

- use of social media on behalf of Harrow NN must be approved prior to setting up sites. It is vital that staff members wishing to use social networking tools to support their professional role properly research the security and privacy settings of the proposed medium to ensure the safety, security and reputation of Harrow NN and its community. Please find the form attached to this policy.

## **APPENDIX D: INTIMATE CARE POLICY**

### **1. Policy statement**

This policy applies to staff with responsibilities for the intimate care of children at Harrow NN. This policy outlines the guidelines for best practice.

Intimate personal care includes hands-on physical care in personal hygiene, and physical presence or observation during such activities. Intimate personal care tasks can include:

- body bathing other than to arms, face and legs below the knee.
- toileting, wiping and care in the genital and anal areas.
- dressing and undressing.
- application of medical treatment, other than to arms, face and legs below the knee
- supporting with the changing of sanitary protection

This policy and the provision's practices will be reviewed periodically.

Harrow NN is committed to ensuring that all staff responsible for the intimate care of children will always undertake their duties in a professional manner. Harrow NN recognises that all children need to be treated with respect when intimate care is given. No child should be attended to in such a way as to cause distress, discomfort or pain.

Intimate care is discussed with all employees involved in the intimate care of children. Staff receive regular supervision and appraisals, which are used to identify any areas for development or further training.

### **2. Our approach to best practice**

All aspects of intimate care need to be carefully planned and consistently carried out. The child who requires Intimate Care is treated with respect at all times. The child's welfare, dignity and right to privacy are of paramount importance.

Each child should be involved in their intimate care and should therefore be supported to achieve the highest level of autonomy. However, age and abilities of each child need to be taken into consideration. Staff should allow all children to be as independent as possible. This may mean giving the child responsibility for removing their clothes or cleaning themselves. All adults involved in intimate care tasks should inform the child about all actions carried out throughout. Only adults that are known to the child will be tasked with intimate care responsibilities.

Individual intimate care plans will be drawn up if required by individual circumstances.

Parents should be informed about the intimate care given to their child.

Each child's right to privacy will be respected. Individual care tasks will be carried out in our toilet areas which are separate from the learning areas but still visible to other staff. Staff should carefully consider and regularly review individual situations to determine how many adults may need to be present during intimate care tasks. Should it be deemed necessary for more than one adult to be present, appropriate reasons to be given and recorded.

Any incidents occurring during intimate care should be immediately reported to the line manager. Such incidents might be:

- Staff accidentally hurting a child
- the child seemed sore or unusually tender in the genital area
- the child misunderstood or misinterpreted something

- the child had a very strong emotional reaction without apparent cause (sudden shouting or crying)

All staff must ensure that they protect themselves by following these guidelines:

- always tell another member of staff when you are doing a change or accompanying a child to the toilet
- always ensure that a child's privacy is protected
- always ensure that you are visible to other members of staff

### **3. Safeguarding**

Children learn best when they are healthy, safe and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them. (EYFS 2014)

All children will be taught personal safety skills carefully matched to their level of development and understanding.

All staff have a duty to be aware that abuse does occur. Due to the many hours of care that we provide, our staff will often be the first to notice any problems; they may also be the first people in whom children confide about abuse.

Harrow NN's safeguarding policy lays out the procedures that must be followed if staff have any reason to believe that a child in their care is subject to emotional, physical or sexual abuse or neglect.

Our first responsibility must be the welfare of the child and we have a duty to children, parents/carers and staff to act quickly and responsibly to any instance that comes to our attention.

If a child becomes distressed or unhappy about being cared for by a particular member of staff, the matter will be looked into and outcomes recorded. Parents/carers will be contacted at the earliest opportunity as part of this process in order to reach a resolution. Staffing schedules will be altered until the issue(s) are resolved so that the child's needs remain paramount.

If a child makes an allegation against a member of staff, all necessary procedures will be followed.

### **4. Children wearing nappies**

Should parents raise safeguarding concerns due to students wearing nappies, staff should provide a copy of the intimate care policy and the safeguarding policy outlining the school's procedures regarding this matter.

All children should be supported and encouraged to begin using the toilets independently unless there is a significant developmental reason for a delay in this area.

Parents are responsible to provide nappies, wipes, and creams. Harrow NN will provide plastic bags, gloves, a bin, and liners.

### **5. Health and safety**

Staff should always wear gloves when dealing with a child who is bleeding, soiled or when changing a soiled nappy. Any soiled waste should be placed in a polythene waste disposal bag, which can be sealed. This bag should then be placed in a bin (complete with liner).

### **6. Special needs**

Children with special needs have the same rights to safety and privacy when receiving intimate care. Additional vulnerabilities that may arise from a physical disability or learning difficulty must be considered and provided for appropriately. If the circumstances require an individual intimate care plan, it should be drawn up and

discussed with the child, those with parental responsibilities and the organisation. This should be reviewed on a termly basis.

Regardless of age and ability, the views and/or emotional responses of children with special needs should be actively sought.

**Guidance to safeguard children and staff with regard to situations which may lend themselves to allegations of abuse (e.g. Physical contact, changing clothes)**

**7. Physical contact**

All staff engaged in the care and education of children and young people need to exercise caution in the use of Physical contact.

At Harrow NN early years we care for very young children. There will be times when staff are required to have close physical contact with a child. It is also important for the children to feel safe, secure and loved in their environment. We understand that children can react differently to physical contact and we respect this.

The expectation is that staff will work in 'limited touch' cultures and that when physical contact is made with pupils this will be in response to the pupil's needs at the time, will be of limited duration and will be appropriate given their age, stage of development and background.

It should always be the child who instigates any sort of physical contact such as cuddles. If a child is very upset then the adult must ask the child if they want a cuddle. Children should not be kissed by staff under any circumstances.

Children in Pre-K may require nappy changing and help on a regular basis. Children in Pre-K and K, once able to use a toilet independently, should not receive frequent or regular help with toileting unless they have an intimate care plan in place. If an adult needs to assist a child from these year groups with intimate care, then they should inform the parents that they have done so.

Staff should be aware that even well intentioned physical contact might be misconstrued directly by the child, an observer or by anyone the action is described to. Staff must therefore always be prepared to justify actions and accept that all physical contact will be open to scrutiny.

Physical contact which is repeated with an individual child or young person is likely to raise questions unless the justification for this is formally agreed by the child, the organization and those with parental responsibility.

Children with special needs may require more physical contact to assist their everyday learning. The general culture of 'limited touch' will be adapted where appropriate to the individual requirements of each child. The arrangements must be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and be open to scrutiny and review. Wherever possible, consultation with the line manager should take place if any deviation from the arrangements is anticipated. Any deviation and the justification for it should be reported.

Extra caution may be required if a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to staff being vulnerable to accusations of abuse. Staff also need to be aware that, occasionally, such children display needy behaviour and will seek out inappropriate physical contact. Should such circumstances arise, staff should deter the child without causing a negative experience. Ensuring that other members of staff observe any interactions with the child, will help to protect staff from any abuse allegations.

## 8. Supervision of changing rooms

These guidelines should be read in conjunction with the school's Safeguarding Policy and the guidelines on Intimate Care. Changing for PE can cause anxiety for some pupils, can influence their perception of the subject and determine whether it is an enjoyable and positive experience. The concern caused by changing can influence a pupil's participation and lead to a variety of avoidance strategies.

For staff there can be confusion and/or worry about supervision and how it accords with safer working practice. There can be a tension between the need to ensure that bullying or teasing does not occur and the risk of being accused of acting inappropriately or even being perceived as someone who might pose a sexual risk to children.

### General Guidance

- Adults must always change or shower privately - never in the same space as children.
- For students in Grade 2 and above, designated single sex changing rooms or areas must be used. For swimming lessons, single sex changing rooms are used for K3 and above.
- All adults should avoid just standing in the changing room watching pupils, or repeatedly going in and out without good reason.
- When supervising students from outside the changing rooms, clear systems/rules must be established so students are clear about expectations of their conduct while they are unsupervised.
- For after school activities parents/carers are not allowed in changing rooms and staff must be vigilant to this except in the case of students in Kindergarten to Grade 1 who are unable to dress themselves. These students are allocated to a designated 'Parents and Children' changing room.
- In Grade 2 to Grade 10, supervising adults should remain in close proximity to the room so that students are aware.
- Students should know that the adults will enter the room if necessary (in response to a disturbance for example).
- Where student privacy is not compromised, the door of changing rooms should be left slightly ajar. If there is a need for adults to enter the room it is recommended they should alert pupils to this by announcing it (e.g. a countdown) to give them the opportunity to cover up if they want to.
- Pupils who express disquiet or concern about the behaviour of a member of staff should be listened to and appropriate enquiries conducted by the relevant Head of School.
- Once students are in Grade 5 members of staff should supervise or assist pupils of the same sex. In Grade 4 down, this is preferable where it is possible.

### Guidance for those supervising students from toddler age to Grade 1

- Younger students will usually change together in a classroom or a unisex changing room. Where appropriate consideration may be given to utilising furniture or screens to provide discrete areas and/or ask girls and boys to be in different parts of the classroom.
- In Early Years classes a sign should be put on the door to deter visitors from entering.
- At least two members of staff should remain in the room while students are changing.
- If pupils need assistance getting changed, refer to the Intimate Care Policy.
- Students of all ages should be encouraged to be as independent as possible and in most cases adults should prompt and give verbal help/encouragement before they offer assistance.
- Assistance should take place openly, not out of sight of others.
- Students in K to G1 must have this same level of supervision during extra-curricular activities.

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- Young students walking from their classroom to the swimming pool area in their swimming kit should cover their bodies with a towel.
- In special circumstances, should a parent request, teachers may find somewhere separate for a student to change such as a cloakroom area or toilets, alone or with a same sex class friend depending on the circumstance.

## **APPENDIX E: SELF HARM POLICY**

### **1. Introduction**

Harrow Nanning believes that pupils who are involved in any self-harming behaviours or are indulging in worrying behaviour that it is essential to address this. Self-harm is a coping mechanism. An individual harms their physical self to deal with emotional pain, or to break feelings of numbness by arousing sensation. Self-harm is any deliberate, non-suicidal behaviour that inflicts physical harm on someone's own body and is aimed at relieving emotional distress. It can include cutting, burning, banging and bruising, overdosing (without suicidal intent) deliberate bone-breaking and swallowing. Self-Harm is not indicative of suicidal ideation nor is it a pre-cursor to suicidal intent it is an attempt to divert the negative thoughts and feelings with a physical pain and physical symbol that is a concrete cause of pain.

### **2. Risk Factors**

Risk factors associated with self-harm:

- Mental Health disorders including depression and eating disorders.
- Drug/alcohol abuse and other risk-taking behaviour.
- Recent trauma e.g. death of a relative, parental divorce.
- Negative thought patterns, including suicidal thoughts.
- Low self-esteem.
- Bullying.
- Abuse: physical, emotional, sexual and neglect.
- Sudden changes in behaviour and academic performance

It is important to consider the self-esteem and unhappiness of any person who is self-harming.

