

**Shrewsbury**  
International School  
PHNOM PENH

## SISPP SFG01 SAFEGUARDING POLICY

**Produced by:** Toby Waterson

**Reviewed by the Advisory Board on:**

**Ratified by the Advisory Board on:**

**Date of Next Review by School Senior Leaders:**

***Shrewsbury International School Phnom Penh is committed to providing outstanding care and education to its pupils and to safeguarding and promoting the welfare of children and young people.***

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The Designated Safeguarding Lead for the School is the Principal, Toby Waterson.



Toby Waterson: 086 838 555

## 1. Introduction

- SISPP fully recognises its responsibilities for safeguarding all of its pupils. This policy has been authorised by the Advisory Board and applies to all members of Staff, governors and volunteers working in the school.
- The School's policy pays due regard to the guidance such as the UK's DfE guidance 'Keeping Children Safe in Education (September 2023) (KCSIE).
- The School also recognises that there are considerable challenges in the local context that relate to child safeguarding and many of the supporting services used by schools in the UK (US, Australia etc.) are not as developed or effective. Therefore, a pragmatic approach is taken by the School to support high standards of child safeguarding which draws on the expertise and commitment found within the staff body to find the best solution for each child in any given situation.
- The School also notes that as a signatory to the UNCRC (United Nations Convention on the Rights of the Child), Cambodia has declared intention to improve services and infrastructure, and develop legal and cultural landscapes to allow for more effective child protection in the country. Therefore, despite any 'cultural context' that may cause any doubt or hesitation when faced with a situation of aligning practice and policy, the UNCRC provides a clear and detailed framework of intent.
- This policy is available to parents on request. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example on an educational visit.
- Whilst the principles of this policy are relevant across the age range, particular attention has been made to ensure it is pertinent in the Early Years setting.
- Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental injury, sexual exploitation or emotional ill-treatment.

- A peer on peer abuse incident should be treated as a child protection issue when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm. It should be noted that children with SEN and disabilities can be disproportionately impacted by things like peer on peer abuse.
- Pupils should know that they have a means of raising issues of personal concern. They should feel that they are encouraged to talk to staff, that the School is always prepared to listen to their concerns and will take them seriously
- The School will take all reasonable measures to:
  - protect each pupil from any form of abuse, whether from an adult or another pupil;
  - be alert to signs of abuse both in the School and from outside;
  - deal appropriately with every suspicion or complaint of abuse.
- The School will support pupils who have been abused in accordance with his/her agreed child protection plan.
- The School will be alert to the medical needs of pupils with medical conditions.
- The School will operate robust and sensible health and safety procedures.
- All staff of the School have a role to play in safeguarding children.
- The School will take all practicable steps to ensure that the School premises are as secure as circumstances permit.
- The School will take all practicable steps to support any child in need even if they are not in immediate danger and will seek help and advice from local support services and agencies as well as the local school network.
- Anyone who has a concern about a child should speak to the DSL.
- The School and the Advisory Board shall undertake an annual review of the Safeguarding Policy which will be minuted in the minutes of the Board Meeting. The nominated governor for safeguarding is Chair of the Advisory Board of Governors, who will be responsible for safeguarding arrangements in the school.
- Other documents that need to be taken into account are:
  - Staff Code of Conduct (HR02)
  - Early Years Provision: Policy and Procedures (aka Staff Handbook) (CU01)
  - Health and Safety Policy (HS01)
  - The School's Missing Child procedure is currently covered by Emergency Procedures in the Early Years site.
  - Recruitment, Appointment & Disclosure Policy and Procedure (HR01)
  - ICT Acceptable Use Agreement (ICT02)
- The School will follow, in so far as it is able to in the best interests of the child, local legal and agency requirements. Local partners are listed in Appendix 3.

Every complaint or suspicion of abuse from within or outside the School will be taken seriously. Any doubts or concerns over apparently borderline cases will be discussed informally with a trusted DSL equivalent at another local school.

## **2. Safeguarding Defined**

The definition of abuse as outlined in 'Keeping Children Safe in Education 2023' is: *'abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.'*

## **3. Recruitment of Staff**

- At SISPP we ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people. All staff appointed to the school will be subject to the procedures detailed in the Recruitment, Appointment & Disclosure Policy and Procedure and is based upon best practice in British International Schools (in turn based on up to date guidance from UK agencies).
- International Child Protection Certificates or equivalent local police checks are required from all staff members and all volunteers at SISPP as outlined in sections 4 & 5 of the Recruitment, Appointment & Disclosure Policy and Procedure .
- The Principal is trained in Safer Recruitment.
- Any member of staff taking up a management position is subject to further background checks.
- The School will take all reasonable measures to ensure that we carry out all necessary checks (Enhanced DBS checks are in place for all UK governors and equivalents are required for those colleagues from other jurisdictions) on the suitability of people who serve on the School's Advisory Board in accordance with the above regulations and guidance given in 'Keeping Children Safe in Education' and the National Minimum Standards for Boarding.
- The School will ensure that where someone (employed, contracted, a volunteer or student) is considered to be unsuitable to work with children, a prompt and detailed report is made to the relevant UK, Cambodian and any other authorities as appropriate depending on the country which has issued the passport.

