AISL
HARROW
SCHOOLS
哈罗学校

Safeguarding Policy (HS19)

APPLIES TO:	All staff, visitors, volunteers, Governors, etc.
AISL RESPONSIBILITY:	Chief Education Officer
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Educational Excellence *for* Life and Leadership

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AISL
HARROW
NANNING
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Create a safe environment
营造安全健康的校园环境
01 STEP.
Listen and observe
倾听和调查
02 STEP.
Report on CPOMS
及时上报CPOMS系统
03 STEP.
SAFEGUARDING IS EVERYONE'S RESPONSIBILITY
安全保护是每个人的责任
Care for peers around you, scan to report help requests. Speak out for your peers!
如果你感觉你的同伴需要帮助，请扫码告诉我们！
为你的同伴发声！

INTRODUCTION

1.1 A Note on Language

In many schools 'safeguarding' and 'child protection' are terms that are used interchangeably, in other schools, they are used side by side, as though they are inseparable.

We regard this latter use as tautology and so have opted to use only the term 'safeguarding' for all matters relating to ensuring that the children in our Schools are safe and well cared for. We prefer the term 'safeguarding' over 'child protection' because there is less scope for anyone to adopt an assumption that ensuring the welfare of children simply means preventing them from coming into harm.

1.2 Scope of this policy

Under the Children Act (UK) and the Law of the People's Republic of China on the Protection of Minors (China), a child is any registered student in an AISL Harrow school. Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (UK) as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- undertaking that role to enable those children to have optimum life chances and to enter adulthood successfully.

This policy applies to, but is not limited to, all staff, students, guests and visitors or anyone working in, or on behalf of, an AISL managed school.

1.3 Purpose of this policy

AISL fully recognise our shared responsibility for child safeguarding. To this end, it is the aim of this policy to document how we:

- protect all children and young people who attend our schools and use our services;
- provide all staff (as defined in Appendix 1) and visitors with the overarching principles that guide our approach to safeguarding.

AISL is committed to working to ensure that children and young people never experience abuse, neglect or exploitation of any kind.

We recognise that we all have a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to seeking ways to continually review our practice such that each of our schools protects children and provides the conditions for humans to flourish.

1.4 Our core beliefs

We recognise and believe that:

- The wellbeing of students and staff is more important than all other considerations in school;

- All children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of abuse, neglect and exploitation. All staff are fully committed to protecting children from maltreatment, whether that is within or outside of the home. This includes keeping children safe from potential harm when online, including harm borne from exposure to disinformation, misinformation and conspiracy theories, and the misuse of artificial intelligence.
- Some children are additionally vulnerable because of the impact of previous experiences, because of special educational needs, disabilities, or because they have a high level of dependency, communication difficulties or other issues; working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.
- Every adult who works with children has a responsibility to keep them safe and to provide help and support to meet the needs of children as soon as problems emerge. AISL is committed to ensuring all those who work with students receive appropriate safeguarding training.
- Staff should be particularly alert to the potential need for early, positive and proportionate intervention. This includes making reasonable adjustments for children who are disabled and those who have specific additional needs, those misusing drugs or alcohol, those showing signs of being drawn into anti-social or criminal behaviour, and those that are in family circumstances presenting challenges for the school.

1.5 Legal framework

The following British and international documents have been referred to in devising this policy:

1. Keeping Children Safe in Education (2026)
2. Law of the People's Republic of China on the Protection of Minors (1992)
3. Working together to safeguard children (2015)
4. Children Act (1989)
5. Children Act (2004)
6. UK Data Protection Act 2018
7. United Nations Convention on the Rights of the Child (1991)
8. Meeting Digital and Technology Standards in Schools and Colleges (DfE 2025)
9. AISL Policy HS34 Artificial Intelligence Acceptable Use Policy

1.6 Roles and responsibilities

Across our schools, all staff are involved in safeguarding children, however, there are some with very specific responsibilities.

Local versions of *Safeguarding Policy* (HS19) are to include a table that lists the people responsible for the roles described below and their contact information.

Schools must have in place a:

- **Designated Safeguarding Lead (DSL)**

  The DSL is responsible for: policy generation; systems and compliance related to safeguarding and oversight of safeguarding procedures (including online safety and the understanding of filtering and monitoring systems and processes in place); staff training; devising the safeguarding action plan; the achievement of objectives within the

safeguarding action plan; conducting internal audits of safeguarding, safer recruitment and the Single Central Register (SCR); leading the safeguarding team; maintaining the confidentiality and integrity of safeguarding records; leading on complex and serious safeguarding cases; ensuring that safeguarding remains at the forefront of the school's corporate consciousness; reviewing, and acting upon, serious case reviews; liaising with third party agencies as appropriate; and any other duties which may periodically be necessary to maintain or improve the school's safeguarding policy and procedures. DSLs should help promote educational outcomes by working closely with their teachers and sharing information about their welfare, safeguarding and child protection concerns.

The school must ensure there are robust and well-understood cover arrangements in place for when the DSL is absent from school. This may include the Head or a DDSL assuming responsibility.

The role of the DSL will also include:

Raise awareness

- Provide support, advice and expertise on all matters concerning safeguarding
- Encourage a culture of safeguarding among staff and of listening to students
- Ensure that a local safeguarding policy is known, understood and used appropriately, and reviewed at least annually
- Monitor the operation of the local policy and regularly review and update the procedures and their implementation, working with the safeguarding team and governors as necessary
- Ensure that all members of staff and volunteers receive the appropriate training, keep and maintain records of this training and ensure that staff are aware of training opportunities and the latest local policies on safeguarding
- Have oversight of the policy and practices in place regarding e-safety with an appropriate understanding of the school's systems for the filtering and monitoring of internet and network use, review the effectiveness of such provision annually in concert with senior leaders whilst ensuring all staff are appropriately e-safety trained and made aware of the school's designated roles and responsibilities for internet filtering and monitoring.

Manage referrals

- Advise and act promptly upon all safeguarding concerns reported to them
- Refer cases of suspected abuse as appropriate, support staff who make or consider making any such referrals and liaise with the local authorities as required
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service or other relevant local and/or international body
- Refer cases where a crime may have been committed to the police
- Maintain detailed, accurate, secure written records of concerns or referrals (e.g. via CPOMS or MyConcern)
- Keep the Head informed of all concerns and actions
- Monitor records of students in the College who are subject to a child protection plan, to ensure that they are maintained and updated as notifications are received
- Monitor the confidentiality and storage of records relating to safeguarding and when a student leaves, ensure their child protection file is copied for the new school as soon as possible and transfer it separately from the main student file, ensuring secure transit and that confirmation of receipt is obtained.

- Likewise, AISL schools will request safeguarding files for children during the admissions process
- Undertake a review of practices after the closure of each safeguarding allegation or major concern and use this to improve practice

The DSL will also contribute to the AISL Safeguarding Network.

- **Deputy Designated Safeguarding Lead (DDSL)**

  The DDSL is responsible for day-to-day safeguarding issues in their designated area of the school. Duties in this regard include, but are not restricted to: acting as the first port of call (designated focal point) for disclosures; maintaining the integrity and confidentiality of safeguarding records; keeping the DSL informed of safeguarding issues as they arise; liaising with parents, caregivers and other agencies to ensure the safety of children; organising case conferences where these are required; devising and implementing welfare plans for students where these are required.

- **Safeguarding team**

  The team is responsible for developing an annual development plan and a report to the Senior Leadership Team (SLT). It is responsible for reviewing policy and procedure and for agreeing a timetable of training for staff and other adults. The team meets regularly to review safeguarding cases and concerns. They operate under the direction of the DSL to ensure the effective implementation of policy and procedures.

