



HARROW
INTERNATIONAL
SCHOOL
哈罗国际学校
SHANGHAI 上海

CHILD PROTECTION AND SAFEGUARDING POLICY AND PROCEDURES

Effective Date	August 2023
Reviewed	August 2025 (ZBE)
SLT Approval	August 2024
Governor Approval	October 2024
Full Review Date	January 2026
Related policies to be read with this policy	Staff Code of Conduct Digital Learning and E-Safety Policy
Associated AISL Group Policy	H13 Safeguarding Policy 2024

Changes in August 2025

- *DSL Team is updated to reflect changes in personnel and leadership structures.*
- *Other minor changes have been made, and references updated, pending a fuller review with the arrival of a new Designated Safeguarding Lead in late 2025. This will include a separate Appendix to reflect changes made in KCSIE 2025; in the interim, colleagues will be advised about these changes in a separate document.*

Changes in August 2024

- *DSL Team is updated (Head of Nursery and Pre-Nursery added to team)*
- *Proposed change in the draft of KCSiE 2024 are added as an appendix (#8). The final version of KCSiE 2024 is not published at the time of the distribution of the policy (20th August 2024) for the new 2024-25 academic year. Updates will be incorporated into the policy in September.*

Changes in Feb 2024

- *CPOMS has been added in place of My Concern throughout policy*
- *Appendix 6 – How to log an incident on CPOMS (replaces How to use My Concern)*

Changes in August 2023

- Staffing update in table of responsibilities (p8)
- Change: Reference to KCSiE is updated to 2023; Working together to safeguard children (2023) (p5)
- Section 1.1 (p11) Added: *“The school will inform shortlisted candidates that online searches may be done as part of pre-recruitment checks”*
- 1.2 Safer Working Practices (p13) Added: *“Guidelines signposted from the DfE Filtering and Monitoring Standards (2023) support the school to have effective systems in place”*

Changes in Jan 2023

Headmaster changed, p8

Changes to policy for August 2022

- Added: The Declaration from THE UNITED NATIONS CONVENTION RIGHTS OF THE CHILD has been inserted before the Introduction
- Change: Table of responsibilities and roles updated to reflect changes in August 2022-23
- Change: Reference to KCSiE is updated to 2022
- Change: The term Child-on-child abuse replaces peer-on-peer abuse in line with KCSiE 2022
- Added: Update on Domestic abuse in line with KCSiE 2022 (*“Children and adults can be impacted through seeing, hearing or experiencing the effects of domestic abuse or experiencing it through their own intimate relationships.”*)
- *Updated: APPENDIX 2: - Laws and conventions guiding the child protection and safeguarding policy fully updated and current accord to Chinese Law*
- *Added: APPENDIX 5: MyConcern – How to submit and update a concern*
- *Added: APPENDIX 5: MyConcern – Guidelines on levels of need*

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The Convention on the Rights of the Child was entered into force on 2 September 1990.

“The child shall enjoy all the rights set forth in this Declaration. Every child, without any exception whatsoever, shall be entitled to these rights, without distinction or discrimination on account of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status, whether of himself or of his family.”

“The child shall enjoy special protection, and shall be given opportunities and facilities, by law and by other means, to enable him to develop physically, mentally, morally, spiritually and socially in a healthy and normal manner and in conditions of freedom and dignity. In the enactment of laws for this purpose, the best interests of the child shall be the paramount consideration.”

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- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school.
- To demonstrate our commitment to protecting children.

This Child Protection and Safeguarding Policy outlines the actions that will be taken to ensure that all students are properly safeguarded in school and at home. Our policy supports the UN's Convention on the Rights of the Child (UNCRC). It is further based on the UK's Department for Education documents, Prevent Duty Guidance (2015) Keeping Children Safe in Education (2023) and Working Together to Safeguard Children (2023). For this document children includes everyone under the age of 19.

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This policy emphasises the need for good levels of communication between all members of the School community and those with designated responsibility for child safeguarding. **Safeguarding our students is more than just child protection.** Therefore, we recognise that the safety of all students is of paramount importance and that all staff and members of the school community, including volunteers, have a full and active part to play in protecting our students from any form of harm.

As communication is paramount, parents should ensure that the School has at least two emergency contacts for their child(ren).

We believe that the School should provide a caring, positive, safe and stimulating environment which promotes all students' social, physical, emotional and moral development. Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of all our students.

This policy has been approved by the Board of Governors of Harrow Shanghai, is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies to all adults, including volunteers, working with pupils in or on behalf of Harrow Shanghai even when this is away from the school, for example at an activity centre or on an educational visit.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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; and
- Taking action to enable all children to have the best life chances

Safeguarding includes the establishment and implementation of procedures to protect children from deliberate harm, however, safeguarding also encompasses all aspects of pupils' mental and physical health, safety and well-being.

AIMS AND OBJECTIVES

Harrow Shanghai is committed to safeguarding and promoting the welfare of all its students and will take appropriate action. The School is committed to working in partnership with parents, Shanghai Youth Service and Rights Protection Office and, if needed, the Police. We continuously look to develop and improve the safeguarding culture within our School. Each student's welfare is of paramount importance. We are all responsible for creating a safe community and environment, in which the understanding and awareness of risk is embedded within the culture.

We need to be pro-actively alert to the possibility of abuse (physical abuse, sexual abuse, emotional abuse and neglect) and other risk factors (Children Missing from Education, Child Sexual Exploitation, Child Criminal Exploitation, so-called ‘honour-based’ violence (HBV), Female Genital Mutilation (FGM), Forced Marriage, Radicalisation, online safety issues, child-on-child abuse) being caused to the students in our care.

In situations where child abuse is suspected, our paramount responsibility is to the child.

We recognise that some students *may* be especially vulnerable to abuse e.g. those with Special Educational Needs and Disabilities, or those living in adverse circumstances. We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at school their behaviour may be challenging. We recognise that some children who have experienced abuse may harm others. We will always take a considered and sensitive approach, and ask for advice as needed, in order that we can support all of our students as required by their individual needs.

These aims will be achieved by:

- Staff INSET will include Child Protection and Safeguarding training each year for new and returning teaching staff.
- Support staff will receive annual bilingual safeguarding training.
- New non-English speaking colleagues will complete a basic online safeguarding awareness training.
- Continuing to develop awareness in all staff of the need for Safeguarding Children and Child Protection and their responsibilities in identifying abuse.
- Ensuring that all staff are made aware of the referral procedures within the School.
- Staff receive updates to keep skills and knowledge up to date.
- The DSL team will all have completed the Designated Safeguarding Lead Level 3 training. In addition, Heads of House, YGLs and SLT will also complete Level 3 DSL training, even if they are not part of the DSL Team, as such training is helpful as part of ongoing CPD for their roles of responsibility.
- Recruitment panel training - at least one member of each recruitment panel will have completed appropriate ‘Safer Recruitment in Education’ training.
- Monitoring any students who have been identified as being ‘at risk’.
- Ensuring that outside agencies are involved where appropriate.
- Maintaining good links with local Chinese agencies, such as the Shanghai Youth Service and Rights Protection Office, as well as with DSLs at other international schools in Shanghai and across the Harrow family of schools.
- Ensuring that key concepts of Child Protection and Safeguarding are integrated within the curriculum, especially via Wellbeing.
- Creating an environment where children feel secure, have their viewpoints valued, are encouraged to talk and are listened to.
- Regular Monitor and peer support discussions around safeguarding via Student Councils.
- Clear documentation that is reviewed annually.
- Clear policies and procedures that are reviewed annually.

School staff, due to their day-to-day contact with individual children during school time, are particularly well placed to observe outward signs of abuse, changes in behaviour or failure to develop. However, all those who come into contact with children and families in their everyday work, including staff who do not have a specific role in relation to safeguarding children, have a duty to safeguard and promote the welfare of children. In particular, all Harrow staff should be aware of the procedures to be followed for reporting concerns about a particular child.

TABLE OF RESPONSIBILITIES - SAFEGUARDING TEAM**All staff will have the relevant training as identified on Page 7.**

Name	Title
Alex Reed	Head Master
Vacant	Senior Deputy Head
Zach Bennetts	Head of Upper School / Upper School DSL Acting Whole-School DSL
Avril Phillips	Head of Lower School / Lower School DSL
Amy Huang	Deputy Head of Upper School / Deputy DSL
Kelly Cui Edwards	Sixth Form Pastoral Lead / Deputy DSL
Hailey Chicot	Early Years Class Teacher / Deputy DSL
Sunny Shao	Pastoral Year Group Lead / Deputy DSL
Yan Chen	Senior Operations Manager / Deputy DSL
Ahmed Hussain ahussein@aisl-edu.com	Nominated AISL Governor (not based in school)
Cherry Cao	Head of Human Resources
Karen Jin	School Nurse

SECTION 1

PROVIDING A SAFE AND SUPPORTIVE ENVIRONMENT

1.1 SAFER RECRUITMENT AND SELECTION

Harrow Shanghai pays full regard to DfE guidance, 'Keeping Children Safe in Education' September 2023; the Protection of Freedoms Act 2012; the Childcare (Disqualification) Regulations 2009; the 'Statutory Framework for the Early Years Foundation Stage' 2014; the 'Education (Independent School Standards) (England) (Amendment) Regulations' 2014.

Please see the School's **Safe Recruitment Policy** for guidance and for more details.

Harrow Shanghai adopts recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools. We ensure that all appropriate measures are applied in relation to everyone who works in or on behalf of Harrow (including staff employed by another organisation) or who is likely to be perceived by the children as a safe and trustworthy adult (including, for example, volunteers, governors and staff employed by external contractors) and follow relevant guidance on checking contractors, host families for educational visits and work experience providers.

Safer recruitment practice includes scrutinising applicants, verifying identity, right to work in China and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking formal interviews, taking up references, and recording all relevant details of checks carried out on the School's Single Central Record (SCR). As a matter of good practice, School seeks two references before making interview where reasonably practicable to do so.

The International Child Protection Certificate (ICPC) is the School's favoured method of checking for criminal records for UK nationals, or non-UK nationals who have previously lived in the UK. The joint initiative, the National Crime Agency's Child Exploitation and Online Protection Command (NCA-CEOP) and ACRO have developed the International Child Protection Certificate (ICPC) to help protect children from offenders who travel overseas to abuse vulnerable children through employment, volunteering and charity work.

The ICPC is a criminal record check against police and intelligence databases in the UK. The ICPC is similar to the Disclosure and Barring Service (DBS) check (formerly CRB check) that is required for anyone working professionally with children in the UK.

Harrow Shanghai will undertake Disclosure and Barring Service (DBS) checks at an Enhanced Level (to include Children's Barred List and Adult's Barred List checks) and Teacher Prohibition checks, for all staff, volunteers and other adults who have unsupervised contact with pupils and students. Governors, the Head Master, SLT, Heads of Department and Heads of Phase will also be checked against the Management Prohibition list (section 128 direction), in line with current guidance for Independent Schools.

For non-UK nationals/residents, the equivalent check from the adult's country of origin should be obtained. For Chinese nationals, this will be undertaking a police check at their local police station.

Statutory regulations require that:

- Harrow keeps a Single Central Record (SCR) detailing a range of checks carried out on their staff (including supply staff, and teacher trainees on salaried routes) who work at the School. As well as, all members of the governing body (these are all held by Head of HR)
- An International Child Protection Certificate (ICPC) (or similar document from their country of origin) is obtained for all new paid appointments to the Harrow Shanghai's workforce.
- An International Child Protection Certificate (ICPC) (or similar document from their country of origin) is obtained for volunteers, further to a risk assessment considering the regularity, frequency, duration and nature of contact with children and the level of supervision of the volunteer by another person engaging in regulated activity.
- Harrow will ensure that any contracted staff have an International Child Protection Certificate (ICPC) (or similar documentation from their country of origin) is checked where appropriate.
- A check of any Teacher Prohibitions, including interim orders, on all teachers.
- A check of Management Prohibitions under section 128 direction, of all Governors, The Head Master, SLT and Heads of Department or equivalent position.
- All new appointments to the School's workforce who have lived outside the UK are subject to additional checks as appropriate.
- Harrow will ascertain that all agency, supply and third-party staff have undergone the necessary safeguarding checks as stated above.
- Identity checks must be carried out on all appointments to the School's workforce before the appointment is made.
- If there is a delay in receiving an International Child Protection Certificate (ICPC) or DBS disclosure or local or overseas checks the Head Master has discretion to allow an individual to begin work pending the receipt of the disclosure/clearance. This will only be allowed if all other checks including a check of the UK's Adult's Barred List and UK's Teacher Prohibition List have been completed (or equivalent check in their adult's country of origin), and once appropriate supervision has been put in place and a risk assessment has been carried out. All other checks must be complete.
- The school will inform shortlisted candidates that online searches may be done as part of pre-recruitment checks

In addition to the above, at least one member of each recruitment panel for Harrow staff will have completed appropriate 'Safer Recruitment' training. When conducting interviews, Harrow has regard to the principles of 'Value Based Interviewing' www.nspcc.org.uk

In addition, Harrow will do everything in its power to obtain confirmation that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site. (For example, on overseas exchange visits, or when pupils are off-site on educational trips and visits.)

