AISL HARROW SCHOOLS 哈罗学校

Safeguarding Policy (HS19)

APPLIES TO:	All staff, visitors, volunteers, contractors, governors, guests, residents etc.
AISL RESPONSIBILITY:	Chief Education Officer
LAST UPDATED:	28 July 2026
REVISIONS: (Reviewer to enter initials and date)	CE – 28 July 2026
Read and Noted by HNN Head and DSL	Jo Dunphy and Ross Little, 1 September 2026

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.

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 DBS/TRA and/or Disciplinary Hearing	There should be a clear and comprehensive summary of the allegation, details of how the allegation was followed up and 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)

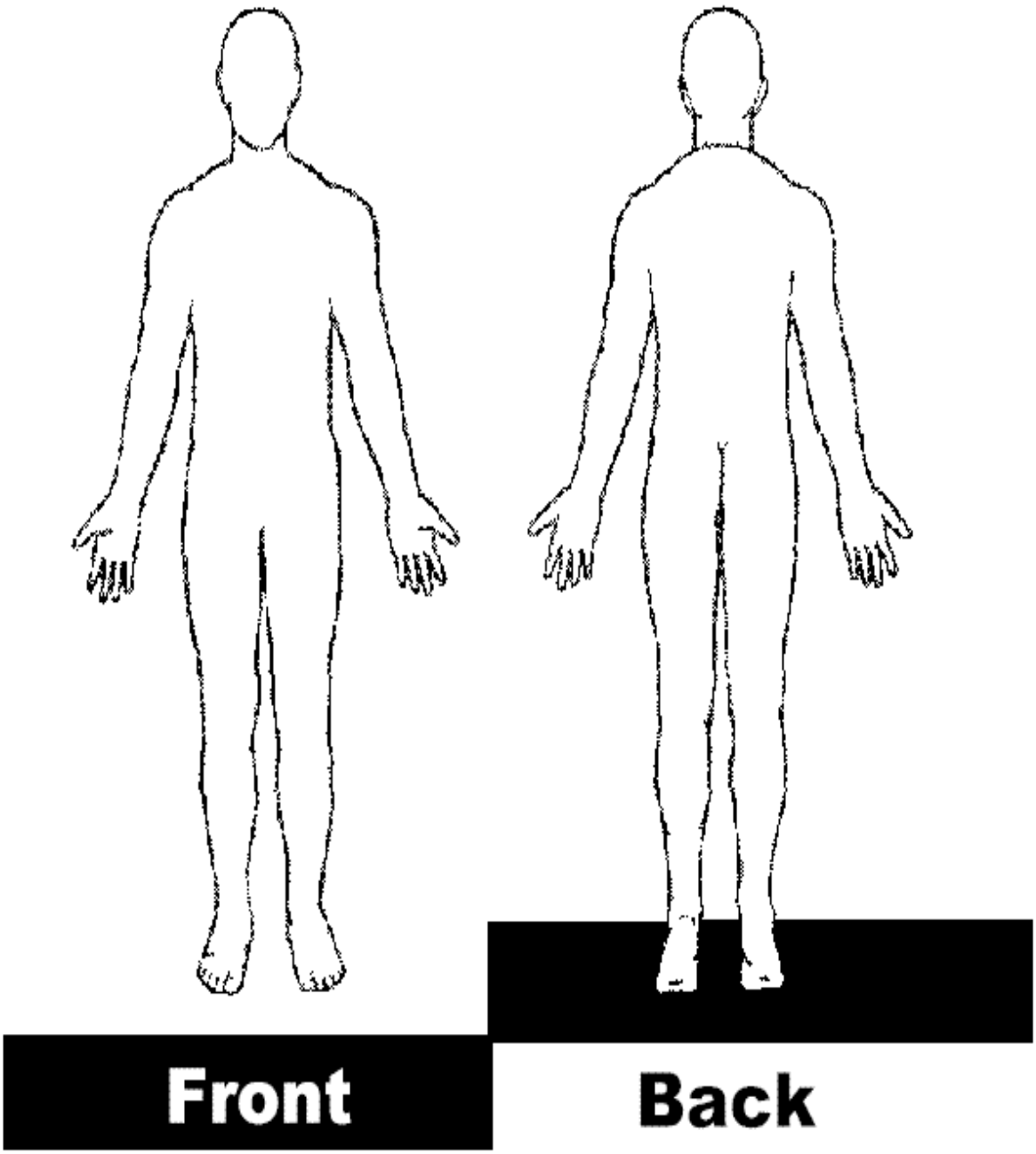
Your Name (PRINT):	**Your Role:**
Student Name: (first, surname and nickname)	**Class and Year/House:**
Time and Date of Incident: (if applicable):	**Date you became aware of the incident/issue:**
Describe the incident as factually as possible. Include who was involved, where it happened, exactly what 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.

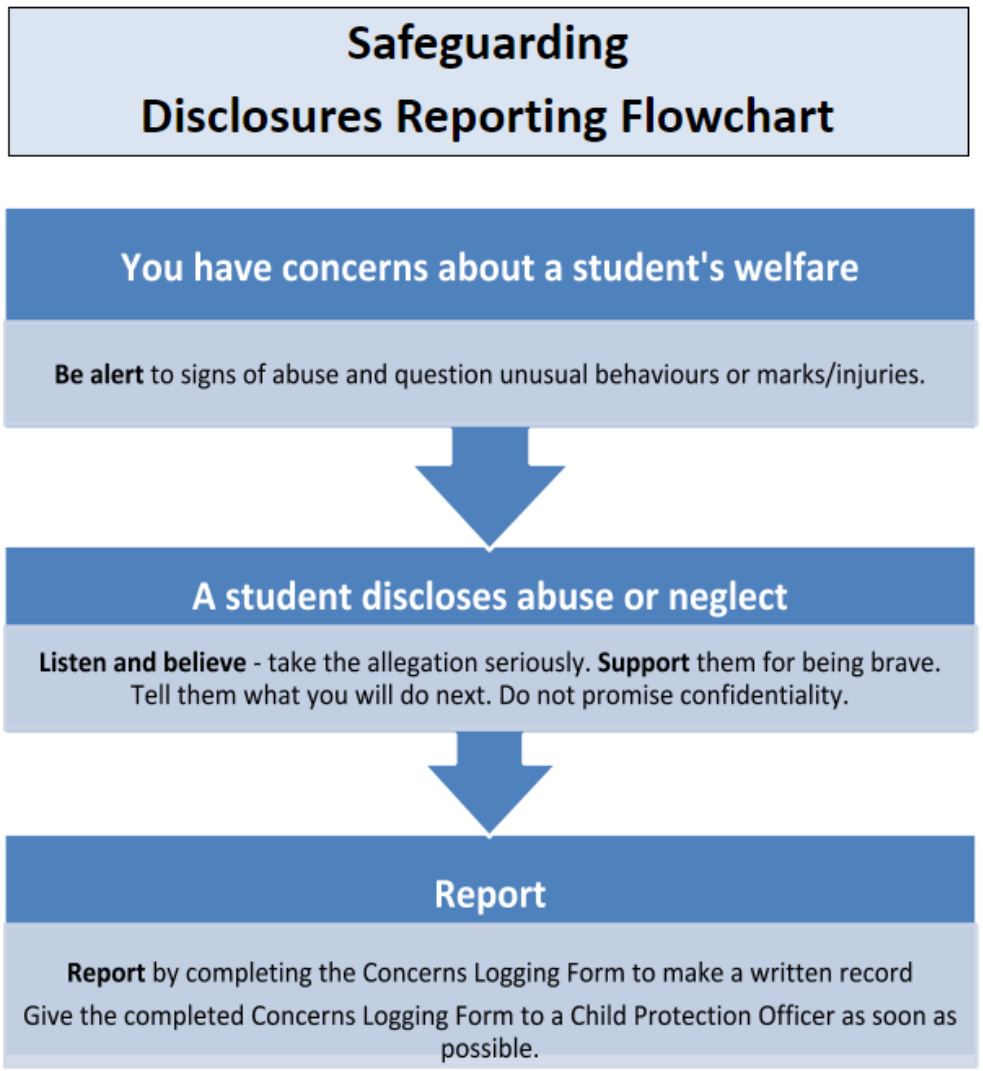
FOR DSL USE

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.