- **Designated Safeguarding Governor**

  The designated safeguarding governor is responsible for overseeing policy and procedure; reporting back to the governing body on all issues related to safeguarding; ensuring that safeguarding sits firmly within the governors' collective consciousness; sampling first-hand the procedures in place at the school as often as is practicable, but no less than annually. Provide guidance, as necessary, to the DSL and wider safeguarding team.

- **Board of Governors (BOG)**

  The BOG has overall responsibility to ensure policy and procedures for safeguarding. It is the role of the BOG to provide scrutiny of safeguarding policy and practice. The BOG takes seriously its responsibility to fulfil its duty of care in promoting the welfare and wellbeing of students, ensuring their security and protecting them from harm. To this end the BOG will ensure that:

  - An effective, up to date safeguarding policy is in place and made available to the staff and on the school website
  - Appropriate policies and procedures are in place and are operational
  - Required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register
  - All staff receive safeguarding training in accordance with this policy
  - Students are educated on how to remain safe, including online safety
  - Appropriate filters and monitoring systems are in place to keep students safe online

- Ensure important information sharing between school, relevant practitioners and local agencies takes place
- Online safety: ensure the school assigns appropriate roles and responsibilities to manage the filtering and monitoring of internet and network use, reviewing the effectiveness of such provision annually. Ensure that cyber security for the school is robust, monitored, and regularly tested.

Systems are in place to ensure application of this policy:

Role	Person
AISL Safeguarding Governor	Ahmed Hussain ahussain@aisl-edu.com
HEOV Safeguarding Lead	Andrew McGregor McgregorA@johnlyonsfoundation.org.uk
AISL Safer Recruitment	Jenny Chan jchan@aisl-edu.com
External **Safeguarding Consultant**	Sian Jorgensen, Encompass Safeguarding Ltd sian.jorgensen@encompass-safeguarding.com

AISL also benefits from a Safeguarding Network made up of DSL/DDSL representatives from each school and the AISL Director of Education. The role of the group is to:

- Share and review policy and procedures
- Evaluate and audit safeguarding practices
  - This will comprise an annual cycle of internal audits undertaken by the local DSL
  - A three-year cycle of external objective reviews
- Develop an action plan encompassing operational practices and strategic development relating to the annual audit.
- Identify professional learning with regards to safeguarding
  - Ensure all staff have experienced the appropriate level of training and that records are in place to affirm it
  - Create peer to peer support and training channels and opportunities

1.7 Record keeping

Well-kept records are essential to good safeguarding practice. AISL is clear about the need to record any concern about a student or students within our school, the status of such records and confidentiality.

Clear records should be made regarding all safeguarding concerns, discussions, and decisions taken, including the rationale for those decisions.

Any member of a school community (including parents and carers) receiving a disclosure of abuse or noticing signs or indicators of abuse, must make an accurate record as soon as possible noting what was said or seen, putting the event in context, and giving the full date,

time and location. If in doubt, report. All records are signed and include the action to be taken.

These notes are to be kept either in hard copy (stored in a fireproof safe, locked with a combination lock), or in a confidential digital format using software such as CPOMS or MyConcern, and held separately to other files. In the same way, notes should be kept of any student who is being monitored for safeguarding reasons (this includes ongoing casework, case reviews and external supervision).

Where children leave school, we ensure their safeguarding file is transferred to their new school as soon as possible. We make sure that these records are sent separately from the main student file, ensuring secure transit and confirmation of receipt is obtained.

1.8 How we keep young people safe

In AISL schools we keep young people safe by:

- employing rigorous recruitment procedures for all staff to check their suitability to work with children.
- raising awareness of safeguarding and equipping children with the skills needed to keep them safe.
- training all staff in safeguarding awareness incorporating online safety (including an understanding of expectations and applicable roles and responsibilities regarding filtering and monitoring internet and network use).
- ensuring that all staff have read and understood the Safeguarding Policy.
- ensuring that all staff are aware of the indicators of child abuse, neglect and exploitation
- ensuring that all staff know how to respond to concerns or disclosures of abuse, neglect and exploitation
- establishing a safe environment in which children can learn and develop
- adopting best practice as it relates to safeguarding
- establishing clearly defined procedures and a code of conduct for all staff, volunteers and visitors
- developing and implementing effective social media, AI and e-safety policies and related procedures
- effective management for all staff and contractors through supervision, support and training
- sharing information about safeguarding and best practice with students, parents, staff outside providers, interns, volunteers and visitors
- sharing concerns with appropriate agencies on a need-to-know basis and involving parents and students appropriately. N.B. Data protection regulation does not prevent the sharing of information for the purpose of keeping children safe from potential or actual harm
- when a student with an open safeguarding case moves to another school, there is a moral duty to inform, or attempt to inform, that school that there is an issue about which they should be aware. Schools must check the legal requirements in the country in which they are operating to ensure actions are fully compliant. Where the legal position is not clear, schools should make a phone call rather than transfer documentation. If there are any safeguarding issues, it is appropriate to make the call and record the fact that the call was made in the student file, the date and time of the call, who the call was made to, their position in the school and the nature of the communication. It is expected that where the

transfer of information is permissible by law, it is undertaken with 5 days of the student transferring to the new school.

- Ensure all staff are aware that safeguarding issues can manifest as child-on-child abuse. This is most likely to include, but may not be limited to:
  - bullying (including cyber bullying)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or other inappropriate contact
  - social exclusion/isolation of another
  - causing physical harm
  - sexual violence and sexual harassment
  - sexting (also known as youth produced sexual imagery)
  - AI – the creation and/or sharing of AI generated explicit 'deep fake' images
  - initiation / hazing type violence and rituals

  (see *Keeping Children Safe in Education 2026*)
- Ensure that staff are aware of other key policies and practices that relate to the safeguarding of students including the school's:
  - Staff Code of Conduct
  - Staff Handbook
  - Anti-Bullying policy
  - Safer Recruitment policy
  - Intimate Care policy
  - Digital Safety guidance and AI/online safety policies (including an understanding of the filtering and monitoring of digital use via school networks, internet access – including 4G/5G use - and pupils' use of devices, including reference to the online threats posed by the '4Cs': content, contact, conduct, and commerce.
  - Educational trips policy and risk assessments for all events and educational visits

1.8.1 Early intervention

We are committed to providing help and support to meet the needs of children as soon as problems emerge. Early intervention relates to ensuring systems are in place to:

- Assess and identify early signs of safeguarding concerns
- Record and track low level concerns
- Implement early intervention based on the data above

This means using CPOMS/MyConcern to record appropriately and using the data evaluatively. Supplementing this with systems for assessing levels of wellbeing (e.g. Pulse) and evaluating the impact of interventions is essential in early identification of concerns. It is necessary for the DSL to ensure the safeguarding team are suitably trained and have responsibility to track and report on early concerns so that interventions can be implemented.

To assist in securing early identification and intervention, it is necessary for the Safeguarding Policy to link to complementary policy and practices, including but not limited to:

- HS20 Prevention of Bullying Policy, e.g. monitoring of bullying incidents
- HS21 Personal, Social, Emotional and Health Education (PSHE) Policy
- HS23a Special Education Needs and Disability Policy
- HS25 Sanctions & Behaviour Policy, e.g. tracking behaviour trends
- HS32 Student Access to Technology (BYOD) Policy

- HS41 Whistleblowing policy

It is important to note that children with SEND may be more vulnerable to safeguarding risks.