All Harrow staff are made aware that they are required to disclose any convictions or cautions received during their employment at Harrow Shanghai. In addition, staff are made aware that they are expected to disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at Harrow) or any circumstances which could lead to consideration of disqualification.

Visitors

All visitors to Harrow Shanghai must sign in at the main gate and wear a visitor's badge. They are given clear guidelines on safeguarding issues whilst on their visit to the School. Visitors should not move freely about the premises without an escort.

Staff and pupils are asked to be vigilant and inform the main reception (ext. number 111) of any unaccompanied visitors.

1.2 SAFER WORKING PRACTICE

Harrow Shanghai undertakes DSL led 'Safe Practice' training on an annual basis to ensure that all staff are safe, and aware of behaviours which should be avoided. This includes training based on KCSiE. Staff should also refer to the **Staff Code of Conduct** and **Acceptable Use Policy** and to ensure best practice.

Copies of these documents are available in the Key Policies File or Harrow Academic Staff Teams.

Safe working practice ensures that students are safe and that all staff:

- Are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Work in an open and transparent way.
- Discuss and/or take advice from Harrow Shanghai / HIMs leadership over any incident which may give rise to concern.
- Record any incidents or decisions made.
- Apply the same professional standards regardless of gender or sexuality.
- Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

In addition, staff are advised and given guidance to ensure that their behaviour and actions do not place pupils or themselves at risk of harm, or of allegations of harm, to a student (for example, in one-to-one tuition outside of school, individual sports coaching, conveying a student by car, engaging in inappropriate electronic communication with a pupil, use of social networking sites, and so on.). This also forms part of the **Staff Code of Conduct**.

Photographs and Use of Mobile Phones including in the Early Years Setting

Photographs and/or videos of the children should be captured on **school equipment where possible**. Where this is not possible, it is permissible to use personal devices only where:

- the photographer undertakes to **upload media to a school OneDrive account and delete this from their personal device within 48 hours**; or
- the photographer otherwise undertakes to **use** (e.g. for WeCom) **and delete the media from their personal device within 48 hours**.

It is not permitted to share media to any other personal device or online platform without permission.

Online Safety Policy and Procedure

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. We currently have the Chinese Government regulations and a firewall application, which is an all-in-one single solution. This protects our school network and its users against threats both internal and external. This device is approved by the Chinese Government. This solution also provides real-time anti-malware protection, HTTPS inspection, Proxy detection, blocking and intrusion detection and on device filtering.

The above solution applies to all devices connected to the LAN, WAN and VLAN networks throughout the School. The Director of ICT Services receives direct notifications of inappropriate activity and responds on a case by case basis. If there are any flagged up issues, then these will go to the DSL or the safeguarding team.

We recognise that students also have access to the internet via 4G/5G devices and that this use is not covered by our firewall systems. This is why education of students in terms of appropriate use of technology is paramount. The Wellbeing programme and ICT lessons are used to ensure that issues of online safety are raised and discussed and that students understand how to be safe in their use of ICT. If inappropriate use of 4G or 5G technology is suspected this should be reported to the DSL who will follow the guidelines set out by the UK Council for Child Internet Safety (UKCCIS) Education Group. Action will be taken in accordance with the severity of misuse, ranging from confiscation of the device (for a specified period) to reporting a crime to the Police. Guidelines signposted from the DfE [Filtering and Monitoring Standards](#) (2023) support the school to have effective systems in place.

1.3 SAFEGUARDING INFORMATION FOR STUDENTS

Harrow Shanghai is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe and how to complain. All pupils know that we have a Safeguarding Team with responsibility for child protection and know who these people are and where to find them. We inform pupils of whom they might talk to, both in and out of school, of their right to be listened to and heard and of what steps can be taken to protect them from harm.

Harrow Shanghai is committed to ensuring there are opportunities in the school curriculum, for example through the Wellbeing curriculum and by providing an age-related, comprehensive curriculum, for pupils to be taught about aspects of safeguarding in order to develop the knowledge and skills they need to recognise and stay safe from abuse, including online safety.

We do this by:

- developing healthy relationships and awareness of domestic violence, bullying, child sexual exploitation, sexual orientation, gender-based violence, hate, relationship abuse, faith abuse and other forms of abuse;
- recognising and managing risks including online, including cyberbullying, online grooming for sexual exploitation and radicalisation, and running away;
- enabling pupils to become safe and responsible users of new technologies and the impact of new technologies on sexual behaviour for example, sexting and accessing pornography;
- enabling pupils to develop knowledge, skills and attitudes consistent with the promotion of the global values of democracy, the rule of law in China and beyond, individual liberty, mutual respect for and tolerance of those with different faiths and beliefs and for those without faith;
- recognising how pressure from others can affect their behaviour, including the risks of radicalisation to extremist behaviour;
- ensuring pupils have the opportunity to discuss controversial issues and develop tolerance and respect for others;
- raising awareness of child sexual exploitation, domestic abuse, so called ‘honour-based’ violence, female

- genital mutilation and forced marriage, upskirting, child-on-child abuse, initiation and hazing type violence and rituals;
- making available appropriate local and online advice.

Additional aspects of safeguarding included in the curriculum are risks associated with:

- substance misuse
- knives, gangs and youth violence
- mental health
- water, fire, roads and railways

The School has updated the curriculum to include aspects of policies related to Child Protection and Safeguarding. This includes the School's **Online Safety, Anti-Bullying policies and Relationship and Sex Education Guidelines (in PSHE Policy)**.

Harrow Shanghai recognises the importance of using age appropriate curriculum resources and ensuring that there is a safe climate for learning which includes the setting of ground rules. Parents are welcome to view any resources and discuss any concerns they have over any curriculum content within our Wellbeing curriculum provision.

Training needs of staff are regularly reviewed to ensure that staff who are delivering safeguarding aspects of Wellbeing or online safety have the appropriate knowledge and skills.

The school monitors and evaluates the impact of the safeguarding taught curriculum provision through our school based monitoring and evaluation processes which include lesson observation, pupil surveys and feedback from pupils, staff and parents.

Information about the School Counsellor is made available to pupils if required see School Counsellor Referrals procedures for details of how to contact the School Counsellor.

The Office of the Children's Commissioner (www.childrenscommissioner.gov.uk/) Kidscape (www.kidscape.org.uk) offers excellent advice on making friends, changing schools, protecting yourself, what to do if you feel you are being bullied etc.

Harrow Shanghai's arrangements for consulting with and listening to pupils are provided via class teachers, Learning Support Assistants (LSAs) and Childcare Assistants (CAs), the School Councils and the School Counsellor. We make pupils aware of these arrangements by posters and messages in assemblies.

1.4 PARTNERSHIP WITH PARENTS

Harrow Shanghai shares a purpose with parents to keep children safe from harm and to have their welfare promoted.

Parents may wish to consult the following for more information on UK Safeguarding:

www.safeguardingchildren.co.uk and www.ceop.gov.uk

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share

sensitive information unless we have permission, or it is necessary to do so in order to protect a child. Harrow Shanghai will share with parents any concerns we may have about their child, unless to do so may place a child at risk of harm.

We encourage parents to discuss any concerns they may have with Class Teachers, House Tutors, Housemasters/Housemistresses or Heads of Phase in the first instance. These colleagues are then able to pass the concerns on to a senior member of staff if necessary.

We make parents aware of our policy via the prospectus pack, Harrow Shanghai website and through workshops, which contain a specific mention after the annual update has taken place and the new policy has been added to Harrow Shanghai website. Parents are also made aware that they can view or obtain a paper copy of the policy on request.

1.5 PARTNERSHIPS WITH OTHER AGENCIES

Harrow Shanghai recognises that it is essential to establish positive and effective working relationships. Safeguarding and promoting the welfare of children sometimes requires a multi-agency approach. There may be times when informal guidance will be requested on a particular issue. There will also be occasions when more formal contact is necessary - such as when an outside referral is made.

In our context this will often be Counsellors or the Shanghai Youth Service and Rights Protection Office, as well as DSLs at other Harrow Schools or Shanghai International Schools.

1.6 SCHOOL TRAINING AND STAFF INDUCTION

The School Governors are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able and are supported in their safeguarding role.

Initial new staff induction will cover the School's own Child Protection and Safeguarding Policy, the identity of the DSL and their deputies, see KCSIE (part one and Annex A). Induction will also cover **Staff Code of Conduct & Behaviour Policy, Missing Child Policy, Behaviour Policy, Acceptable Use Policy and the Speaking-Up Policy** and related procedures.

All staff (including temporary staff, volunteers and School Governors) are provided with access to the School's Child Protection and Safeguarding Policy and informed of the School's child protection arrangements. All Harrow Shanghai staff, including Governors and volunteers, will be made aware of any revisions and updates to the Child Protection and Safeguarding Policy on an annual basis. All staff will be asked to confirm that they have read the policy and are aware of any changes to the previous version. These records will be held by the HR Department.

In addition, to this, at least one member of each recruitment panel will complete appropriate 'Safer Recruitment in Education' training, and this training will be renewed every two years.

Copies of the completion certificates from all online training courses are handed to the HR department and kept in staff files. Similarly, registers are taken and logged for whole staff safeguarding INSET sessions. Once a year, the DSL is responsible for checking that the HR Department has evidence that all Harrow Shanghai staff are up-to-date with Child Protection and Safeguarding training. The DSL check HR is also following up in cases where staff are

found not to be up-to-date. This information is registered in the Single Central Record.

Child Protection and Safeguarding Whole School training must ensure staff are able to:

- understand the policy and procedures;
- understand individual staff responsibilities to ensure that concerns for the safety of a child are effectively addressed;
- identify signs of possible abuse and neglect at the earliest opportunity;
- respond in a timely and appropriate way including appropriate communication with children
- understand the role of the DSL;
- be aware of external avenues for notifying concerns including the use of escalation and whistle-blowing procedures;
- comply with record-keeping requirements;
- recognise grooming behaviour by adults including inappropriate sexual comments; excessive one- to-one attention or inappropriate sharing of images;
- recognise normal and concerning sexual behaviours of children;
- have up to date knowledge of safeguarding issues.

All staff should read and understand this policy as it includes information put into our school's context from the UK's *Keeping Children Safe in Education* DfE September 2023 Part One and Annex A.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf

All Harrow Shanghai staff and Governors will be asked to sign to say that they have read and understood this policy. These records will be held by the HR Department.

1.7 ROUTINE SCHOOL PROCEDURES TO PREVENT ABUSE FROM STAFF.

All members of the teaching staff and relevant members, having unsupervised access to children, are vetted through the relevant authorities. This is to check whether there is anything in their past which would militate against them being employed at Harrow Shanghai.

All members of staff, both teaching and non-teaching, are professionally obligated to refer any fear or allegation of abuse directly to the DSL or the Head Master. If the concern is about the Headmaster, then the Chairman of Governors must be contacted.

All staff have a professional obligation to inform the DSL, the Head Master or their relevant Line Manager if they have any concerns regarding the behaviour and conduct of any other member of staff. All information passed on in this way will be treated seriously and responded to professionally and sensitively. Harrow Shanghai is committed to supporting all colleagues who forward their concerns.

All staff have immunity from retribution and disciplinary action for 'speaking-up' in good faith. Please see the School's **Speaking-Up Policy** for further details.

In the event that the allegation or rumour concerns a member of staff the Head Master and DSL together will decide rapidly whether there may be substance to it.

The member of staff may be immediately suspended and escorted from school property pending further investigations, if such actions are deemed necessary. In the event that a member of staff is suspended pending an investigation, a senior colleague will keep in close contact with the member of staff to offer support and information regarding the progress of the investigation.

1.8 SUPERVISION, SUPPORT, ADVICE AND GUIDANCE FOR STAFF

- Staff will be supported by the Designated Safeguarding Lead (See Appendix 1 for details), and the other members of the Senior Management Team.
- The Designated Safeguarding Lead will be supported by the Governor responsible for child protection and safeguarding matters (See Appendix 1 for details).
- Child protection and safeguarding advice is available from Tim Gerrish (See Appendix 1 for details).

At Harrow Shanghai, supervision provides support, coaching and training for staff and promotes the interests of children and fosters a culture of mutual support, teamwork and continuous improvement which encourages the confidential discussion of sensitive issues.

Supervision provides opportunities for staff to:

- discuss any issues – particularly concerning children’s development or well-being;
- identify solutions to address issues as they arise; and
- receive coaching to improve their personal effectiveness.

Regular staff appraisals are carried out to review their practice to ensure they improve; identify any training needs and secure opportunities for continued professional development for staff.