保障政策（HS19）

适用范围：	所有教职员工、访客、志愿者、承包商、校董、宾客、居住者等
亚洲国际学校有限公司负责人：	首席教育官
最近更新时间：	2026 年 7 月 28 日
修订： **(审阅人输入姓名缩写和日期)**	CE – 2026 年 7 月 28 日

17 引言

17.1 语言说明

在许多学校中，“保障”和“儿童保护”是可以互换使用的术语； 在其他学校中，它们并排使用，好像是密不可分的。

我们认为后者使用重言式，因此在确保我们学校的儿童安全且受到良好照顾的所有事项上，仅选择了“保障”一词。 与“儿童保护”相比，我们更喜欢“保障”一词，因为任何人都没有这样的假设，即确保儿童福利仅意味着防止他们受到伤害。

17.2 本政策的范围

根据《儿童法》（英国）和《中华人民共和国未成年人保护法》（中国），儿童是指在 AISL 哈罗学校注册的任何学生。《共同保障儿童》（英国）中定义了保障和促进儿童福利：

- 保障儿童免遭虐待；
- 防止损害儿童的健康或发育；
- 确保儿童在与提供安全有效的照料相符的环境中成长；
- 承担该角色，以使这些儿童有最佳的生活机会并成功进入成年期。

本政策适用于但不限于所有教职员工、学生、来宾和访客，或在 AISL 管理的学校中或代表 AISL 管理的学校工作的任何人。

17.3 本政策的目的

AISL 完全承认我们在保障儿童方面的共同责任。为此，本政策旨在记录我们如何：

- 保护所有上学并使用我们服务的儿童和青少年；
- 向所有教职员工（如*附录 1* 所定义）和访客提供指导我们保障方法的总体原则。

AISL 致力于确保儿童和青少年永远不会遭受任何形式的虐待、忽视或剥削。

我们认识到，我们所有人都有责任促进所有儿童和青少年的福祉并确保他们的安全。我们致力于寻求方式来不断地审查我们的做法，以便我们的每一所学校都能保障儿童并为人类的繁荣提供条件。

17.4 我们的核心信念

我们认识到并相信：

- 学生和教职员工的福祉比学校中所有其他考虑更为重要；
- 所有儿童，不论其年龄，残疾，性别，种族传统，宗教信仰，性取向或身份如何，均有权获得平等保护，免受各种形式的虐待、忽视和剥削。所有教职员工都全力致力于保护儿童免受虐待，无论是来自家庭内部还是外部，这包括保护儿童免受上网时的潜在伤害，包括因接触虚假信息、错误信息和阴谋论以及滥用人工智能行为而造成的伤害。
- 由于以前的经历、特殊的教育需要、残疾、或由于他们的高度依赖、沟通困难或其他问题，一些儿童还容易受到伤害； 与儿童、青少年、他们的父母、照料者和其他机构合作，对于促进青少年的福利至关重要。
- 每一个与儿童一起工作的成年人都有责任确保他们的安全，一旦出现问题，立即提供帮助和支持，满足儿童的需求。AISL 致力于确保所有与学生一起工作的教职员工都接受适当的保障培训。
- 教职员工应特别注意学生对早期、正面和适度干预的潜在需求。这包括对伤健、需要额外照顾、有滥用药物或酒精问题、反社会、犯罪行为迹象和面对家庭环境挑战的学生，提供合理的教学调整。

17.5 法律框架

在设计此政策时，参考了以下英国、中国和国际文件：

10. 《确保儿童安全接受教育（2026 年）》
11. 《中华人民共和国未成年人保护法（1992 年）》
12. 《共同保障儿童（2015 年）》
13. 《儿童法（1989 年）》

14. 《儿童法（2004 年）》
15. 《英国数据保护法（2018 年）》
16. 《联合国儿童权利公约（1991 年）》
17. 《确保学校教育中的数字科技安全标准（英国教育部，2025 年）》
18. 《AISL HS34 人工智能可接受使用政策》

17.6 角色和责任

在我们的学校中，所有员工都参与了保障儿童的工作，但是其中有些人承担着非常具体的责任。

学校编写和使用的《保障政策》（HS19）应包括一个列出下述角色负责人及其联系信息的表格。

学校必须具备以下条件：

- **指定的保障负责人（DSL）**

  DSL 负责：制定政策；与保障相关的系统和合规性以及监督保障程序（包括在线安全、了解筛查和监督系统和程序）；员工培训；制定保障行动计划、实现保障行动计划的目标；进行内部保障审核；安全招聘和《中央登记册》（SCR）；带领保障团队；维护保障记录的机密性和完整性；处理复杂和严重的保障事件；确保保障措施始终是学校企业意识的重中之重；审查严重的事件并采取行动；酌情与第三方机构联络；以及维持或改善学校的保障政策和程序可能需要定期执行的其他职责。DSL 应该通过与教师紧密合作并共享有关其福利、保障和儿童保护方面的信息来帮助促进教育成果。

  学校必须建立健全且明确的替代履职机制，确保 DSL 不在校期间，其职责能够得到有效履行。该职责可由校长或 DDSL 临时承担。

  DSL 的角色还包括：

增强意识

- 就所有保障相关事宜提供支持、建议和专业知识
- 鼓励员工参与保障和倾听学生声音的文化
- 确保当地保障政策被知晓、理解和适当使用，并至少每年审查一次
- 监督当地政策的运作，定期审查和更新程序及其实施，必要时与保障工作组和校董合作
- 确保所有员工和志愿者都接受适当的培训，保存和维护培训记录，并确保员工了解培训机会和最新的当地保障政策
- 与当地电子安全负责人密切合作
- 监督有关电子安全的政策和做法，适当了解学校过滤和监控互联网和网络使用的系统，每年与高层领导者一同审查这些规定的有效性，同时确保所有教职员工都接受过适当的电子安全培训，并了解学校在互联网过滤和监控方面指定的角色和职责。

管理移交

- 就向他们报告的所有保障问题提供建议并迅速采取行动
- 酌情移交涉嫌虐待的事件，支持进行或考虑进行任何此类移交的员工，并根据需要与地方当局联络
- 将某人因对儿童造成风险/伤害而被解雇或离职的事件移交犯罪记录查询及限制雇佣局或其他相关的本地及/或国际机构
- 将可能涉嫌犯罪的事件移交警方
- 详细、准确、安全地维护此类问题或移交的书面记录（例如 CPOMS或 MyConcern）
- 所有问题和行动及时告知负责人
- 监控受儿童保护计划保护的大学生的记录，以确保一收到通知就对其进行维护和更新
- 监控保障记录的机密性和存储，当学生离校时，确保尽快将向新学校提供他们的保障档案复印件，并将其与主要学生文件分开寄送，确保安全寄送并获得确认收件回执单
- 同样，AISL学校将在招生过程中要求提供儿童的保障档案

- 在每起保障指控或重大问题结束后进行检讨，并以此改进实践

DSL 还会为AISL保障网络作出贡献。

- **指定的副保障负责人（DDSL）**

DDSL 负责其学校指定区域的日常保障事务。在这方面的职责包括但不限于：作为披露的第一联络点（指定联络点）； 维护保障记录的完整性和机密性； 使 DSL 及时了解出现的保障问题； 与父母、照料者和其他机构联络，以确保儿童的安全； 在需要的情况下组织案例会议； 为需要的学生设计和实施福利计划。

- **保障团队**

该团队负责制定年度发展计划并向高层领导团队（SLT）汇报；负责审查政策和程序；负责商定员工和其他成年人的培训时间表。团队定期开会审查保障案例和关切；团队成员在 DSL 的指导下运作，确保政策和程序的有效实施。

- **指定的保障校董**

保障校董负责监督政策和程序； 向治理机构报告所有与保障有关的问题； 确保保障措施牢固地存在于校董的集体意识中； 在可行的情况下，尽可能多地对学校现有的程序进行第一手取样，但不少于每年一次。必要时向 DSL 和更广泛的保障团队提供指导。

- **校董会（BOG）**

BOG 全面负责确保保障政策和程序。BOG 的职责是对保障政策和实践进行审查；认真履行关怀职责，促进学生的福祉与健康，确保学生的安全并保护学生免受伤害。为此，BOG 将确保：

- 制定有效的最新保障政策，向员工提供并在学校网站上发布

- 制定适当的、可以正常运行的政策和程序
- 及时进行所需的职前检查并将其正确记录在《单一中央登记册》中
- 所有员工均根据本政策接受保障培训
- 教授学生如何保持安全，包括网络安全
- 安装适当的过滤和监控系统，确保学生的网络安全
- 确保学校、相关从业者和当地机构之间的重要信息共享
- 网络安全：确保学校分配适当的角色和责任来管理互联网和网络使用的过滤和监控，并每年审查此类规定的有效性。确保学校的网络安全体系稳固、受到监控并定期测试。

制定落实本政策的制度：

角色	人员
AISL 保障校董	Ahmed Hussain ahussain@aisl-edu.com
HEOV 保障负责人	Andrew McGregor McgregorA@johnlyonsfoundation.org.uk
AISL 安全招聘	Jenny Chan jchan@aisl-edu.com
外部**保障顾问**	Encompass Safeguarding 公司的 Sian Jorgensen sian.jorgensen@encompass-safeguarding.com

AISL 还受益于由学校的保障负责人、副保障负责人和集团教育总监共同构成的保障网络。该小组的作用是：

- 交流和检讨政策和程序

- 评估和审查保障实践
  - 这包括由DSL开展的年度内部审查
  - 三年为一周期的外部客观审查
- 制定包含与年度审查相关的运营实践和战略发展的行动计划
- 确定与保障相关的专业学习
  - 确保所有员工都接受过适当级别的培训，并且备有记录证实
  - 创建同侪支持、培训渠道及机会

17.7 记录保存

妥善保管的记录对于良好的保障惯例至关重要。AISL 很清楚有必要记录对我们学校中一个或多个学生的任何担忧，此类记录的状态和机密性。

应清晰记录所有保障问题、讨论和决定，包括做出这些决定的理由。

任何学校社区的成员（包括父母和照料者），如果收到披露虐待或注意到虐待迹象或指示的信息，则必须尽快准确记录，并说出所见。并提供完整的日期、时间和位置。如有疑问，请报告。所有记录均已签名并包括要采取的措施。

这些注意事项要么以纸质形式保存（存储在用密码锁锁定的防火保险箱中），要么使用 CPOMS 或 MyConcern 等软件以机密数字格式保存，并与其他文件分开。同样，应保留任何因保障原因而受到监视的学生的笔记（包括正在进行的案例研究、事件审查和外部监督）。