1.8.2 Raising awareness and equipping students with skills to prevent abuse

It is recognised that because of the day-to-day contact with students, school staff are well placed to observe the outward signs of abuse and that all staff and governors have a full and active part to play in protecting our students from harm. School will therefore:

- Emphasise the importance of providing early help to students to provide support for a problem as soon as it arises, to prevent the issue from escalating. Furthermore, it is recognised that students may face many challenges that put them in need of support and ensure that staff are aware of them. These include stress, peer pressure, body image concerns, anxiety and relationship issues.
- Ensure children know that there are adults in the school whom they can approach if they are worried
- Embed opportunities in the curriculum and school life for children to develop the skills they need to recognise and stay safe from abuse, including online
- Establish a PSHE or moral education programme that instills the language, knowledge and skills to support children in avoiding abuse.
- Raise the awareness to all staff members of the need to safeguard and promote the welfare of children, and of their responsibilities in identifying and reporting possible cases of abuse.
- Ensure every member of staff (including temporary, supply staff, trainee teachers and volunteers) and the governing body knows the name of the Designated Safeguarding Lead (DSL) and their deputies responsible for child protection and their role.
- The name of the Designated Safeguarding Lead and their deputies should be clearly and widely visible in the school and on its website, with a statement explaining the school's role in referring and monitoring cases of suspected abuse and allegations.

1.9 Key contacts

All adults on our campuses are involved in keeping children safe.

Responsibility does not fall only on teachers, or only on the safeguarding team. However, as an Appendix to the local safeguarding policy, schools will produce and publish details of Safeguarding Leads within each school, these details will be publicly viewable throughout each school.

2 RECOGNISING ABUSE – WHAT STAFF SHOULD LOOK OUT FOR

2.1 Importance of vigilance

All staff should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

2.2 Types of abuse and neglect

Abuse; a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Children may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Physical abuse; 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. This also extends to persistent child on child abuse.

Emotional abuse; the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development and mental health:

- 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, hearing and/or experiencing the ill-treatment of another (e.g. witnessing domestic violence). 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.

Children's mental health was added to the KCSIE 2022 guidance, ensuring that staff should consider when this might become a safeguarding trigger. It is recognised that mental health problems can lead to self-harm and suicidal ideation. AISL Harrow schools must offer access to professional mental health services for students, often via dedicated in-school counsellors and medical staff. In relation to students' mental well-being, all staff are expected to:

- Promote good mental well-being and prevent the onset of mental illness
- Observe students and identify early those who are experiencing or at risk of developing mental health problems
- Make sure early targeted help is provided
- Liaise with school specialists and pastoral leaders in the development of a support plan

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 or not the child is aware of what is happening. Most sexual abuse is committed by someone known to the victim. The abuse 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 online and remote contact).
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- Child on child sexual abuse involving the first two bullet points above

Neglect: 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 as a result 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 caregivers); or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- This would include failure to provide proper adult guardianship such as leaving children unsupervised at home for an extended period of time.

Often abuse is seen exclusively as something that adults do to children, but it is important to recognise that abuse can equally occur within the student body, between peers, or between students of different ages (child on child abuse). Vigilance for this type of abuse is just as important as for adult-child abuse; the means by which it should be reported are just the same.

It is important that staff are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

See *Appendix 2* for further information on the possible indicators of abuse.

2.3 Boarding Specific Risks

Introduction
Living away from home creates additional safeguarding risks. NMS Standard 8.4 expects child protection policies and related policies to reflect the particular risks of boarding, including shared overnight accommodation, sexual relationships, significant gender imbalance and harmful online content. This supplement identifies these risks at HNN and applies throughout boarding, including evenings, nights, weekends and off-site arrangements. It draws on the English boarding National Minimum Standards, KCSIE and Working Together to Safeguard Children as benchmarks, alongside applicable Chinese requirements, and must be read with the school's safeguarding policy and boarding procedures.

Boarding risks
Abuse between pupils. Bullying, coercion, initiation rituals, sexual harassment or violence may continue in shared bedrooms and communal spaces, leaving victims unable to escape perpetrators. Relationships and vulnerability. Sexual relationships, differences in age or power, significant gender imbalance, SEND and language barriers may increase vulnerability or inhibit disclosure. Prefect roles may be misused.

Adult conduct and access. Grooming, harmful discipline, favouritism, private messaging, secluded contact, access to staff accommodation, inadequate recruitment checks or unsupervised visitors may expose boarders to abuse.

Supervision and whereabouts. Insufficient or inexperienced staff, weak night cover, poor registers and unclear leave or collection arrangements may leave pupils unprotected or delay a missing-child response.

Online harm. Devices may expose pupils to grooming, exploitation, cyberbullying and sexual imagery. Downloaded material and mobile data can bypass school filtering and monitoring.
Health and emotional wellbeing. Homesickness, isolation, self-harm, deteriorating mental health, unmet medical needs, medication errors or delayed treatment may go unnoticed or unmanaged.
Accommodation and daily care. Unsuitable room allocation, inadequate privacy, unsafe premises, poor hygiene, unmet dietary needs, insecure possessions or ineffective emergency evacuation may cause harm.

Activities and external care. Poorly assessed outings, recreation, transport, guardianship or host arrangements may expose pupils to injury, unsuitable adults or inadequate care.

Voice and reporting. Fear of retaliation, limited family contact, inaccessible complaints routes or lack of trusted and independent support may prevent children raising concerns.

Information and accountability. Weak handovers, fragmented records, delayed referrals, unreported staff concerns or incomplete follow-up may prevent patterns being recognised and children receiving protection.

School response
The Boarding Lead and DSL must maintain and review boarding risk assessments, individual support and clear handovers. Staff must explain expectations about relationships, consent, privacy and devices; ensure boarders know how to obtain help at any hour; and act immediately on concerns. Pupil concerns must be recorded through the school's safeguarding system and escalated without waiting for the next school day. Concerns about adults follow the policy's separate reporting routes.

Leaders must secure appropriate local referrals, monitor completed actions, listen to boarders and review risks after incidents or changes in provision.
References: Boarding NMS (May 2026), particularly 8.4; KCSIE 2026; Working Together to Safeguard Children 2026.

3 PROCEDURES FOR DEALING WITH DISCLOSURES OR REPORTING

3.1 Other than as designated, the role of all staff is not to investigate or verify the situation, but rather to report the concern or disclosure and set in motion the process of getting help for the child.

Step 1

You have a concern about a child's well-being, based on:
a) Something the child or another child or adult has told you;
b) Something you have noticed about the child's behaviour, health, or appearance;
c) Something another child or adult said or did.

Even if you think your concern is minor, the DSL may have more information that, together with what you know, represents a more serious worry about a child. It is never your decision alone how to respond to concerns – but it is always your responsibility to share concerns, no matter how small.

Step 2

The DSL will decide whether you need to find out more by asking the child/young person, or their parent to clarify your concerns, being careful to use open questions:
…beginning with words like: 'how', 'why', 'where', 'when', 'who'?

Step 3

Let the child/young person/parent know what you plan to do next if you have heard a disclosure of abuse or you are talking with them about your concerns. Do not promise to keep what s/he tells you secret.

For example; 'I am worried about your bruise and I need to tell Mrs Smith so that she can help us think about how to keep you safe.'

Step 4

Use the *Concerns Logging Form (Appendix 3)* to make a written record as soon as possible after the event, noting:
a) Name of child
b) Date, time and place
c) Who else was present?
d) What was said/What happened/What you noticed … speech, behaviour, mood, drawings, games or appearance/injuries. If child or parent spoke, record their words rather than your interpretation
e) Analysis of what you observed and why it is a cause for concern

Step 5

Give the completed *Concerns Logging Form (Appendix 3)* to the DSL as soon as possible ensuring it is handed in and not copied or stored electronically.

The DSL will decide on further appropriate action and will remain in close communication with other professionals around the child/young person and with the family if appropriate.

4 PROFESSIONAL CONFIDENTIALITY

4.1 Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of safeguarding.

4.2 The only purpose of confidentiality in this respect is to benefit the child. A member of staff must never guarantee confidentiality to a student, nor should they agree with a student to keep a secret. Where there is a safeguarding concern, this must be reported to the Designated Safeguarding Lead.

4.3 Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a 'need-to-know basis' only. Any information shared with a member of staff in this way must be held confidentially.