1.9 RELATED HARROW SHANGHAI POLICIES

Safeguarding is not just about protecting children from deliberate harm (child protection). It includes:

- 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
- taking action to enable all children to have the best outcomes and It relates to aspects of care and education, including:
- equal opportunities
- promoting positive behaviour
- children’s/learners’ health and safety and well-being including their mental health
- meeting the needs of children who have special educational needs and/or disabilities
- the use of reasonable force
- meeting the needs of children and learners with medical conditions
- providing first aid
- educational visits and work experience
- intimate care and emotional well-being
- online safety and associated issues
- appropriate arrangements to ensure children’s and learners’ security, taking into account the local

context.

- children not collected from school
- lost children
- pupils' health and safety
- rigour with which absence is followed up
- decision-making process involved in taking pupils off roll
- care taken to ensure that pupils placed in alternative provision are safe at all times

Safeguarding can involve a range of potential issues such as:

- neglect
- physical, sexual and/or emotional abuse
- bullying, including online / cyberbullying (by text message, on social networking sites, and so on) and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence / violence against women and girls
- radicalisation and/or extremist behaviour
- child sexual exploitation and trafficking
- child criminal exploitation
- the impact of new technologies on sexual behavior, for example sexting and accessing pornography
- teenage relationship abuse
- child-on-child abuse
- substance / drug misuse
- issues which may be specific to a local area or population, e.g. gang activity and youth violence
- domestic violence and abuse
- sexual exploitation
- female genital mutilation (FGM)
- forced marriage
- faith abuse
- so-called 'honour-based' violence (HBV)
- hate
- fabricated or induced illness (FII)
- mental health issues
- poor parenting (particularly in relation to babies and young children)
- going missing from education
- going missing from home or care
- upskirting
- Initiation/ hazing type violence and rituals
- Other issues not listed here but that pose a risk to children

It relates to other policies including:

- Complaints Policy
- Admissions Policy
- Safer Recruitment Policy
- Teaching and Learning Policy
- Partnership with Parents
- Medical inc. Administering Medication Policy

- Intimate Care Policy
- Disciplinary Procedures
- Speaking-Up Policy
- Acceptable Use of ICT

Harrow Shanghai policies relating to Safeguarding and other policies such as Safer Recruitment, Behaviour, Online-Safety (Acceptable Use Policy), Staff Code of Conduct, Educational Visits etc. are available in Harrow Academic Staff Teams.

1.10 CONFIDENTIALITY, DATA PROTECTION & INFORMATION SHARING

When sharing confidential information about a member of staff or pupil, the School has regard to its responsibilities. The School has an expectation that individuals process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. **At least 2 emergency contact phone numbers are held for each pupil in line with best practice advice.**

Harrow Shanghai ensures that the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring that there are systems in place for children to express their views and give feedback. **Harrow ensures that staff members do not promise confidentiality to the child and always act in the interests of the child.**

Information must be shared with the Police and the Shanghai Youth Service and Rights Protection Office where the child/young person is/may be at risk of significant harm.

Where there is a concern that the child may be suffering or is at risk of suffering significant harm, the child's safety and welfare must be the overriding consideration.

The Seven Golden Rules of Information Sharing:

1. Ensure that personal information about living persons is shared appropriately.
2. Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
4. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
5. Consider safety and well-being. Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
6. Necessary, proportionate, relevant, accurate, timely and secure. Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

In the case of a Missing Child Policy full details can be found in the Harrow Shanghai '[Missing Child Policy](#)'.

1.11 PUPIL INFORMATION

In order to keep children safe and provide appropriate care for them, Harrow Shanghai requires accurate and up to date information regarding:

- Names (including any previous names), address and date of birth of child.
- Names/contact details of persons with whom the child normally lives.
- Names/contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above).
- Details of any persons authorised to collect the child (if different from above).
- Any relevant court orders in place including those which affect any person's access to the child (e.g. Contact Order, Care Order, Guardianship Order, Injunctions etc.).
- If the child is or has been subject to a Child Protection Plan.
- Names and contact details of key persons in other agencies, including doctors.
- Any other factors which may impact on the safety and welfare of the child.

Harrow will collate and store this information to which access will be via the Head Master and the Head Master's PA.

1.12 DESIGNATED SAFEGUARDING LEAD (DSL)

Harrow Shanghai has appointed a senior member of staff with the necessary status and authority to be the Designated Safeguarding Lead (DSL). They are responsible for matters relating to child protection and welfare.

In the absence of the DSL, or if the DSL is him/herself the subject of a complaint, one of the designated Deputy DSLs will take responsibility for child protection and safeguarding issues within Harrow Shanghai, and carry out all the related duties of the DSL. The DSL and the Head Master must ensure that there is always cover for this role including arrangements during school holidays (usually the Chinese Deputy DSL will be available during this time).

If someone in the Harrow Shanghai community has a concern regarding a child then they should speak to the DSL. Concerns should always lead to help for the child at some point. Flow charts in the Appendices indicate procedures which must be followed.

1.13 SPEAKING - UP

All staff are required to report any concerns or allegations about Harrow Shanghai practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. Such reports are made to the Head Master or the DSL.

It is essential for the School to keep a record of all incidents and concerns arising in connection with members of staff in order that historical patterns can be detected.

Whilst it is important to protect staff against malicious allegations, all concerns and complaints need to be treated with 'respectful uncertainty', and all evidence carefully recorded.

Child Protection and Safeguarding training for Harrow staff aims to raise awareness of 'grooming behaviour' and ensure that external advice is sought in any case causing concern.

In the event that a Child Protection or Safeguarding concern is raised with the DSL and/or the Head Master, and you believe that Harrow has not handled it effectively, please either follow the School's Whistleblowing Policy

There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other speaking-up channels may be open to them. General guidance can be found at <https://www.gov.uk/whistleblowing>

SECTION 2

IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO ARE SUFFERING OR LIKELY TO SUFFER SIGNIFICANT HARM

Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. The School is under a duty to make enquiries, or cause enquiries to be made, where it has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Decisions about significant harm are complex and should be informed by careful assessment of the child's circumstances, and discussion between the statutory agencies and with the child and family. Staff should in particular look out for students who are:

- Disabled or have specific additional needs
- Have special educational needs
- Young carers
- Showing signs of being drawn in to anti-social or criminal behaviour
- Frequently going missing from home
- At risk of trafficking, exploitation or modern slavery
- At risk of being radicalised or exploited.
- In a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Misusing drugs themselves
- Returning home after being in care
- Being privately fostered.

Teachers and other adults in schools are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, students, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or School staff being alerted to concerns.

It is the duty of all staff to be vigilant and observant when dealing with pupils in their care and to have no hesitation in passing on concerns that they may have regarding the physical and emotional wellbeing of any child in the school.

Staff and volunteers should understand that they are not making a diagnosis, only receiving concerns. None of the signs and symptoms listed in the following pages may actually prove that a child is being abused, and these indications should not be taken as proof. They may be indicators which, when put into context, provide justification for action.

There may be occasions when a pattern of relatively minor incidents or events may indicate a larger problem. In order to monitor this staff need to 'Log a Concern' on My Concern / CPOMS if they observe anything that is a cause for concern, or a child discloses something to them.

Notes on My Concern /CPOMS will be followed up by the DSL and Deputy DSLs. If any concern involves the non-teaching staff, whether to alert to a concern or as a concern forms should be passed to the Chinese Speaking Deputy Designated Safeguarding Lead. Patterns can then be monitored, and further action taken as needed.

2.1 WELFARE FILES AND CHILD SAFEGUARDING FILES

All safeguarding notes are recorded on My Concern / CPOMS. Historic ‘Welfare Files’ – pre-September 2021 are for all students where staff have expressed concerns or recorded incidents on a ‘Logging a Concern’ form are held in the DSL’s office. This will include, but is not limited to, observations, diagrams of injuries, reports and disclosures. All historic documentation is stored in the DSL’s office within a locked cabinet.

In the event that the DSL contacts outside agencies for guidance, advice or to make a formal referral, or should the DSL be contacted by an outside agency to pass on information about a pupil, then the DSL will create a formal ‘Child Protection File’. In such cases a notation will be made on My Concern / CPOMS by the DSL so that the existence of such a file is known.

All Welfare and Child Safeguarding Files will be retained for at least 75 years in line with current good practice guidance.

2.2 DEFINITIONS

For the purpose of this policy a child is a person 19 years or younger unless national law defines a person to be an adult at an earlier age.

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another. Development means physical, intellectual, emotional, social or behavioural development. Health includes physical and mental health. Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

Abuse and Neglect are forms 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 (for example via the internet). They may be abused by an adult or adults, or another child or children.

Where allegations concern serious harm by one or more pupils against another pupil, the matter should be reported to the DSL. In such cases the pupil against whom an allegation of abuse has been made may be suspended from the School and the School’s **Behaviour, Rewards and Sanctions Policy** and sanctions will apply. The School will take steps to ensure the safety and welfare of all the pupils involved, including the pupil or pupils accused of abuse.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at the risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that we as staff communicate so that we can be aware of how these experiences can impact on the child’s mental health, behaviour and education.

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.

Signs and symptoms of physical abuse could include:

- Unexplained injuries, bite marks or burns which could be recurrent
- Bruises in places where you would not normally expect to find them, in soft tissue, for example, rather than on the bony prominence
- Bruises with a distinctive shape or pattern, like hand prints, grasp or finger marks, or belt marks
- Bruises in or around the mouth
- Burns or scalds with clear outlines
- Improbable excuses to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishments that appear excessive
- Bald patches
- Withdrawal of physical contact
- Arms and legs covered during hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others

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

Signs and symptoms of sexual abuse could include:

- Sudden changes in behaviour or performance
- Displays of affection in a sexual way inappropriate to age
- Exhibits sexually explicit behaviour
- Tendency to cling and need reassurance
- Tendency to cry easily
- Regression to younger behavioural traits
- Complaints of genital itching or pain
- Distrust of a familiar adult, or anxiety about being left with a relative or babysitter.
- Unexplained gifts of money
- Depression and withdrawal
- Apparent secrecy
- Wetting day or night
- Sleep disturbances or nightmares
- Chronic illnesses, especially throat infections and venereal disease
- Anorexia or bulimia
- Unexplained pregnancy
- Fear of undressing for games
- Phobias and panic attacks
- Self-inflicted injuries
- Attempted suicide
- Repeatedly runs away from home

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse

effects on the child's emotional development. It may involve conveying to children 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 and how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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 cyberbullying), 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, though it may occur alone.

Signs and symptoms of emotional abuse could include:

- Physical and emotional development lags
- Admission of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-depreciation
- Sudden speech disorders
- Weight loss or weight gain
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Depressed and withdrawn
- Excessively clingy and tearful
- Drug/solvent abuse
- Compulsive stealing or scavenging
- Reluctance to go to school and/or go home
- Running away
- Excessive fear of parents / carers

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

- provide adequate supervision at home, or leaving the child under 16 alone overnight;
- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Signs and symptoms of neglect could include:

- Constant hunger, greedy, stealing food
- Poor personal hygiene - is smelly, scruffy and dirty
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school

- Untreated medical problems
- Low self-esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging
- Lingering illnesses which have not been treated
- Is often inadequately dressed for weather conditions
- Suffers repeated accidents, suggesting a lack of proper supervision
- Does not respond when given attention *OR* craves attention and affection from any adult

SO-CALLED ‘HONOUR BASED’ VIOLENCE (HBV):

So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL.

FEMALE GENITAL MUTILATION (FGM):

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a girl may be at risk of FGM.

If you have a concern that a girl or young woman is at risk of FGM, or has already undergone the procedure, you should contact the School’s Designated Safeguarding Lead.

CHILDREN MISSING FROM EDUCATION (CME):

All staff must inform the Designated Safeguarding Lead of any pupil who fails to attend school regularly, or has been absent without the school’s permission for a continuous period of 10 school days or more.

CHILD SEXUAL EXPLOITATION (CSE):

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. The child often believes they are in control of the situation. Violence, coercion and intimidation are common. It is also important to recognise that CSE can be perpetrated by children and not only by adults e.g. a 15 year old girl may be exploited by a 17 year old boy.

Like all forms of child sex abuse, child sexual exploitation can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;

- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person’s immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);

- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one- off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Child Criminal Exploitation: Criminal exploitation of children is a geographically widespread form of criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Like other forms of abuse and exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic Abuse - This does not have to include violence to be classed as abuse.

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological, physical, sexual, financial and emotional. Women and men may experience domestic abuse at some time in their lifetime. Children and adults can be impacted through seeing, hearing or experiencing the effects of domestic abuse or experiencing it through their own intimate relationships. We will be mindful of how this affects children and that our staff may themselves be victims.

Fabricated Illness - Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

Private Fostering - A private fostering arrangement is one that is made privately for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.) The school will follow the legal requirements of reporting as set out by the law of China.