在儿童离开学校的情况下，我们确保将其保障档案尽快转移到他们的新学校。我们确保将这些记录与主要学生档案分开发送，以确保获得安全的过境和收据确认。

17.8 我们如何保护青少年安全

在 AISL 学校中，我们通过以下方式确保青少年的安全：

- 对所有员工采用严格的招聘程序，以检查他们是否适合与儿童一起工作

- 提高对保护和装备儿童的技能的意识，以确保他们的安全
- 培训所有员工的保障意识，融入线上安全（包括了解有关过滤和监控互联网和网络使用的期望和适用角色和职责）
- 确保所有员工均已阅读并理解*《保障政策》(HS19)*
- 确保所有员工都知道儿童虐待、忽视和剥削的指标
- 确保所有员工都知道如何应对虐待、忽视和剥削的疑虑和披露
- 建立一个安全的环境，使儿童可以学习和发展
- 采用与保障相关的最佳实践
- 为所有员工、志愿者和访客建立明确定义的程序和行为准则
- 制定和实施有效的社交媒体、人工智能和电子安全政策以及相关程序
- 通过监督、支持和培训对所有员工和承包商进行有效管理
- 与学生、父母、供应商之外的员工、实习生、志愿者和访客共享有关保障和最佳实践的信息
- 与需要了解情况的机构分享顾虑，并适当让父母和学生参与。注意：数据保护条例并不阻止为保护儿童免受潜在或实际伤害而共享信息。
- 当有未决保障事件的学生转到另一所学校时，学校有道德义务通知或尝试通知该学校他们应该注意此问题。学校必须检查其运营所在国家/地区的法律要求，以确保行动完全合规。如果法律立场不明确，学校应拨打电话而不是移交文件。如果存在任何保障问题，最好拨打电话，并在学生档案中记录拨打电话的事实、拨打电话的日期和时间、拨打电话的对象、他们在学校的职位以及通讯的性质。如果法律允许信息移交，预计会在学生转入新学校的 5 天内进行移交。
- 确保所有员工都意识到保障问题可能表现为儿童虐待儿童。这很可能包括但不限于：
  - 欺凌（包括网络欺凌）
  - 身体虐待，例如打、踢、摇晃、咬、拉头发或其他不当接触
  - 社交排斥/孤立他人
  - 造成身体伤害
  - 性暴力和性骚扰
  - 色情短信（也称为青少年制作的色情图片）
  - AI - 制作和/或传播由人工智能生成的露骨“深度伪造”图像。
  - 入会/戏弄类型的暴力和仪式

《确保儿童安全接受教育》（2026 年）

- 确保员工了解与保障学生相关的政策和实践，包括学校的：
  - 《员工行为准则》
  - 《员工手册》
  - 《反欺凌政策》
  - 《安全招聘政策》
  - 《贴身照料政策》
  - 《数字安全指南和 AI/在线安全政策》（包括了解通过学校网络过滤和监控数字使用、互联网接入（包括 4G/5G 使用）以及学生对设备的使用，包括涉及由“4Cs”构成的在线威胁：内容、联系、行为和商业。
  - 教育旅行政策和所有活动和教育访问的风险评估

1.8.1 早期干预

我们致力于在问题出现时立即提供帮助和支持，以满足儿童的需求。早期干预确保制度到位，以：

- 评估并识别保障问题的早期迹象
- 记录和跟踪低级别问题
- 根据以上数据实施早期干预

这意味着使用 CPOMS/Myconcern 进行适当的记录并评估性地使用数据。利用评估福祉水平和干预效果的系统（例如 Pulse）作为补充手段对于问题的早期识别至关重要。DSL 有必要确保保障团队得到适当的培训，并有责任跟踪和报告早期问题，以便实施干预措施。

为了帮助确保早期识别和干预，有必要将《保障政策》（HS19）与其他互补的政策和实践结合起来，包括但不限于：

- 《HS20 反欺凌政策》，例如监测欺凌事件
- 《HS21 个人、社交、情感与健康教育政策》
- 《HS23a 特殊教育需求和残障政策 》
- 《HS25 处分与行为管理政策》，例如跟踪行为趋势

- 《HS32 学生自带科技产品政策》
- 《HS41 举报政策》

需要注意的是，有特殊教育需要或残障（SEND） 的儿童更容易受到保障风险的影响。

1.8.2 增强意识并培养学生防止虐待的能力

一般认为，由于每天与学生接触，学校员工可以很好地观察到虐待的外在迹象，所有员工和校董都可以发挥充分、积极的作用，保护我们的学生免受伤害。因此，学校将：

- 强调向学生提供早期帮助的重要性，以便在问题出现时立即提供支持，防止问题升级。此外，人们认识到学生可能会面临诸多导致他们需要支持的挑战，要确保员工知晓这些挑战，包括：压力、同伴压力、身体形象问题、焦虑和人际关系问题
- 确保儿童知道学校里有成年人，如果有烦恼，可以寻求他们的帮助
- 在课程和学校生活中为儿童提供机会，培养他们识别和防止虐待（包括网络虐待）所需的技能
- 成立“个人和社会的健康教育（PSHE）”或道德教育计划，传授语言、知识和技能，以支持儿童避免虐待
- 提高所有员工对保障和促进儿童福利的必要性以及他们在识别和报告可能的虐待事件方面的责任的认识
- 确保每位员工（包括临时员工、供应员工、实习教师和志愿者）和治理机构都知晓负责儿童保障的指定的保障负责人（DSL）及其副手的姓名和角色。
- 指定的保障负责人及其副手的姓名将张贴在校内和学校网站上的醒目位置，并附声明，解释学校在移交和监督涉嫌虐待和指控事件中的作用

17.9 关键联系人

我们校园中的所有成年人都参与保障儿童的安全。

责任不仅限于教师，也不限于保障团队。但是，作为当地保障政策的附录，学校将在每所学校内部制作和发布“保障负责人”的详细信息 – 这些细节将在每所学校中公开显示。

18 识别虐待 – 员工应注意什么

18.1 保持警惕的重要性

所有员工都应意识到虐待和忽视的迹象，以便能够确定儿童可能需要帮助或保护的情况。

建议所有员工在保障方面保持“在这里可能发生”的态度。

18.2 虐待和忽视的类型

虐待; 不妥当对待儿童的一种形式。有人可能通过造成伤害或没有采取预防伤害的方式虐待或忽视儿童。他们可能会被一个或多个成年人或另一名儿童或多个儿童虐待。儿童可能容易遭受多重伤害，包括（但不限于）性剥削、犯罪剥削和严重的青少年暴力。

身体虐待； 一种可能涉及的虐待形式； 殴打、摇晃、投掷、中毒、燃烧或烫伤、溺水、窒息或对儿童造成身体伤害。当父母或照料者捏造儿童疾病的症状或故意诱发儿童疾病时，也可能造成人身伤害。这也延伸到持续的儿童虐待儿童。

情感虐待； 对儿童的持续性情感虐待，例如对儿童的情感发展和心理健康造成严重和不利影响：

- 这可能涉及向儿童传达他们仅在满足另一个人的需要的情况下就毫无价值或不被爱，不适当或有价值的情况。

- 这可能包括不给儿童机会表达他们的观点，故意使他们沉默或“取笑”他们的言论或交流方式。
- 它可能具有年龄或对儿童强加的不适当的期望。这些可能包括超出儿童发展能力的互动，以及过度保护和限制探索与学习，或阻止儿童参与正常的社交互动。
- 这可能涉及看到、听到和/或经历他人的虐待（例如目击家庭暴力）。它可能涉及严重的欺凌（包括网络欺凌），导致儿童经常感到受惊或处于危险之中，或者对儿童的剥削或腐败。
- 对儿童的所有形式的虐待都涉及某种程度的情感虐待，尽管这种虐待可能单独发生。

《确保儿童安全接受教育 2022》指南新增了有关儿童心理健康的内容，要求教职员工关注心理健康问题何时可能演变为一项保障风险因素。学校认识到，心理健康问题可能导致自我伤害及自杀意念。AISL 哈罗学校必须为学生提供专业心理健康服务的获取渠道，通常包括由校内专职心理辅导员及医务人员提供相关支持。在促进学生心理健康方面，全体教职员工应当：

- 促进学生良好的心理健康，预防心理疾病的发生。
- 密切关注学生，及早识别正在经历心理健康问题或有相关风险的学生。
- 确保提供有针对性的早期支持。
- 与学校相关专业人员及关怀辅导负责人协作，共同制定学生支持方案。

性虐待：涉及强迫或诱使儿童或青少年参加性活动，不一定涉及高水平的暴力行为，无论儿童是否意识到正在发生的事情。大多数性侵害行为都是由受害者认识的人实施的。 这些侵害可能涉及：

- 身体接触，包括通过插入性（例如强奸或口交）或非插入性行为，例如手淫、接吻、摩擦和接触衣服外部。
- 还可能包括非接触式活动，例如让儿童参与观看或制作性影像、观看性活动、鼓励儿童以不适当的性行为举止或诱导操控儿童以备虐待（包括线上或远程接触）。