- The School will ensure that where staff from another organisation are working with our pupils on another site, we have received assurances that appropriate child protection checks and procedures apply to those staff.
- Child protection training is part of the induction programme for all newly appointed staff. Staff are made aware of their responsibilities in identifying and reporting possible cases of abuse.
- SISPP does not allow people whose suitability has not been checked, including through a criminal records check, to have unsupervised contact with children being cared for. All staff in regulated activity with Early Years children and with children who have before or after school care up to the age of 8 are told on induction of the need to inform the school if their circumstances change resulting in them being disqualified under the UK Childcare (Disqualification) Regulations 2018 or other national equivalents.

#### **4. Training**

- All members of staff and volunteers newly appointed have a meeting with the Designated Safeguarding Lead. He/she will explain the school's safeguarding policy and procedures and the Staff Code of Conduct and ensure that the new member of staff understands the procedures. New staff will be given copies of the Safeguarding Policy including the Staff Code of Conduct and the Staff Handbook. The new member of staff/volunteer will also be given a copy of Part 1 of 'Keeping Children Safe in Education'. They will be told that Toby Waterson is the Designated Safeguarding Lead. They will also be told about the School's safeguarding response to children who have concerning attendance records.
- All staff will complete an online annual Educare Safeguarding course "Child Protection for International Schools" and attend Level 1 safeguarding training in person with the DSL on an annual basis. A record of attendees is kept by the HR office in the Single Central Register (SCR).
- The Designated Safeguarding Lead is Toby Waterson (Principal). The DSL receives DSL training every two years and undertake modules of the inter-agency training.
- The Designated Governor for Safeguarding (from hereon 'Nominated Governor'), Carla Howarth, will attend Child Protection training for governors every three years. She will meet termly with the Designated Safeguarding Lead to review safeguarding matters within the School.
- Training in Level 1 child protection will be provided and updated annually for all staff, including part-time and voluntary staff. Staff will be advised that they should have the attitude that 'it could happen here'.

#### **5. Designated Safeguarding Lead**

The Designated Safeguarding Lead for the School is the Principal, Toby Waterson. There are currently no deputy DSLs (DDSLs).

Toby Waterson: 086 838 555

The DSL is responsible for matters regarding child protection and welfare. Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other. If preferred, the parents may discuss concerns with the pupil's classroom teacher, who will notify the Designated Safeguarding Lead in accordance with the procedures.

5.1 The responsibilities of the Designated Safeguarding Lead 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 and concern for children;
- to ensure child protection procedures are in place and updated as appropriate on an annual basis; and reviewed and approved by the Advisory Board annually;
- to meet with the Safeguarding team on a regular basis;
- to meet with the Designated Governor termly;
- to develop a Safeguarding Action Plan;
- to maintain an ongoing training programme for all School employees;
- to keep detailed accurate and secure written records of any concerns raised or suspected cases of abuse/referral;
- to recognise how to identify signs of abuse and when it is appropriate to make a referral;
- to ensure all staff are aware of school policy;
- to be available to provide support to pupils;
- to liaise with the police and NGOs and other agencies on behalf of the School;
- to coordinate arrangements for monitoring of pupils on roll who have been identified as being in need of protection;
- to obtain access to resources and attend any relevant or refresher training courses every years including inter-agency training;
- to ensure parents have access to the Safeguarding Policy;
- where children leave the establishment, to ensure their child protection file is copied for the new establishment as soon as possible but transferred separately from the main pupil file.

5.2 The Designated Safeguarding Lead will:

- liaise with the local authority and work with other agencies to secure best outcomes for individual cases;
- arrange for internet safety training every two years to the pupils, staff and parents. This is in addition to the continual internet safety training that the pupils receive (as appropriate for their age).



- in relation to looked after children, ensure that appropriate staff have the information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. The DSL should have details of the child's carer. To have due regard that a previously looked after child potentially remains vulnerable.
- consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare when safeguarding incidents/behaviours occur outside of school.
- where the Principal is the subject of a complaint, consult with the Chairman of the Board of Governors or in his/her absence, the Deputy Chairman, without notifying the Principal first.
- refer cases where a person is dismissed or let go due to risk/harm to a child to the Disclosure and Barring Service, as appropriate.

## 6. Types of Abuse

### ***Staff must know what constitutes child abuse.***

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.

6.1 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.

6.2 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 a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or

hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

6.3 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

6.4 Neglect – The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

## 7. Signs of Abuse

***Staff must be able to recognise signs of child abuse.***

Possible signs of abuse include (but are not limited to):

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members of friends, without an obvious reason;

- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.
- Children who have unexplained bruising, marks or signs of abuse.
- Children's comments which give cause for concern.