RADICALISATION:

It is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation is seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Schools can build pupils' resilience to radicalisation by promoting fundamental global values and perspectives, thus enabling them to challenge extremist views. This should not stop pupils debating controversial issues. On the contrary, the School should provide a safe space in which children, young people and staff can understand the risks

associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

Roles and responsibilities:

- Preventing radicalisation in school is all our responsibility. The DSL understands the expectations and key priorities to prevent radicalisation. This is embedded within the safeguarding procedures and processes in the School.
- The Harrow family do not give a platform for extremist speakers and events.
- Harrow Shanghai provides a broad and balanced curriculum that helps protect pupils against extremism and promotes community cohesion.
- Harrow Shanghai has IT filtering systems to keep children safe when accessing the internet at school.

CHILD-ON-CHILD ABUSE:

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to, physical abuse (hitting, kicking, hair pulling, biting), bullying (including cyberbullying), gender based violence/sexual assaults and sexting. Staff should recognise that children are capable of abusing their peers. This abuse may take place entirely online or online abuse may facilitate offline abuse.

Different gender issues can also be prevalent when dealing with child-on-child abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. School adopts a zero-tolerance approach to abuse: it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Whilst it is more likely that girls will be victims and boys’ perpetrators, child-on-child abuse is unacceptable and will be taken seriously.

The School’s House/pastoral structure, and the **Anti-Bullying Policy and Behaviour, Rewards and Sanctions Policy** aim to minimise the risk of child-on-child abuse. Awareness is also raised through House Periods and Wellbeing lessons. Abuse is abuse and should never be tolerated or passed off as “BANTER” or “part of growing up”. Victims of child-on-child abuse will be supported in Harrow Shanghai by peer mentors, pastoral staff and parents.

School implements procedures to minimise the risk of child-on-child abuse. Allegations of abuse are recorded confidentially using the schools MyConcern online portal. The Safeguarding Team actively encourages all members of staff to report all concerns through this mechanism. This includes concerns not reported by a child in acknowledgment abuse may be taking place but not reported. All concerns are managed by the Safeguarding Team. Allegations of child-on-child abuse must be investigated and dealt with by the relevant Head of Phase on a case by case basis. This will involve interviewing those pupils involved and if necessary, meeting with parents to elicit support. Where possible, a ‘restorative meeting’ between both parties will be held and pupils will make a positive commitment to move forward, enlisting the support of peer/teacher mentors where required. This will be monitored by tutors/class teachers and Head of Phase. Should further incidences arise then parents will be called in to discuss the next course of action.

As a School we are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. We will not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”. We will challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts as dismissing or tolerating such behaviours risks normalising them. Upskirting is where someone takes a picture under a person’s clothing without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation, distress or alarm.

It is a criminal offence in the UK. Anyone of any gender can be a victim. We understand that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language and this is why a whole school/Harrow approach through our Wellbeing programme is utilised to raise awareness and challenge ill-informed viewpoints.

GANGS:

The vast majority of students at Harrow Shanghai will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact. The School is committed to ensuring that pupils:

- feel safe at school all the time;
- understand very clearly what unsafe situations are; and be highly aware of how to keep themselves and others safe.

SEXTING:

What is ‘sexting’? In the latest advice for UK schools (UKCCIS, 2016), sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as ‘youth produced sexual imagery’. ‘Sexting’ issues may require matters to be referred to the police. ‘Sexting’ does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

Sexting must be dealt with robustly. The member of staff should confiscate electronic devices and refer the matter immediately to the DSL.

What to do if an incident involving sexting comes to your attention?

Report it to the DSL immediately.

- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal in the UK.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

The UK Council for Child Internet Safety (UKCCIS) has published sexting advice for schools: <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

VULNERABLE CHILDREN:

All staff are asked to be particularly sensitive to signs that may indicate possible safeguarding concerns and follow appropriate guidance.

Poor or irregular attendance (see Attendance Policy) and persistent lateness and non-communication with the School should be a cause for concern. “Wealthy Neglect” does exist in most top international school.

School is vigilant in its acknowledgement that additional barriers can exist when recognising abuse and neglect in relation to children with SEN, disabilities, certain health conditions and language limitations.

SECTION 3

TAKING ACTION TO ENSURE THAT CHILDREN ARE SAFE AT HARROW SHANGHAI AND AT HOME

All staff and volunteers are aware that in order to find up to date and practical child protection procedures and guidance they can use this policy. They can also use websites such as www.safeguardingchildren.co.uk

3.1 EARLY HELP

All Harrow Shanghai staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment. Any staff member who has a concern about a child's welfare should follow the referral processes. Staff may be required to support other outside agencies following any referral.

If staff members have any concerns about a child (as opposed to a child being in immediate danger) they will need to decide what action to take. Where possible, there should be a conversation with the DSL to agree a course of action, although any staff member can make a referral to children's social care. Other options could include referral to specialist services e.g. School Counsellor.

Any child may benefit from early help, but all school and Harrow Shanghai staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is frequently missing/goes missing from care or home;
- is misusing drugs or alcohol;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
- has been adopted to a family from the care system.

3.2 ACTION FOLLOWING DISCLOSURE, ALLEGATION CONCERN OR OBSERVATION

It is not the responsibility of Harrow Shanghai staff to investigate or determine the truth of any disclosure or allegation of abuse. All staff, however, have a duty to recognise concerns and maintain an open mind.

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. It must not be assumed that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration. Staff must remain alert to the fact that children with SEND can be more prone to peer group isolation and disproportionately impacted by things like bullying - without outwardly showing any signs or they may find it more difficult to communicate concerns. The learning support department will liaise with form tutors and class teachers where there is a cause for concern.

Accordingly, all concerns indicating possible abuse or neglect will be recorded and discussed with the DSL (or in

their absence the Deputy DSL or the Head Master) prior to any discussion with parents.

3.3 ALL STAFF MUST IMMEDIATELY REPORT:

- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Any behaviours which give rise to suspicions that a child may have suffered harm (e.g. significant changes in behaviour, worrying drawings, writings or play).
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Any concerns that a child is presenting signs or symptoms of abuse or neglect.
- Any significant changes in a child's presentation, including non-attendance.
- Any hint or disclosure of abuse or neglect received from the child, or from any other person, including disclosures of abuse or neglect perpetrated by adults outside of the family or by other children or young people.
- Any concerns regarding person(s) who may pose a risk to children (e.g. staff in school or persons living in a household with children present) including inappropriate behaviour, e.g. inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

There may be occasions when a pattern of relatively minor incidents or events may indicate a larger problem. In order to monitor this staff are asked to log any concerns on My Concern / CPOMS if they observe anything that is a cause for concern, or a child discloses something to them.

If a child is in IMMEDIATE DANGER OR IS AT RISK OF HARM, a referral should be made to the police and Shanghai Youth Service and Rights Protection Office immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made. In emergencies, or when a crime may have been committed, it will be necessary to contact the police directly. In such circumstances the DSL and/or Head Master must be notified at the earliest possible opportunity.

3.4 RESPONDING TO DISCLOSURE

It is important that all staff are aware of the importance of safeguarding and promoting the welfare of children and that they create a climate in which children can feel able to talk about their feelings, concerns and their worries and feel confident to come forward to disclose abuse if it arises. They must know it will be taken seriously, treated with sensitivity and respect and have their wishes and feelings taken fully into account.

Disclosures or information may be received from pupils, parents or other members of the public. Harrow Shanghai recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity. Pupils with communication difficulties will be enabled to express themselves to a member of staff with appropriate skills, based on individual circumstances.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the designated person. A detailed, contemporaneous, written record, (which must be signed and dated) must be made by staff of any allegation, however unpalatable, and presented to the DSL or Head Master immediately. If in doubt about recording requirements staff should discuss this with the DSL.

The special position of the School Nurse and School Counsellor is recognised, but there is a statutory responsibility on all staff to report any allegations immediately.

Principles:

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the Designated Safeguarding Lead in order that s/he can make an informed decision of what to do next.

Alleged victims or perpetrators should not be interviewed by school staff to elicit further information.

Every complaint or suspicion of abuse from within or outside Harrow will be taken seriously and followed up and, as set out in this policy, will be referred to an external authority such as the Pudong Education Bureau. This includes allegations of historic abuse.

In the case of those working in a school, the guidance is specific, namely that you need to report any staff to the DSL or Head Master who have:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he/she would pose a risk of harm or is unsuitable to work with children.

Staff will:

- Listen to and take seriously any disclosure or information that a child may be at risk of harm.
- Keep an open mind - staff should not take a decision as to whether or not abuse has taken place.
- Try to ensure that the person disclosing does not have to speak to another member of Harrow Shanghai staff.
- Clarify the information.
- Listen, but not press for information or ask leading questions.
- Try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did xxx hit you?'
- Try not to show signs of shock, horror or surprise. The child needs to feel that you are in control of a situation that is beyond their control.
- Not express feelings or judgements regarding any person alleged to have harmed the child.
- Explain sensitively to the person that they have a responsibility to refer the information to the Designated Safeguarding Lead, who will ensure that correct action is taken.
- Reassure and support the person as far as possible.
- Explain that only those who 'need to know' will be told - but not give a guarantee of absolute confidentiality.
- Explain to the person what will happen next and that they will be involved as appropriate and be informed of what action is to be taken.
- Make notes as soon as possible after the meeting. (It may be possible to do this during the meeting, circumstances permitting.) Give details of the conversation and any observable behaviour (e.g. was shaking, continued to cry, constantly moved around the room etc. - document but DO NOT interpret these features). Try to record the actual words used by the child wherever possible.
- Write up these notes in full. This record should include the date, time, place of the conversation and the essence of what was said, by whom, and in whose presence. The record should be signed by the person making it, and use names, not initials. The record must be kept securely and handed to the DSL.
- Preserve evidence. All evidence (for example any scribbled notes, mobile phones containing text messages, clothing, computers etc.) must be safeguarded and preserved.

In addition, staff are advised to:

- Find a quiet place to talk, one where you will not be interrupted, but which is not remote. Assure the child that you have time to talk.
- Stay calm and be reassuring. It may take several hours/days/months before a child will fully divulge information. They often confide in only one adult.
- Say that you will do your very best to help and support the child. Promise to do your best for them, but, right from the start, never give them a blanket promise to keep a secret. Make it clear that you will keep the child informed about what you are doing and what is happening at each stage.
- Believe what you are being told. Informed people state clearly that children rarely, if ever, make up stories. So do not cast doubt because it has taken courage to speak to you. Remember, it is for the police, to determine the truth behind allegations, not you. To do so could prejudice a possible police prosecution.
- Keep a record of statements and aim to quote the child verbatim. At the end of the conversation take a few moments to double-check and clarify the facts that have been recorded.
- Say that you are glad that the child told you and reassure them that they are right to have done so. If they have chosen you to divulge to it says something about the quality of their relationship with you. Praise them for being brave enough to tell you and for surviving the incident. Assure them of their status as children – they are not responsible for what has happened to them.

3.5 ACTION BY THE DESIGNATED SAFEGUARDING LEAD

(In the event of the absence of the DSL, one of the deputy DSLs will act as the DSL).

The following actions will be taken where there are concerns about significant harm to any child:

Following any information raising concern, the DSL will consider:

- Any urgent medical needs of the child - the child's interests are paramount.
- Discussing the matter with other agencies involved with the family.
- Consulting with appropriate persons e.g. School Counsellor, nurse
- The child's wishes and any fears or concerns they may have.

Then decide:

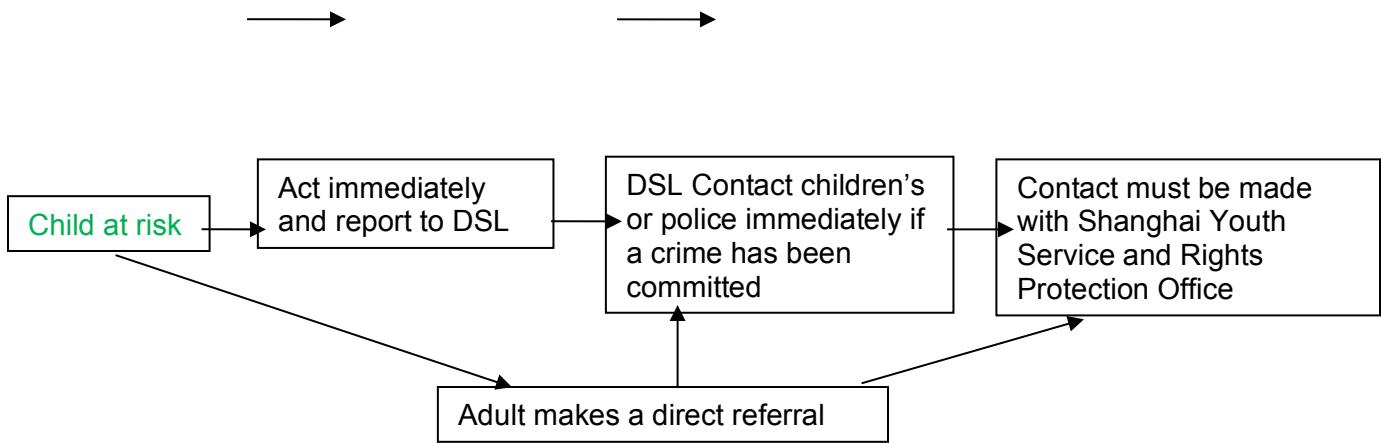
- Wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk.
- Whether to make a child protection referral to the Shanghai Youth Service and Rights Protection Office or a given Embassy
- If further monitoring is necessary.
- If it would be appropriate to undertake an assessment (similar to the Common Assessment Framework - CAF) and/or make a referral to outside agencies.