- 性虐待不仅是成年男性所为。女性和其他儿童也可能实施性虐待。
- 涉及上述前两点的儿童对儿童的性虐待。

忽视：持续未能满足儿童的基本生理和/或心理需要，可能会严重损害儿童的健康或发育。

- 怀孕期间母亲的疏忽。
- 儿童出生后，父母或照料者的疏忽可能导致他们未能：提供足够的食物、衣服和住所（包括被排除在家中或被遗弃）； 保障儿童免受身心伤害或危险； 确保充分的监督（包括使用不适当的照料者）； 或确保获得适当的医疗护理或治疗。
- 它还可能包括对儿童的基本情感需求的忽视或不回应。
- 这可能包括未能提供适当的成人监护，例如将孩子长时间留在家中无人看管。

通常，虐待只被视为成年人对儿童的一种行为，但重要的是要认识到虐待同样可能发生在学生群体内、同龄人之间或不同年龄的学生之间。对这类虐待行为的警惕与警惕成人虐待儿童的行为同样重要，报告的方式也是一样的。

重要的是，员工要意识到家庭虐待可以包含一系列行为，它可能是单一事件或是存在某种模式的一连串事件。这种虐待可以是但不限于心理、身体、性、经济或情感虐待。儿童可能成为家庭虐待的受害者。他们可能会在家中看到、听到或体验虐待的影响和/或在自己的亲密关系中遭受家庭虐待（青少年关系虐待）。所有这些都可能对他们的健康、福祉、发展和学习能力产生长期的不利影响。

有关可能的虐待指标的更多信息，请参见*附录 2*。

19 披露或报告的处理程序

19.1 除了指定的职责外，所有员工的职责不是调查或核实情况，而是报告问题或披露情况，并启动为儿童寻求帮助的过程。

第 1 步

您对儿童的健康有所关注，具体取决于：

a) 儿童或其他儿童或成人告诉您的事情；
b) 您注意到的儿童的行为、健康或外表；
c) 其他儿童或成人说过的话或做过的事。

即使您认为您所担心的问题并不严重，但 DSL 可能会掌握更多的信息，这些信息与您所了解的情况结合起来，会拼凑出对儿童更严重的担忧。如何应对关切绝不是您一个人的决定，但分享关切永远是你的责任，无论多么微小。

第 2 步

DSL 将决定你是否需要通过询问儿童/青少年或其家长来澄清你所关心的问题，请谨慎使用开放式问题：
…开头是诸如“如何”、“为什么”、“在哪里”、“何时”、“谁”之类的词。

第 3 步

如果您听到了有关虐待的披露，或者您正在与儿童/青少年/父母谈论您的担忧，请让他们知道您下一步打算做什么。不要承诺对他/她告诉您的内容保密。

例如，“我担心你的伤痕，我需要告诉史密斯太太，以便她可以帮助我们考虑如何确保你的安全。”

第 4 步

事件发生后，请使用*《关切记录表》（附录 3）*尽快进行书面记录，请注意：

a) 儿童的名字
b) 日期、时间和地点
c) 还有谁在场
d) 说了什么/发生了什么/您注意到了…言语、行为、情绪、绘画、游戏或外表/伤痕。如果儿童或父母讲话，请记录他们的话，而不是您的解释

e) 分析您观察到的情况以及为什么会引起关注

第 5 步

尽快将填写好的*《关切记录表》（附录 3）*交给 DSL，确保将其上交，而不是复印或以电子方式储存。

DSL 将决定进一步采取适当措施，并与儿童/青少年周围的其他专业人员以及家人（如果适用）保持密切联系。

20 专业机密

20.1 所有与儿童一起工作的人员都需要讨论并充分理解保密问题，尤其是在保障方面。

20.2 在这方面，保密的唯一目的是让儿童受益。教职员工绝不能向学生保证保密，也不应同意学生保守秘密。如果存在保障问题，则必须向指定的保障负责人报告。

20.3 仅在必需了解的情况下，才会将有关个别事件的相关信息告知员工。与员工以这种方式共享的任何信息都必须保密。

21 针对员工的指控

21.1 虐待的指控可以由儿童提出，也可以由其他有关成年人提出。员工有义务配合调查。

21.2 对教职员工或志愿人员的行为的任何担忧，或对教职员工的虐待指控，必须立即报告给 DSL 或校长（前者无法履行职能时），他们将采取必要的行动。针对高层领导或 DSL 的指控应直接向校长提出。针对校长的指控应向首席教育官提出。

21.3 任何虐待指控均将以公平、一致的方式处理，为儿童提供有效保护，同时支持被指控的人。在调查或考虑指控时，学校将竭尽全力维护机密并防止不必要的宣传。

21.4 针对员工的恶意指控将由校长和（如果适当）校董委员会进行调查和处理。

指控结果

指控调查的结果通常应确定为以下之一：

<table>
<tr><th>结果类型</th><th>定义</th><th>调查后续行动</th><th>记录</th></tr>
<tr><td>成立</td><td>有足够的证据证明指控。</td><td>与人力资源和/或其他专业人士讨论移交至英国披露与禁止服务局(DBS)/ 英国教学监管局（TRA）和/或纪律听证会。</td><td rowspan="3">对指控进行清晰全面的总结，详细说明指控是如何跟进和解决的，并记录所采取的任何行动和做出的决定。记录保存在被指控者的机密人事档案中，并向当事人提供副本。
记录应至少保留至被指控者达到正常退休年龄，或自指控之日起 10 年（如果更长）。</td></tr>
<tr><td>虚假</td><td>有足够的证据反驳指控。</td><td rowspan="3">如果发现指控是虚假的、未经证实的或恶意的，则该信息不应包含在任何参考资料中。</td></tr>
<tr><td>不成立</td><td>这与虚假指控不同。 这意味着没有足够的证据证明或反驳指控。因此，该术语并不表示有罪或无罪。</td></tr>
<tr><td>恶意</td><td>有足够的证据反驳指控，并存在蓄意欺骗的行为。</td><td>被认定为恶意的指控细节应从人事记录中删除。</td></tr>
</table>

此外，在与人力资源/顾问商议后，学校可能希望使用另一种结果类型（没有根据）。

***没有根据**：没有证据或适当的依据可以支持这一指控。它还可能表明提出指控的人曲解了事件或误解了所见。或者，他们可能没有意识到所有情况。

22 对同事的疑虑：怎么办

22.1 报告渠道

如果某位员工对另一位员工或志愿者存有疑虑，应将其转给校長。

如果对高级员工有疑虑，应转交给校长。

如果对校長有疑虑，应将其交给校董会和指定的保障校董。对高级管理人员或校長的任何关注或指控，将在不通知有关个人的情况下予以报告。

任何人都不应感到自己无法大声说出来，并让他们对与学校儿童安全有关的任何事情有所关注。向提出此类问题的个人保证，他们不必担心由于提出此类问题而带来的任何有害后果。在他们有顾虑时大声疾呼是他们的绝对权利，甚至是他们的义务。

22.2 指控类型

根据英国《确保儿童安全接受教育》法定指南，在确定指控调查的结果时应使用以下定义：

a) 成立：有足够的可识别证据证明指控；
b) 虚假：有足够的证据反驳指控；
c) 恶意：有明确的证据证明存在蓄意欺骗的行为，而且指控完全是虚假的；
d) 没有根据：没有证据或适当的依据可以支持这一指控。它还可能表明提出指控的人曲解了事件或误解了所见。或者，他们可能没有意识到所有情况；
e) 不成立：这与虚假指控不同。这意味着没有足够的证据证明或反驳指控。因此，该术语并不表示有罪或无罪。

以下内容由《国际学校教育工作者和其他成人虐待儿童指控管理》提供。该文件伴随本政策并为以下内容提供支持。

除校长或校董以外的员工被指控涉嫌下列任一行为，须立即向 DSL 报告：

- 做出伤害学生或可能伤害学生的行为
- 可能犯下侵害某学生或与某学生有关的刑事罪行
- 对一个或多个儿童的行为构成其可能对学生造成伤害的风险

DSL 无法履行职能时，须将指控上报至高层领导团队中的保障负责人或直接报告至校长。随后，校长将通知保障校董。DSL 有责任在收到移交后采取后续保障步骤。员工在报告任何有关儿童的疑虑后，必须确信将获得支持。员工须确保任何关于保障情况的书面报告都以儿童为中心、符合儿童的最大利益、植根于儿童发展并且有证可依。在校长的指导下，DSL 可成立响应小组，其成员构成根据指控的性质而定。响应小组所做的决定应尽可能得到儿童及其家人的同意。具有明确时间表的、清晰的评估过程以及任何变化对儿童福利产生的影响须记录在案。报告任何保障问题时须遵守沟通渠道，做到保密。若任何员工有理由相信学生正面临直接或重大伤害风险，须不再顾及保密义务，而是有义务立即将此信息传达至 DSL。

众所周知，评估风险并采取措施减轻这些风险有助于促进学生福利和保障。风险评估可能涉及整个学校、学校存在危险的特定学段或区域，或者涉及个别学生或教职员工。必须保留风险评估记录。

如果对员工提出的指控涉及到校长，指控接收者须立即通知保障校董，后者将按上述方式进行协商，而无需先通知校长。

任何被认为不适合与儿童一起工作的员工的姓名将在集团人力资源总监的建议和支持下根据 DBS 的移交政策转交至 DBS、TRA、ICPC 以及其他相关组织。

有时，员工可能会遇到他们知道会影响其专业能力的个人困难。员工有责任与直线经理讨论此类情况，以便为其提供专业和个人支持。虽然在大多数情况下此类报告是保密的，但如果个人困难引起有关学校学生福利或安全的担忧，则无法保证这一点。