### **3. Guidelines and Protocol**

Any member of staff who has concerns regarding a pupil self-harming must report to a Designated Safeguarding Lead (DSL) and/or the EDSL if appropriate.

Staff should listen to pupils in emotional distress calmly and in a non-judgmental way. Staff must not make promises assuring confidentiality but should reassure pupils that in order to seek health and happiness people need to know about their problems so that they can help. Staff should immediately inform the EDSL after a disclosure – details of the conversation should be documented on iSAMS, In all cases the Safeguarding Taskforce will decide on further actions.

If an injury has occurred that needs treatment or if the pupil has taken an overdose the pupils should be escorted to the Clinic or ambulance called. The Clinic staff will notify the parents of treatment given and the Hm inform the parents as is directed by the EDSL. The pupil will normally be expected to receive some form of counselling.

If the pupil seeks independent help from the Clinic/Counsellor then the pupil would be encouraged to allow the Clinic/ Counsellor to liaise with the pupil's parents and appropriate School staff. However, parents, DSL, Hm would be informed if it was felt that the pupil was a danger to themselves or if their behaviour was seriously affecting others.

Pupils may be required to leave the School for a period of time for the following reasons:

- Their condition is not improving.
- They are refusing to acknowledge they have a problem.
- They or their parents are refusing to co-operate with the management of their condition.

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- If, in the judgement of medical, academic or pastoral staff, their behaviour is having a detrimental impact on other students in the School.

The School will give parents full support in trying to find appropriate help and will continue to liaise closely with the family during this period.

The pupil will be allowed back into School when the Head Master is satisfied that the reasons for the temporary leaving no longer apply.

**Guidelines for staff supporting pupils who are self-harming**

**How do you know there is a problem?**  
 The pupil told you?  
 Other pupils or staff have voiced their concerns?  
 The pupil always dresses with long sleeves and refuses to do games?  
 You've noticed changes in the mood of the pupil? – withdrawn, miserable, hyperactive, sad.  
 The pupil has presented with other mental health issues e.g. eating disorder  
 There are visible signs of self-harming.

**Yes to any of the above and under 16**  
 Don't avoid the situation. Be proactive not reactive, don't wait for the situation to get worse  
 Approach the pupil and try to talk to them  
 Be prepared to listen in a non- judgmental way.  
 Speak to the boarding House staff or DSL  
 Remember time constraints – be honest with the pupil and yourself about how much time you have.  
 Don't deal with the situation on your own.  
 Boarding pupils will be referred to the Clinic who will arrange counselling if appropriate or referral to outside agencies.

Any medical concerns should be reported to the Clinic who will deal with any medical needs – deep cuts, or burns or over doses.

If the pupil seeks independent help from the Clinic/Counsellor then the pupil would be encouraged to allow the medical centre to liaise with the pupil's parents and appropriate School staff. However, parents, Hm and a DSL would normally be informed if it was felt that the pupil was a danger to themselves; if their behaviour was seriously affecting others or the pupil was uncooperative with the medical centre regarding treatment. Day pupils under 16 parents would normally be informed and advised to access medical help.

**Yes to any of the above and over 16**  
 Day pupils over 16 would be encouraged to talk to their parents.  
 If it was felt that the pupil was a danger to themselves or others parents would be informed

**Pupils may be asked to leave the School for a period of time for the following reasons:**  
 Their condition is not improving  
 They are refusing to acknowledge they have a problem  
 They or their parents are refusing to co-operate with the management of their condition.

If, in the judgement of medical, academic or pastoral staff, their behaviour is having a detrimental impact on other pupils in the School.  
The pupil will be allowed back into School when the Head Master is satisfied that the reasons for the temporary leaving no longer apply.

## **APPENDIX F: EATING DISORDER POLICY**

### **Managing Eating and Weight Loss Concerns**

Eating Disorders are prevalent in the lives of pre- adolescent and adolescent students, especially in high achieving communities.

Training and awareness:

All staff will be required to attend inset training for awareness and understanding of :

- The underlying cause and effect of common eating disorders
- To build knowledge of the signals that indicate a disorder
- To identify the effects of disordered eating on individual health, community impact and learning outcomes.
- The Harrow NN policy and the reporting procedure to initiate Safeguarding action.

Teaching and non-teaching staff should be aware of the following red flags, exhibited habitually, may indicate an eating disorder in a student entrusted to our care. Some indicators are:

- High social anxiety and test anxiety
- Loss of focus and /or persistent confusion
- Wearing long sleeves and slacks even on very hot days
- Excessive restriction or expressed fear of food: calories and limited variety
- Sneaking food
- Failure to eat routinely
- Binging and Purging
- Sudden and excessive weight loss or weight gain
- Self- Harming Behaviours
- Significant appearance of lanugo facial hair
- Thinning of hair and receding hair line
- Obsessive exercise regime

If a member of staff sees evidence of significant, sudden and excessive weight fluctuation and/or disordered eating patterns, reporting is imperative and immediate. The reporting procedure requires:

- Notifying the relevant Designated Safeguarding Lead (DSL) via iSAMS with all evidence and observations or reports from other sources that give cause for safeguarding action on the students behalf.
- Reporting person may also speak with the DSL personally to further alert the leader that a report has been filed in the iSAMS system
- The DSL will assign the appropriate members of the Safeguarding Taskforce to further investigate and initiate the appropriate action in a confidential manner.
- The student will be assessed by the School Clinic Doctor regarding the students 'physical state of health and then if appropriate by a school mental health professional (counsellor or psychologist) will assess the students emotional wellness.

IF it is determined that an eating disorder exists or there is a high risk of a developing eating disorder, resulting action may include:

- Regular weight measurements at the Clinic – where consent is given by the student
- Regular counselling sessions with the School Counsellor
- Implementation of an eating plan consistent with School dining
- Referral, after consultation with parents, to specialist support

In cases where an eating disorder is confirmed or medically significant weight loss/gain is recorded, a pupil may be able to stay in school. A pastoral concern team will consider the details of reasonable care based on the expert input of the medical and mental health professionals involved in the overall treatment plan. If the school can adequately provide the care required, the pupil may continue school attendance.

The Housemaster and will be advised as to the care plan. The Housemaster will further be informed and regularly updated regarding the clinical progress or decline of the students' condition, in order to offer relevant Pastoral Care, accurately provide ongoing monitoring and care plan refinement, needed for the student to successfully continue their academic pursuits in school.

It may be possible that the pupil stay in school in the process of managing the illness provided the pupil agrees to the care plan and:

- adheres to the medical advice (given by the school clinic physician or shared with the School by outside specialists), which may include being signed off games, submitting to a specific sleep schedule
- consenting to regular weight measurements, and regular medical check-ups with the Clinic Physician and/or Nurse
- adheres to the pastoral support plan implemented by the school

If a pupil fails to adhere to medical advice, continues to lose weight, or is the subject of further significant risk, the pupil will, in all likelihood, be asked to go home to recover under the care of their parents.

In some circumstances, the distress caused to others (pupils and staff) may be a factor in deciding whether a pupil can manage their eating disorder/distress within the School environment. This policy also applies if pupils enter the School with eating concerns.

## **APPENDIX G: SAFER RESTRAINT POLICY**

In this policy, physical *restraint* means the use of physical force to prevent, restrict or subdue movement of a student's body or part of their body. Physical restraint should only be used when it is immediately required to protect the safety of the student or any other person.

School staff may only use physical restraint on a student when it is immediately required to protect the safety of the student or any other person noting that:

- for physical restraint to be immediately required there should be no less restrictive action that could be taken to avert the danger in the circumstances
- staff should use the minimum force needed to protect against the danger of harm
- staff should apply the physical restraint for the minimum duration required and remove it once the danger has passed.

The decision about whether to use physical restraint rests with the professional judgment of the staff member/s involved, who will need to take into account both their duty of care to the students and their right to protect themselves from harm.

Physical restraint should not be used unless immediately required to protect the safety of the student or any other person (see above).

Restraint must not be included in a Behaviour Support Plan or be used as a routine behaviour management technique, to punish or discipline a student or to respond to:

- a student's refusal to comply with a direction, unless that refusal to comply creates an imminent risk to the safety of the student or another person
- a student leaving the classroom/school without permission, unless that conduct causes an imminent risk to the safety of the student or another person
- verbal threats of harm from a student, except where there is a reasonable belief that the threat will be immediately enacted
- property destruction caused by the student unless that destruction is placing any person at immediate risk of harm.

Any restraint which covers the student's mouth or nose, in any way restricts breathing, takes the student to the ground into the prone or supine position, involves the hyperextension of joints, or application of pressure to the neck, chest or joints, must not be used.

If applying physical restraint in the limited circumstances set out above, staff must:

- use the minimum force required to avoid the dangerous behaviour or risk of harm
- only restrain the student for the minimum duration required and stop restraining the student once the danger has passed.

Staff should ensure the type of restraint used is consistent with a student's individual needs and circumstances, including:

- the age/size of the student
- gender of the student
- any impairment of the student e.g. physical, intellectual, neurological, behavioural, sensory (visual or hearing), or communication
- any mental or psychological conditions of the student, including any experience of trauma
- any other medical conditions of the student
- the likely response of the student

- the environment in which the restraint is taking place.

Any matter of this nature needs to be reported to the line manager as well as the parents. An incident report should also be recorded.

**Pupils in distress**

There may be occasions when a distressed pupil needs comfort and reassurance that may include physical touch. Staff must remain self-aware at all times to ensure that their contact is non- threatening or intrusive and cannot be subjected to misinterpretation.

Where a staff member has a particular concern about the provision of such care and reassurance, they should seek further advice from their line manager or the designated safeguarding lead.

## APPENDIX H: COUNSELLING POLICY

Counselling Practice at HNN

Intended use for reference to SLT, Hm's, Pastoral Care Staff

The counsellor's role is to facilitate the clients (typically students) work in ways that respect their values, personal resources and capacity for self-determination. Counsellors draw from a number of theoretical approaches, including those that are cognitive, affective, behavioural, and systemic. These theories may be applied to individuals, groups, and families.

Counselling is a service sought by people in emotional distress, experiencing confusion or conflict, having difficulty managing behaviours or thoughts, as well as those who are in crisis or have been determined to be at risk via safeguarding assessment or report. Further, Counselling is conducted with persons who are considered to be emotionally high functioning as well as those who may be struggling with emotional wellness. In some cases, counselling may be prescribed as part of a treatment plan for student or staff members with a diagnosed disorder. The counsellor may also explore with a client any evidence of abuse or neglect in order to support the student appropriately in managing the effects of the abuse. The primary focus of all counselling is the client's goals. Thus, counselling involves both choice and change.