## **8. Contextual Safeguarding**

Where incidents and or behaviours are associated with factors outside the school setting and/or occur between children outside the school setting the designated safeguarding lead should be considering contextual safeguarding. This simply means assessments of children in such cases should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Children's social care assessments should consider such factors and so, it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the evidence and the full context of any abuse. Supporting information regarding contextual safeguarding, and where schools fit into the wider environment, is available here:

<https://contextualsafeguarding.org.uk/>

## **9. Serious Violence**

All staff should be aware of the indicators that may signal that a child is at risk from or is involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

## **10. Child on Child Abuse**

Staff should recognise that children are capable of abusing their peers and other children. Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Victims of child on child abuse should be supported as they would be if they were the victim of any other form of abuse, in accordance with this policy. Child on child abuse can manifest itself in a number of ways. This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse; sexual violence and sexual harassment; upskirting; sexting and initiation/hazing type violence and rituals. More information below:

## **11. Sexting**

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law.

## **12. Initiation/Hazing**

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

## **13. Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be aware of the impact that traumatic experiences can have on the mental health of children.

#### **14. Prejudiced Behaviour**

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

#### **15. Upskirting**

This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It could constitute a criminal offence in Cambodia.

#### **16. Teenage Relationship Abuse**

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

#### **17. Sexual Violence and Sexual Harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff

should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should:

- make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenge behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

When referring to sexual violence we are referring to rape, assault by penetration; and sexual assault.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment can include: sexual comments, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual jokes or taunting; physical behaviour such as deliberately brushing against someone; online sexual harassment such as non-consensual sharing of sexual images and videos and unwanted sexual comments and messages.

It is vital that staff at the School understand that any child who is perpetrating the abuse may also be at risk of harm. Staff should make every effort to ensure that the perpetrator is also treated as a victim and undertake assessments to conclude this. Sensitive work must be undertaken with the child who is perpetrating, by helping them to understand the nature of their behaviour and the effect it has on others may prevent abuse as a whole.

Staff must be able to use their professional judgement in identifying when what may be perceived as “normal developmental childhood behaviour” becomes abusive, dangerous and harmful to others. It is recognised that girls are more likely to be victims and boys more likely to be perpetrators. Incidents of peer-on-peer abuse will be recorded, investigated and dealt with as a safeguarding incident. A child who reports sexual violence or sexual harassment should be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be made to feel ashamed or that they are creating a problem. Any concerns should be reported to the DSL.

## **18. Safeguarding Children with Special Educational Needs and Disabilities**

It is recognised that children with special educational needs or disabilities (SEND) can present additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration; children with SEND can be disproportionately impacted by issues such as bullying, without necessarily showing outward signs; communication barriers.

It is important, therefore, to be particularly sensitive to these issues when considering any aspect of the welfare and safety of such children, and to seek professional advice where necessary.

## **19. Children Missing Education**

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School and college staff should follow their procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Schools and colleges should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage.

## **20. Domestic Abuse and Honour-Based Violence**

Children living in households where there is domestic abuse which could be coercion or violence, including honour based violence, could be at significant risk of harm. Depending on the level of risk, we may or may not consult parents before contacting support groups.

## 21. Child Sexual Exploitation/Child Criminal Exploitation

The staff are all told if they have any concerns they should speak to the Designated Safeguarding Lead.

*\*Female Genital Mutilation (FGM) and Radicalisation are integrated into school safeguarding policies but for Early Years in the local context these items are not currently elaborated upon, but please speak to the DSL if you have any concerns or questions relating to either.*

## 22. Whistleblowing

All staff are required to report to the Principal, or, in his/her absence, the Chairman of Governors, any concern or allegations about school practices or the behaviour of colleagues including inappropriate sexual comments; excessive 1-1 attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images which are likely to put pupils at risk of abuse or other serious harm. 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. A copy of the whistleblowing policy is to be developed.

## 23. Injuries

At the beginning of each session or school day parents are requested to notify us of any accidents, incidents or injuries which may affect their child before leaving him/her at the setting/school. A note will be made of any existing injuries and how the injury was received will be recorded on a Body Map (Appendix 2).

## 24. Arrangements for children who have one-to-one tuition/car journeys

- Some occasions may occur where one-to-one supervision or teaching occurs;
- Children are seen on a one-to-one basis for pastoral care;
- No child should be seen in a room with the door closed where there is not a window in the door. If this is not possible then there should be another adult present or the door left open.
- A child being transported in a car should sit in the back of the car.