23 豁免和发声程序

23.1 担心同事行为的员工可能会担心自己误解了情况，并且会怀疑报告是否会危害同事的职业。所有员工都必须记住，儿童的福利至关重要。该程序使员工能够自信地提出关注或指控，并进行敏感的询问。

23.2 AISL 认识到，其员工通常是第一个怀疑或意识到某事不对劲的人，因此完全致力于以负责任和专业的方式处理他们对保障儿童的真正关注。AISL 还意识到，出于多种原因，员工经常感到不愿提出此类担忧。这就是为什么 AISL 学校将始终支持所有“大声疾呼”他们所关心的问题的员工的原因。

23.3 要进行披露，您只需要诚实行事，例如 诚实地相信您提出的关注。AISL 学校通过其政策和做法，积极鼓励您利用学校公认的举报渠道（通过学校的保障官员或直接联系校长）在内部提出疑虑。您的顾虑将得到最严格的保证。AISL 和学校将确保及时、有效地调查您的疑虑，并在可能的情况下告知您结果。如果疑虑与校长有关，则应直接向校董会主席和/或保障校董提出。

23.4 学校不会对任何举报后来被判定为错误的虐待行为的学校雇员承担责任或不承担任何责任，除非可以证明该人故意捏造了该报告。

24 保障和物理环境

24.1 所有 AISL 学校都必须是所有学生的安全场所。我们的健康与安全政策中概述了实现这一目标的方法。另请注意以下要点，这些要点与儿童安全特别相关：

24.2 门应有透明的玻璃窗。任何薄膜或百叶窗都必须允许房间外的人看见

24.3 卫生间与更衣室的使用：有成人、访客和员工卫生间，并有明显的标识。成人不得使用与学生相同的卫生间。在必须进入学生专用卫生间的情况下，如处理行为或健康和安全问题，请将门打开，并宣布您进入卫生间的原因，以警告其他使用卫生间的学生。在这种情况下，尽可能避免单独行动。我们知道，对于年幼的儿童，员工将协助儿童上厕所和提供贴身照料。在这种情况下，请参阅《贴身照料政策》(HS26b)。学校必须明确禁止学生进入指定供异性生理性别使用的厕所或更衣室。在可能的情况下，学校应为正在探索自身性别的学生提供独立的封闭式卫生间和更衣空间。对于正在探索自身性别的学生单独使用设施的情况，应进行适当记录、妥善沟通，并定期审查。正在探索自身性别的学生不得使用指定供异性生理性别使用的厕所或更衣设施。

24.4 11 岁及以上学生必须使用独立的单性别更衣空间；从 8 岁起，学生必须使用按生理性别指定的厕所。

24.5 如果教职员工与学生在房间内进行一对一的交流（如寄宿、探险或旅行等），则应确保房门保持敞开，或在可能和适当的情况下移动至更公共的空间

24.6 请注意，所有 AISL 哈罗学校均应确保任何时候都处于无手机环境（寄宿宿舍内在受控情况下使用手机除外）。学校的移动设备政策及相关流程应明确所有利益相关方应遵守的要求。

24.7 寄宿及住宿旅行：任何情况下，学生均不得与异性学生共用过夜住宿。

25 支持正在探索自身性别的学生

学校在支持提出（可能进行）社会性别转换的学生或家长时，应遵循以下指导原则：

25.1 学校应投入时间充分了解儿童的想法和感受，并以专业的态度关注儿童的经历及其可能面临的脆弱性。

25.2 必须考虑家长/照顾者的意见，但首要考虑因素必须是儿童的最大利益。

25.3 在适当情况下，应考虑专家及专业人士提供的指导和建议。

25.4 政策和流程应保持灵活性，并能够轻松调整，同时以保障儿童安全和公平为正当目标，避免建立在性别刻板印象基础上的流程。

如果学生向教职员工透露其可能正在探索自身性别、已经在探索自身性别或正在考虑进行社会性别转换，但不希望采取任何行动，则学校没有强制要求必须将该信息告知家长。

26 安全招聘

26.1 安全地招聘 AISL 学校所有员工是维护和促进教育中儿童福利的第一步。《HS47 招聘政策》规定了在 AISL 哈罗学校实施的程序和做法。我们更安全的招聘流程旨在：

a. 通过制定高标准的实践和招聘来威慑潜在的滥用者。
b. 在申请和面试阶段拒绝不适当的候选人。
c. 通过制定有力的政策并就安全做法达成共识，防止虐待儿童。

26.2 实现我们的目标

我们确保每个招聘小组中至少有一名员工接受过安全招聘培训，并确保：

a) 学校已收到并检查了来自教师原籍国和以前工作国的最新警察记录（ICPC/DBS 或当地同等机构开具）
b) 定期重新开具警方背景审查（通常是续签合同时）
c) 至少有两个适当的专业推荐人，其中一个必须来自候选人的当前或最近的校长/雇主。 对所有员工的推荐人进行电话核实，并将结果记录在单一中央登记册（SCR）上。此类核实可以再次确认候选人适合从事与儿童相关的工作。
d) 对选定的候选人进行数字筛选，以确保他们适合该职位。候选人应提前了解这一保障程序

e) 通过 COBIS 向教学监管局（Teaching Regulation Agency）核查是否存在禁止、指令、处罚或限制的情况。
f) 在申请流程中包含自我声明环节
g) 对新员工的文件及其身份进行真实性验证
h) 所有新员工都阅读并签署了*《保障政策》(HS19)*和《行为准则》
i) 员工入职时提供保障方面的培训（如有需要，使用当地语言），并每年一次正式更新此培训

26.3 对承包商的最低保障要求

对于所有承包商，我们希望至少做到以下几点：

a) 提供的上岗培训涵盖保障方面的内容；
b) 在承包商员工开始在校园内工作之前，需提供书面确认，证明已对所有员工进行了所需的背景调查和身份核查；
c) 运营团队的指定高级成员（或在其他学校结构中，校长）确保通过定期会议与相关管理人员共享 DSL 信息；
d) 承包商阅读、填写并签署 DSL 自我声明表；
e) 对在现场工作超过 6 天的工作人员进行无犯罪记录调查；
f) 与承包商共享《行为准则》，并保留承包商阅读并理解《行为准则》的记录；
g) 工具箱讲座-每天提醒 CSP 意识。

26.4 对所有在校园内生活的成年人的最低保障要求

对于员工住校的学校：

a) 在入职会议上（新员工入职期间）向所有人提供*《保障政策》(HS19)*和员工《行为准则》；
b) 期望所有居住者遵守*《保障政策》(HS19)*和《行为准则》；
c) 住校成年人阅读、填写并签署 CSP 自我声明表和《住校成年人同意书》；
d) 所有住校成人均需接受背景调查。

27 员工培训

a) 培训应使指定的保障负责人充分了解自己的角色以及其他机构（尤其是儿童的社会照料）的过程、程序和职责。

b) 在保障专责小组的支持下，每所学校的人力资源经理（或在有其他结构的学校中，校长）会保留所有员工保障培训的详细记录，并在需要更新培训时发出提醒。

c) 一个好的做法是在所有员工会议中列入一个保障议程项目。

d) 所有带薪和无薪员工都接受了定期的强制性安全培训（包括如何确保学生在线安全）。这包括校董、高级管理人员、外部供应商、志愿者、实习生和承包商，或任何代表学校工作的人。

e) 新员工在入职过程中进行了保障培训，并且每年进行一次进修培训，以使培训保持最新状态。

f) 此外，指定的员工（DSL 和 DDSL）将每两年进行一次多机构培训，以使其知识和技能保持最新状态。我们的目标是确保这批员工，**以及主要的关怀辅导负责人、高层领导和住校舍监都经过 3 级保障培训**。

g) 《员工职业行为准则》概述了员工期望的行为标准。 期望所有员工都阅读此代码并签名以确认他们已这样做。 所有员工（以及与学生一起工作的所有成人）在开始工作之前均已阅读并同意本政策。