5 MANAGING ALLEGATIONS AGAINST STAFF

5.1 Allegations of abuse can be made by children, and they can be made by other concerned adults. Staff have a duty to cooperate in any investigation.

5.2 Any concern about the behaviour of a member of staff or volunteer, or allegation of abuse against a member of staff must immediately be reported to the DSL or Head if the former is not available who will take the necessary action. Allegations against a senior leader or the DSL should be made directly to the Head. Allegations against the Head should be made to the CEdO.

5.3 Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

5.4 Malicious allegations against staff will be investigated and dealt with by the Head and, if appropriate, a committee of governors.

Outcome of Allegations

The outcome of allegation investigations should be typically identified as one of the following:

Outcome Type	Definition	Action after investigation	Recording
Substantiated	There is sufficient evidence to prove the allegation.	Discussion with HR and/or other professionals, about referral to	There should be a clear and comprehensive summary of the allegation, details of how the allegation was followed up and

		DBS/TRA and/or Disciplinary Hearing	resolved, and a note of any action taken and decisions reached. This should be kept in the confidential personnel file of the accused, and a copy provided to the person concerned The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.
False	There is sufficient evidence to disprove the allegation.	Where the allegation is found to be false, unsubstantiated, or malicious, the information should not be included in any reference.	
Unsubstantiated	This is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.		
Malicious	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.		Details of allegations that are found to have been malicious should be removed from personnel records.

In addition, there is a further outcome type (unfounded) which schools may wish to use, after liaison with their HR/ advisors.

***Unfounded:** there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

6 CONCERNS ABOUT A COLLEAGUE: WHAT TO DO

6.1 Reporting channels

If a staff member has a concern about another staff member or volunteer this should be referred to the relevant Head of School.

Where there are concerns about a member of senior staff this should be referred to the Head.

Where there are concerns about the Head, this should be referred to the Chair of Governors and the designated Governor for Safeguarding. Any concern or allegation against a member of senior management or the Head will be reported without informing the individual concerned.

No individual should feel that they cannot speak up and let their concerns be known about any matter relating to the safety of children in school. Individuals who raise such concerns are assured that they need not fear any deleterious consequences as a result of having raised such concerns. It is their absolute right – indeed their duty – to speak up when they have concerns.

6.2 Types of allegations

As specified in the UK's 'Keeping Children Safe in Education', the following definitions should be used when determining the outcome of allegation investigations:

a) Substantiated: there is sufficient identifiable evidence to prove the allegation;
b) False: there is sufficient evidence to disprove the allegation;
c) Malicious: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false;
d) Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw; alternatively, they may not have been aware of all the circumstances;
e) Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

The content below is informed by managing allegations of child abuse by educators and other adults in international schools. This document accompanies this policy and supports the content below.

Any allegations against staff; other than the Head or governor that indicate that they may have undertaken any of the points below, will be reported immediately to the DSL

- behavior that has harmed a student, or may have harmed a student
- possible criminal offence committed against or related to a student
- behavior towards a child or children in a way that indicates he or she would pose a risk of harm to students

If the DSL is not available, an allegation will be reported to the SLT member responsible for safeguarding, or directly to the Head. Subsequently, the Head will inform the governor responsible for safeguarding. It is the responsibility of the DSL to take the next steps in the safeguarding process upon referral. Staff must feel confident that they will be supported if they report any concerns about a child. Staff will be expected to ensure that any reports written about any safeguarding situation are child-centred, in the child's best interests, rooted in child development and informed by evidence. The DSL, under guidance from the Head may gather a response team, the constitution of which will reflect the nature of the allegation. Decisions made by the response team should be agreed with the child and family where possible. A clear process of evaluation with a clear timeframe will be recorded along with the impact of any change on the welfare of the child.

Those reporting any safeguarding concerns will adhere to the lines of communication, ensuring confidentiality. Regardless of the duty of confidentiality, any member of staff who has reason to believe that a student is at immediate or significant risk of harm, has a duty is to forward this information without delay to the DSL.

It is recognised that the evaluation of risk and putting in place measures to mitigate risk contributes to promoting the welfare and protection of students. Risk assessments may pertain to the whole school, to specific phases or areas of the school that have hazards associated with them, or to individual students or staff. A record of the risk assessment must be maintained.

If the allegation made to a member of staff concerns the Head, the person receiving the allegation will immediately inform the Governor with responsibility for safeguarding, who will consult as above, without notification to the Head.

The name of any member of staff considered not suitable to work with children will be referred to the Disclosure and Barring Service (DBS), TRA, and ICPC, and other relevant organisations with the advice and support of the Group Director of HR and in accordance with the DBS Referral Policy.

Occasionally a member of staff may have a personal difficulty that they know is impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so that professional and personal support can be offered. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of students in the school.

7 IMMUNITY & SPEAKING UP PROCEDURES

7.1 Staff who are concerned about the conduct of a colleague may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's status or career. All staff must remember that the welfare of a child is paramount. This procedure empowers staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

7.2 AISL recognises that its staff are often the first people to suspect or realise that something is wrong and is therefore fully committed to dealing responsibly and professionally with their genuine concerns about child safeguarding. AISL also recognises that, for a number of reasons, staff often feel reluctant to raise such concerns. That is why an AISL school will always support any and every member of staff who 'speaks up' about a concern they have.

7.3 To make a disclosure, you only need to act in good faith, e.g. with an honest belief about the concern you raise. Through its policies and practice, an AISL school actively encourages you to raise concerns internally making use of the accepted channels of reporting – through the school's Safeguarding Team members, the Head of HR, or directly to the Head. Your concern will be treated in the strictest confidence. AISL and, more directly, the school will ensure that your concerns are investigated promptly and efficiently and, whenever possible, you will be advised of the outcome. If the concern relates to the Head, then it should be raised directly with the Chair of Governors and/or the nominated Governor with Responsibility for Safeguarding.

7.4 The school will not hold responsible or at fault any school employee making a report of abuse that is later judged to be false, unless it can be demonstrated that the person willfully and intentionally falsified a report.

8 SAFEGUARDING AND THE PHYSICAL ENVIRONMENT

8.1 Every AISL school must be a safe place for all students. The way we achieve this is outlined in our Health and Safety Policy. Please also note the following key points, which relate specifically to the safety of children:

8.2 Doors should have clear glass windows. Any film or blinds must still allow occupants to be visible from outside the room

8.3 Bathroom and Changing Room Use: Adult, visitor and staff bathrooms are available and are clearly identified as such. Adults must not use the same bathrooms as students. In cases where it is necessary to enter a student allocated bathroom, such as to attend to a behavioural or health and safety issue, leave the door open and announce your reason for entering the space as a warning to other students using the bathroom. Where possible in such situations avoid being alone. We understand that with very young children, staff will be assisting with children's toileting and intimate care needs. In this case, please refer to the *Intimate Care Policy (HS26b)*. Schools must explicitly prohibit students from entering toilets or changing rooms designated for the opposite biological sex. Where possible, schools should provide self-contained bathroom and changing spaces for students who are questioning their gender. Separate use of facilities by gender-questioning students should be recorded appropriately, communicated properly, and reviewed regularly. Students who are questioning their gender should not be permitted to use toilet or changing facilities designated for the opposite biological sex.

8.4 Students aged 11 or over must be provided with single sex private spaces for undressing and designated toilets by biological sex from the age of 8 upwards.

8.5 If staff are in a one-to-one situation with students in a room, (e.g in boarding, on expeditions or trips etc.) they should ensure that the door remains open, or move to a more public space where this is possible and appropriate.

8.6 Note that all AISL Harrow schools are expected to ensure they are mobile phone-free environments at all times (with the exception of controlled phone use in the boarding houses). The school's mobile devices policy and procedures should make clear the expectations for all stakeholders.