## 25. Disclosure Procedures

***Staff must know what to do if concerned that a child may be suffering abuse.***

25.1 Initial Complaint: If a child discloses to a member of staff:

- find somewhere quiet to talk as soon as possible;
- stay calm and reassuring;



- explain that you cannot promise to keep what you are told a secret – you will have to inform the Designated Safeguarding Lead;
- listen to and believe what the pupil tells you – tell them that, whatever the circumstances, they are not to blame;
- do not press for details – some cases of abuse may need further investigation. It is better for the pupil not to have to repeat details unnecessarily ;
- do not ask 'leading' questions (e.g. "What did he do next?");
- do ask 'open' questions (e.g. "Is there anything else you want to tell me?");
- ask the pupil if he/she has told anyone else;
- don't make any promises to the pupil – the situation may cause you to react emotionally. Whilst this is an understandable reaction, at such times it is possible that you could make promises you cannot fulfil;
- tell the pupil you are pleased he/she has decided to tell someone and that this was the right thing to do;
- let the pupil know you understand how difficult it is to talk about such experiences;
- must keep a written record of the conversation (Appendix 1 Concern Reporting Form). The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead as soon as possible in person;
- information about the allegations must not be shared with anyone else.

25.2 Preserving evidence: All evidence, (e.g. scribbled notes, mobile phones containing text messages, clothing, computers) must be safeguarded and preserved. Where relevant, make notes as to where bruises etc. are on the child. Do not take photographs.

Reporting: All suspicions or complaints of abuse or concerns about extremism or radicalisation must be reported to the Designated Safeguarding Lead, or if the complaint concerns the Designated Safeguarding Lead, the nominated governor.

## **26. Decision making – 'Accessing the right service at the right time'**

### ***Safeguarding team members must know what to do to best support a child***

We take a holistic approach to safeguarding all children in our care and recognise that different families need a different level of support at different

times. As stated in the introduction, local support services are not as developed as in countries such as the UK, US or Australia and we may rely on NGOs to provide support for children in need. However, the main decision making and actions will be taken and supported internally amongst the safeguarding team and wider school staff.

This guidance identifies four levels to ensure all children receive the support and intervention they need to achieve a positive life experience. Of central importance in understanding where a child's needs might lie on this continuum, is the cooperation and engagement of parents and carers and we aim to develop good, professional relationships to ensure that we have a shared understanding of each child's needs.

It should be noted that if parents demonstrate a lack of co-operation or appreciation about the concerns we identify this may, in itself, raise the level of the need and required level of action.

### 26.1 Level 1 – Universal

Children with no additional needs and where there are no concerns. Typically, these children are likely to live in a resilient and protective environment where their needs are met. These children will require no additional support beyond that which is universally available.

Each child is allocated a key person who will make a relationship both with the child and his or her family. The key person will make observations and keep records to ensure there are no barriers to a child's learning and establish stable and affectionate relationships. We anticipate that by working closely with parents and sign-posting families to other universal services within our community that we can meet the needs of children and families at this level. *At this level parents will always be consulted before any action is taken.*

### 26.2 Level 2 – Children in Need of Early Help

These children can be defined as needing some additional support without which they would be at risk of not meeting their full potential. Their identified needs may relate to their health, educational, or social development, and are likely to be short term needs. If ignored these issues may develop into more worrying concerns for the child or young person. These children will be living in greater adversity than most other children or have a greater degree of vulnerability than most if their needs are not clear, not known or not being met a lead professional will coordinate a whole family assessment and plan around the child.

Sometimes in discussion with parents and carers and through our observations and records we may think a child and their family could benefit from additional support from outside agencies to ensure he/she reaches his/her full potential. This process is known as Early Help. We have knowledge of the different agencies

which may be able to offer support and we will work with parents and carers to decide which support would be most appropriate for their family. We will work with parents to access this support. The DSL will take the lead when liaising with other agencies.

*At this level parents will always be consulted before we contact another agency and their written consent gained before any action is taken.*

### 26.3 Level 3 – Children with Complex Needs

This level applies to those children identified as requiring targeted support. It is likely that for these children their needs and care are compromised. Only a small fraction of children will fall within this band. These children will be those who are vulnerable or experiencing the greatest level of adversity.

Children with additional needs: These children are potentially at risk of developing acute/ complex needs if they do not receive early targeted intervention.

Sometimes in discussion with parents and carers and through our observations and records we realise that a child and their family have a number of needs which are preventing a child from reaching his/her full potential. In this case we will discuss the situation with parents and carers and try to identify each area of concern so that a range of other agencies can come together to offer support to the family. With parental consent we will coordinate a response from a range of other agencies/professionals.

*At this level parents will always be consulted before we contact another agency and their written consent gained before any action is taken.*

### 26.4 Level 4 – Children with Acute Specialist Needs/ Child Protection

These are children whose needs and care at the present time are likely to be significantly compromised. Sometimes in discussion with parents and carers and through our observations and records we realise that a child is at risk of significant harm (see below) and we must take emergency action to ensure that a child is kept safe. If the Designated Lead is unsure whether or not the concern meets this threshold he/she may discuss the case with a trusted consultant and/or the nominated governor.