28 自我评估和内部质量控制

为了确保有关保障的文件保持有效和更新，学校将确保：

a) 至少每三年进行一次外部审核，这是我们保障改进行动计划的一部分

b) 每年进行一次内部审核

c) 保障服务将根据《哈罗标准 1.7 保障文化》和相关的《测评指标》进行评估

29 保障预算

29.1 鉴于保障工作的核心重要性，保障工作在学校账户中拥有**自己指定和受保护的预算项目**。 该预算项目包括:

a) 两年期审计的资金;

b) 标牌资金;

c) 存放和办公室杂物的资金。

与保障有关的员工培训费用应在主要持续专业发展（CPD）预算内编列。

30 风险评估

a) 进行风险评估对促进安全具有良好的效果。 这些评估涵盖了学校工作的所有方面，例如房舍和设备、现场活动、场外活动和所使用的场所、校巴的使用以及其他运输方式。

b) 我们的风险评估包括处理儿童保障风险的部分和风险管理计划。

c) 我们的风险评估在与其他合作伙伴和第三方提供商合作时会考虑所有保障事项，例如在探险和游学中。

d) 在适当的情况下，向东道组织/地点的员工提供简短的简报/培训信息，内容涉及儿童保障以及如何报告关注的问题。

e) 风险评估由经理/高级领导签署，而不仅由游学或探险领队签署。

31 实施行动

为了实施和监督本政策，AISL 学校会:

a. 指定一个高级领导担任 DSL，并为此角色提供适当的培训、支持和时间；以及在适当的情况下，在学校需求的规模和背景下，指定副 DSL ；
b. DSL 或至少一名副 DSL 应能流利使用学校所在地的语言；
c. 确保任命的校董在保障工作中发挥领导作用，包括在学校内部倡导保障问题并与校长联系，对保障措施和所有相关政策进行概述，并按照日程表安排每年与校长一起审核保障措施；
d. 通过培训计划和在现场张贴海报，确保每个教职员工、志愿者、校园使用者、员工和校董都知道负责保障工作的指定保障人员的姓名及其作用；
e. 确保所有员工和志愿者了解自己的责任，即警惕滥用的迹象以及记录任何疑虑并将其转交给指定的负责保障的老师；
f. 通过在学校的各个关键点获得已签署的经认可的访客单和张贴 CS 报告海报的信息，确保所有访客都知道儿童保障期望和报告程序；
g. 确保所有员工接受保障培训，并且对 DSL、DDSL、保障工作组成员以及指定的保障校董每两年进行一次培训；
h. 与有关机构建立有效联系，并根据需要与他们进行有关保障事项的查询合作；
i. 确保将所有儿童福利和保障记录安全地保存在锁定的位置；
j. 确保始终遵循更安全的招聘惯例；
k. 确保按照商定的程序处理对涉及保障方面员工的任何指控，并紧急处理所有这些关切；
l. 通过遵循有关健康、安全和风险评估的学校程序，确保学校建筑物和场所得到适当保护，并清楚记录所有进行的风险评估；
m. 确保具有保障性元素的其他学校政策（例如健康与安全、反欺凌、电子安全、行为、人力资源招聘、寄宿制裁）均与此政策保持一致，并且在适当情况下相互参照这项政策；
n. 进行年度保障审查，并根据年中审查的保障行动计划跟踪进度。校董会将至少每年一次（根据年度审核和审查）收到一份保障报告；
o. 确保所有员工、校董和志愿者收到并签署本政策的副本；
p. 确保父母通过定期举办的研讨会从学校获得有关学校和教职员工的安全保障责任的信息；
q. 为学生提供适合年龄的教育和保障培训；
r. 确保第三方对学校校园和设施的任何使用都符合学校对保障实践的期望。

32 保障服务的联系信息

a) 每所学校将维护一个有关当地儿童保障机构和支持服务的数据库。这些服务的详细信息将提供给保障团队。

b) AISL 学校将通过与代理机构每两年进行一次私人联系来努力保持这些链接的新鲜度。这样可以确保，即使发生了最糟糕的情况，学校也可以通过必要的联系充分利用我们提供的服务。

附录 1：术语定义

本政策中使用的“所有员工”一词包括但不限于：

18. 教师（包括代课教师）
19. 助教
20. 行政人员
21. 运营人员
22. 助理
23. 宿舍员工
24. 高级管理人员
25. 校董
26. 在学校工作的所有带薪人员
27. 外部活动提供者
28. 教练
29. 志愿者
30. 实习生
31. 承包商/外包员工
32. 顾问
33. 演讲嘉宾

34. 派遣专业人员进行现场培训

本政策中使用的“居住者和员工”一词包括但不限于：

4. 居住在校内员工宿舍或寄宿院舍的教职员工的家庭成员（非学校雇员）；“成人”指18岁及以上的人。
5. 获准居住在校内员工宿舍或寄宿院舍的教职工长期访客或来访者，例如，停留较长时间（超过6天）；
6. 居住者雇用的定期在校园内的员工宿舍或寄宿宿舍中工作的任何人， 例如，保姆和女佣。

学校必须与适当的机构合作，调查在学校工作或参与学校事务的成年人**是否表现出或可能表现出不适合与儿童一起工作/接触儿童的行为**。

附录 2：虐待指标

需要注意什么以及何时需要关注?

所有员工都应了解虐待和忽视的类型和迹象，以便他们能够识别可能需要帮助或保护的学生。员工不确定时，应始终与 DSL保持联系。虐待儿童是一种粗暴对待儿童的形式。有人可能通过造成伤害或不采取防止伤害的行动来虐待或忽视儿童。儿童可能在家庭或机构或社区环境中被他们认识的人虐待，或者更罕见的是被其他人虐待。虐待可以完全在线上发生，或者可以使用技术来助长线下虐待。学生可能会被一个或多个成年人或一个或多个儿童虐待。

员工应了解常见的四种主要虐童类别，尽管各类别之间可能存在交叉：

- 身体虐待：一种可能涉及殴打、摇晃、投掷、中毒、燃烧或烫伤、溺水、窒息或对儿童造成身体伤害（如向儿童提供酒精或药物以及对儿童实施体罚）的虐待形式。当父母或照料者捏造儿童疾病的症状或故意诱发儿童疾病时，也可能造成人身伤害。
- 情感虐待：对儿童的持续情感虐待，例如对儿童的情感发展造成严重和不利的影响。这可能涉及告诉儿童他们一文不值或不被爱、不够好或仅在满足他人需要时才有价值。这可能包括不给儿童机会表达他们的观点，故意让他们沉默或“取笑”他们的言论或交流方式。这可能具有强加给儿童与其年龄或发育不符的期望的特征。这些可能包括超出儿童发展能力的互动，以及过度保护和限制儿童探索和学习，或阻止儿童参与正常的社交互动。这可能涉及看到或听到他人被虐待。这可能涉及严重的欺凌（包括网络欺凌），导致儿童经常感到受惊或处于危险之中，或者对儿童的剥削或腐败。对儿童的所有形式的虐待都涉及某种程度的情感虐待，尽管这种虐待可能单独发生。
- 性虐待：涉及强迫或诱使儿童或青少年参加性活动，不一定涉及高水平的暴力行为，无论儿童是否意识到正在发生的事情。这些活动可能涉及：身体接触，包括通过插入性（例如强奸或口交）或非插入性行为，例如手淫、接吻、摩擦和接触衣服外部。还可能包括非接触式活动，例如让儿童参与观看或制作性影像，观看性活动，鼓励儿童以不适当的性行为举止或诱导操控儿童以备虐待。性虐待可能在线上发生，技术可能被用来助长线下虐待。性虐待不仅是成年男性所为。女性和其他儿童也可能实施性虐待。
- 忽视：持续未能满足儿童的基本生理和/或心理需要，可能会严重损害儿童的健康或发育。忽视可能是怀孕期间母亲的疏忽。儿童出生后，父母或照料者的疏忽可能导致他们未能：

提供足够的食物、衣服和住所（包括被排除在家中或被遗弃）；保障儿童免受身心伤害或危险；确保充分的监督（包括使用不适当的照料者）和不将儿童单独留在家；或确保获得适当的医疗护理或治疗。它还可能包括对儿童的基本情感需求的忽视或不回应。

注意事项:

身体虐待的可能指标	**情感虐待的可能指标**
10 身体任何部位的原因不明的瘀伤 11 不同年龄的瘀伤（各种颜色） 12 反映所用物品（电线、皮带、带扣、乒乓球拍、手）形状的伤害 13 缺席或休假后经常出现的伤害 14 不明原因的烧伤，尤其是脚底、手掌、背部或臀部的烧伤 15 以电炉、铁或香烟的图案燃烧 16 手臂、腿、脖子或躯干上的绳索勒伤 17 与儿童提供的信息不一致的伤害 18 具有明显边界线的灼伤 19 无法解释的撕裂，擦伤或骨折	20 情感虐待会导致儿童改变其行为方式 21 他们可能不在乎自己的行为或所发生的事情，这也被称为负面冲动行为 22 或者，他们可能试图使人们不喜欢他们，这被称为自我孤立行为 23 遭受情感虐待的儿童可能会产生冒险行为，例如偷窃、欺凌和逃跑 24 自残或进食障碍 25 可能缺乏社交能力 26 远离父母
性虐待的可能指标	**可能的疏忽指标**
27 不适合年龄的性知识、行为或使用语言 28 不寻常的人际关系模式 29 儿童患有性病 (不论年龄段) 30 口腔、生殖器或肛门部位受到外伤或流血的证据 31 行走或坐姿困难 32 拒绝换衣服，担心上厕所 33 儿童离家出走，没有提出任何具体投诉 34 不想和一个人在一起 35 怀孕 (尤其是年轻怀孕) 36 极端保护的育儿方式 37 接触色情	38 儿童未有梳洗或饥饿 39 父母对儿童的学习成绩不感兴趣 40 父母不回应学校的反复沟通 41 儿童不想回家 42 父母或法定监护人都不在 43 紧急情况下无法与父母取得联系

严重欺凌是一种虐待形式，因此如果有合理理由怀疑儿童正在遭受或可能遭受重大伤害，则将被视为儿童保护问题处理。

员工应注意的其它形式的虐待包括：

- 儿童失学
- 儿童性剥削
- 儿童犯罪行剥削
- 家庭虐待
- 以名誉为由的暴力、切割女性生殖器官（FGM）、强迫婚姻和熨胸
- 极端化
- 有家人在监狱里的儿童
- 儿童之间的虐待
- 性暴力和性骚扰