The service of counselling is meant as an avenue for processing and discovery through reflection and discussion, in order to reach a deeper understanding of self within one's circumstance: past, present and future. In addition, counselling may lead to resolution or provide a safe space for further processing of thoughts and feelings. Counselling may also provide a sounding board when airing frustrations, venting anger or when in search of applicable solutions and strategies for actionable plans. All action plans are selected or determined by the client. The counsellor relationship is disciplined and confidential: not to be confused with friendship. However, to establish an effective counselling relationship, building a highly connected relationship of trust is required. (This process can happen quickly or require several sessions before meaningful discovery of client need can be ascertained). Therefore, in each session the client's self-determined goals are paramount.

### Confidentiality

Harrow Nanning recognises that matters arising in counselling are confidential. The Counsellor will share information on a 'need to know, what, and when' basis. The professional evaluations of the counsellor in this regard will vary dependent upon the age of the student, and their willingness for content to be shared. Any individual meeting with the counsellor does so in the knowledge that a counsellor is obligated to share any information necessary to protect individuals from significant harm (for more details please see HNN Safeguarding policy).

What counselling involves

- An ongoing process, of connection, discovery, realisation and change.
- Offering support to students with various forms of stress or mood disorders, or simply those seeking some encouragement or personal connection.
- Facilitating a clients' identification of (and working towards) their own goals, rather than dispensing advice or advocating an agenda.
- Collaborating with other members of staff as required.

In addition to this the counsellor at HNN may also conduct group therapy, work with families and run training sessions with adults and students.

What counselling is not

- Student discipline or a recipe for behaviour management.

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- A substitute for a teacher-student relationship.
- A way of getting a student to apologise or consistently follow your instructions
- A medical or psychological assessment.
- A way to 'fix' students, parents or staff.
- A means of curtailing a child's expression of emotions.

**Fitness to practice**

In order to maintain fitness to practice, it is a school expectation and a professional requirement that the counsellor shall:

- seek supervision and consultation with other qualified professionals about client treatment and/ or professional practice responsibilities. It is anticipated that this will take the form of a skype and a face-to-face session with an external professional counsellor each month, as well as fortnightly consultations with school's psychologist.
- Ensure that there is an adequate provision of time for this supervision, alongside any personal planning, research, note writing, reflection etc.

HNN recognises that the counsellor's priority is student care and aims that they will rarely attend more than five meetings each week.

## APPENDIX I: ANNUAL SAFEGUARDING TRAINING SCHEDULE AND ALLOCATED TRAINERS

Lead	Recipients	Date
Online Level 3	DSLs and CPOs	August/ early Sept
Online Level 2 (AISL Academy)	All new staff	Pre-arrival
Executive Safeguarding Lead	All staff	Induction (Aug and Feb)
Head of EYS- Intimate Care	All HLL Staff	Induction (Aug and Feb)
Executive Safeguarding Lead	All external vendors	September
Heads of Phases	Trip organisers and attendees	Prior to trips

Heads of Phases will then lead specific areas for their teams, as planning in the PD schedules.

Additionally, we offer training at points over the school year to ensure any new staff who missed induction or staff in need of a refresher course are trained.

Sessions are planned and shown on the Harrow Nanning calendar accessible in Outlook.

## APPENDIX J: WHISTLEBLOWING POLICY

### Purpose of this guide

Each AISL school and its governing body are committed to honesty and integrity. There is an expectation that all staff maintain high standards of professionalism in accordance with their contractual obligations and the school's policies and procedures.

If members of staff, parents, governors, or the school community at large become aware of activities which give cause for concern, this policy acts as a framework to allow concerns to be raised confidentially. It also provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion. The school and governing body are committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved.

This procedure should only be used where all other existing internal procedures are felt to be inappropriate or when a member of staff, for whatever reason, feels inhibited in going through normal line management channels. Staff should always first consider using normal line management for raising concerns.

This procedure is only for the purpose of raising concerns about wrongdoing and is not a substitute or alternative for existing procedures such as the **internal grievance policy (HS35) or staff disciplinary & competence policy (HS39)** for staff. This policy does not form part of a staff member's contract of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the school and the school reserves the right to amend its content at any time.

### Aims of policy

This policy has three main aims:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- To provide staff with guidance as to how to raise those concerns;
- To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be a mistaken.

### Who is covered by this policy

This policy reflects the school's current practices and applies to all individuals working at all levels of the organisation, including the Governors, Head, members of the Leadership Team, academic and administrative staff, consultants, contractors, and outside providers (collectively referred to as "staff" in this policy) who are advised to familiarise themselves with its content.

### What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.

This may include:

- criminal activity;
- child protection and/or safeguarding concerns (see the specific Safeguarding policy);
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- financial fraud bribery or mismanagement;

- abuse of position;
- negligence;
- breach of the school's internal policies and procedures including its Code of Conduct;
- conduct likely to damage the School's reputation;
- unauthorised disclosure of confidential information;
- concerns about the harm or risk of harm to children;
- the deliberate concealment of any of the above matters.

A 'whistle-blower' is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the school's activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to staff's own personal circumstances, such as the way you have been treated at work. In those cases, the staff member should use the **Internal Grievance Policy (HS35)**. If you are uncertain whether something is within the scope of this policy, you should seek advice from the Head or from an appropriate Senior Manager. If the matter is in relation to an alleged wrongdoing by the Head, then you should seek the advice of the Chair of Governors.

#### **Safeguards: protecting your rights**

The school and the governing body recognise that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The school and the governing body will not tolerate harassment or victimisation and will take action to protect staff members when they have a genuine concern.

The following principles apply:

1. **Harassment or Victimisation.** The school and the governing body will not tolerate any attempt to victimise the 'whistle blower' or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances. Note that this does not mean that if a staff member is already the subject of internal procedures such as disciplinary or redundancy, that those procedures will be halted because of that staff member raising a concern under the whistleblowing policy.
2. **Confidentiality.** We hope that staff will feel able to voice whistleblowing concerns openly under this policy. The school and the governing body will make every effort to protect a staff member's identity if confidentiality is requested. As indicated above, identity will be protected as far as possible, but should the investigation into the concern require the staff member to be named as the source of the information, that this will be discussed with the staff member before their name is disclosed.
3. **Anonymous Allegations.** Anonymous allegations will be considered at the discretion of the school and the governing body. In exercising the discretion, the factors to be considered would include:
  - a. the seriousness of the issues raised;
  - b. the credibility of the concern; and
  - c. the likelihood of confirming the allegation from attributable sources.

Staff members are encouraged to put their name to an allegation in cases where proper investigation may be more difficult or impossible if we cannot obtain further information and it is also more difficult to establish whether allegations are credible.

4. **Untrue Allegations.** If a staff member makes an allegation where s/he has a genuine concern, but it is not confirmed by the investigation, no action will be taken against that staff member. If, however, we conclude that a staff member has made malicious or vexatious allegations, or with a view to personal gain, disciplinary action may be taken against that staff member.
5. **Unfounded Allegations.** Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the staff member who raised the concern, who will be informed that the school/governing body deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.
6. **Support to Staff members.** It is recognised that raising concerns can be difficult and stressful. Advice and support will be made available, as appropriate to both the staff member(s) raising the concerns and any staff member(s) subject to investigation.

**Procedure: how to raise a concern**

As a first step, a staff member should normally raise concerns with their immediate manager or their manager's superior. This depends, however, on the seriousness and sensitivity of the issues and who is involved.

Where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- Head
- The Chair of Governors

**Investigation and Outcome**

1. Once a member of staff has raised a concern, an assigned member of senior staff or an appropriate member of the governing body will arrange a meeting as soon as possible to discuss their concern.
2. A member of staff may bring a colleague or HR representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.
3. The school and/or the governing body will carry out an initial assessment to determine the scope of any investigation. The school and/or governing body will inform the member of staff of the outcome of its assessment. The member of staff may be required to attend additional meetings in order to provide further information.
4. In some cases, the school and/or governing body may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the school and governing body to minimise the risk of future wrongdoing.
5. The school and the governing body will aim to keep the member of staff who raised the concern informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the school and the governing body giving the member of staff specific details of the investigation or any disciplinary action taken as a result. Any information about the investigation should be treated as confidential.
6. If the school or governing body concludes that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

**Protection and support for whistle-blowers**

It is understandable that whistle-blowers are sometimes worried about possible repercussions. The school and governing body aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment because of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should inform the Head immediately. If the matter is not remedied, they should raise it formally using the school's Complaints and Grievance Policy.

Staff must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

## APPENDIX K: SAFEGUARDING AUDIT ASSESSMENT & ACTION PLAN

This audit enables us to:

- Assess the School's Safeguarding practice, identify any gaps, and develop an Action Plan to address any outstanding issues and future learning;
- Ensure that key people within the school (including the Governing Body) are aware and how the school is working to keep children safe as defined by current guidance;
- How the school can demonstrate effective safeguarding in all that they undertake;
- Report to the Governing Body, AISL, HISL as required;
- Assemble evidence of 'Impact of Practice' for any inspection.

This audit has a model template Action Plan which assists with identifying gaps, targets to remedy and when by. This is a working tool and reviewed on a regular basis. The action plan will be presented alongside the audit to demonstrate progress and impact.

### Using the Audit

- The Hm, Executive Designated Safeguarding Lead and ideally with the Link Safeguarding Governor completes this audit June/July; this will reflect your current school safeguarding scoring and help you have an action plan identifying key targets for the forthcoming academic year;
- It is completed or reviewed at any time during the course of an academic year by the Executive Designated Safeguarding Lead appointed to complete this;
- That it is presented to stakeholders as a standalone item and the activity is discussed and recorded in the minutes;
- A copy is placed with the schools safeguarding portfolio of evidence and is used in any inspection.
- Copies should be kept of at least the 3 previous years of this Audit to demonstrate progression.

### AUDIT

The following set of questions helps identify:

- If we comply according to the DfE Guidance Keeping Children Safe in Education & other key safeguarding guidance's policies & procedures.
- Evidence of meeting both mandatory requirements, compliances and recommended good practices
- Meeting the Health, Safety and Wellbeing needs of pupils who attend the school and meeting their needs based on current national and local safeguarding concerns.