*There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt damage or change the child's development.*

*It may be:*

- *the child is at risk of serious harm from others or themselves and requires skilled risk assessment and protection;*

- *the child or young person is likely to put others at risk or harm, distress or loss and a response needs to take account of the individual's interests and wellbeing of others;*
- *the child's circumstances, including their health, finances, living conditions or social situation, are likely to cause them or others serious harm, social exclusion or reduction of life chances;*
- *the situation requires assessment of, and intervention in unpredictable emotional, psychological, intra-family or social factors and responses;*
- *the circumstances are such that there are significant risks in both intervening and not intervening, when a fine judgement is required.*

*Careful analysis and interpretation of information will enable practitioners and families to:*

- *think about what is important and identify needs or difficulties;*
- *explain why these have come about;*
- *understand the impact of strengths and pressures on the child or young person;*
- *reach agreement about what needs to be improved;*
- *agree the priority issues, aims and goals in terms of improving the child's wellbeing;*
- *agree desired outcomes.*

*Consider:*

- *What is the lived experience of the child?*
- *When and how are the child's needs not being met?*
- *What are the effects on the child's current development and long term effects?*
- *What are the child's needs, wishes and feelings regarding intervention and likely outcomes?*

(Taken from: Multi-agency Guidance on Threshold Criteria to help support Children, Young People and their Families in Shropshire 2017) Shropshire Threshold Document

Action by the Designated Safeguarding Lead:

Where there are concerns that a child is being harmed or is at risk of harm then the Principal should be informed or in his absence, a nominated member of the faculty and where there is an allegation made against the Principal, the Chair of the Advisory Board of Governors.

The action to be taken will take into account:

- The local legal context and support available.

- The nature and seriousness of the suspicion or complaint. A complaint involving a criminal offence will always be referred to social services or the police.
- The wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
- The wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all proper consultation, to override parental wishes in some circumstances. If the Designated Safeguarding Lead is concerned that disclosing information to parents would put a child at risk, she will take further advice from the relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.

However, as soon as sufficient concern exists that a child may be at risk of significant harm, action must be taken, possibly reporting to the police.

## **27. Allegations Against Staff**

The School has procedures for dealing with allegations against staff/governors/volunteers that aim to strike a balance between the need to protect children from abuse and the need to protect staff from false or malicious allegations. These procedures (which are set out in Appendix 5) follow the guidance 'Dealing with Allegations of Abuse Against Teachers and Other Staff' as outlined in the Policy for Dealing with Allegations of Abuse Against Teachers and Other Staff, and should be used where the member of staff has:

- 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 or she would pose a risk of harm if they work regularly or closely with children.
- If a member of the boarding staff is suspended pending a child protection investigation, arrangements will be made for alternative accommodation away from children.

### **27.1 Allegations Against the Designated Safeguarding Lead**

- The matter should be reported immediately to the nominated governor who is the Chair of the Advisory Board.
- Appropriate support will be provided and a representative will be appointed to keep the accused person informed of the progress of the case as appropriate.

## 27.2 Allegations Against the Principal or Chair of the Advisory Board/Nominated Governor.

- Where an allegation or complaint is made against the Principal, the person receiving the allegation should immediately inform the Chair of the Advisory Board, or in her absence the Chair of the UK school's governing body, **James Pitt**, without first notifying the Principal. Similarly, if an allegation is made against the Chair, the allegation should be reported to the Chair of the UK school's governing body, **James Pitt**.

## 27.3 Allegations Against Pupils

- A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the relevant School's policies.
- The School will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.
- The School will ensure that, unless there is compelling reason not to, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation.
- In the event that a disclosure is made of pupil on pupil abuse then all the children involved, whether perpetrator or victim will be treated as being 'at risk'.
- Peer on peer abuse can take many forms, for example: being sexually touched/assaulted or being subject to initiation/hazing type violence.
- The victim will be supported initially by an appropriate member of staff such as the form tutor, house parent or school nurse. Regular meetings can take place and where necessary referral to a more specialist counsellor or therapist can be arranged.

## 27.4 Suspected Harm from Outside the School

A member of staff who suspects that a pupil is suffering harm from outside the School should seek information from the child with tact and sympathy using 'open' and not leading questions. A sufficient record should be made of the conversation which should be referred to the Designated Safeguarding Lead as soon as possible.

## 27.5 Confidentiality and Information Sharing

- The School will keep all safeguarding records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and any other agencies to ensure that all relevant information is shared for the purposes of child protection. All safeguarding records are marked as such and kept securely locked.
- Staff will be made aware of the importance of sharing information and a fear of sharing information must not stand in the way of the need to promote the welfare, and protect the safety, of children.

### 27.6 Recording Allegations

- The School will record all allegations of abuse, the subsequent actions and outcomes in the confidential records kept in the Principal's file.