这些可能表现为：

1. **儿童失学**；儿童失学可能是虐待或忽视的潜在指标。员工和社区成员（包括父母和照料者）应报告任何引起保障官员或 DSL 担心的学生出勤率低或缺勤的情况，尤其是屡次和/或长时间发生，以帮助确定虐待和忽视的风险，包括性剥削，以及帮助防止将来儿童失踪的风险。
2. **儿童性剥削（CSE）**；这涉及剥削性的情况、环境和人际关系，青少年通过从事性活动而得到一些东西（例如食物、住宿、毒品、酒精、礼物、金钱或仅仅是感情）。性剥削有多种形式，从看似“自愿”的关系到团伙和团体的严重有组织犯罪。犯罪者总是对受害者拥有某种权力，这种权力随着剥削关系的发展而增加。性剥削涉及不同程度的胁迫、恐吓或诱惑，包括来自同龄人的不必要性压力，进行性欺凌，包括网络欺凌和性诱导。但是，同样重要的是要认识到，一些遭受性剥削的青少年没有表现出这种虐待的任何外部迹象。
3. **切割女性生殖器官（FGM）**；这包括所有涉及部分或全部切除外部女性生殖器或女性生殖器官其他损伤的程序。AISL 遵循英国在这方面的建议：必须报告涉及任何 18 岁以下女性的 FGM 披露。
4. **极端化**；这是指一个人支持恐怖主义和极端主义形式的过程。没有唯一的方法来识别可能容易受到极端主义意识形态影响的个人。可能导致脆弱性的特定背景因素通常与诸如家人，朋友或在线等特定影响因素结合在一起，并且极端主义或恐怖组织似乎可以提供答案的特

定需求。与管理其他保障风险一样，员工应警惕儿童行为的变化，这可能表明他们可能需要帮助或保护。

5. **强迫婚姻/绑架**；在某些文化中，强迫婚姻仍然被认为是可以接受的。任何认为儿童有遭受这种特定形式虐待风险的员工，应立即将其报告给保障小组的成员。

虐待迹象

虐待可能包括（但不限于）以下迹象，存在以下迹象也不一定意味着正在发生虐待：

- 学生透露自己遭到虐待，或提出了导致该推断的问题
- 学生受伤，无法得到合理或一致的解释，或者在类型或位置上不寻常
- 伤害正在显现出一定的模式或频率
- 学生从事极端或具有挑战性的行为，或者学生的行为突然发生变化
- 学生要求放弃由某个教师教授的科目或在成绩或行为方面表现出显着变化，并且似乎不愿讨论原因
- 学生似乎受到了忽视（例如身上脏、饥饿、没有足够的衣服）
- 学生似乎不愿回家或被父母或监护人公开拒绝
- 学生的发展在情感进步方面有所滞后
- 学生在情感上退缩，表现出对成年人缺乏信任
- 学生回避被触摸或因突然的动作而退缩
- 学生体重减轻或增加

您可能会注意到的迹象：

• 回避 • 突然的行为变化 • 焦虑 • 粘人 • 沮丧 • 具有侵略性 • 睡眠问题 • 饮食失调 • 尿床	• 衣服脏 • 冒险 • 旷课/早到 • 饮食习惯改变 • 强迫行为 • 噩梦 • 药物 • 酒精 • 自残 • 有自杀的想法

忽视

仪表/卫生

- 身上臭或脏
- 衣服未洗
- 衣服不够，例如没有冬衣
- 经常饥饿，不吃早饭就上学，或在家中无法获得食物

健康&发展问题

- 受伤后未得到治疗、医疗和牙齿问题
- 因缺乏监督而造成的多次意外伤害
- 反复出现的疾病或感染
- 没有得到适当的药物
- 错过医疗预约，例如接种疫苗
- 肌肉张力差或关节突出
- 皮肤溃疡、皮疹、跳蚤叮咬、疥疮或癣
- 腹部变薄或肿胀
- 贫血
- 疲倦
- 体重或成长缓慢，未达到发育里程碑（称为发育迟缓）
- 语言、沟通或社交能力差

居所

- 生活在不适宜的家庭环境中（例如没有暖气）
- 长期无人照料
- 承担照顾其他家庭成员的角色
- 生活在适宜的家庭环境中，有食物、住所和温暖，但缺乏人际交往、家人的爱和关注（可能由女佣和司机照顾）

情感虐待

情感虐待或忽视通常没有任何明显的身体症状，但您可能会在儿童的行为或情绪中发现迹象。情绪变化是正常的成长现象，因此很难判断儿童是否受到情感虐待。

受到情感虐待或忽视的婴儿和学龄前儿童可能：

- 对陌生人或刚认识的人过分亲昵
- 缺乏信心或变得警惕或焦虑
- 似乎与他们的父母疏远，例如被带到托儿所或从托儿所被接走时
- 对其他儿童和动物具有攻击性或恶意

大一点儿童可能：

- 存在您不希望他们在这个年龄使用的语言、行事的方式或知道的事情
- 难以控制强烈的情绪或发生极端的爆发
- 似乎与父母、家人或朋友隔绝
- 缺乏社交技能或几乎没有朋友
- 对社交媒体、微信等上的帖子显得心烦意乱、忧心忡忡
- 感到自己在网上被欺负或被他人嘲讽

性虐待

远离特定人群

- 他们可能会避免与他人单独相处，例如家人或朋友
- 他们可能看起来害怕某个人或不愿与他们交往

表现出不符合年龄的性行为

- 儿童可能在很小的时候就变得性活跃
- 他们可能滥交
- 他们可能会使用性语言或知道您不希望他们在那个年龄知道的信息

身体症状

- 肛门或阴道酸痛
- 异常分泌物
- 性传播感染 (STI)
- 怀孕

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

倾听学生的声音和做好记录

学校将为学生提供一系列倾诉的机会。如果学生公开自己受到了某种形式的虐待或忽视，教职员工应：

- 立即停止任何其他活动，倾听学生的诉说
- 认真倾听学生的诉说并保持开明 — 不要打断儿童或害怕沉默
- 使用“什么、何时、如何、何地”将问题限制在弄清事实状况所需的最低限度；避免使用诸如“这发生在你的兄弟姐妹身上吗？”之类的引导性问题，这可能会影响调查
- 不得尝试自行调查事件或决定学生是否受到虐待
- 让学生放心，但永远不要承诺不告诉任何人。相反，请向学生解释哪些人必须知情，以确保根据本政策采取适当的行动
- 尽快与 DSL 讨论此对话，除非获得 DSL 或校长的指示，否则不要采取进一步行动
- 仅在需要知道的情况下共享信息
- 如下所述，对谈话进行完整的书面记录

员工必须尽快以书面形式记录有关儿童的所有疑虑、讨论和决定，可以使用 MyConcern 等资源。相关记录必须是对谈话或观察的清晰、准确和真实的描述。如果学生进行了公开，记录必须包括以下详细信息：

- 记录的日期、星期几、时间和地点
- 谁在谁面前说了什么、做了什么
- 儿童使用的任何明显的非语言行为或词语

任何其他证据（例如，潦草的笔记、包含短信的手机、衣服、电脑）都必须妥善保存并尽快转交给 DSL。员工或志愿者不得保留任何副本。注释可以被扫描并上传到 CPOMS/MyConcern 等资源中。

附录 3：《关切记录表》（中文版）

您的姓名（印刷体）：	**您的角色：**
学生姓名： (姓名和昵称)	**班级和年级/院舍：**
事件发生的时间和日期： (如适用）：	**您获知事件/问题的日期：**
尽可能真实地描述事件。 包括涉及的人员、发生的地点、发生的确切情况等。记住要清楚地描述您观察到的任何行为或身体症状。	
您采取了什么行动? 您的签名:	
表格填写的时间和日期:	

此表格应手写。不要创建数字记录。在亲自将报告交给学校所在地区的 DDSL 或 DSL（前者无法履行职能时）之前，请先检查报告。确保此表格清晰易读且使用简明英语。请记住，非哈罗员工可能会阅读此表格。例如，该表格可用作法律诉讼中的证据。