### Self-assessment scoring

Work through the statements and score according to what currently describes your school now:

**Level 1** - There is very little or no knowledge of this area in the school or amongst the staff

**Level 2** - There is knowledge of this area within the school/college; however, it is not fully effective in that not all staff are aware, understand or apply. A policy or details are being developed

**Level 3** - Knowledge is effective & a policy or details is developed & due to be implemented within the school. Some staff training is still required

**Level 4** - This area is well embedded within the school & school Curriculum (where required). There is evidence of positive work & practice & this can be evidenced

Effective Safeguarding - Striving to Achieve Best Practice				
A. Policy, Procedures & Recording	Lv. 1	Lv. 2	Lv. 3	Lv. 4
The school has a current Child Protection & Safeguarding Policy which is consistent with multi-agency safeguarding procedures and has been reviewed & approved by the governing body. The policy has its own statement reflecting the local community, local pupil's needs & the vision and ethos is made clear. The policy is known to everyone in the school including the Governing Body and is in consultation with pupils; it is fully understood and applied including reference to an annual Child Protection Audit. It is easily accessible to parents/carers. The Policy is also available on the school website.				
The school has developed a Safeguarding Information Leaflet for pupils/parents/carers/visitors.				
The school has reviewed all policies and identified those that should be consistent with the Child Protection/Safeguarding Policy. All Policies have a version control which are aligned and merged where relevant. An Action Plan is produced to ensure that policies are consistent and cross-referenced appropriately.				
There is evidence of quality assurance & rectification by the Governing Body before implementation of a policy. Staff have confirmed they have received, read (and understood) and signed copies where relevant to their role; a detailed log is kept on file of this activity				
The school is following recommended national GDPR (General Data Protection Act 2018) and Harrow's guidance's on access to, sharing and retention of CP / Safeguarding records on children				
The school has the current guidance on recording, retaining, and transfer of child protection records which is evidenced and uses recommended guidance for Harrow ILA schools and settings				
The Executive Designated Safeguarding Lead keeps separate records, comprising of one file per child-on-child protection concerns and those that are deemed vulnerable in the school.				
The school has a system of tracking transfer in and transfer out of child protection records which is maintained & audited				
There is a system of safe storage of CP/safeguarding files which have restricted access applied and staff who have access are justified in their role to have that access				
The school has a pro-forma for reporting and recording child protection concerns which can be evidenced as acted upon, this includes: - a record of actions taken; outcomes, and the use of a specific CP/ Safeguarding chronology for each child where there are concerns				
Evidence is recorded where advice has been sought from external agencies, which includes the step up/step down with preventative and social care partners. Evidence is recorded of tracking, contacts and referrals made.				

The school has an Anti-Bullying Policy which includes online bullying and complies with Section 89 of the Education & Inspections Act 2006. This policy is displayed on the school website and is known to all staff, non-teaching staff and the local community.				
The Anti- Bullying Policy has been produced in participation with the whole school community, with a child friendly version produced for pupils				
There are separate records of bullying incidents & evidence that incidents are analysed for patterns, trends, and hot spots. This includes strategies/models to prevent and intervene.				
Notes- development/ progress on/ evidence /location				

<b>B. Promoting the Welfare of Pupils - children are protected and feel safe</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
All staff, including non-teaching staff are aware of the Child Protection & Reporting Procedures within the school, these are made accessible & are fully understood and applied.				
The school can demonstrate clear lines of communication on safeguarding matters & there is evidence of regular meetings & structures with Designated Safeguarding Lead/s and or pastoral staff which also allows for discussion, reflection and reviews of pupils who are deemed as vulnerable, records are kept of this activity				
The school can show participation in partnership with external agencies with an aim of improving the child's situation, following up and challenging decisions where they feel a child is at risk				
Early indicators of pupils experiencing living with Domestic Abuse are identified, are acted upon and referrals and services are sought for victims and alleged perpetrators.				
Notes- development/ progress on/ evidence /location				

<b>C. Managing Allegations- Safer Working Practices &amp; Recruitment</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>

There is a Code of Conduct for Behaviour & Safer Working practice, which applies to & is known to all Staff and all those who regularly come into school. All have signed to confirm that they have read the Code of Conduct.				
Section 128 for Governors / Prohibition and Barring checks for relevant staff are completed and full evidenced on the SCR and in personnel files.				
The Disqualification Under Child Care Act 2006 (2018) is applied and adhered to				
The DfE guidance 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings 2019' is referred to and used within the school & there is activity evidenced through practice				
The Designated Safeguarding Lead/s has undertaken Safer Working Practice training which has been discussed in staff meetings. This includes staff and pupil acceptable use of IT, use of mobile phones & social media. It is part of a rolling programme of staff training and is also part of the staff induction for all staff including non-teaching staff.				
There is a continuous induction in the school for all new staff including supply, temporary, agency & students which fully informs all new staff of their role in safer working practices & expectations around professional and personal boundaries				
All members of staff including non-teaching staff are aware of the school procedure for responding to & managing allegations against staff, with clear procedures on how to report any concerns they may have. This includes the process for whistle blowing				
All members of the senior leadership, including governors and DSL are aware of the Harrow Procedures on Managing Allegations against Staff				
The Whistle Blowing processes are accessible and displayed in the school.				
Whistleblowing records are clear, in detail and fully recorded with all advice taken, actions and outcomes				
If advice/a referral is made these are retained in compliance with the current Harrow record retention practices				
Where relevant following a whistleblowing enquiry staff are referred to the DBS and Teacher Regulation Agency				
There is a policy/guidance in place for the supervision of volunteers where a risk assessment is undertaken and recorded of the role of the volunteer/s within school; this includes frequent visitors / contractors to the school site				
Recruitment and Selection processes are regularly reviewed to ensure that they are in line with DfE/ KCSIE / Harrow guidance. DBS checks are rigorous including overseas checks. References are pursued & retained.				

There are other measures in place including the use of declarations and risk assessments. The school office has a clear & accessible system for monitoring & recording recruitment outcomes.				
Notes- development/ progress on/ evidence /location				

<b>D. Safeguarding &amp; the Curriculum</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
There is evidence of preparing pupils for each transition through school / post 16 which incorporates safeguarding information for pupils & parents.				
There is evidence of all teaching, mentoring and support staff contributing to safeguarding in the curriculum and this can be evidenced in planning & continuous review				
The school is aware of the statutory requirements and expectations for effective the delivery of Relationships and Health Education (Primary) and Relationships, Sex and Health Education (Secondary).				
Through PSHE or similar approaches in the curriculum, pupils can explore how to keep themselves safe, understand risks and harmful behaviours. Pupils are encouraged to express how they feel and are given a variety of coping strategies and support.				
Pupils can explore healthy & safe relationships and understanding consent. The school can demonstrate a commitment to Relationship, Sex and Health Education, as part of a Whole Schools Approach, relevant to their pupil's needs, age and understanding.				
Pupils clearly know who a trusted adult within the school is that they can share worries and concerns about the school, out of school & about their local community				
Pupils can articulate what is keeping safe, how to keep themselves safe, how they can report any concerns when in the community, when online & when using social media				
Notes- development/progress on/ evidence /location				

<b>E. Online Safety</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
The school has an On-Line Safety Policy/Guidance which has been developed in consultation with a wide range of staff & pupils. Questionnaires & the pupil voice has been used ensuring there is a whole school ownership. The Policy is displayed on the school's website. It is evidenced that the policy is reviewed on an annual regular basis to consider new & specific Safeguarding concerns				
The school is using an electronic communications & social media policy to support the work of online safety in the school				
The school is aware of Cyber Crime, its issues, impact and what to do should cybercrime be suspected. Including early identification of vulnerable pupils/ students and providing appropriate support / interventions.				
Pupils are made aware of Cybercrime and risks around this				
The school can demonstrate effective use of the national guidance 'Sexting (youth generated images) Guidance for Schools/Colleges & are aware on how to apply this in the school. They have taken advice from preventative & child protection agencies (including the Police) in making appropriate referrals as and when required.				
The school attempts to inform/engage pupils and their parents in taking a shared responsibility in keeping safe. It is effective in the education and protection of vulnerable children who may be put at particular risk from their own and others' actions whilst on-line. The school regularly evaluates the effectiveness and impact of the programmes and uses national and local initiatives				
The school has a policy aligned with national, EDB, DfE and Harrow policies on acceptable use of the internet/social media/ video, mobiles, and cameras				
The school has appropriate filtering and monitoring systems, and leaders and governors receive regular monitoring reports				
Notes- development/ progress on/ evidence /location				

<b>F. Children Absent from Education (Pre 16 provision)</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
The school has clear attendance processes which are communicated to parents. All staff in school are aware of the policy and local procedures.				
Parents are asked for key information which is pursued when children move out of the area, go abroad or when families arrive from another area at school to obtain a place				
The school have a CME lead who regularly makes checks to ensure the systems are robust & effective. Clear plans are in place to support vulnerable learners who are regularly absent or late. This lead is aware on how to seek advice from the EDB when CME is suspected or known.				

<b>G. Parental Responsibility</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
Parental Responsibility is asked about and routinely recorded, and included as a Question on consent forms				
Where possible the school holds more than one emergency contact for each pupil, and this is regularly reviewed and kept up to date				

<b>H. FGM, HBV, Forced Marriage, Breast Ironing/Flattening</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
A Designated Safeguarding Lead/s has read, understood the applicable Multi-Agency Safeguarding Children Procedures completed the relevant training and undertaken any on-line courses available.				
All Staff including non-teaching have a working knowledge of these specific issues including guidance, regulations, and statutory requirements. They can identify the signs, know how to report and who to. Staff are kept up to date on emerging issues, like these on the annual whole school training. Pupils are aware of the issues and know who to report any concerns relevant to age and understanding.				

<b>I. Child Exploitation &amp; Trafficking (CRE)</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
A Designated Safeguarding Lead has developed an understanding of Child Sexual Exploitation, Exploitation & Trafficking and is familiar with the relevant CRE Multi-Agency Safeguarding Children Procedures. The DSL knows how to identify the signs, seek advice, and make a referral on concerns regarding pupils who are suspected of; or who may be a victim.				

A planned teaching programme on this specific issue takes place through PHSEE and through similar approaches in the curriculum. This is a continuous activity which also includes grooming & trafficking. Pupils are aware of the issues and know who to report any concerns to which is relevant to their age and understanding. Appropriate resources are being used which may include national and local campaigns / initiatives				
The school is aware of the need to educate and protect vulnerable children who may be put at particular risk from their own and the actions of others. The school can also demonstrate knowledge in how they have taken advice, are using local mechanisms (local partnership groups) or made a referral using safeguarding procedures				

<b>J. Child Sexual Abuse in the family (Interfamilial CSA)</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
The school is working to help increase the knowledge of CSA to identify indicators				
The school understands the impact of interfamilial abuse on a child/ren in a family and will act upon all suspicions of				
Safeguarding school training and updates includes CSA				

<b>K. Gangs &amp; County Lines</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
A Designated Safeguarding Lead has developed an understanding & knowledge on how to identify the signs of pupils involved in Gangs & County Lines issues & CRE Procedures. They are aware on how to identify issues, seek advice and make an appropriate referral on pupils suspected of; or who may be a victim				
All Staff have a working knowledge of these issues. They can identify the signs and are aware of the process in who to make a report to in the school. They are kept up to date with any ongoing issues / concerns.				
Pupils understand the dangers of being involved in gangs relevant to their age and understanding and are aware as to who to report any concerns to.				