8.7 Boarding and Residential Trips: students are not permitted under any circumstances to share overnight accommodation with a child of the opposite sex.

9 SUPPORTING STUDENTS WHO ARE QUESTIONING THEIR GENDER

Schools who are supporting students or parents who have raised a request for (possible) social transitioning should be guided by the following:

9.1 The school should take time to understand the thoughts and feelings of the child fully and be professionally curious about the child's experiences and their potential vulnerabilities.

9.2 The views of the parents/carers must be taken into account, although the overarching determinant must be the best interests of the child.

9.3 The guidance and advice of specialists and professionals should, where appropriate, be taken into consideration.

9.4 Policies and protocols should be flexible and easily adaptable, with legitimate aims based on safeguarding and fairness, and should avoid protocols based on gender stereotypes.

Where a student shares with a staff member that they may be/are gender questioning or considering social transitioning, but that they do not wish for any actions to be taken, there is no compulsory

requirement for the school to pass this information on to parents.

10 SAFER RECRUITMENT

10.1 The safer recruitment of all staff working in AISL schools is the first step to safeguarding and promoting the welfare of children in education and the *Recruitment Policy* (HS47) sets out procedures and practices to be implemented in AISL Harrow Schools. Our safer recruitment processes aim to:

a. Deter potential abusers by setting high standards of practice and recruitment.
b. Reject inappropriate candidates at the application and interview stages.
c. Prevent abuse to children by developing robust policies and agreeing on safe practice.

10.2 Achieving our aims:

We ensure that at least one member of staff on every recruitment panel has undertaken training in safer recruitment and that:

a) Up-to-date police records (ICPC/DBS or local equivalent) from the country of origin and previous any countries of employment, have been received and checked by the school
b) On a regular basis, usually at the time of contract renewal, police checks are renewed.
c) At least two appropriate professional references, one of which must be from a candidate's current, or most recent, Head/employer are sought. Telephone verification of the authenticity of references are undertaken for all staff and recorded on the SCR. Such verifications re-substantiate the candidate's suitability to work with children.
d) A digital screening process is undertaken for selected candidates to ensure their suitability for the role. Candidates should be made aware of this safeguarding process in advance.
e) References are made to the Teaching Regulation Agency (via COBIS) for the checking of possible prohibitions, directions, sanctions, and restrictions.
f) There is inclusion of a self-declaration within the application process
g) Authentication is substantiated for new staff documentation and for their identity.
h) All new staff read and sign acknowledgment of the *Safeguarding Policy (HS19)* and *Staff Code of Conduct*.
i) Mandatory staff safeguarding training is provided on arrival (in local language if required), with formal refresher training delivered on an annual basis.

10.3 Minimum safeguarding requirements expected of contractors

We expect the following as a minimum in the case of all contractors:

a) Induction training provided which covers safeguarding;
b) Written confirmation that all required background and identity checks have been conducted on all contractor's employees prior to them beginning work on campus
c) A designated senior member of the Operations team (or, in alternate School structures, the Head) ensures that DSL information is shared with relevant managers through regular meetings;
d) Contractors read, complete and sign the Self Declaration Form;
e) Police checks for any member of staff who will be employed on-site for longer than 6 days;

f) Our Code of Conduct for contractors is shared and a record is kept of their having read and understood it;
g) Toolbox Talks - daily reminders given on CSP awareness.

10.4 Minimum safeguarding requirements expected of all adults living on campus

In schools where staff live on campus:

a) The *Safeguarding Policy (HS19)* and staff Code of Conduct are made available to all at induction meeting (during new staff induction);
b) Expectation for all residential occupants to adhere to the Safeguarding Policy (HS19) and our Code of Conduct;
c) Resident adults read, complete and sign the CSP Self Declaration Form and an 'Adults Living on Campus' agreement.
d) All resident adults undergo background checks

11 STAFF TRAINING

a) Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care.
b) Each school's HR Manager (or in schools with alternate structures, the Head), supported by the Safeguarding team, keeps detailed records of all staff safeguarding training and issue reminders when training updates are required.
c) It is good practice to include a safeguarding agenda item in all staff meetings.
d) All paid and unpaid members of staff have regular, mandatory safeguarding training (including on how to ensure pupils stay safe online). This includes school governors, senior managers, outside providers, volunteers, interns, and contractors, or anyone working on behalf of the school.
e) New staff have safeguarding training as part of the induction process and that this is kept up to date by refresher training annually.

f) In addition, the designated members of staff (DSL, and DDSL) will undertake multi-agency training every two years to keep their knowledge and skills up to date. We aim to ensure that this group of staff is Level 3 safeguarding trained, **alongside key pastoral leaders, senior leaders and resident boarding Housemasters/mistresses**.
g) Standards of behaviour expected of staff, are outlined in the Staff Professional Code of Conduct. It is expected that all staff read this code and sign to acknowledge that they have done so. All members of staff (and all adults working with students) read and agree to this Policy before their duties begin.

12 SELF-ASSESSMENT AND INTERNAL QUALITY CONTROL

To ensure that safeguarding documentation remains effective and up to date, schools will ensure that:

a) An externally led audit is carried out at least every three years, which forms part of the safeguarding improvement action plan;
b) An internal audit occurs annually.
c) Safeguarding provision is to be evaluated against Harrow Standards 1.7 Safeguarding Culture and the associated *Success Descriptors*.

13 BUDGETING FOR SAFEGUARDING

In recognition of the central importance of safeguarding, it is to have its **own designated and protected budget line** in the school accounts. From this budget comes:

a) Funds for the biennial audit;
b) Funds for signage;
c) Funds for storage and office sundries.

Training of staff connected to safeguarding is to be budgeted for under the main CPD budget.

14 RISK ASSESSMENT

a) Risk assessments are undertaken to good effect in promoting safety. Such assessments cover all aspects of the school's work, such as premises and equipment, on-site activities, off-site activities and the venues used, use of minibuses and other forms of transport.
b) Our risk assessments include sections to address child safeguarding risks and a risk management plan.
c) Our risk assessments consider all safeguarding matters when working with other partners and third-party providers, for example on expeditions and trips.
d) Where appropriate, short briefings/training input are given to staff of host organisations/locations on child safeguarding and how to report issues of concern.
e) Risk assessments are signed off by managers/senior leaders, not only by the trip or expedition leader.

15 IMPLEMENTATION ACTIONS

In order to implement and monitor this Policy, AISL schools will:

a) Designate a senior person as DSL, providing appropriate training, support and time for this role. Where appropriate, and where scale and context of school demand, designate Deputy DSLs.
b) The DSL, or at least one Deputy DSL, should be fluent in the native language of the school's location;
c) Ensure a nominated governor takes a lead role for safeguarding including championing safeguarding issues within the school and liaising with the Head, having an overview of the safeguarding and all related policies, auditing safeguarding measures annually alongside the Head following a calendared timeline;
d) Ensure every member of staff, volunteer, site user, employee and governor know the name of the designated safeguarding officer responsible for safeguarding and their role through the training programme and the display of posters around the site;
e) Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for recording any concerns and referring any concerns to the designated teacher responsible for safeguarding;
f) Ensure all visitors are aware of child safeguarding expectations and reporting procedures by having information on signed acknowledged visitor slips and CS reporting posters at key points around the school;
g) Ensure all staff receive safeguarding training annually and that DSL, DDSLs, safeguarding team members and Nominated Safeguarding Governor are Level 3 trained every two years;

h) Develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters;
i) Ensure all child welfare and safeguarding records are kept securely, and in locked locations;
j) Ensure safer recruitment practices are always followed;
k) Ensure that any allegations against members of staff with a safeguarding aspect are dealt with following agreed procedures and all such concerns to be dealt with urgently;
l) Ensure that the school building and site are appropriately secure, with a clear record kept of any risk assessments carried out, by following school procedures on health and safety and risk assessments;
m) Ensure that other school policies which have a safeguarding element (e.g. health and safety; anti-bullying; e-safety; behaviour; HR recruitment; boarding sanctions) are all consistent with this policy and with each other and where appropriate make cross-reference to this policy;
n) Carry out an annual safeguarding audit, and track progress against a safeguarding action plan, reviewed mid-year. Governing Body will receive a safeguarding and safeguarding report at least once a year (based on the annual audit and review);
o) Ensure all staff, governors and volunteers receive and sign for a copy of this policy;
p) Ensure that parents receive information from the school about the responsibility placed on the school and staff for safeguarding through calendared workshops;
q) Provide age-appropriate education and safeguarding training to students;
r) Ensure that any use of the school's campus and facilities by a third party complies with the school's expectations of safeguarding practice