### 27.7 Monitoring

- Records are monitored for patterns and appropriate action is taken.
- Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School and a prompt report to the Advisory Board.
- The Designated Safeguarding Lead will monitor the operation of this policy and its procedures and will make an annual report to the Governors. Carla Howarth is the nominated Governor with responsibility for updating the Governors on safeguarding issues. The DSL and the Nominated Governor will meet termly to review the Safeguarding Policy and Action Plan.
- The Governors will undertake an annual review of this policy and how their duties under it have been discharged.
- The Governors will ensure that any deficiencies or weaknesses in regard to child protection arrangements at any time are remedied without delay.

### 27.8 Record keeping

- It is important that employers keep a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved. This record should be placed on the person's confidential personnel file with a copy given to the individual.
- The record should be kept at least until the person reaches retirement or for ten years if that would be longer.
- The purpose of the record is to enable accurate information to be given in response to any future request for a reference.
- Details of allegations that are found to be malicious should be removed from personnel records.

## **Appendices**

Appendix 1 – Safeguarding Concern Report Form & Safeguarding Action Record

Appendix 2 - Body Map

Appendix 3- Local safeguarding and support contact points including Phnom Penh International Schools Association - child safeguarding group.

Appendix 4 – Job Description Designated Safeguarding Lead (& Deputy)

Appendix 5 – Procedures for Dealing with Allegations of Abuse against Teachers and other Staff



## Appendix 1a/b

### Reporting a Safeguarding Concern Form.

**Hand this form to the DSL (Deputy Principal, Charlotte Thomas) unless she is absent, or the concern is about the Deputy Principal (in which case hand it to the Deputy DSL (Toby Waterson, the Principal)).**

Your name (in full)	
Child / Staff Member / Person Name (in full)	Pupil Code (if relevant)
Date of Birth (pupil)	Year group / class
Details of concern: (prompts) <i>What are you worried about? Who?</i> <i>What (if recording a verbal disclosure by a child use their words)?</i> <i>Where? When (date and time of incident)? Any witnesses?</i>	
Who was this form handed to?	
Sign	Date