All information and actions taken, including the reasons for any decisions made, will be fully documented. All will be recorded on My Concern /CPOMS. See Appendix 4 for Flowcharts and Procedures.

Concern raised / Child in need

Act immediately and report to DSL

Put in place early help or pastoral support. Maybe outside agencies.



3.6 ACTIONS FOLLOWING A CHILD SAFEGUARDING REFERRAL

It is the responsibility of all staff to safeguard children. It is the role of the DSL (or Deputy DSLs) to attend meetings and provide reports for these. Other staff in the School, however, may also be asked to contribute.

The Designated Safeguarding Lead (or, in their absence, one of the Deputy Designated Safeguarding Leads) will:

- Contribute to the strategy discussions and all assessments.
- Provide a report for, attend and contribute to any subsequent Child Protection Conference.
- If the child or children has a Child Protection Plan, contribute to the Child Protection Plan and attend Core Group Meetings and Review Child Protection Conferences, and support the child and their family.
- Where possible, share all reports with parents prior to meetings.
- Where in disagreement with a decision made, for example, not to apply Child Protection Procedures or not to convene a Child Protection Conference, then take guidance from the following relevant sources: <http://www.safeguardingchildren.co.uk/professionals/professional-resolutions>

OR

Tim Gerrish, The HIMs Safeguarding Consultant

- Where there is significant information in respect of a child subject to a Child Protection Plan, immediately inform the key member of staff/carer e.g. any significant changes or concerns, departures from the Child Protection Plan, child moves/goes missing/is removed from school or fails to attend school.

3.7 RECORDING AND MONITORING

The Designated Safeguarding Lead will review all monitoring arrangements in the timescale and manner determined by circumstances. These details will then be recorded and clearly understood by all parties concerned in the particular case.

Harrow Shanghai will record:

- Information about the child: name (plus any other names the child is known by), address, date of birth, those

with parental responsibility, primary carers, emergency contacts, names of persons authorised to collect from school, any court orders, if a child is or has been subject to a Child Protection Plan.

- Key contacts in other agencies including medical details.
- Any disclosures/accounts from child or others, including parents (and keep original notes).
- Significant contacts with carers / other agencies / professionals.
- All concerns, discussions, decisions, agreements made and actions taken (dated, timed and signed, to include the name and agency/title of the person responsible/spoken to), the plan to protect the child and arrangements for monitoring/review.

All records should be objective and include:

- Statements, facts and observable things (what was seen/heard).
- Diagram indicating position, size and colour of any injuries (not photograph). This can be recorded on My Concern / CPOMS.
- Words child uses, (not translated into ‘proper’ words).
- Non-verbal behaviours.

Harrow Shanghai will monitor any cause for concern including where there could be serious child welfare concerns:

- Injuries / marks
- Attendance
- Changes e.g. mood / academic functioning
- Relationships
- Language
- Behaviour
- Demeanour and appearance
- Statements, comments
- Medicals
- Stories, ‘news’, drawings
- Response to P.E. / Sport
- Family circumstances
- Parental behaviour / care of child

All Child Protection documents will be retained in a ‘Child Protection’ file, separate from the child’s main file. This will be locked away and only accessible to the Head and Designated Safeguarding Lead. These records will be copied and transferred as soon as possible to any school or setting the child moves to, clearly marked ‘Child Protection, Confidential, for attention of DSL.’ The file will be transferred separately from the main pupil file, ensuring secure transit and obtaining confirmation of receipt. Along with the CP File, a record will be kept of when and to which establishment the copy CP file was sent. The final school will retain the CP File until at least the child’s 25th birthday.

If the child goes missing from education or is removed from roll to be educated at home, then a copy of any Child Protection file will be sent to the Pudong Education Bureau.

The DSL will retain all original copies of Child Protection files until at least the child’s 25th birthday at which time they will be amalgamated in to the general pupil files and transferred to archive storage.

In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of, child sexual abuse or child sexual exploitation; 50 years from the date of birth of the pupil involved should be a sufficient period of retention but this should be kept under review. All other records of allegations are to 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.

When sharing confidential information about a member of staff or pupil, the school has regard to its responsibilities under Chinese Law. The HIMs legal team may need to be consulted.

3.8 SUPPORTING THE CHILD AND PARTNERSHIP WITH PARENTS

- Harrow recognises that the child's welfare is paramount, however good child protection practice and outcome relies on a positive, open and honest working partnership with parents.
- Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive and supportive working relationship with them whilst fulfilling our duties to protect any child.
- We will provide a secure, caring, supportive and protective relationship for the child.
- Children will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why.
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The DSL will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the children.
- The School employs two Counsellors who are trained in safeguarding.

3.9 HISTORIC ABUSE

In the event that a case of 'historic abuse' is reported, it will be treated with the same level of care and concern as a current Child Protection case. Therefore, the guidance given to staff in Section 3.2 'Responding to Disclosure' and Section 4 'Allegations regarding person(s) working in or on behalf of the School still applies.

The Head Master and DSL should be informed at the earliest possible opportunity, and they will check the school archives to determine if the case had previously been investigated, and then decide whether the Shanghai Youth Service and Rights Protection Office, Embassies and/or the police should be contacted for guidance or a new referral made.

Any member of staff or volunteer at Harrow Shanghai has an obligation to report to the Head Master or the Chairman of Governors any matters of concern relating to safeguarding that are brought to their attention, no matter when these occurred.

SECTION 4

Allegations regarding person(s) working in or on behalf of Harrow Shanghai (including volunteers)

Preamble

Allegations against members of staff are handled sensitively by school. Whilst allegations may be false, malicious or displaced, school undertakes to protect both staff and children by investigating and establishing, based on fact, whether or not such allegations are founded or otherwise. It is therefore essential that all allegations are investigated sensitively and confidentially in line with agreed procedures.

Harrow Shanghai operates procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations. If an allegation against a member of staff is found to have been malicious it will be removed from personnel records. If an allegation is not substantiated, is unfounded or malicious, it will not be referred to in any employment reference.

Section 1: allegations that may meet the harms threshold

This section is based on ‘Section 1: Allegations that may meet the harms threshold’ in part 4 of Keeping Children Safe in Education. It must be read in conjunction with the school’s Disciplinary Policy.

This section applies to all cases in which it is alleged that a member of staff (including where that person is no longer working in or on behalf of Harrow and/or the allegation is historical), including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A ‘case manager’ will lead any investigation. This will be the Head Master, or the chair of governors where the Head Master is the subject of the allegation. Where the Head Master does not wish to act as the ‘case manager’ this responsibility should be delegated without delay.

The case manager will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs. The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of children. The case manager may need to clarify any information regarding the allegation; however no person will be formally interviewed or asked to write a formal statement at this stage. The case manager should, via the Head Master, consult with HIMs if there needs to be a referral to Shanghai Youth Service and Rights Protection Office, Embassies and/or the police for investigation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, whilst school reserves the right to do so, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role, for example a virtual role.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with the school's suite of policies to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the Head Master. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve external agencies. The case manager may, on occasion, consider it necessary to involve the police *before* consulting the DSL – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the DSL as soon as practicably possible after contacting the police.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the DSL (and the police, where necessary). Where the police are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the DSL, police and/or children's social care services, as appropriate

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the DSL. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the DSL what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the DSL to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts
- We will address issues such as information sharing, to ensure any previous concerns or known allegations are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the Head Master, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from relevant personnel and agencies, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the Head Master to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will retain on record any non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on ‘Section 2: Concerns that do not meet the harm threshold’ in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term ‘low-level’ concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Head Master will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Head Master will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Code of Conduct.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential and held securely
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1, we will revisit and review that pattern.
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Reporting and references

We ensure that where Harrow Shanghai ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person has engaged in conduct that harmed (or is likely to harm) a child or if they otherwise pose a risk of harm to a child, a detailed report is made to the ICPC, ACRO and DBS (or equivalent national organisations) as soon as possible and in any event within one month; ceasing to use a person's services includes dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

In addition, if the person being referred is a teacher Harrow Shanghai will also consider referring the case to the to the ICPC, ACRO, DBS and Teaching Regulation Agency (TRA) in the UK. Or similar organisations and bodies in the teacher's country of nationality. The TRA and similar bodies are responsible for the regulation of

teachers in respect of serious misconduct.

We will not include low-level concerns in references unless the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Appendix 2 - Laws and Conventions Guiding the Child Protection and Safeguarding Policy

Laws and Conventions Guiding the Child Protection and Safeguarding Policy

The child protection policy and accompanying procedures are based on local, national, and international law, including:

The PRC Minors Protection Law, 17th October 2021

The following articles are relevant to our setting and help support our work in safeguarding our pupils:

Article 3

The state shall guarantee minors' right to life, right to development, right to be protected, right to participation, and other rights. Minors shall equally enjoy all rights in accordance with the law and shall not be discriminated due to the ethnicity, race, gender, permanent household registration, occupation, religious belief, degree of education, family status, and physical and mental health status, among others, of themselves and their parents or other guardians.

Article 4

Minors shall be protected under the principle that is most beneficial to minors. The handling of matters involving minors shall satisfy the following requirements:

- (1) Offering special and preferential protection to minors.
- (2) Respecting the personal dignity of minors.
- (3) Protecting the privacy of and personal information on minors.
- (4) Adapting to the laws and characteristics of minors' mental and physical health development.
- (5) Listening to the opinions of minors.
- (6) Combining protection with education.

Article 6

Protecting minors is a common responsibility of state organs, armed forces, political parties, people's organizations, enterprises and public institutions, social organizations, self-governing organizations of a mass character at grass-roots level in urban and rural areas, guardians of minors and other adults. The state, society, schools and families shall educate, and help minors to protect their lawful rights and interests, and enhance their awareness and capability of protecting themselves.

Article 11

Any organization or individual finding any circumstance that is harmful to the physical and mental health of minors or infringing upon the lawful rights and interests of minors shall have the right to discourage and stop such circumstance and file a report or accusation to the public security organ, the civil affairs department, the education department, and other relevant departments. State organs, residents' committees, villagers' committees, entities, and their staff members in close contact with minors finding in work that minors' physical and mental health has been infringed upon, is suspected of being infringed upon, or is facing other dangerous situations, shall immediately report to the public security organs, the civil affairs departments, the education departments and other relevant departments. Relevant departments receiving an accusation or a report involving minors shall accept and handle it in a timely manner according to the law and notify the relevant entity and personnel of the handling results in an appropriate manner.

Protection by parents:

Article 17

Parents or other guardians of minors shall not conduct the following acts:

- (1) Mistreatment, abandonment, or illegal adoption of minors or committing domestic violence against minors.
- (2) Indulging, instigating, or utilising minors to commit illegal and criminal conducts.
- (3) Indulging or instigating minors to participate in heretic and superstition activities, or accepting terrorism, separatism, extremism, and other infringements.
- (4) Indulging or instigating minors to smoke (including electronic cigarettes), drink alcohol, gamble, roam the streets for begging, or bully others.
- (5) Indulging or forcing minors who shall receive compulsory education to be deprived of education or drop out of school.
- (6) Indulging minors to be addicted to the Internet and access to books, newspapers, movies, radio and television programs, audio and video products, electronic publications, and online information, among others, that are harmful to or may affect their physical and mental health.
- (7) Indulging minors to enter commercial entertainment venues, bars, business premises for Internet access services and other places that are inappropriate for minors.
- (8) Allowing or forcing minors to engage in labour other than those prescribed by the state.
- (9) Allowing or forcing minors to marry or concluding engagements for minors.
- (10) Illegally disposing of or embezzling the property of minors or utilizing minors to seek illicit

interests.

Article 20

Parents or other guardians of minors finding that minors' physical and mental health has been or is suspected of being infringed upon, or that minors' other lawful rights and interests have been infringed upon, shall identify the situation and take protective measures in a timely manner. Under serious circumstances, immediate report shall be given to the public security organs, the civil affairs departments, the education departments and other departments.

Article 21

Parents or other guardians of minors shall not leave minors under the age of eight or in need of special care due to physical or psychological reasons unattended, or hand them over to persons without capacity for civil conduct, persons with limited capacity for civil conduct, persons with severe infectious diseases, or other inappropriate persons for temporary care. Parents or other guardians of minors shall not allow minors under the age of sixteen to live alone without guardianship.