<b>L. Sexual Violence &amp; Harassment, Peer on Peer Abuse</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
A Designated Safeguarding Lead has developed an understanding & is aware of the current Guidance on Sexual Violence & Sexual Harassment between children in schools & colleges (Dec 2017)				

All staff including non-teaching staff have an awareness and understanding of the differences between healthy, problematic, and harmful behaviours, in the context of promoting a safe & secure school environment				
All staff including non-teaching staff promote positive behaviours, respond with clear and consistent boundaries. They understand the triggers for problematic & harmful behaviour and using de-escalation techniques can create alternative strategies.				

<b>M. Extremism &amp; Prevent</b>	<b>Lv. 1</b>	<b>Lv. 2</b>	<b>Lv. 3</b>	<b>Lv. 4</b>
All Staff including non-teaching staff have a working knowledge of the issues and available support for pupils				
The school is aware about its Prevent duties including the local protocol of referring in all possible cases of to the local Police				
The school provides information & education in the curriculum on both Chinese and British Values for pupils including access to online websites, approved organisations, and speakers. The school can evidence proactive challenge of views using filtering & monitoring systems to protect pupils				

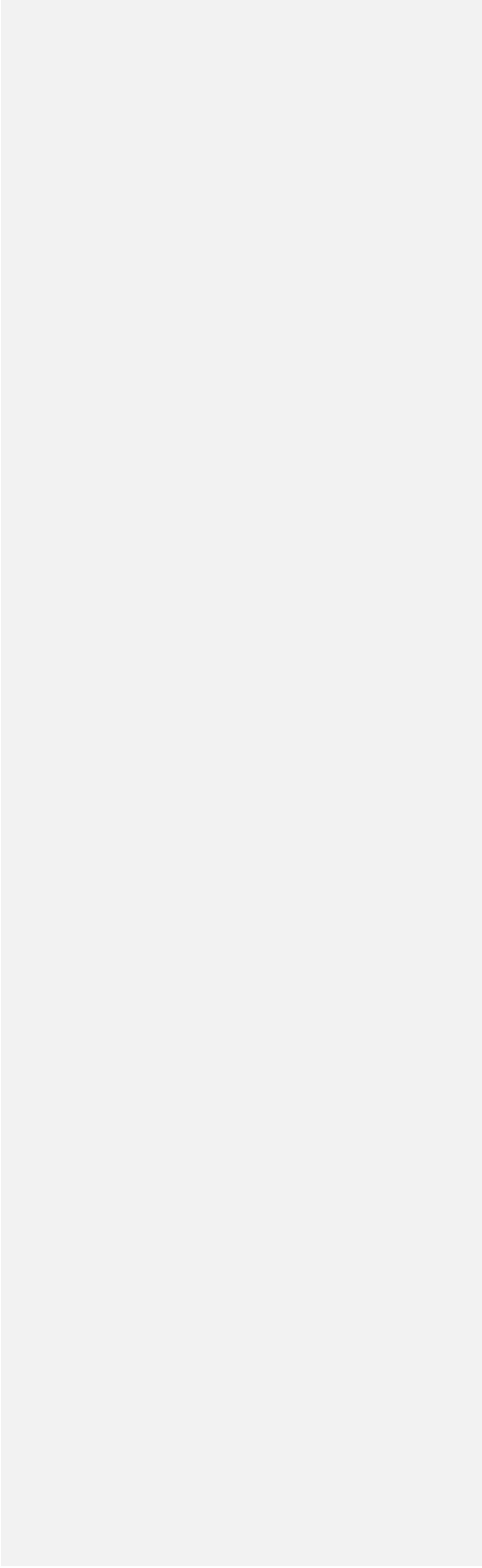
If you have identified a score of 1, 2, 3 there needs to be an action plan with targets and priorities to work on. The action plan needs to be reviewed with details of how the school will achieve the targets, within what timescale, and who has the responsibility to ensure completion.

If you have identified a score of 4. You should be asking yourselves the following questions:

- How does your school sustain this score?
- How does the school continue to enhance the breadth and depth of learning and the whole school approach to safeguarding?

#### **ACTION PLAN**

<b>AREA FOR IMPROVEMENT:</b>					
<b>SUCCESS CRITERIA:</b>					
<b>EVIDENCE:</b>					
<b>ACTION</b>	<b>Lead Person</b>	<b>Target Dates</b>	<b>Monitored by</b>	<b>Method of Monitoring</b>	<b>Resources/ Finance/ PD</b>



## APPENDIX K: ANTI-BULLYING POLICY

The (Australian) National Centre Against Bullying defines bullying as ongoing and deliberate misuse of power in relationships through repeated verbal, physical and/or social behaviour that intends to cause physical, social and/or psychological harm. It can involve an individual or a group misusing their power, or perceived power, over one or more persons who feel unable to stop it from happening. Bullying can happen in person or online, via various digital platforms and devices and it can be obvious (overt) or hidden (covert). Bullying behaviour is repeated, or has the potential to be repeated, over time (for example, through sharing of digital records). Bullying of any form or for any reason can have immediate, medium, and long-term effects on those involved, including bystanders. **Single incidents and conflict or fights between equals, whether in person or online, are not defined as bullying.**

Bullying can take many forms, but the main types are:

- Physical- hitting, kicking, spitting, demanding money or belongings.
- Verbal- name calling, insults making racist, sexist, homophobic or offensive remarks.
- Indirect- excluding or 'blinking'.
- Online (otherwise known as cyberbullying)- posting hurtful comments, resharing photos, spreading rumours online, editing photos.

Aims of Policy:

- To ensure that all staff, parents, and students understand the meaning of 'bullying' and the impact that can have on individuals
- To create a culture where everyone agrees that bullying is not acceptable
- To share the signs of bullying
- To establish a clear procedure to deal with bullying, including support for the victim and education for the perpetrator

### Signs that someone is being bullied:

There are several reasons that someone may be bullied. It could be aimed at their appearance, personality, background, or their academic ability (both strong and weak). In some cases, the child may come forward and tell a teacher. Parents may also raise concerns and ask teachers to investigate further. In other cases, victims of bullying are harder to identify.

Signs that a student is being bullied may include:

- Under-achievement academically
- Absenteeism
- Reluctance to come into the school
- Crying easily
- Low self esteem
- Sitting alone in lessons or at lunchtime
- Opting out
- Spending 'free time' alone
- Anxiety and insecurity
- Younger Students may follow staff
- Over dependence on adult company

- Losing books, pens, money etc.
- Becoming aggressive or disruptive
- Becoming withdrawn/depressed
- Making frequent visits to the medical room or toilet
- Being jumpy when a cyber-message is received
- Suffering from headaches, stomach-ache, anxiety, irritability
- Sleeping problems.

#### **Dealing with Bullying at HNN**

It is important to get the full picture when bullying is reported. In some cases, parents or children may refer to a one-off incident as 'bullying'. Although these cases should not be brushed aside, it is important to clarify whether the incident is an ongoing problem or a disagreement between peers.

The following steps should be taken when bullying is suspected:

1. If a child or parent is reporting a claim of bullying, staff should listen carefully and make notes of frequency, perpetrators, and any patterns to the bullying. If there is any evidence (e.g., screenshot) the staff member should store them safely. This may be a class teacher or any trusted adult. Assure the child that it is not their fault.
2. Any report or concern should be reported firstly to the Homeroom teacher/ Tutor. If a teacher has identified a sign of bullying, the homeroom teacher/ tutor should be made aware on the same day.
3. The Homeroom teacher/ tutor investigates, speaking privately to the victim, then the accused bully and any other students involved. They may also wish to ask other teachers for their observations. The investigation should be concluded within 5 days.
4. Once investigated, the homeroom teacher/ tutor has a better idea of whether bullying is taking place. If this is the case, they should alert the EDSL/DSL and log the incident on Engage.
5. The EDSL/DSL will take over the investigation and invite parents from both sides for a meeting. The consequences and next steps will be discussed, and a Peace Agreement will be signed by the students.
6. Following this, if the perpetrator is found to be bullying again, this will result in a formal meeting with the Head Master.

#### **Bullying in Boarding:**

Any incidents of bullying that occur in the Boarding House should be reported to the Designated Safeguard lead for Boarding. If the concerns only relate to boarding, it is their responsibility to carry out an investigation that is concluded within 5 days. If they find that bullying has taken place, they must report it to the EDSL/ DSL and to the homeroom teachers/tutors of the students. They will then meet with the parents to decide the next steps. These might include changing boarding rooms or a temporary exclusion from boarding.

#### **Support for victims:**

Bullying can have a long-lasting effect on a child's development and can impact their confidence, trust, and social skills an adult. Therefore, it is important that the victims of bullying receive support. This will include 1:1 time with their Homeroom teacher/ tutor, support guidance from various sources (listed below) and a closer eye from all members of staff that encounter the student. In some cases, the child may benefit from external support, such as counselling. The school will support these cases by recommending providers and allowing time out of school for these reasons.

Guidance and support for bullying can be found at:

Safeguarding and Child Protection Policy and Guidelines

<https://www.victimsupport.org.uk/you-co/types-crime/bullying/>  
<https://www.bullying.co.uk/index.php/young-people/advice/introduction-to-bullying.html>  
<https://www.kidscape.org.uk/advice/advice-for-young-people/dealing-with-bullying/>  
Support for parents can be found at:  
<https://www.unicef.cn/en/how-to-talk-to-your-children-about-bullying>

#### **Consequences for bullying:**

If a child is found to have been bullying their peers, a note will be made on their school record (via iSAMS). Consequences will vary dependent on the severity, but can include:

- Logged on iSAMS
- Parental meeting
- Laptop ban
- Loss of free time
- Suspension
- Referral to outside agencies (in cases where bullying is linked to emotional issues)

Reflecting the school values of Courage, Honour, Humility and Fellowship, there will also be support for the bully to help them reflect on their behaviour. This will include mentoring, whole class discussions about effects of bullying and role plays to develop empathy. Furthermore, they should be encouraged to make amends, by apologising or doing something nice for the victim.

#### **Preventing Bullying at HNN**

There is zero tolerance to bullying in HNN, both among students and staff. To educate the students about bullying, they will receive regular sessions in PHSEE about this topic. The PSHEE lead teacher will ensure that suitable planning and resources are shared with each grade level. School assemblies will also reinforce the message that bullying is not right. There will be poster displayed on the corridors to encourage the correct behaviour from children. Furthermore, there will be a confidential box that people can post any concerns that they have about bullying, whether it is about themselves or others. This will be checked by the PSHEE Lead teacher every two days.