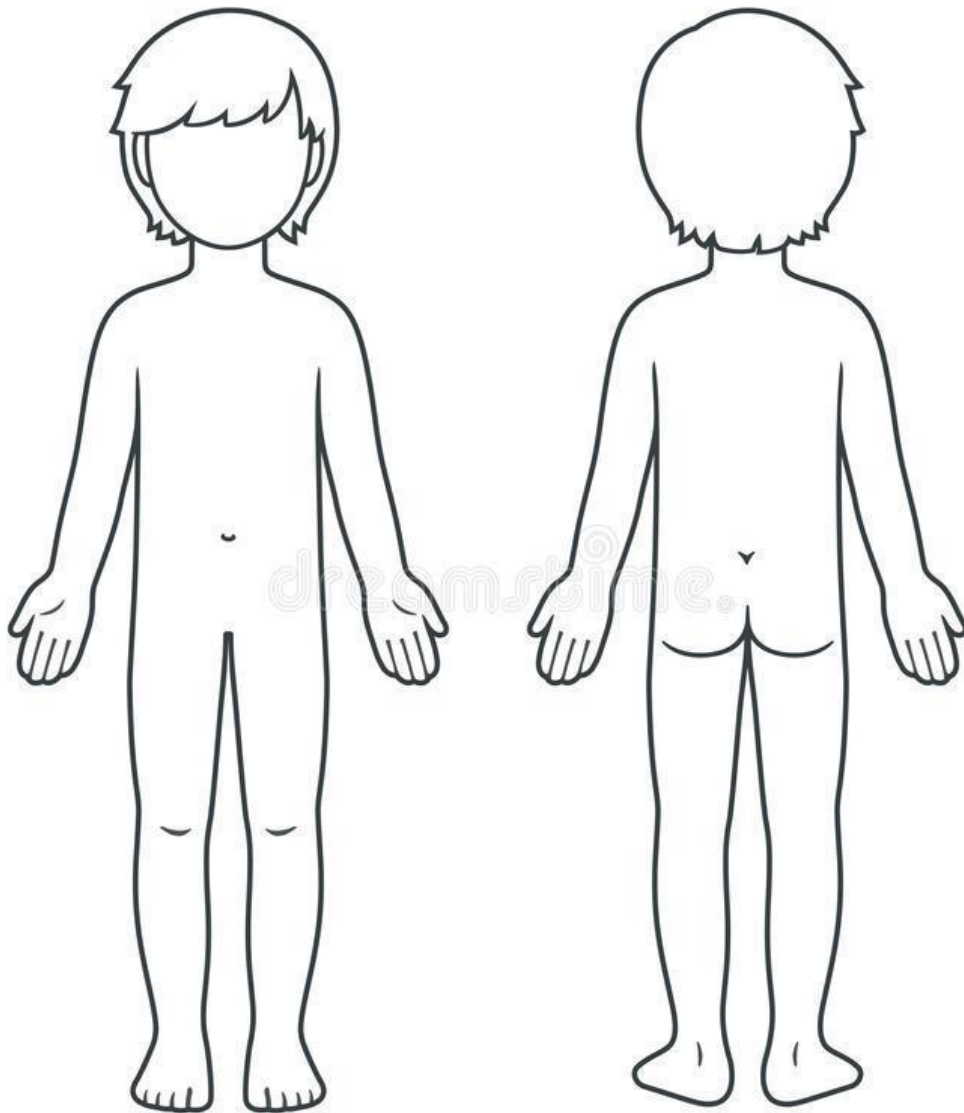
### Safeguarding Record of Action

For DSL/Deputy DSL to complete (includes actions taken to support child, communication with parents/guardians or external agencies, other staff members. Record advice sought, from whom and when.

Name of Child \_\_\_\_\_ Pupil Code \_\_\_\_\_

Date	Action taken	By whom (signature)

## Appendix 2: Body Map



## Appendix 3: Contact Numbers & local mapping (in development)

1. **Chair of Advisory Board of Governors and Nominated Governor, Carla Howarth** chowarth@gt-consultancy.co.uk +44 7814 014006.
  2. **Police** Hotline telephone: 1288 (largely for sexual abuse and CSE).  
CALL FIRST > Child Protection Unit (CPU) <https://childprotectionunit.org/>.
  3. **APLE** (Action Pour Les Enfants) (NGO) Extensive report including web-based 'hotline' to report signs of and/or internet based abuse. Call 092-311-511 (24/7 Hotline) to talk to the hotline team.
- 
4. **British Embassy Phnom Penh**  
27-29 Street 75, Sangkat Srah Chak, Khan Daun Penh, Phnom Penh, 12201  
Telephones +855 (0)61 3000 11/12/44/99  
[UKinCambodia@fcdo.gov.uk](mailto:UKinCambodia@fcdo.gov.uk)
  5. **ChildSafe:** <https://thinkchildsafe.org/>  
Email: [info@thinkchildsafe.org](mailto:info@thinkchildsafe.org)  
Phone: (+855) 23 986 601  
Address: House 89B, Street 103
  6. **UNICEF** Exchange Square, 5th floor, Bldg. no. 19&20 Street 106, Sangkat Wat Phnom, Khan Daun Penh, Phnom Penh. (P.O Box 176, Phnom Penh)  
Telephone: +855 (0)23 260 204  
Email: [phnompenh@unicef.org](mailto:phnompenh@unicef.org)  
Website: <http://www.unicef.org.kh>
  7. **World Vision** (NGO)  
#20, Street 71, Tonle Bassac, Chamkar Morn, Phnom Penh  
P.O. Box 479, Central Post Office, Phnom Penh, 12000, Cambodia  
Office: +855 (0)23 216 052  
Email: [contact\\_cambodia@wvi.org](mailto:contact_cambodia@wvi.org)
  8. **ChildHelpline** (NGO)  
[infochc@childhelpline.org.kh](mailto:infochc@childhelpline.org.kh)  
*"You can SMS a problem or question to a Child Helpline Cambodia phone counsellor by sending a message to 017 985 810 in English or Khmer using English (sometimes called Latin) letters within Cambodia."*
  9. **First Step** (NGO)  
<https://www.first-step-cambodia.org/contact-us>  
Office: 092 900 369 Referral Inquiries: 012 461 460  
#63B/C, St. 450, Sangkat Tuol Tumpung II  
Khan Chamkarmon, Phnom Penh, Cambodia  
[office@first-step-cambodia.org](mailto:office@first-step-cambodia.org)
  10. **Friends International** (NGO)  
<https://friends-international.org/about-us/>
  11. **Sombok** (counselling)  
<https://www.sombokpsychology.com/Counselling>
  12. **Local School Network** - DSLs or equivalents.

School	Name	Role	Contact
Canadian International School (CIS Koh Pich)	Jason Russell Zack Lowe Tanja Caley	Middle/High Counsellor and DSL Elementary Counsellor and DSL Student Support Lead	<a href="mailto:jason.russell@cisp.edu.kh">jason.russell@cisp.edu.kh</a> <a href="mailto:zack.lowe@cisp.edu.kh">zack.lowe@cisp.edu.kh</a> tanja.caley@cisp.edu.kh
International School Phnom Penh (ISPP)	Jonathan Smedes	Deputy Director - (Learning, Teaching, Innovation and Impact)	jonathansmedes@ispp.edu.kh
Australian International School Phnom Penh (AISPP)	Sharon Gibbons	International School Counsellor	sharon.gibbons@aispp.edu.kh
East West International School (EWIS)	<a href="#">Kate O'Connell</a> Landon Seigler	Principal Middle School Principal & Child Protection Officer	kate.oconnell@ewiscambodia.edu.kh landon.seigler@ewiscambodia.edu.kh
King's School Canterbury (PP)	Barbara Faria	Head of School	barbara.faria@vattanacproperties.com
Southbridge International School	Andrew Beecher	Dean of Student Affairs	Andrew.beecher@sis.edu.kh
Hope International School Cambodia	N/A	N/A	N/A
Singapore Cambodia International Academy	Brenton Toh	Vice Principal	+6590929557
Northbridge International School	Annalise Stephens	DSL	n/a

SSIIAPP includes schools in grey highlight.