Protection by School:

Article 39

Schools shall establish a student bullying prevention and control work system and provide education and training on the prevention and control of student bullying for faculty members and students. School shall immediately stop bullying behaviours of students and notify parents or other guardians of bullying and bullied minor students to participate in the identification and handling of bullying behaviours; provide psychological counseling, education and guidance for relevant minor students in a timely manner; and provide necessary family education and guidance for parents or other guardians of relevant minor students. For minor students who conduct bully, schools shall strengthen discipline in accordance with the law based on the nature and extent of the bullying behaviours. Schools shall not conceal serious bullying behaviors and shall report to the public security organs and the education administrative departments in a timely manner and cooperate with the relevant departments on handling them in accordance with the law.

Article 40

Schools and kindergartens shall establish a work system for preventing sexual assault and sexual harassment of minors. Schools and kindergartens shall not conceal illegal and criminal acts such as

sexual assault and sexual harassment of minors and shall report to the public security organs and education administrative departments in a timely manner and cooperate with the relevant departments on handling them in accordance with the law. Schools and kindergartens shall provide age-appropriate sex education for minors and improve their self-protection awareness and ability of preventing sexual assault and harassment. Schools and kindergartens shall adopt relevant protective measures in a timely manner for minors who have suffered sexual assault and harassment.

Article 77

No organisations or individuals shall conduct cyberbullying acts such as insulting, slandering, threatening or maliciously damaging the image of minors through texts, pictures, audios, videos, etc. Minors falling into the victim of cyberbullying and their parents and other guardians are entitled to notify internet service providers to delete, block, disconnect the link, etc. Upon receiving such notifications, internet service providers shall adopt necessary measures to curb cyberbullying and prevent the spread of the information.

Article 87

Local people's government and relevant departments shall safeguard campus safety and supervise and guide schools and nurseries to fulfil their responsibilities on campus security and establish a mechanism of reporting, handling and coordinating emergencies.

Anti-domestic Violence Law of the People's Republic of China, 2015:

In 2015, a 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 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 3 – ROLES AND RESPONSIBILITIES

The governing board has an overarching role in ensuring that policies, procedures and training in their schools or colleges are effective and comply with the law at all times. *The Governing Body should ensure that:*

- Harrow Shanghai complies with Chinese Law and upholds HIMs levels of expected safeguarding. As well as other relevant partners and organisations who are engaged in activities relating to children.
- Harrow Shanghai acknowledges the guidance in [Working Together to Safeguard Children](#). However, we must always be aware that we need to put this in context; both as an international school with a global outlook and a school governed by Chinese law.
- There is a clear accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children.
- They appoint a named Governor with specific responsibility for Child Protection, who will undergo Child Protection Training and refresher training at three-yearly intervals, to take leadership responsibility for the school's safeguarding arrangements.
- The members of the board with specific responsibility for staff recruitment and child protection and safeguarding receive appropriate and up-to-date child protection and safer recruitment training, and that refresher training takes place every four years.
- Harrow Shanghai has a child protection and safeguarding policy and procedures in place which are provided to and read by all staff – including temporary staff and volunteers – on induction. These are in accordance with UK guidance, and refer to locally agreed procedures put in place by, they are updated annually, and available publicly either via Harrow Shanghai website or by other means.
- All staff and governors read this policy and sign that they have read and understood the policy and procedures.
- Mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in this policy and procedures.
- All staff undertake appropriate child protection training annually.
- A senior member of the school's leadership team is designated to take lead responsibility for child protection (Designated Safeguarding Lead). The DSL's job description is similar in standard to the one outlined in Annex B of KCSIE 2023, and the need for a Deputy DSL is reviewed.
- The DSL has the appropriate authority and the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.
- Information regarding the role of the DSL is provided to all staff and volunteers on induction.
- Staff have the skills, knowledge and understanding necessary to keep looked after children safe.
- Appropriate staff have the information they need in relation to a child's looked after legal status.
- Harrow Shanghai's Staff Code of Conduct, amongst other things, includes staff/pupil relationships and communications including the use of social media. This should be provided to all staff – including temporary staff and volunteers – on induction.
- Harrow Shanghai operates safe recruitment procedures and has written recruitment and selection policies and procedures in place, to prevent those who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensures volunteers are appropriately supervised.
- At least one person on any appointment panel has undertaken safer recruitment training.
- Harrow Shanghai has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from locally agreed inter-agency procedures.
- Where services or activities are provided on Harrow Shanghai premises by another body, that the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with Harrow Shanghai on these matters where appropriate.

- There are procedures in place to make a referral to the ICPC, ACRO and DBS or local equivalent, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through the Wellbeing curriculum.
- Children are safeguarded from potentially harmful and inappropriate online material.
- Appropriate filters and appropriate monitoring systems are in place so children are safeguarded from potentially harmful and inappropriate online material being careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding. Guidelines signposted from the DoE Filtering and Monitoring Standards (2023) support the school to have effective systems in place.
- There are procedures in place to handle allegations that a child has harmed another child (child-on-child abuse) and these are followed by all staff.
- Harrow Shanghai has due regard in particular to the duty to prevent radicalisation and extremism. To stop young people from being drawn into terrorism; to report known cases of female genital mutilation (FGM) and to follow procedures when a child goes missing from education.
- Appropriate safeguarding responses are in place to children who go missing from education including the statutory duty to notify the Chinese authorities, Shanghai Youth Service and Rights Protection Office or relevant Embassy, as appropriate, when a pupil’s name is about to be deleted from the school admission register.
- Where services or activities are provided, on the School premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the school on these matters where appropriate.
- They undertake review of Harrow Shanghai policies and procedures relating to safeguarding and the efficiency with which the related duties have been discharged. Therefore, an annual ‘Safeguarding Audit’ should be carried out.
- They remedy, without delay, any deficiencies or weaknesses regarding child protection and safeguarding arrangements.

The Head Master should ensure that:

- The policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are fully implemented, and followed by all staff.
- S/he liaises with the Chinese Authorities, including the Shanghai Youth Service and Rights Protection Office and/or partner agencies e.g. Embassies in the event of allegations of abuse being made against a member of staff or volunteer.
- S/he receives appropriate child protection and safeguarding training which is regularly updated.
- Sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies.
- A report is sent to the ICPC, ACRO and DBS (within one month of them leaving the School) regarding any person (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. For full details and to download a copy of the referral form see: <https://www.gov.uk/government/organisations/disclosure-and-barring-service>
- In addition, if the person is a teacher, Harrow will also consider referring the case to the National College for Teaching and Leadership. The National College is responsible for the regulation of teachers in respect of

serious misconduct. This may happen where a teacher is dismissed (or would have been dismissed had s/he not resigned) and a prohibition order may be appropriate, because of ‘unacceptable professional conduct’, ‘conduct that may bring the profession in to disrepute’, or a ‘conviction at any time for a relevant offence’. For full details and to download a copy of the referral form see: <https://www.gov.uk/government/collections/teacher-misconduct>

Designated Safeguarding Lead (DSL):

Harrow Shanghai has appointed a senior member of staff with the necessary status and authority - the Designated Safeguarding Lead (DSL) - to be responsible for matters relating to Child Protection and Welfare.

In the absence of the DSL, or if the DSL is him/herself the subject of a complaint, the designated Deputy DSL will take responsibility for Child Protection issues within Harrow Shanghai and carry out all the related duties of the DSL. The DSL and the Head Master must ensure that there is always cover for this role including arrangements during school holidays.

The main responsibilities of the DSL are:

- To be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- To be fully conversant with the local Chinese law and Harrow Shanghai’s Child Protection & Safeguarding Policy and Procedures.
- To be available to all staff in Harrow community for consultation on Child Protection and Safeguarding issues, and act as a source of support, advice and expertise within the College.
- Liaise with staff (especially the pastoral team, medical centre team, IT technicians and SENCO) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral.
- To coordinate the Child Protection and Safeguarding Procedures within the School.
- To monitor the keeping, confidentiality and storage of records in relation to Child Protection and Safeguarding, including monitoring and updating records of pupils in Harrow Shanghai who are subject to a Child Protection Plan as notification is received.
- To ensure that appropriate action is taken in Harrow Shanghai and that procedures are followed in actual or suspected cases of abuse.
- To inform the Shanghai Youth Service and Rights Protection Office, or relevant Embassy in writing when a child who is subject to a Child Protection Plan.
- When a child who is subject to a Child Protection Plan moves to another school, and to inform the new school of the child’s status.
- To take part in strategy meetings, initial child protection conferences or reviews, and core groups as required. In the event that the DSL cannot attend, the DSL should ensure that a key member of staff attends. Where this is not possible, the DSL must provide a written report to the conference / meeting / group as required. (It is acknowledged that this should only occur rarely as the involvement of Harrow staff is vital given the close involvement with the child.)
- Carry out an annual review of the Child Protection and Safeguarding Policy and Procedures, assess how the duties have been discharged, and report on these findings to the Governing body via the Designated Governor and/or Chairman.
- Ensure that the DSL, Deputy DSLs and other relevant staff have undertaken child protection training and training

in inter-agency working, and will attend refresher training at two-yearly intervals.

Referrals

The DSL will:

- Advise and act upon all suspicion, belief and evidence of abuse reported to him / her.
- Refer cases of suspected abuse to the local Chinese authority, including the Shanghai Youth Service and Rights Protection Office or the children's respective Embassy.
- Formally refer cases of suspected abuse or allegations to the relevant investigating agencies within 24 hours of the disclosure or suspicion of abuse.
- If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves;
- Refer to guidance from the UK's Channel programme for information where radicalisation concern as required;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Chinese Police as required.

Working with others:

- Liaise with the Head Master to inform them of issues and actions taken, and ensure there is always cover for this role. (Unless the Head Master is the subject of the complaint - in this situation the DSL will liaise directly with the Chairman of Governors.)
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Act as a source of support, advice and expertise for staff.

Training:

- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead deputies should also undergo training every 2 years.
- Refresh their knowledge and skills (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how UK local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school or Harrow with regards to the requirements of the Prevent duty, including online safety and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or Harrow may put in place to protect them.

The DSL will:

- Maintain an ongoing training programme for all Harrow Shanghai employees, and ensure that this training is current and relevant.
- Ensure each member of staff has access to and understands the School's Child Protection and Safeguarding Policy and procedures, especially new and part time staff;
- Maintain for all staff members child protection training (including online safety) that is regularly updated and considered as part of the whole-school approach. This includes regular safeguarding and child protection updates as required, and at least annually.
- Ensure that all staff have initial induction training in Child Protection.
- Check annually with the HR Department that all Harrow Shanghai staff are up-to-date with Child Protection training and follow up in cases where staff are found not to be up-to-date with training. (Refresher training must be completed every 3 years.)
- Keep detailed, accurate, secure written records of any incidents and concerns.
- Ensure that the curriculum offers opportunities for raising student awareness of child protection issues and developing strategies for ensuring their own protection, for example through the Wellbeing programme.
- To make sure staff are aware of training opportunities and the latest local policies on safeguarding. For example, UK links can be accessed through Tim Gerrish or websites like the ones listed in Appendix 5

In order to ensure that the School's policies are known, understood and used appropriately, the DSL will:

- Ensure that the School's Child Protection and Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this.
- Ensure the Child Protection and Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Harrow Shanghai in this, with the aim of avoiding later conflict.
- To ensure that all staff are aware of training opportunities and the latest policies on safeguarding for example, the offer of the School to provide training on NSPCC Safeguarding in Schools Online course.

Child Protection File:

- When a child leaves the School, the DSL ensures the child protection file is copied and transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt.
- Harrow Shanghai will retain the original CP file until at least the child's 25th birthday (if we are the final school) along with a record of when and to which establishment the copy was sent (if appropriate).
- Harrow Shanghai must have regard to any other requirement requiring longer retention period: The current requirement under IICSA (Independent Inquiry into Child Sex Abuse) is that records of child sex abuse should be retained for the period of the inquiry. For recommendations please see: <https://www.iicsa.org.uk/letter-to-local-authority-ceos>
- Ensure that, if a child goes missing or leaves to be educated at home, then a copy of that child's protection file should be sent to the Shanghai Youth Service and Rights Protection Office for further investigation or notification.

Availability:

- During term time always be available (during school hours) for staff in the school or Harrow Shanghai to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputies) would be expected to be available

in person, it is a matter for individual schools, working with the DSL, to define what “available” means and whether in exceptional circumstances availability via phone and or other such mediums is acceptable.

- It is a matter for individual schools and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities
- It is a matter for individual schools and colleges as to whether they choose to have one or more deputy DSL(s). Any deputies should be trained to the same standard as the DSL.
- Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the DSL. This responsibility should not be delegated.