16 CONTACT INFORMATION FOR SAFEGUARDING SERVICES

a) Each school will maintain a database of local child safeguarding agencies and support services. Details of these services will be available to the Safeguarding Team.
b) AISL schools will endeavour to keep these links fresh by making personal contact with the agencies on a biannual basis. This ensures that if the worst were ever to happen, schools have the contacts necessary to make the most of the services available to us.

APPENDIX 1: DEFINITIONS OF TERMS

The term 'all staff' as used in this policy includes, but is not limited to:

1. Teachers (including supply teachers)
2. Teaching Assistants
3. Administrative staff
4. Operations staff
5. Support assistants
6. Boarding staff
7. Senior managers
8. Governors
9. All paid staff who are working for the School
10. Outside activity providers
11. Coaches
12. Volunteers
13. Graduate interns
14. Contractors/Outsourced Staff
15. Consultants
16. Visiting speakers
17. Visiting professionals delivering training on-site

The term 'residential occupants and staff' as used in this policy includes, but is not limited to:

1. Family members of staff residing in school houses or boarding residences on campus, who are not employed by the school; 'adults' are those aged 18 and over.
2. Long-term guests or visitors of staff given permission to reside in staff houses or boarding residences on campus. For example, staying for an extended period (more than 6 days);
3. Any individual, employed by a residential occupant, to work in the staff houses or boarding residences on campus on a regular basis. For example, nannies and domestic helpers.

Schools must work with appropriate agencies to investigate when any adult who is/has worked at, or is involved with, the school has "**behaved or may have behaved in a way that indicates they may not be suitable to work with/have access to children**".

APPENDIX 2: INDICATORS OF ABUSE

What to look out for and when to be concerned

All staff should be aware of the types and signs of abuse and neglect so that they are able to identify students who may be in need of help or protection. If staff are unsure, they should always speak to the DSL. Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Students may be abused by an adult or adults or by another child or children.

Staff should be aware of the four main categories of child abuse which are commonly identified, although there may be cross over between categories:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm, providing them with alcohol or drugs and administering corporal punishment 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.

- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's 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: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily a high level of violence, whether or not 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- Neglect: 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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or 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) and not leaving children at home alone;

or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Things to watch out for:

POSSIBLE INDICATORS OF PHYSICAL ABUSE	**POSSIBLE INDICATORS OF EMOTIONAL ABUSE**
10 Unexplained bruises and welts on any part of the body 11 Bruises of different ages (various colours) 12 Injuries reflecting shape of article used (electric cord, belt, buckle, table tennis bat, hand) 13 Injuries that regularly appear after absence or vacation 14 Unexplained burns, especially to soles, palms, back, or buttocks 15 Burns with a pattern from an electric burner, iron, or cigarette 16 Rope burns on arms, legs, neck, or torso 17 Injuries inconsistent with information offered by the child 18 Immersion burns with a distinct boundary line 19 Unexplained laceration, abrasions, or fractures	20 Emotional abuse can cause a child to change the way that they behave. 21 They might not care how they act or what happens to them, this is also known as negative impulse behaviour. 22 Or they may try to make people dislike them, which is called self-isolating behaviour. 23 A child who is being emotionally abused may develop risk-taking behaviours such as stealing, bullying and running away. 24 Self-harming or eating disorders 25 May lack social skills 26 Appear distant from parents
POSSIBLE INDICATORS OF SEXUAL ABUSE	**POSSIBLE INDICATORS OF NEGLECT**
27 Sexual knowledge, behaviour, or use of language not appropriate to age level 28 Unusual interpersonal relationship patterns 29 Venereal disease in a child of any age 30 Evidence of physical trauma or bleeding to the oral, genital, or anal areas 31 Difficulty in walking or sitting 32 Refusing to change into PE clothes, fear of bathrooms 33 Child running away from home and not giving any specific complaint 34 Not wanting to be alone with an individual 35 Pregnancy, especially at a young age 36 Extremely protective parenting 37 Exposure to pornography	38 Child is unwashed or hungry 39 Parents are uninterested in child's academic performance 40 Parents do not respond to repeated communications from the school 41 Child does not want to go home 42 Both parents or legal guardian are absent 43 Parents cannot be reached in the case of emergency

Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation
- Child criminal exploitation
- Domestic abuse
- So called 'honour-based' violence, female genital mutilation (FGM), forced marriage and breast ironing
- Radicalisation
- Children with family members in prison
- Child on child abuse
- Sexual violence and sexual harassment

These may manifest as:

1. **Children missing from education**; A child going missing from education is a potential indicator of abuse or neglect. Staff and community members (including parents and carers) should report any poor student attendance or absences which cause concern to the safeguarding officers or the DSL, particularly on repeat occasions and/or over prolonged periods of time, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of the child going missing in future.
2. **Child sexual exploitation (CSE)**; This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship to serious organised crime by gangs and groups. The perpetrator/s always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.
3. **Female Genital Mutilation (FGM)**; This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. AISL follows UK advice in this area: it is mandatory to report FGM disclosures that concern any female under the age of 18.
4. **Radicalisation**; This refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. As with managing other safeguarding risks, staff should be alert to changes in a child's behaviour which could indicate that they may be in need of help or protection.
5. **Forced marriage/abduction**; In some cultures, forced marriages are still regarded as acceptable. Any member of staff who considers a child at risk of this particular form of abuse, should report it immediately to a member of the safeguarding team.

Signs of abuse

Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- The student discloses that he or she has been abused, or asks a question which gives rise to that inference
- A student's injury cannot be reasonably or consistently explained, or is unusual in type or location
- A pattern or frequency of injuries is emerging
- The student engages in extreme or challenging behaviour or there is a sudden change in the student's behaviour
- The student asks to drop subjects or displays significant changes in attainment or behaviour with a particular teacher and seems reluctant to discuss reasons
- The student appears neglected (e.g. dirty, hungry, inadequately clothed)
- The student appears reluctant to return home or has been openly rejected by parents or guardians
- The student's development is delayed in terms of emotional progress
- The student withdraws emotionally, showing a lack of trust in adults
- The student shies away from being touched or flinches at sudden movements
- The student loses or gains weight

Signs you may notice:

• withdrawn • suddenly behaves differently • anxious • clingy • depressed • aggressive • problems sleeping • eating disorders • wets the bed	• soiled clothes • takes risks • misses school/arrives very early • changes in eating habits • obsessive behaviour • nightmares • drugs • alcohol • self-harm • thoughts about suicide

NEGLECT

Appearance / hygiene

- be smelly or dirty
- have unwashed clothes
- have inadequate clothing, e.g. not having a winter coat
- often hungry or turns up to school without having breakfast or access to any food at home

Health & Development issues

- untreated injuries, medical and dental issues
- repeated accidental injuries caused by lack of supervision
- recurring illnesses or infections
- not been given appropriate medicines
- missed medical appointments such as vaccinations
- poor muscle tone or prominent joints
- skin sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- anaemia

- tiredness
- faltering weight or growth and not reaching developmental milestones (known as failure to thrive)
- poor language, communication or social skills.