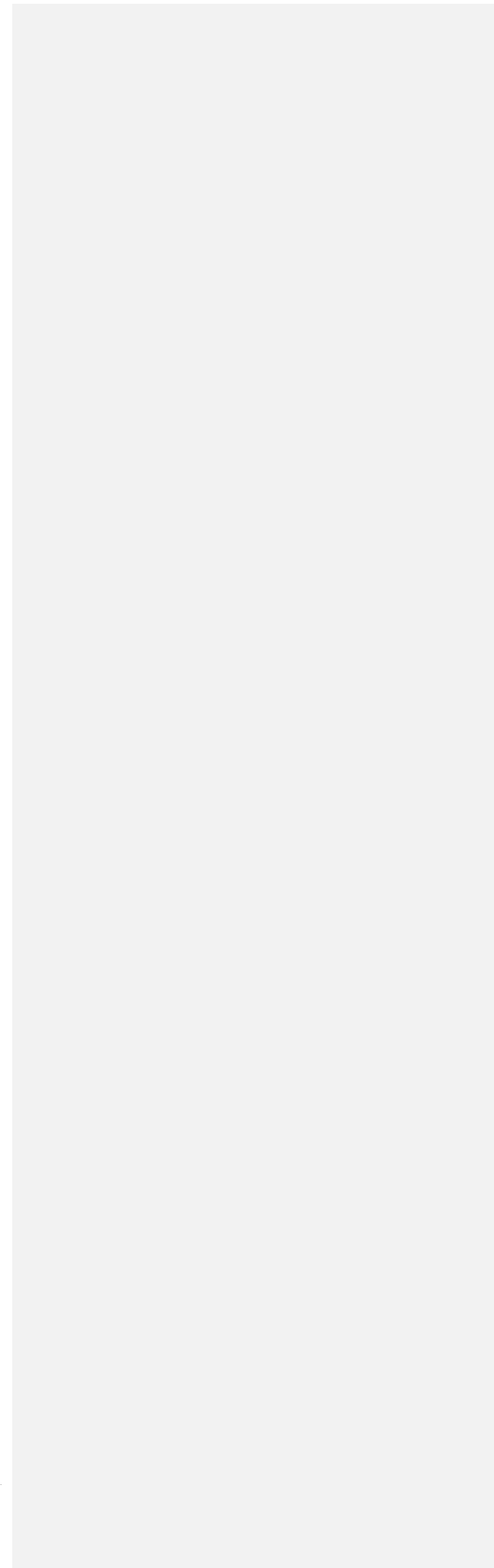
The Stop Bullying Box

#### **Bullying in the Workforce**

As with student, bullying amongst staff is unacceptable. If a teacher feels that they are being bullied, they should follow guidance in the [Internal Grievance Policy \(HS35\)](#). Likewise, if someone feels that another member of staff is victim to bullying, they should not conceal this and follow the procedure detailed in the [Internal Grievance Policy \(HS35\)](#).

Safeguarding and Child Protection Policy and Guidelines

批注 [EG1]: @Neil Clayton this needs adding- not sure if this is the right advice or they follow whistleblowing??



# APPENDIX L: Bereavement Policy

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## 1. Aims

This bereavement policy aims to:

- Set out a guideline for how the school will respond to a death in our school community
- Set out a plan for communicating deaths in a timely manner that balances our school community's interests and transparency with the wishes of the family of the deceased
- Identify best practices for supporting pupils and/or members of staff experiencing bereavement
- Define the roles and responsibilities of key staff members and the governing board
- Provide a roadmap and framework for pupils or staff returning to school following bereavement

## 2. Roles and responsibilities

### 2.1 Headmaster and Chinese Principal

The Headmaster and Chinese Principal have overall responsibility for the implementation of this policy and for delegating any responsibilities under this policy to other members of staff.

The HM and CP will:

- Liaise with the family of the deceased
- Where appropriate, communicate details of a death to pupils and staff as set out in this policy, or activate communication teams
- Respond to media requests for information in the case of a publicised death
- Participate in any multi-agency reviews as requested

### 2.2 Whole School Deputy Head Teacher (Executive Designated Safeguarding Lead)

The DH has responsibility for monitoring and supporting bereaved pupils and staff members (including before their bereavement, where relevant – for example, in the case of terminal illness).

The DH will:

- Support the HM and CP where appropriate

- Plan for reintegration of students and staff for a death, liaising with relevant staff
- Provide direct support to bereaved pupils and staff, with the support of the Safeguarding Taskforce
- Signpost to external support available to bereaved pupils and staff
- Organise safe spaces for bereaved members of the school community to take a time out
- Arrange for the attendance and supervision of pupils at funerals (where permitted)
- Maintain a calendar of dates and holidays that may be particularly difficult for bereaved pupils or staff and ensure they're supported on those days
- Provide additional support during significant transitions e.g. when moving up to the next year group or transitioning to a new school

### 2.3 The Safeguarding Taskforce

The Safeguarding Task Force support the HM/CP/DH by supporting staff in following the correct procedures and by using their close relationships with students to further support the needs of young people at this difficult time.

The Safeguarding Task force will:

- Monitor individual students on a personal level in class and boarding
- Report back to the DH any further areas of grief or concerns
- Support staff in signposting the correct procedures and reporting to SLT if any staff are struggling
- Ensure that reporting is complete and actions are followed through

### 2.4 Governing board

The governing board is responsible for monitoring the implementation of this policy, and supporting the Senior Leadership Team.

The governing board will:

- Undertake regular monitoring of how the school is supporting the bereaved, and the staff who support them, for example through regular catch-ups and video calls
- Monitor the Senior Leadership Team's emotional wellbeing, for example through weekly meetings or video conferencing
- Assist the SLT, where required, in responding to media requests for information in the case of a publicised death
- Where necessary, arrange for another staff member to take the lead if the HM/CP is not available to respond to a death immediately

## 3. Provision for supporting staff who support the bereaved

Supporting pupils and staff who are grieving can be painful. Those staff members who carry out this essential work will be monitored and supported.

- Where necessary, cover will be provided, to ensure that staff have time to grieve.
- A safe space will be agreed upon for those returning to school
- The staff member's line manager will check in with them daily (in person or via phone call) to check their wellbeing
- External counselling services will be recommended by the leadership team where appropriate
- Additional support from sister schools (e.g. psychologist) will be sought if necessary What internal and external resources will be available to support these staff members
- Bereavement training will be given to the Safeguarding Taskforce team and the SLT

## 4. Immediate actions following a death

**Death in the school community:**

The Headmaster and CP must be told immediately of any death impacting the community (e.g. student or staff)

The HM/CP to liaise directly with family members and other parties (see roles)

A staff meeting is to be held as soon as possible, with no information being shared in written format

The HM/CP give clear instructions to staff about communication and use of social media (there is to be none)

The DH to proceed with making logistical plans (e.g. cover) and pastoral plans (counselling, reintegration etc)

**Personal Bereavement (staff):**

If a staff member suffers a personal bereavement and wishes time off work, this should be communicated with their line manager

The line manager liaises with the DH to ensure cover is in place

HR to support in cases where the staff member needs to leave the city.

In cases whereby the staff member needs extended leave or to fly elsewhere, approval must be sought from HM

Line manager to have daily check ins with the member of staff and to feedback any concerns to SLT

**Personal Bereavement (student):**

If a student suffers a personal bereavement (e.g. family member), contact should be made with the Homeroom team or the Parent Liaison Officer

Condolences shared by the school (case by case)

The Homeroom team/Parent Liaison Officer will communicate with the Head of Phase

Daily contact made with family by the Homeroom team (LS) or TA (US)

The Head of Phase and DH to work on a reintegration plan and share with family

On arrival back to school, a safe space is provided to the child, with a designated member of staff allocated to keep an eye on the reintegration

**4.1 Clarifying information and the wishes of the family**

The Headmaster and Chinese Principal will oversee all communication made with regards to a death. They will either personally be in contact with the family or will select a suitable member of staff who knows the family.

Any news of a death with the rest of the school community will be face to face.

- Staff will be informed in a whole school staff meeting
- If other parents need to know, then a meeting will take place with the PTA to decide the best course of action
- News of a death in the community should not be put in writing, in danger of it being shared further
- Disciplinary will occur if staff are found to be sharing false or unconfirmed information

**4.2 Sharing the news with staff**

All news will be shared with staff by the Headmaster and/or Chinese Principal.

The Senior Leadership Team may be informed initially, via phone call.

For all other staff, a Whole School staff meeting will be arranged by the Headmaster/ Chinese Principal. Staff are reminded not to speculate or share details about the staff meeting.

**4.3 Sharing the news with pupils**

The Senior Leadership Team will meet to decide what information is shared with students. This will be case by case.

In the case of a student or staff bereavement, an assembly for G3+ could be held, lead by the DH.

For students under G3, arrangements will be made to use homeroom time or PSHEE time, if appropriate

#### **4.4 Informing parents/carers**

The Headmaster/ Chinese Principal will first communicate with the PTA, to confirm a communication plan

If the bereavement is of a student, the parents of the class will be called for a meeting with the HM/CP

If the bereavement is of a staff member, then the relevant Parent Class Representatives will be called for a meeting with the HM/CP

In all meetings, next steps and additional support will be shared with parents, along with expectations regarding communication

#### **4.5 Responding to specific causes of death**

Some deaths need to be handled more sensitively due to their potential to cause fear, anger or imitation. In cases such as suicide or homicide, the same procedures as outlined above will be followed. In some cases, these might involve the local police and further investigation. Staff should be open and not conceal any information that they feel is relevant to the case. Historical data (such as iSams) could be used to further aid investigations.

If the death is due to contagious disease, we will follow procedures as determined by our local health protection team

#### **4.6 Responding to the media**

In the event that a death that affects the school raises media interest, we will respond in the following manner:

- The Chinese Principal will liaise with the Government Affairs Officer and Headmaster
- All information should meet the Safeguarding and Data Protection Policies
- All information should be shared with staff prior to being made public
- Any other member of staff will not share information; doing so can result in a disciplinary action

### **5. Support for pupils returning to school after bereavement**

Whether a pupil has been away from school following a personal bereavement or after a death affecting the whole school community, the school will support them in their return to school and for as long as necessary afterwards.

#### **6.1 Reintegration meeting**

The Deputy Head or Head of Phase will meet with the bereaved pupil and their parents/carers to discuss how best to manage a return to school.