All staff and volunteers should:

- Fully comply with the School’s policies and procedures.
- Attend appropriate training.
- Inform the designated person of any concerns.
- Read and understand at least the School Child protection and Safeguarding Policy. *Therefore they have a duty to:*
- Record any safeguarding concerns on My concern / CPOMS or alert the DSL team.
- Report concerns about another staff member, refer these concerns to the Head Master.
- Report concerns about the Head Master, refer these concerns to the Chair of Governors.
- Raise concerns about poor or unsafe practices and potential failures in the school’s safeguarding regime via the Speaking-Up Policy and its procedures.
- Be aware of systems within the Harrow Group supports safeguarding and these should be explained to them as part of staff induction. This includes: the School’s Child Protection and Safeguarding policy; the School’s staff Code of Conduct; and the identity and role of the DSL.
- Receive appropriate child protection training which is regularly updated.
- Receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- 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.
- Maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.
- Where there are concerns about a child, raise these with the DSL
- Understand that anyone can make a referral.

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 taught about safeguarding, 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, and review such provision annually

Systems are in place to ensure application of HS13 policy:

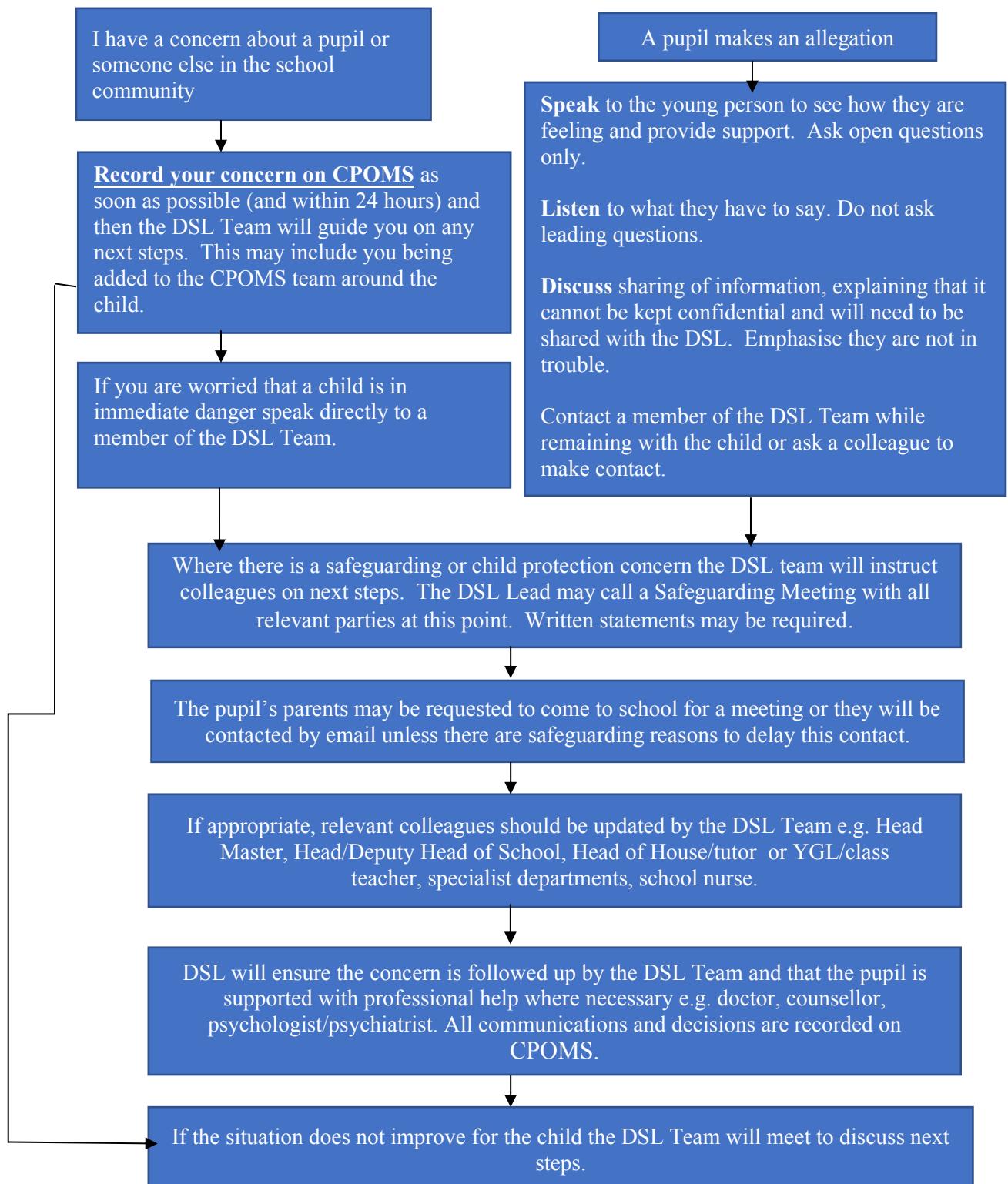
Role	Person
AISL Safeguarding Governor	Ahmed Hussain ahussain@aisl-edu.com
HEOV Safeguarding Lead	Debra Price priced@johnlyonsfoundation.org.uk
AISL Safer Recruitment	Jenny Chan jchan@aisl-edu.com
Safeguarding Consultant	International Child Protection Advisors (ICPA) www.icpa.co.uk

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

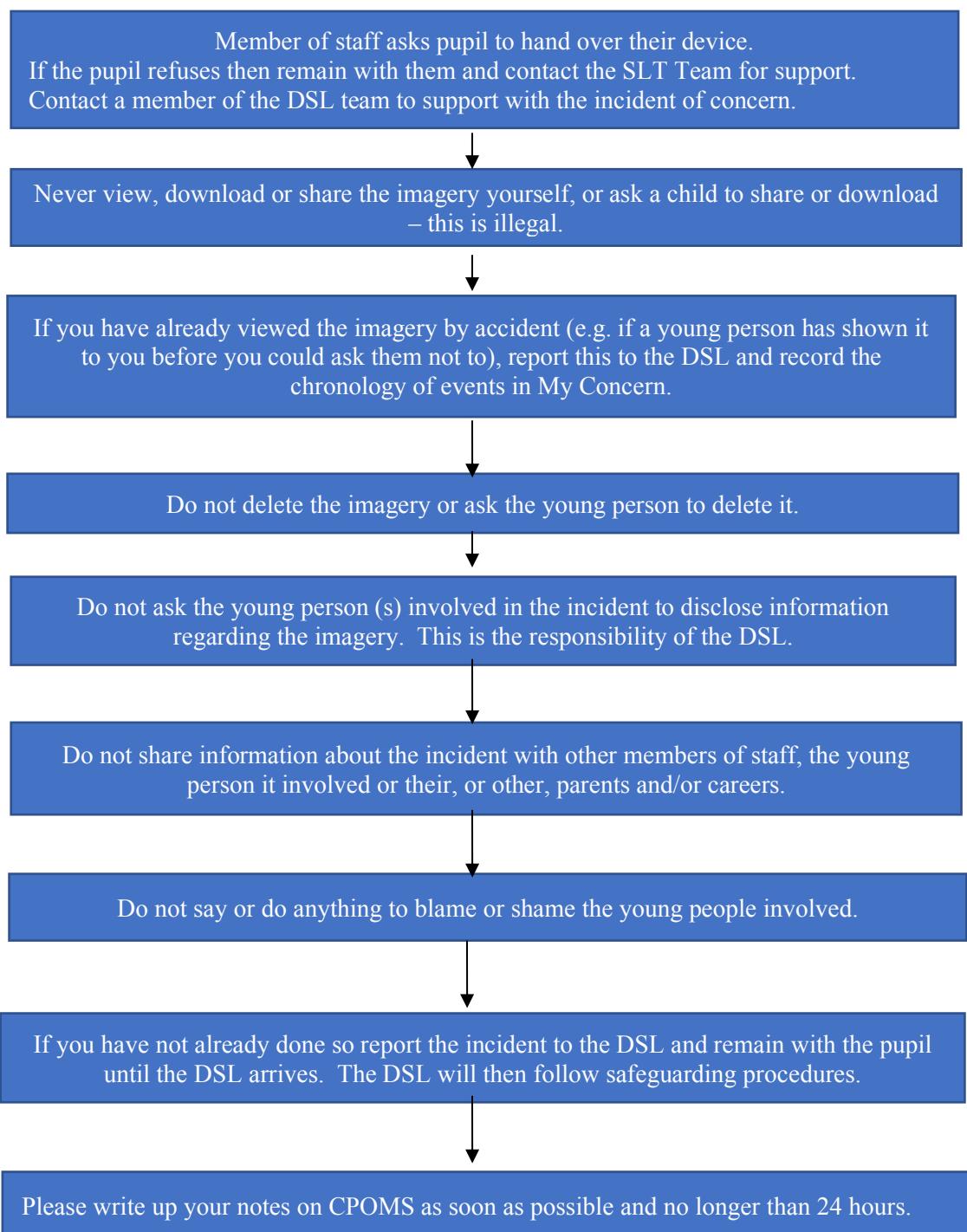
- Share and review policy and procedures
- Evaluate and audit safeguarding practices
 - This will comprise an annual cycle of internal audit undertaken by the DSL
 - A three-year cycle of external objective review
- Develop an action plan encompassing operational practices and strategic development relating 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

Appendix 4 – Flow Charts and Procedures

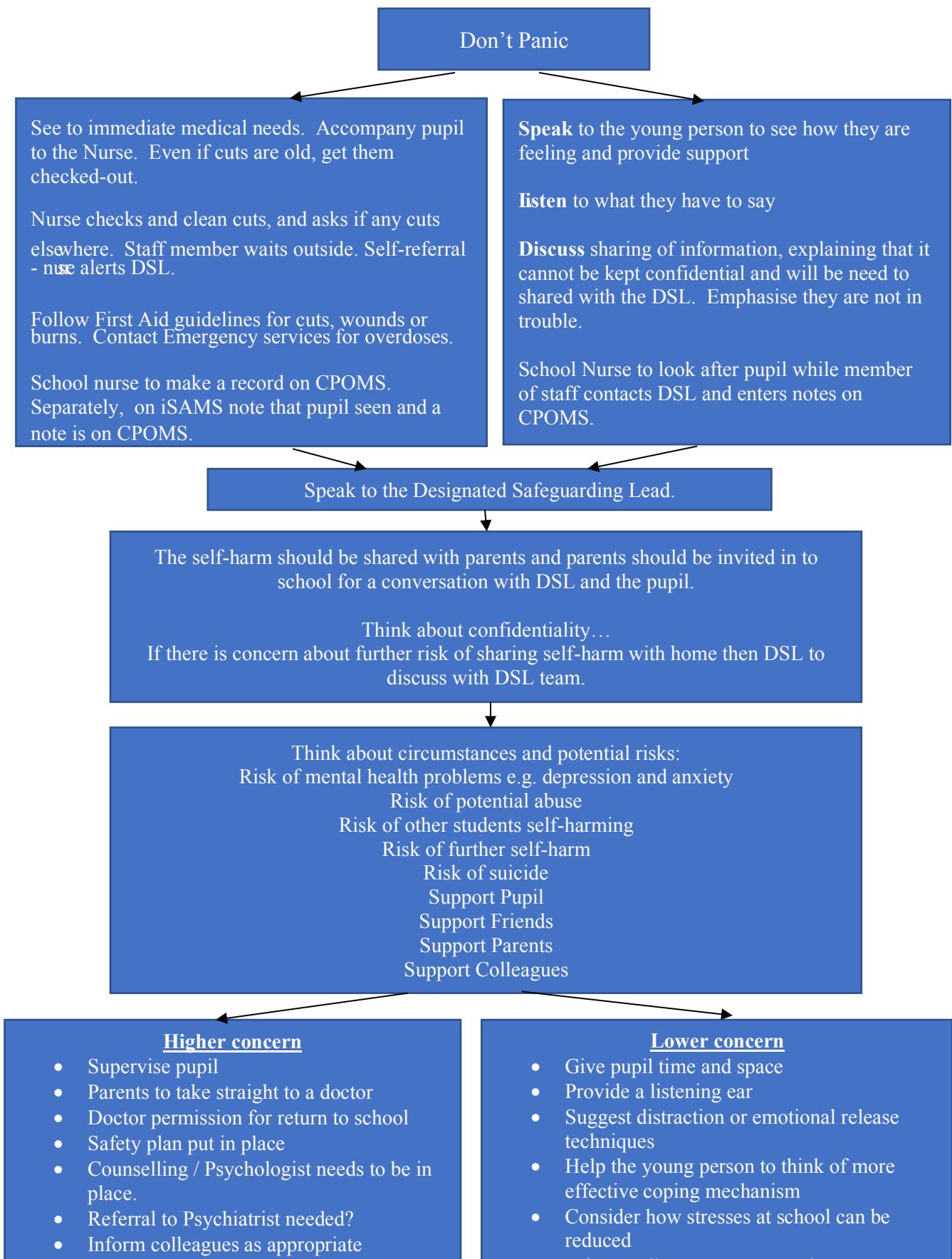
Safeguarding Concern Flowchart



Sexting concern flowchart



Self-harm Procedure Flowchart



APPENDIX 5 – HOW TO ADD A CPOMS ENTRY AND UPDATE

Full details on how to add and update an entry on CPOMS is available on sharepoint here: [CPOMS](#) instructions for restricted users.