Housing

- living in an unsuitable home environment (eg not having any heating)
- left alone for a long time
- taking on the role of carer for other family members
- living in a suitable home environment with food, shelter and warmth but lacking human contact, love and attention from family members (may be looked after by maids and drivers)

EMOTIONAL ABUSE

There often aren't any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions.
Changes in emotions are a normal part of growing up, so it can be really difficult to tell if a child is being emotionally abused.
Babies and pre-school children who are being emotionally abused or neglected may:

- be overly-affectionate towards strangers or people they haven't known for very long
- lack confidence or become wary or anxious
- not appear to have a close relationship with their parent, e.g. when being taken to or collected from nursery etc.
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect them to know at their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents, family members or friends
- lack social skills or have few, if any, friends
- appear upset and worried about postings on social media, WeChat etc
- feel they are being bullied online or taunted by others

SEXUAL ABUSE

Stay away from certain people

- they might avoid being alone with people, such as family members or friends
- they could seem frightened of a person or reluctant to socialise with them.

Show sexual behaviour that's inappropriate for their age

- a child might become sexually active at a young age
- they might be promiscuous
- they could use sexual language or know information that you wouldn't expect them to know at that age

Have physical symptoms

- anal or vaginal soreness
- an unusual discharge

- sexually transmitted infection (STI)
- pregnancy

SOURCE: https://www.nspcc.org.uk/preventing-abuse/

Listening to students and record keeping

The school is to provide a range of opportunities for students to be listened to. If a student discloses that he or she has been abused or neglected in some way, the member of staff should:

- Immediately stop any other activity to listen
- Listen carefully to the student and keep an open mind — do not interrupt the child or be afraid of silences
- Limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoid using leading questions such as, "has this happened to your siblings?" which may prejudice an investigation
- Not make any attempt to investigate the incident themselves or make a decision as to whether or not the student has been abused
- Reassure the student but never promise not to tell anyone. Instead, explain who needs to be told to ensure that proper action is taken in accordance with this policy so as to help keep the child safe
- Discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL or the Master
- Only share information on a need-to-know basis
- Make a full written record of the conversation as set out below.

Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible, perhaps using a resource such as CPOMS. The recording must be a clear, precise and factual account of the conversation or observations. Where a student has made a disclosure, the record must include details of:

- Its date, day of the week, time and place
- What was said and done by whom and in whose presence
- Any noticeable non-verbal behaviour or words used by the child.

Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer. Notes may be scanned and uploaded onto a resource such as CPOMS/MyConcern.

APPENDIX 3: LOGGING CONCERNS FORM (English version)

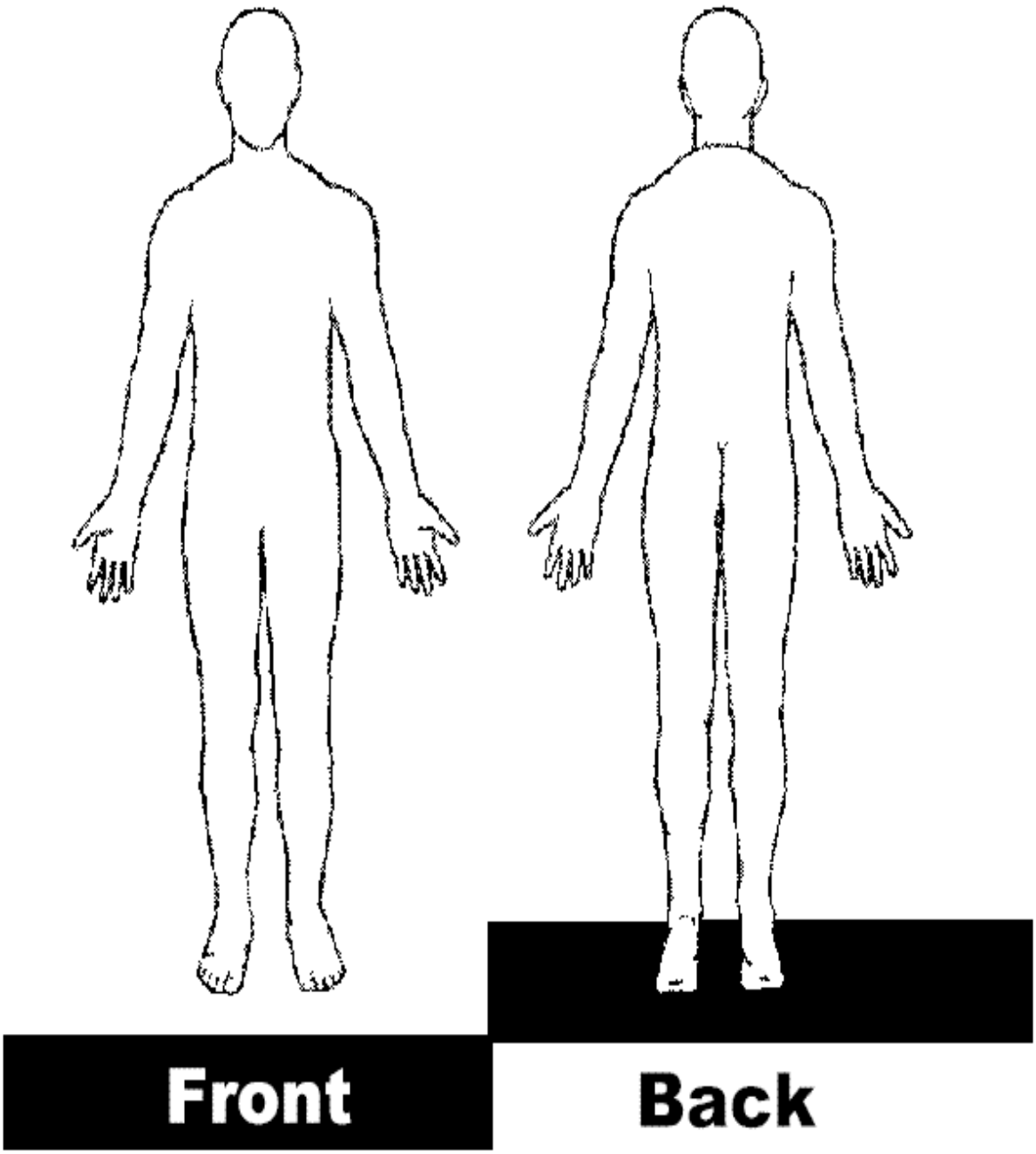
Your Name (PRINT):	**Your Role:**
Student Name: (first, surname and nickname)	**Class and Year/House:**
Time and Date of Incident: (if applicable):	**Date you became aware of the incident/issue:**
Describe the incident as factually as possible. Include who was involved, where it happened, exactly what happened etc. Remember to describe clearly any behaviour or physical signs you have observed.	
What actions did you take? Your Signature:	
Time and date of when the form was completed:	

This form should be handwritten. Do not create a digital record. Check your report before personally handing it over to the DDSL in your section of the school or DSL if the former is unavailable. Make sure this form is legible and uses plain English. Please remember this form might be read by someone not working at Harrow. This form could, for example, be used as evidence in legal proceedings.