The purpose of the meeting will be to:

Determine whether the pupil is emotionally ready to return to the classroom either full-time or with adjustments to the timetable to allow for a phased return

Address any concerns the pupil and their parents/carers have about the return to school

Consult with the pupil about how or even if they want their classmates to know of the death (where relevant)

Open lines of communication between the pupil and relevant staff to ensure support should the pupil feel overwhelmed

Open lines of communication between the school and the pupil's parents/carers to coordinate support

Consider any additional support needed for a pupil who is vulnerable or has special educational needs (SEN) or a disability

#### **6.2 Ongoing support**

We will maintain regular contact with the pupil's parents/carers to monitor how the pupil is coping  
Safeguarding and Child Protection Policy and Guidelines

We acknowledge significant dates or holidays may be especially difficult via iSams flagging system

We know that grief may impact a pupil's progress and affect their behaviour. To manage this, we will monitor behaviour via the Homeroom team/ tutor team and TA. Logs will be made on iSams where required

We will take care to manage changes for bereaved pupils by preparing them in advance (where possible) and taking extra steps to support necessary transitions

## 7. Support for staff returning to school after bereavement

Whether a staff member has been away from school following a personal bereavement or after a death affecting the whole school community, the school will support them in their return to school and for as long as necessary afterwards.

### 7.1 Reintegration meeting

The Line Manager will meet with the bereaved staff member to discuss how best to manage a return to school.

The purpose of the meeting will be to:

Determine whether the staff member is ready to return to work and the best way to make that return (e.g. a phased return to work or a temporary change in duties)

Address any concerns the staff member may have about the return to school

Consult with the staff member about how or even if they want their pupils and colleagues to know of the death (where relevant)

Set guidelines for communication between the staff member and their line manager to monitor and support the staff member

### 7.2 Ongoing support

We acknowledge that grief can have an impact on a staff member's physical and mental health, which can then go on to impact their performance.

We also recognise that grieving is highly personal and that there can't be a one-size-fits-all solution for monitoring and supporting a bereaved person.

We will work with each individual to create a system of monitoring and support that works for that person. This may include:

- A phased return to full time work
- A safe space allocated
- Daily check in communication with their line manager

## 8. Monitoring arrangements

This policy will be reviewed annually, by the Senior Leadership Team. At every review, it will be approved by Head Quarters.

## 9. Links with other policies

This policy is linked to our:

- Safeguarding Policy
- Safeguarding Emergency Policy

#### Appendix: useful contacts

ORGANISATION	CONTACT DETAILS
LIFELINE CHINA	 <p>Lifeline offers free, confidential, and anonymous support services from 10am-10pm, 365 days a year. The Lifeline community is available to provide a safe source of support for individuals in times of emotional distress or crisis. Website: <a href="https://lifelinechina.org/">https://lifelinechina.org/</a></p>
SHANGHAI/ NANNING UNITED FAMILY HOSPITALS	Shanghai- 400 639 3900 Nanning- 4008-919191

## APPENDIX M: Safeguarding/ Suicide Emergency Plan

### Boarding:

- The member of staff initially on the scene must remain with the child and raise the alarm immediately with nearby staff/ staff on duty
- **Alert the Deputy Head (DH), Headmaster (HM), Chinese Principal (CP) and Head of Security immediately**
- Other staff to contain the remaining boarders in a distant and safe place
- Staff must not put themselves in any danger or endanger others
- Coordination at the scene to be determined by the Deputy Head/ Headmaster/ Chinese Principal
- Head of Security to contact emergency services if needed
- If an incident does occur, follow instruction from DH/HM/CP.
- **No information should be communicated or shared by any member of staff to colleagues, parents or media unless instructed to be the DH/HM/CP.**

### In School Time:

- The member of staff initially on the scene must remain with the child and raise the alarm immediately with nearby staff/ staff on duty
- **Alert the Deputy Head (DH), Headmaster (HM), Chinese Principal (CP) and Head of Security immediately**
- Head of Security and Operations team to cordon off the area
- Staff must not put themselves in any danger or endanger others
- Coordination at the scene to be determined by the Deputy Head/ Headmaster/ Chinese Principal
- Head of Security to contact emergency services if needed
- **During the event, the Parent Liaison Officer (in the presence of another staff member) will follow the scripted phone call to parents, no later than 10 minutes after the alarm is raised. If injury/death has already taken place, the Chinese Principal is to follow the scripted phone call home in the presence of another staff member.**
- If an incident does occur, follow instruction from DH/HM/CP
- **No information should be communicated or shared by any member of staff to colleagues, parents or media unless instructed to be the DH/HM/CP.**

If an event occurs out of school, please follow the school's Bereavement Policy and follow instruction from SLT.

Training of handling delicate phone calls to take place for Matrons, Parent Liaison Officer, and Chinese Principal.

## **APPENDIX N: Safeguarding Children, Protecting Staff - Staff Code of Conduct**

This document was created in June 2021 and is informed by:

Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings (2006).

## 1. Introduction

Staff have a crucial part to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff establish the safest possible learning and working environments which safeguard young people and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

The guidance contained in this document is an attempt to identify what behaviours are expected of adults who work with pupils. Adults whose practice deviates from this code of conduct may bring into question their suitability to work with pupils or children and young people.

This document should be read in conjunction with the following:

- *Harrow Nanning Child Protection and Safeguarding Policy*
- *Keeping Children Safe in Education (2018)*

## 2. Duty of Care

All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from sexual, physical, and emotional harm. Children have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of pupils. Failure to do so may be regarded as professional neglect.

The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.

Parents, the public and local agencies and authorities have legitimate expectations about the nature of professional involvement in the lives of pupils. When staff accept a role that involves working with children, they need to understand and acknowledge the responsibilities and trust inherent in that role.

The school has a duty of care towards its employees which requires them to provide a safe working environment for staff and guidance about safe working practices. Staff who are subject to an allegation should therefore be supported and the appropriate policy guidance actioned.

The school's duty of care and the staff duty of care towards children should not conflict. This 'duty' can be demonstrated through the use and implementation of these guidelines.

*This means that these guidelines:*

- *Apply to ALL adults working in education settings whatever their position, roles or responsibilities.*

*This means that all adults should:*

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

*This means that the school should:*

- *Foster a culture of openness and support.*
- *Ensure that systems are in place for concerns to be raised.*
- *Ensure that there is in place effective recording systems which confirm discussions, decisions and the outcomes of any actions taken.*
- *Ensure that staff are not placed in situations which render them particularly vulnerable.*

*This means that the Governing Body should:*

- *Ensure that appropriate safeguarding and child protection policies and procedures are adopted, implemented, and monitored in school.*

### 3. Exercise of Professional Judgement

This guidance cannot provide a complete checklist of what is or is not appropriate behaviour for staff. It does highlight, however, behaviour that is inappropriate, inadvisable and may be illegal. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their care and, in so doing, will be seen to be acting reasonably.

Staff should always consider whether their actions are warranted, proportionate, safe and applied equitably.

### 4. Power and Positions of Trust

As a result of their knowledge, position and/or authority invested in their role, all adults working at the school are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship of equals. There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is not used for any personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

Where a person aged 18 or over is in a position of trust with any student at Harrow Nanning it is a case of gross misconduct, and may be an illegal offence, to engage in sexual activity with or, in the presence of that student, to cause or incite that child to engage in or watch sexual activity.

### 5. Confidentiality

Members of staff may have access to confidential information about pupils in order to perform their everyday responsibilities and duties. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a pupil or her/his family for their own or other's advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate or embarrass the pupil.

Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child's identity does not need to be disclosed the information should be used anonymously.

There are circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay but only to those with designated child protection responsibilities.

If a member of staff is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from the designated safeguarding lead. The storing and processing of personal information about pupils and staff is outlined in the *Data Protection Policy*.

*This means that where no specific guidance exists staff should:*

- Discuss the circumstances that informed their action or their proposed action with the DSL. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted.
- Always discuss any misunderstanding, accidents or threats with a senior colleague.
- Always record discussions and actions taken with their justifications.

*This means that adults should not:*

- Use their position to gain access to information for their own advantage and/or a child's or family's detriment.
- Use their power to intimidate, threaten, coerce or undermine pupils.
- Use their status and standing to form or promote relationships with pupils, which are of a sexual nature or which may become so.

*This means that staff:*

- Are expected to treat information they receive about children and young people in a discreet and confidential manner. However, information which may affect a child's welfare **MUST** always be passed on to the DSL.
- Should seek advice from a member of SMT if they are in any doubt about sharing information they hold or which has been requested of them.
- Need to be cautious when passing information to others about a pupil.
- Need to know the procedures for handling allegations against staff and to whom any concerns or allegations should be reported.
- Need to know the names of those with delegated child protection responsibilities in the school and be familiar with reporting procedures.

## 6. Propriety and Behaviour

All staff have a responsibility to maintain the school's confidence in their ability to safeguard the welfare and best interest of the children and young people in our care. They should adopt the highest standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the public in general and all those with whom they work.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny because it is considered to compromise their position and indicate an unsuitability to work with pupils. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. Behaviour in staff personal lives may impact on their work with students and the reputation of the school.

Adults in contact with pupils should therefore understand and be aware that safe practice also involves judgement and integrity about behaviours in places other than the work setting. This is especially the case where it brings the reputation of the school into disrepute.

Staff conduct and performance must not be adversely impacted by alcohol or drugs when undertaking their duties. Illegal drugs are prohibited on site. Consumption of alcohol is not permitted on site except at school functions or when otherwise agreed by the Head Master that modest amounts of alcohol may be consumed. Smoking is not permitted on site.

## 7. Dress and Appearance

A person's dress and appearance are matters of personal choice and self-expression.

However, the school environment is a professional place of work and staff should consider the manner of dress and appearance appropriate to this setting. Members of staff are required to set positive examples in terms of their dress and appearance, given that we, as much as the pupils, reflect the image of the school. Staff must, therefore, in all respects be smart, professional, and business like. In and around school, all staff, teaching and non-teaching should wear a business jacket and male members of staff should also wear a tie. Exceptions to this will be when staff are specifically carrying out technical or manual duties as part of their role, e.g. PE staff when teaching sport.

Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegation.

## 8. Behaviour Management

All pupils have a right to be treated with respect and dignity. Staff should not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation. Please refer to the Harrow Nanning *Behaviour, Rewards and Sanctions Policy*.

*This means that staff should not:*

- *Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model.*
- *Make sexual remarks to or about a pupil.*
- *Discuss their own sexual relationships with or in the presence of pupils.*
- *Discuss a pupils sexual relationships in inappropriate settings or contexts.*
- *Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate or might be interpreted as such.*

*This means that adults should:*

- *Be aware that behaviour in their personal lives may impact upon their work with pupils.*

*This means that adults should wear clothing which:*

- *Promotes a positive and professional image.*
- *Is appropriate to their role.*
- *Is not likely to be viewed as offensive, revealing or sexually provocative.*
- *Does not distract, cause embarrassment or give rise to misunderstanding.*
- *Is absent of any political or other contentious slogans.*

*This means that adults should:*

- *Not use force as a form of punishment.*
- *Try to defuse situations before they escalate*
- *Keep parents informed of any sanctions*
- *Adhere to the school's policy on behaviour, rewards and sanctions.*

## 9. Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they do so in ways appropriate to their professional role.

Some staff, for example, those who teach PE or who offer music tuition, will on occasions have to initiate physical contact with pupils in order to support a child

A 'no touch' approach is advised. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender and context.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another or with a different child. Staff should therefore always use their professional judgement.