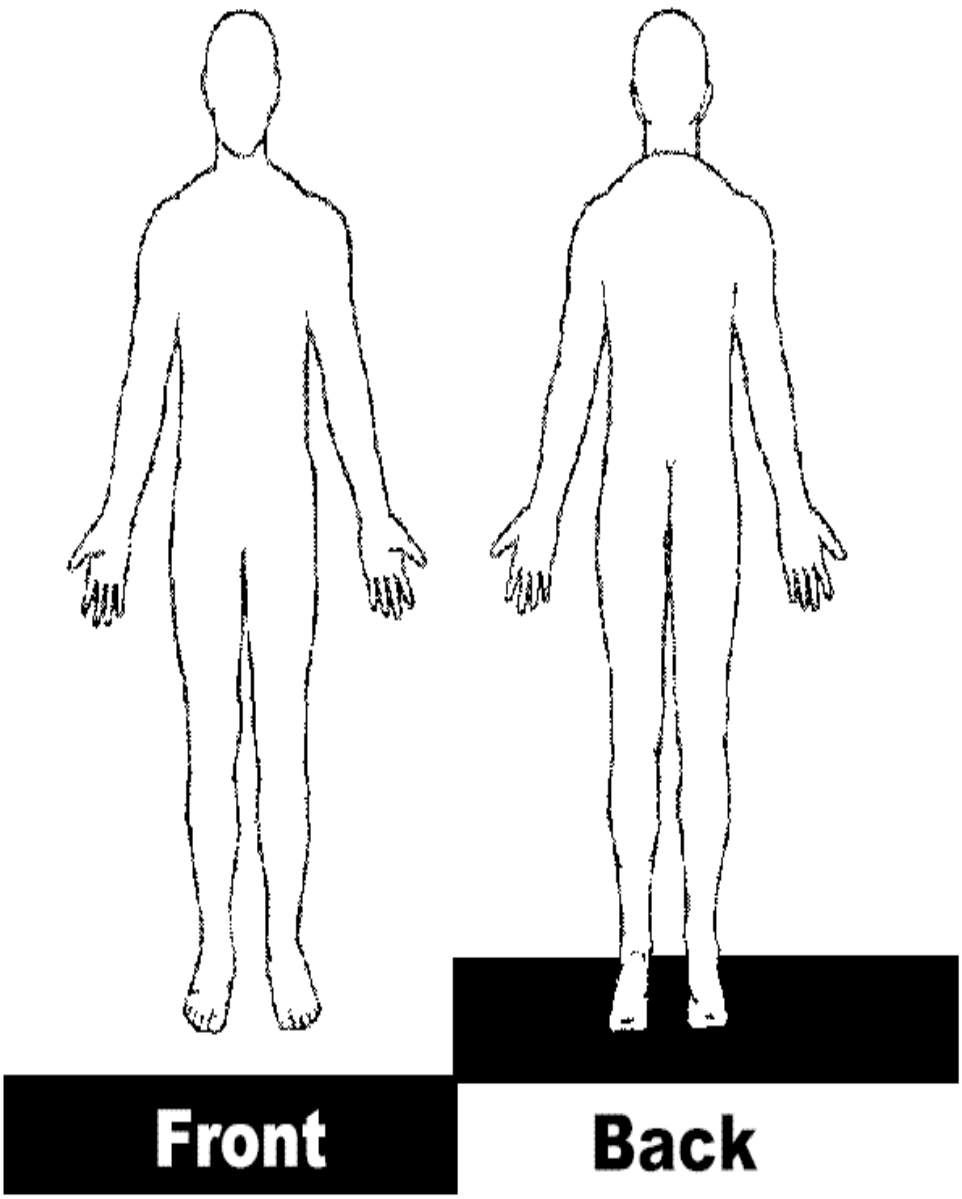
由 DSL 填写

接收人 **日期和时间：**

事件跟进人员建议采取的措施

下图仅在适用于表述的关注点时才需要注释。

此页面的目的是准确定位身体上的身体接触或痕迹/瘀伤/伤口。



附录 4：报告流程图

保障

公开报告流程

你担心学生的福祉

留心有关虐待的表徵，向学生提问其不寻常行为、伤痕或损伤。

学生表示受到虐待或忽视

聆听和相信 - 严谨看待其指控。**支持**学生勇敢面对。告诉他们你的下一步打算。不要承诺保密。

報告

填妥《关切记录表》并**报告**。将完成后的《关切记录表》尽快交予负责儿童保障的人员。

附录 5：处理儿童虐待儿童和指控的安排

大多数学生互相伤害的情况将根据学校的《反欺凌和行为政策》进行处理。但是，所有教职员工都应该意识到，学生对另一个学生的行为可能会引起保障问题；这被称为儿童对儿童的虐待。学生之间可能引起保障问题的行为示例如下：

- 欺凌（包括网络欺凌）
- 身体暴力，例如打、踢、咬或以其他方式造成身体伤害
- 性暴力，例如强奸、插入式性侵或性侵犯
- 性骚扰，例如与性相关的评论、言论、玩笑和网络性骚扰
- 偷拍，这通常涉及在他人不知情的情况下偷拍其裙底
- 青少年制作的性意象（色情短信）
- 制作和传播露骨的人工智能“深度伪造”图像
- 厌女言论以及宣扬针对女性的暴力/歧视行为
- 入会/戏弄类型的暴力和仪式

儿童对儿童的虐待对男孩的表现往往不同于对女孩的表现。例如，女孩似乎更容易遭受性侵犯和/或剥削，而男孩似乎更容易遭受与帮派有关的暴力和严重的青少年暴力。有特殊教育需要或残疾的学生特别容易受到同伴虐待。任何年龄和性别的学生之间都可能发生性暴力和性骚扰。但是，员工应该意识到，某些群体比其他群体面临更大的风险。患有特殊教育需要或残疾的女孩和学生更有可能成为此类虐待的受害者。性暴力包括性侵犯、插入式性侵和强奸等行为。这种行为的一个关键特征是性行为是在未经受害者同意的情况下进行的。只有在个人有选择参与性行为的自由和能力的情况下，才能给予同意。

性骚扰是指“不受欢迎的具有性特征的行为”，它可能在线上和线下发生。性骚扰可能会：侵犯儿童的尊严，和/或使他们感到被恐吓、贬低或羞辱，和/或造成敌对、冒犯或性化的环境。性骚扰有多种形式：

- 与性相关的评论，例如对他人的衣着或外表发表淫秽评论或性言论，使用有性特征的名称等
- 色情“笑话”或嘲弄
- 身体行为，例如故意摩擦他人，拨弄衣物，展示具有性特征的图片、图画或照片

网络骚扰，例如未经同意共享图像和视频、不受欢迎的色情评论和信息、制作“深度伪造”内容，包括在社交媒体上。这种类型的骚扰可能是独立的，也可能是更广泛的性骚扰和/或性暴力模式的一部分。

学校在帮助学生理解什么构成儿童对儿童的虐待以及培养能够降低此类行为发生风险的行为规范方面，发挥着重要作用。。员工还应了解以下方面的重要性：

- 执行明确的规章制度
- 以一致的方式实施《行为政策》
- 明确性暴力或性骚扰是虐待行为，是不可接受的
- 实施学校的反欺凌策略并推广哈罗价值观

其他防止儿童对儿童的虐待的策略包括：

- 提供适合发展的福祉或其他课程，让学生知道哪些行为是可以接受的
- 任何学生均可向教职员工提出疑虑的制度，让他们知道自己会被倾听、相信和重视
- 为那些被认定为可能易受伤害的学生提供自信和安全的针对性工作
- 强有力的监督安排，特别是对于寄宿生

如果出现儿童对儿童的虐待指控，必须尽快通知 DSL。被指控虐待的学生可能会在随后的调查期间被停学，学校的行为和纪律政策将适用。受害者和施暴者都将被视为处于危险之中，并将遵循本政策规定的保障程序。作为这些程序的一部分，DSL 将开展风险评估，该评估将考虑所有相关人员（受害者、施暴者和学校其他学生）的需求以及需要采取的保护和保证他们安全的措施。在编制风险评估时，将适当考虑以下因素：受害者的意愿；指控事件的性质；相关当事人的年龄；该事件是孤立事件还是某种模式的一部分；受害者和施暴者之间的任何权力不对等；对受害者和其他学生的任何持续风险；以及任何相关的背景因素。

附录 6：指导中国儿童保护政策的法律和公约

《中华人民共和国未成年人保护法（2012）》：第五条：

保护未成年人的工作，应当遵循下列原则：（1）尊重未成年人的人格尊严；（2）适应未成年人身心发展的规律和特点；（3）教育与保护相结合。全国人民代表大会常务委员会，中华人民共和国主席令第 65 号《中华人民共和国未成年人保护法（2012）》。

中华人民共和国反家庭暴力法（2015）：

2015 年通过的一项新法律（2016 年 3 月 1 日生效）保护在中国境内的外国人和中国公民免受家庭暴力。其中两个条款对儿童和学校有特定的意义：

第十四条：学校、幼儿园、医疗机构、居民委员会、村民委员会、社会工作服务机构、救助管理机构、福利机构及其员工在工作中发现无民事行为能力人、限制民事行为能力人遭受或者疑似遭受家庭暴力的，应当及时向公安机关报案。公安机关应当对报案人的信息予以保密。

第三十五条：学校、幼儿园、医疗机构、居民委员会、村民委员会、社会工作服务机构、救助管理机构、福利机构及其员工未依照本法第十四条规定向公安机关报案，造成严重后果的，由上级主管部门或者本单位对直接负责的主管人员和其他直接责任人员依法给予处分。全国人民代表大会常务委员会，中华人民共和国主席令 第三十七 号《中华人民共和国反家庭暴力法（2015）》。

附录 7：保障培训的期望

职务	培训	频次
保障校董	**三级**	**2 年一次**
AISL 保障负责人	**三级**	**2 年一次**
AISL 人力资源总监	**三级**	**2 年一次**
学校 DSL 和 DDSL	**三级**	**2 年一次**
校长	**三级**	**3 年一次**
学校人力资源经理	**三级**	**3 年一次**
高层领导团队和主要的关怀辅导负责人	**三级**	**3 年一次**
寄宿部主任	**三级**	**3 年一次**
寄宿部**住校员工**	**二级**	**3 年一次**
全体员工（教学和行政）	**一级**	**每年一次**
志愿者等	**保障简介**	**每年一次**

附录 8：理解确认书

请打印此页面，并将其签名并返回给指定的保障负责人

我已阅读，理解并同意遵守《*保障政策*》*(HS19)*和《员工职业行为准则》。 我知悉文件的范围涵盖我的私人生活和职业生活。

我了解，如果我不遵守其中的指示，我将受到纪律处分，这可能会导致解雇和/或将我的行为报告给警察。

全名（请大写）：

_____

签署: _____ 日期: _____

将此签名页返回给指定的保障负责人； 请保留文档的其余部分供您自己记录。