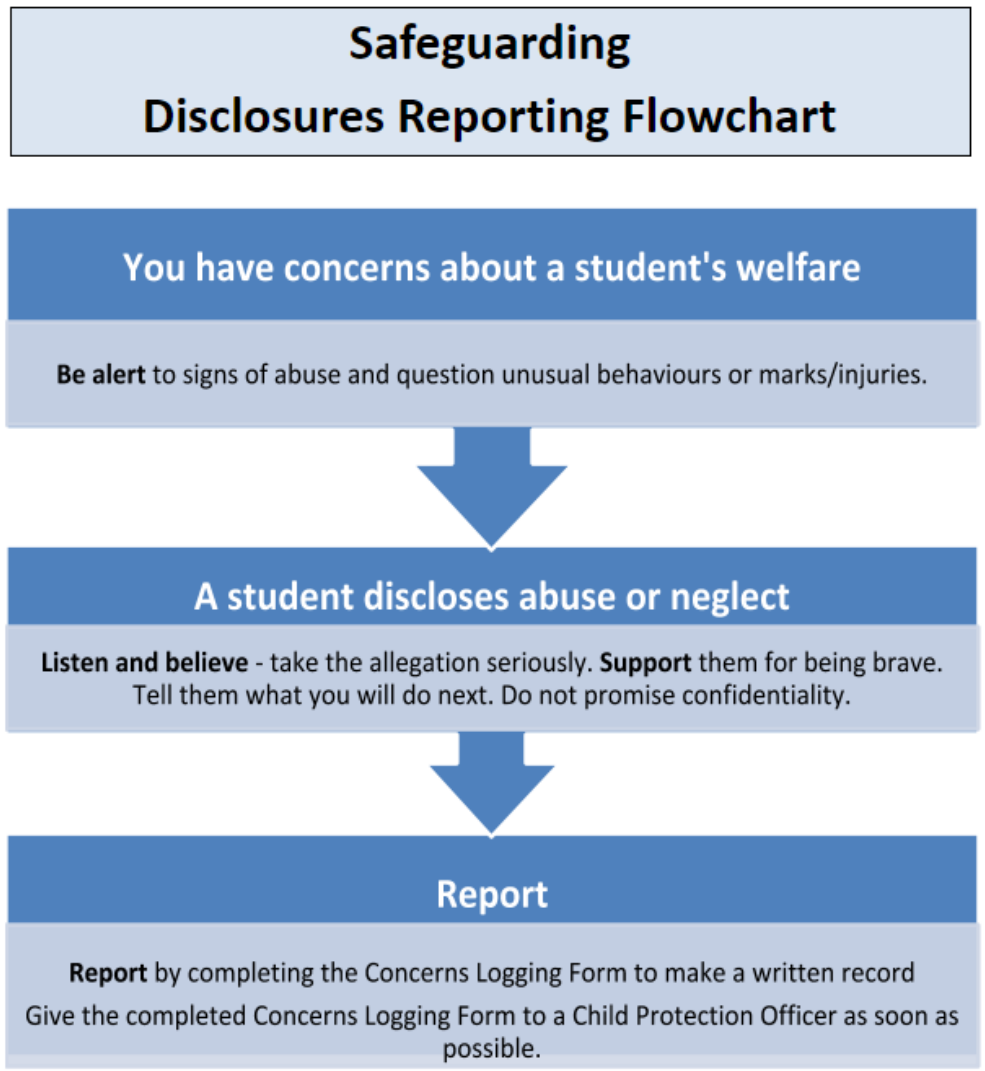
FOR DSL USE

Received By	**Date and Time:**
Proposed Action By the designated person	

The diagrams below only need to be annotated if applicable to the concern/s expressed overleaf. The purpose of this page is to accurately locate physical contact or a mark/bruise/wound on the body.



APPENDIX 4: REPORTING FLOWCHART



APPENDIX 5: ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ABUSE AND ALLEGATIONS

Most instances of students causing harm to each other will be dealt with under the school's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a student towards another; referred to as child-on-child abuse. Examples of students' conduct towards each other that could raise safeguarding concerns are:

- Bullying (including cyberbullying)
- Physical violence such as hitting, kicking, biting or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing
- Youth produced sexual imagery (sexting)
- Explicit AI 'deep fake' imagery creation and sharing
- Misogyny and the promotion of violence/discrimination against women
- initiation/hazing types violence and rituals.

Child-on-child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence. Students with Special Educational Needs or Disabilities are particularly vulnerable to peer-on-peer abuse. Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls and students with SEND are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexual remarks about a person's clothes or appearance, using sexualised names etc
- Sexual "jokes" or taunting
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing, displaying pictures, drawings or photos of a sexual nature

Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages, 'deep fake' creation, including on social media. This type of harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

Schools have an important role in developing student understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. Staff should also be aware of the importance of:

- Enforcing the explicit rules
- Implementing in a consistent way its Behaviour Policy
- Being clear that sexual violence or sexual harassment is abusive behaviour and is unacceptable
- Implementing the school's anti-bullying strategy and promoting the Harrow values.

Other strategies in place to prevent the occurrence of child-on-child abuse include:

- Providing developmentally appropriate wellbeing, or other, lessons which develop student understanding of acceptable behaviour
- Systems for any students to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable
- Having robust supervision arrangements, particularly for those in boarding

If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the school's policies on behaviour and discipline will apply. Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the school) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other students; and any relevant contextual factors.

APPENDIX 6: LAWS AND CONVENTIONS GUIDING THE CHILD PROTECTION POLICIES FOR MAINLAND CHINA

The PRC *Minors Protection Law,* 2012: Article 5:
In the protection of minors, the following principles shall be followed: (1) respecting the personal dignity of minors; (2) following the laws which govern the minors' physical and mental development and the characteristics of such development; and (3) combining education with protection. Standing Committee of the National People's Congress, *Law of the People's Republic of China on the Protection of Minors (2012 Revision)* Order of the President No.65 PRC.

Anti-domestic Violence Law of the People's Republic of China, 2015:
In 2015, a new law was passed (effective March 1st 2016) that protects foreigners and Chinese citizens within China's borders from domestic violence. Two articles of this law have specific implications for children and schools:

Article 14: Schools, kindergartens, medical institutions, residents' committees, villagers' committees, social service agencies, aid management agencies, welfare agencies and their staff members shall promptly report cases to public security organs if they find, during the course of their work, that persons with no civil capacity or persons with limited civil capacity have suffered or are suspected of suffering domestic violence. Public security organs shall keep confidential the identity of case reporters.

Article 35: Where a school, kindergarten, medical institution, residents' committee, villagers' committee, social service agency, aid management agency, welfare agency and its staff members fail to report a case to a public security organ in accordance with Article 14 herein, resulting in serious consequences, the person directly in charge and other persons subject to direct liabilities shall be given disciplinary sanctions pursuant to the law by the relevant superior competent department or their own employer. Standing Committee of the National People's Congress, (2015) *Anti-domestic Violence Law of the People's Republic of China.* Order No.37 of the President, PRC.

APPENDIX 7: SAFEGUARDING TRAINING EXPECTATIONS

Position	Training	Frequency
Safeguarding Governor	**Level 3**	**2 years**
AISL Safeguarding Lead	**Level 3**	**2 years**
AISL Director of HR	**Level 3**	**2 years**
School DSL and DDSLs	**Level 3**	**2 years**
Head	**Level 3**	**3 years**
School Director of HR	**Level 3**	**3 years**
SLT and Key Pastoral Leaders	**Level 3**	**3 years**
Boarding HMs	**Level 3**	**3 years**
Boarding **Residential Staff**	**Level 2**	**3 years**
All staff (academic and non academic)	**Level 1**	**Annually**
Volunteers etc.	**Introduction to safeguarding**	**Annually**

APPENDIX 8: ACKNOWLEDGEMENT OF COMPREHENSION

Please print out this page and return it, signed, to the Designated Safeguarding Lead

I have read, understand and agree to abide by the *Safeguarding Policy (HS19)* and the Staff Professional Code of Conduct. I acknowledge that their scope covers both my private and professional life.

I understand that if I do not follow the guidance laid out therein, I will be subject to disciplinary action which may result in dismissal and/or my actions being reported to the police.

FULL NAME (capitals, please):

_____

SIGNED: _____ DATE: _____

Return this signed page to the Designated Safeguarding Lead; please keep the rest of the document for your own records.