Physical contact should never be secretive or for the gratification of the adult or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible and reported to the designated safeguarding lead.

Where feasible and safe, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and so – as far as is possible – use a level of contact and/or form of communication which is acceptable to the child for the minimum time necessary.

Some staff, for example, those who teach PE or who offer music tuition, will on occasions have to initiate physical contact with pupils in order to support a child so they can perform a task safely, to demonstrate the use of a particular instrument/equipment or assist them with an exercise. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an appropriate environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

## 10. Changing Facilities

Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying behaviours do not occur. This supervision should be appropriate to the needs and age of the young people concerned.

Staff need to be vigilant in their own behaviour, being sensitive to the potential for embarrassment, and be mindful of the needs of the pupils.

*This means that adults should:*

- *Be aware that even well-intentioned physical contact may be misconstrued by the child, an observer, or by anyone to whom this action is described.*
- *Never touch a child in a way which may be considered indecent.*
- *Consider alternatives, if it is anticipated that a pupil might misinterpret any such contact, perhaps involving another member of staff.*
- *Always explain to a pupil the reason why contact is necessary and what form the contact will take.*
- *Always be prepared to explain actions and accept that all physical contact be open to scrutiny.*
- *Never indulge in horseplay, tickling or fun fights.*
- *Always encourage children, where possible, to undertake self-care tasks independently.*

*This means staff should:*

- *Unless to ensure welfare/safety, no physical contact when children are in a state of undress.*
- *Announce if entering a changing room*
- *Ensure facilities are supervised but avoid remaining in the same room unless pupil needs require it.*

*This means adults must not:*

- *Change in the same place as pupils.*
- *Shower with pupils.*

## 11. Social Contact

Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. If a pupil or parent seeks to establish social contact or if this occurs coincidentally, the member of staff should exercise his/her professional judgement in making a response. There are occasions when there are social contacts between pupils and staff, where for example the parent and teacher are part of the same social circle. These contacts will be easily acknowledged and openly recognized.

It is recognized that staff can support a pupil or parent who may be in particular difficulty. Care needs to be exercised in those situations where the pupil/parent comes to depend upon the staff member for support outside their professional role. This situation should be discussed with senior management.

## 12. Communication with Pupils (Including the use of Technology)

Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries.

Adults should not share any personal information with a child or young person. They should not request or respond to any personal information from the child other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation or their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to pupils or social media details.

Email or text communications with a child should be within the school's agreed protocols. Communication outside of these may lead to disciplinary action.

## 13. First Aid, Administration of Medicine and Pupils in Distress

Health and safety best practice places duties on all employers to ensure appropriate health and safety policies and equipment are in place and an appropriate person is appointed to take charge of first-aid arrangements. Appropriate training should be given before an individual takes on a role which may require administering first aid or medication.

Some pupils may need medication during school hours. In circumstances where children need medication regularly a health care plan should be created to ensure the safety and protection of pupils and staff. [\[This is detailed in Harrow Nanning's Medical Policy.\]](#)

There may be occasions when a distressed pupil needs comfort and reassurance. This should not include physical contact. Staff should remain self-aware at all times in order that any uninitiated contact is not subject to misinterpretation.

*This means that adults should:*

- Have no secret social contact with pupils.
- Always be aware of the potential dangers of social contact with pupils or parents.
- Advise the DSL of any social contact they have with a pupil which may give rise to concern.
- Report and record any situation which they feel might compromise the standing of the school.

*This means that staff should:*

- Ensure that any communication is justifiable and cannot be misinterpreted.
- Ensure that personal social networking sites are set at private and pupils are never listed as approved contacts.
- Never use or access social networking sites of pupils.
- Not give their personal contact details to pupils, including their mobile telephone number.
- Only make contact with children for professional reasons and in accordance with school policy.
- Not use internet or web-based communication channels to send messages to a child/young person.

*This means that adults should:*

- Explain to the child what is happening when administering First Aid.
- Always act and be seen to be acting in the best interests of the child.
- Have regards to any health plan which is in place.
- Ensure that an appropriate risk assessment is undertaken prior to undertaking certain activities, e.g. overnight trips.
- Consider the way they offer comfort to a distressed pupil.
- Not assume that all children seek physical contact if they are distressed.
- Record situations which may give rise to concern.

批注 [EG2]: @Neil Clayton Beijing... do we have one?

special attention and favour upon a child might be construed as being part of a 'grooming' process, which is inappropriate and may lead to disciplinary actions.

#### 14. One to One Situations

Staff working in one-to-one situations with children and young people may be more vulnerable to allegations. Teachers and others should recognize this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and pupils are met.

Pre-arranged meetings with pupils away from the school premises are not permitted unless there is good reason and approval is obtained from their parent(s), the Head of the respective School and the designated safeguarding lead.

It is inappropriate for adults to offer lifts to children outside their normal working duties unless there has been prior agreement with the respective Head of School. There may be occasions where the child requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to the Head of the respective School and the designated safeguarding lead.

#### 15. Infatuations

Staff need to be aware that it is not uncommon for pupils to become strongly attracted to a member of staff and/or develop an infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff and should make every effort to ensure that their own behaviour is above reproach.

Any adult who becomes aware that a pupil may be infatuated with a member of staff should discuss this at the earliest opportunity with the Head Master so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

#### 16. Sexual Contact

Any sexual behaviour by a member of staff with or towards a pupil is an example of gross misconduct, inappropriate and may be illegal. This is a dismissible offence. Children are protected by specific legal provisions regardless of whether the child or young person consents or not. This includes the prohibition on adults in a position of trust (see section 4 above).

The sexual activity referred to does not just involve physical contact. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production or circulation of inappropriate and revealing images, etc. KCSIE (2018) defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening".

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring

*This means that staff should:*

- *Ensure that when lone working is an integral part of their role, staff have taken necessary precautions to ensure the safety and security of the pupil and themselves.*
- *Ensure that there is visual access and/or an open door in one-to-one situations.*
- *Avoid the use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.*
- *Ensure that any emergency arrangements of lifts are recorded and can be justified when questioned.*

*This means that adults should:*

- *Report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff.*
- *Always maintain professional boundaries.*

*This means that adults should:*

- *Not pursue sexual relationships with children and young people either in or out of school.*
- *Avoid any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative, including verbal comments, letters, electronic mail, phone calls, texts or physical contact.*
- *Not make sexual remarks to or about a child/young person*
- *Not discuss their own sexual relationships with or in the presence of pupils.*

- *Take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought.*

## 17. Educational Visits and After School Activities

Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after school activity. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries.

In all circumstances, those organizing trips and outings must pay careful attention to ensuring safe staff/child ratios and to the gender mix of staff, especially on overnight stays.

## 18. Curriculum

Many areas of the curriculum can include or raise subject matter which is of a sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sensitive or inappropriate nature. Responding to pupils' questions requires careful judgement and staff may wish to take guidance in these circumstances from an appropriate colleague.

## 19. Photography and videos

Photography and video are increasingly permeating teaching practices. Any such work that involves pupils taking or recording images of themselves, their peers or staff requires careful consideration and planning. It must take place with due regard of the need to safeguard the privacy, dignity, safety and well-being of pupils.

The school has parental permission to use images and videos of our students for promotional and marketing purposes, within set safeguarding parameters, and through official school marketing accounts only. Any deviation from this is a breach of basic safeguarding expectations, may lead to disciplinary action and is breach of trust with our parental community.

Staff should not take images on personal devices of our students unless specific guidance has been given on storage and deletion that has been approved by the designated safeguarding lead.

Staff should not post or circulate any images of our students on personal social media accounts, websites or any other forum without the express permission of the parents of all children represented and the approval of the designated safeguarding lead.

For images and videos that are circulated through Harrow Nanning official marketing channels, the only allowed method, for public use the following must be followed:

- If the photograph is used, avoid naming the pupil

- Full names should never be published (forename or forename and initial letter of surname only)

If you have any doubt regarding the taking and use of images please seek guidance from the designated safeguarding lead.

*This means that adults should:*

- *Ensure that their behaviour remains professional at all times.*
- *Follow published guidelines for the conduct of trips and expeditions.*

*This means that adults should:*

- *Be aware of the potential for unplanned discussions of a sensitive nature when delivering certain topics.*

*This means adults should not:*

- *Enter into or encourage inappropriate discussion about sensitive/inappropriate topics.*

*This means adults should:*

- *Be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded.*
- *Avoid making images of children in one-to-one situations.*

*This means that adults should not:*

- *Take, display or distribute images of children unless they have consent to do so.*
- *Take images of children using personal devices.*

for a member of staff to be in sole charge at any time, to avoid the potential for compromising circumstances. In addition to observing the above guidelines, boarding staff must follow the additional procedures set out in *Boarding Handbook* to promote a positive ethos and safe environment.

*This means that staff should:*

- Follow school policy on the use of IT equipment.
- Ensure that pupils are not, through the use of any medium, exposed to indecent or inappropriate images.

## 20. Inappropriate Images/Material

Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images or weblinks.

All staff are required to adhere to the school's *Use of ICT Policy*. Under no circumstances should any adult use school equipment to access inappropriate material, including adult pornography. Personal equipment containing these images or links to them should never be brought into or used in the workplace.

Breaches of this guidance will raise serious concerns about the suitability of the adult to continue working with children and young people.

Accessing indecent images of children on the internet, whether using school or personal equipment, on or off school premises and making, storing or disseminating such material is illegal. If proven, this will lead to criminal proceedings and reporting to the relevant agencies that control suitability to work with children and young people (barring from the teaching profession).

## 21. Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion.

Staff should be aware of their individual responsibilities to bring matters of concern to the attention of the Head Master or Governing Body, especially where the welfare of children may be at risk.

Please refer to the *Whistleblowing Policy* for further information.

## 22. Sharing Concerns and Recording Incidents

All staff should be aware of the school's child protection and safeguarding procedures, including procedures for dealing with allegations against staff. All allegations will be taken seriously and properly investigated in accordance with KCSIE (2018) and safeguarding best practices.

In the event of an incident occurring, which may result in an action being misinterpreted and/or an allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and reported to the Head Master.

## 23. Boarding

Within a school context the risks and opportunities for abuse by staff are greater within a boarding setting. The Boarding House duties are planned to avoid the need

*This means that staff should:*

- Report any behaviour by colleagues that raises concern.
- Report any behaviour by children which might put staff at risk.

*This means that the school will not:*

- Take action against any member of staff who reports concerns.

*This means that adults:*

- Should take responsibility for passing information where they have concerns about any matter pertaining to the welfare of an individual in the school.

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