CPOMS – How to add and update an entry

What should NOT go on CPOMS?

- Any low-level pastoral incident / concern – speak to HMMS / tutor / class teacher in LS first (HM's and tutors should record these concerns in ISAMS)
- Any safeguarding concerns about a member of staff – speak / communicate with DSL or Deputy DSLs or anything which you are ‘self-reporting’

What should you report on CPOMS?

Any issue which concerns you about a pupil or an incident you have witnessed. This might include:

- Concerns about a pupil being anxious, depressed, showing different behaviour – a subtle change over time or a rapid change
- A significant pastoral concern such as a friendship difficulty, inability to form good relationships with peers
- Any safeguarding concern – mental health issues, self-harm, suicidal ideation, eating disorder, abuse, drugs, inappropriate behaviour, bullying and peer on peer abuse of any sort, alcohol use, inappropriate use of online technology including accessing pornography, gambling, criminal activity of any sort etc.
- Home issues – parental divorce, significant illness, parental mental health concerns, lack of supervision, family member in prison
- Witnessing or overhearing nasty comments about a pupil / seeing another pupil being unkind to another
- A safeguarding “event” – finding pupils in a compromising situation, a member of the public trespassing or accessing area of the College that they are not allowed, a significant accident. An event does not have to have a pupil assigned to it (especially if you are uncertain who the pupil might have been – it is more important to report what you saw)

How to report a concern

- Log in at <https://harrowshanghai.cpoms.net>
- Click on “Add incident”

- Fill in the details on the “Incident” page, remembering these important points:
 - Name of student
 - Date, time and place
 - Who else was present
- The details of the incident box should contain ALL details, specifically names, times, places – as much detail as you have about the pupil / event /situation. If a child or parent spoke, record their words rather than your interpretation of them.
- **The incident should ALWAYS be alerted to the appropriate Head of Phase.** Please note that the Headmaster and Principal Deputy Head are notified of all new incidents. Heads of Phase are responsible for delegating concerns; in most cases the concern will be delegated to HMMs, tutors or class teachers as case lead.
- Attachment – you can attach documents to the entry. It might be a copy of some hand written notes, a piece of work that a pupil has written that you are concerned about, something which you have found (eg a note / piece of paper which is concerning)
- When you are satisfied, press “submit incident”.

If there is an urgent safeguarding issue and you feel a pupil is at risk of significant harm, please directly contact a DSL or DDSL in person or by using their phone and then log on CPOMS.

Adding an action

You may be included or assigned responsibility for an incident. In such cases you will receive an alert via email. Once you have read an alert, you can then log an action. This is very similar to incident logging and you can choose to alert other staff in the same manner. You can then make sure that there is a clear trail of what has been done, by whom and when. This ensures that everyone alerted has an up-to-date knowledge of what is happening with that student/ incident. Full details on adding actions is in sharepoint.

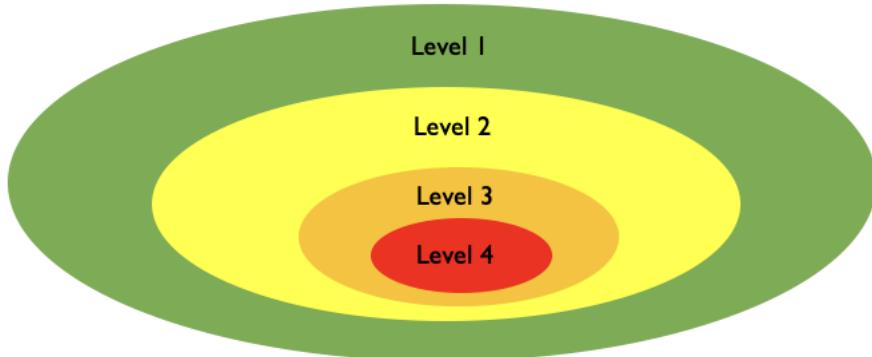
APPENDIX 6 –LEVELS OF NEED

Levels of need

The below table is a guide around levels of need.

After an entry has been made onto CPOMS, a level of need will be assigned to the pupil associated with the case. Levels of need may move, depending on the pupil’s circumstances. When a level of need is altered, the rationale behind that decision will be recorded on CPOMS.

The initial level of need will be decided by the DSL or Deputy DSL, based on the criteria listed below.



Level	Needs of the pupil	Examples of support	Other comments
Low level Pastoral concern (1)	<p>This pupil may just need keeping an eye on to ensure that a low level concern does not develop into a larger issue.</p> <p>The team around the child (usually taken from HoH, Tutor, class teacher, DSL / YG Lead) will speak about the pupil at their weekly meetings to ensure that there have been no further developments.</p> <p>Examples may be initial concerns regarding:</p> <ul style="list-style-type: none"> • Disordered eating or weight loss • Low level mental health or behaviour changes • Family circumstances • SEN or academic issues • Friendship / relationship issues • Poor sleep 	<p>The support offered will be by internal College staff and professionals.</p> <p>The pupil should be offered support by relevant individuals. This might be:</p> <ul style="list-style-type: none"> • HoH/ Class teacher • Tutor • Counsellor • Head of School • Deputy Head of School • Nurse • SEN Lead <p>The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The DSL or Head of Phase will discuss the pupil at their fortnightly meeting with the HMM / Class teacher</p>	<p>HoHs / tutors / class teachers should build up a full chronology of the pupil on CPOMS, adding any relevant updates as soon as they occur. At least monthly, you should provide a summary of the pupil on CPOMS so that their progress can be recorded.</p> <p>This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p>
Higher level Pastoral concern (2)	<p>This pupil will need a close eye keeping on them and is likely to need access to an additional service, usually provided by the School but not exclusively so.</p> <p>They may be vulnerable individuals who are showing early signs of a failure to thrive and flourish, either in School or at home. Additional help is needed in order to enable them to fulfil their potential.</p> <p>This pupil will need close monitoring and there may be higher level concerns about:</p> <ul style="list-style-type: none"> • Disordered eating or weight loss • Mental health or behaviour changes • Family circumstances (eg divorce) • Significant bereavement • Significant ill health within the family • SEN or academic issues • Friendship / relationship issues • Bullying • Sexual harassment • Online safety / sexting • Peer on peer abuse 	<p>The support offered will usually be by internal College staff and professionals.</p> <p>The pupil should be offered support by relevant individuals. This might be:</p> <ul style="list-style-type: none"> • HoH / Class teachers • Tutor • Counsellor • Head/Deputy Head of School • Nurse • SEN Lead • DSL <p>The pupil will be discussed as part of the biweekly PLG / Safeguarding meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The DSL and Head of School will discuss the pupil at their fortnightly meeting with the HM / class teacher</p> <p>External services may be accessed, if appropriate. These might include:</p> <ul style="list-style-type: none"> • Psychologist • SEN Support (eg an educational psychologist) 	<p>The pupil will be discussed in detail at a DSLs meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>It is likely that parents will be aware that there are pastoral concerns.</p> <p>HoHs / US Class teacher should build up a full chronology of the pupil on CPOMS, adding any relevant updates as soon as they occur. At least monthly, an HoH / Class teacher should provide a summary of the pupil on CPOMS so that their progress can be recorded.</p> <p>This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>If appropriate relevant pastoral information will be shared with SLT and the Master.</p>

Level	Needs of the pupil	Examples of support	Other comments
	<ul style="list-style-type: none"> Attendance at College General social issues / social anxiety Gender issues 	<ul style="list-style-type: none"> An external therapist Education Welfare Service 	
Intensive support and monitoring (3)	<p>This pupil will require significant support due to complex and high-level pastoral concerns. Often several areas of professional support will be required. The pupil is likely to be dealing with multiple long-term issues and they need support from individuals to ensure that the impact of these significant issues are minimised as much as possible.</p> <p>Issues likely to be within this category of concern are:</p> <ul style="list-style-type: none"> Eating disorder, significant weight loss Mental health – severe anxiety, depression, suicidal ideation Diagnosed mental health illness, such as OCD, Bipolar or Schizophrenia Repeated online safety concerns, sexting Repeated alcohol offences Concerns over illegal substances Significant bullying which is longer term Dangerous behaviour Serious physical illness / disability Gambling or gaming addiction Serious sexual harassment Peer on peer abuse Gender transition / reassignment Risky sexual behaviour Death of a parent / sibling 	<p>The support offered will include both internal and external professionals and agencies. This may include:</p> <ul style="list-style-type: none"> Counselling External psychologist or Psychiatrist External therapists Head of School Deputy Head of School DSL Education welfare service <p>The pupil will be discussed as part of the DSL meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The Heads of School and DSL will discuss the pupil at their fortnightly meeting with the HoH.</p> <p>This pupil will be put onto a College welfare plan which will be overseen by the DSL and specialist tutoring support will also be offered and discussed.</p>	<p>The pupil will be discussed in detail at DSL group meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>The welfare plan will be reviewed fortnightly.</p> <p>It is likely that parents will be aware that there are pastoral concerns.</p> <p>HoHs / class teachers should build up a full chronology of the pupil on CPOMS, adding any relevant updates as soon as they occur. At least fortnightly, a HoH / class teacher should provide a summary of the pupil on CPOMS so that their progress can be recorded.</p> <p>This will enable the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>The Head and the SLT will be aware of the pupil's needs. The Safeguarding Governor will be informed.</p>
Significant, serious and urgent Level of Need (4)	<p>This pupil is likely to be living in circumstances where they are suffering or are likely to suffer significant harm, where the young person themselves may pose a risk of serious harm to others or where there are complex needs in relation to disability and may require a more specialist intervention.</p> <p>The pupil may be accessing more specialised services such as residential care or hospitalisation.</p> <p>Issues likely to be in this category of concern are:</p> <ul style="list-style-type: none"> In-patient care for an eating or mental health issue Suicide attempt or suicidal ideation (requiring psychiatric evaluation) Psychiatric assessment for an acute mental health concern (such as psychosis) Abuse – physical, sexual, emotional, neglect Honour based violence: FGM, Forced Marriage Sexual violence or assault Radicalisation Absconding, no idea of whereabouts Homelessness <p>In this level of need, an appropriate external referral is likely to be made</p>	<p>The support offered will include both internal and external professionals and agencies to help children and their families cope with very significant and long term care. This may include a combination of:</p> <ul style="list-style-type: none"> Therapists / medical professionals within an inpatient setting Counselling College / external Psychiatrist External therapists DSL Education welfare service Head Master Head of School <p>The pupil will be discussed as part of the PGL meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The DSL will discuss the pupil at their meeting with the Heads of School</p> <p>This pupil will be put onto a School welfare plan which will be overseen by the DSL and specialist tutoring support will also be offered and discussed.</p>	<p>The pupil will be discussed in detail at DSL group meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>The welfare plan will be reviewed weekly.</p> <p>Parents will be aware that there are pastoral concerns and will have regular contact with the HM and also the DSL.</p> <p>A Child protection plan may be in place and will be monitored and overseen by the DSL.</p> <p>HoHs / class teachers should build up a full chronology of the pupil on CPOMS adding any relevant updates as soon as they occur. At least fortnightly, a HoH / class teacher should provide a summary of the pupil on CPOMS so that their progress can be recorded.</p> <p>This will enable the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>The Head and the SLT will be aware of the pupil's needs. The Safeguarding Governor will be informed.</p>

Appendix 8

Proposed changes in the draft of Keeping Children Safe in Education, 2024 (DoE)

Definition of Safeguarding changed to to include:

- “Providing help and support to meet the needs of children as soon as problems arrive”
- Protecting children from maltreatment, **inside or outside the home including online**

Early Help – professionals should be alert to need of early help for a child who:

- Frequently missing from **education, home or care**.
- Has experienced multiple suspensions and at risk of being expelled
- Has parent or carer in custody

Abuse, neglect and exploitation:

- Where applicable ‘abuse and neglect has been changed in the document to ‘abuse, neglect and exploitation’
- Definition of abuse also changed to clarify that harm can include children witnessing the ill treatment of others. Particularly when children see, hear or experience domestic abuse and its effects

Children absent from education:

- In outlining sign that children may be at risk of harm, the guidance updates “deliberately missing education” to “unexplainable or persistent absences from education.”

Data protection:

- Guidance recommends education professionals read DfE Data protection guidance for schools (DfE 2024b).

Alternative provision:

- When school places a pupil with an alternative provision provider, the school continues to be responsible for pupil’s safeguarding

Children who are lesbian, gay, or gender questioning:

- This section is under review (see gender questioning children guidance consultation (DoE2023b)

Holding and sharing information:

- As well as keeping records of concerns, discussion and decisions, DSLs should keep record of rationales for any decisions made