## Appendix 4: Job Description for DSL/Deputy DSL

The Designated Lead for Safeguarding at SISPP & Deputy (to be able to deputise in all aspects of the DSL role).

In carrying out the role set out below, the Designated Safeguarding Lead should be guided by two important principles. First, following the Children Act 1989, the principle that the welfare of the child should be paramount. Second, the principle that confidentiality should be respected as far as possible (without compromising the first principle).

28.1 It is essential that designated safeguarding leads are familiar with the content of the following key documents:

- The Department for Education's statutory guidance for schools and colleges, 'Keeping Children Safe in Education 2020
- Working Together to Safeguard Children 2018
- Independent Schools Standards Regulations 2014
- Early Years Foundation Stage Statutory Framework 2017

28.2 The Designated Safeguarding Lead must:

- Be a member of the Senior Team
- Take lead responsibility and is accountable for safeguarding and child protection, (lead responsibility must never be delegated).
- Be fully conversant with the SSCP child protection procedures and to co-ordinate action on child abuse within school, ensuring that all staff are aware of their responsibilities in relation to safeguarding.
- Provide supervision and guidance to deputy designated safeguarding leads.
- Ensure that all deputy designated safeguarding leads are trained to the same standard as themselves.
- Refer individual cases of suspected abuse to relevant local childrens' services and to liaise with them and other agencies on individual cases and on general issues relating to safeguarding.

28.3 In greater detail, this involves the following:

- Ensuring that all staff, both teaching and non-teaching, know about, and have access to the procedures for safeguarding and that all cases of suspected abuse are reported in the correct way.
- Referring cases where a person is dismissed or left due to risk/harm to a child to the DBS in the UK if relevant.
- Referring cases where a crime may have been committed to the police as required.

- Ensuring that all staff have regular child protection updates (at least annually).
  - Ensuring that all teaching and non-teaching staff attend the School's safeguarding awareness training every three years.
  - Ensuring Deputy Designated Safeguarding Lead regularly updates their child protection training (at least annually) and suitable training every two years.
- Working with others – The Designated Safeguarding lead must:
    - As required, liaise with the "Deputy Principal Early Years" as relevant i.e. if there are safeguarding or child protection concerns relating to a staff member.
    - 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 – The Designated Safeguarding Lead must:
    - Ensure that they and any deputies should undergo training to provide them with the knowledge and skills to carry out the role.
    - Ensure that they and any deputies, in addition to the formal training set out above, should refresh their knowledge and skills (this might be via e-bulletins, meeting other designated safeguarding leads, 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 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.
      - Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff.
      - Are alerted 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.
- Safeguarding files – The designated safeguarding leads must:
    - Ensure that all safeguarding files are stored securely & accessed only by authorised individuals.

- Where children leave the School ensure their details are passed to the DSL or equivalent in the destination school safeguarding.

### **Availability**

During term time the DSL should ensure that they (or a deputy) are always available (during school hours) for staff to discuss any safeguarding concerns.

## **Appendix 5: Procedures for Dealing with Allegations of Abuse against Teachers and other Staff**

### **Introduction**

This procedure can be made available in large print or other accessible format if required. This policy will be reviewed on an annual basis and has been written with due regard to 'Keeping Children Safe in Education' (September 2019).

The following procedures will be used where the member of staff or volunteer has:

- 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 or she would pose a risk of harm if they work regularly or closely together with children.
- The procedures apply whether the alleged abuse took place at the school or not.
- Allegations against a teacher who is no longer teaching should be referred to the police.
- Historical allegations of abuse should also be referred to the police.

### **Allegations against Staff**

- Any allegation or complaint made about a member of staff, the Designated Safeguarding Lead/Deputy or volunteer should be reported immediately to the Chair of Advisory Board of Governors. Where appropriate, the Principal will consult with a trusted consultant about next steps.

### **Allegations against the Principal or Chair of the Advisory Board of Governors**

- Where an allegation or complaint is made against the Principal, the person receiving the allegation should immediately inform the Chair of the Advisory Board of Governors, or in his absence the Deputy Chair, without first notifying the Principal. Similarly if an allegation is made against the Chair of the Advisory Board of Governors, the allegation should be



reported to the Principal. Any such allegations will be discussed with a trusted consultant or nominated governor in the first instance.

### Supporting Those Involved

- The School has a duty of care to their employees and so the School must ensure that effective support is provided for anyone facing an allegation such as welfare counselling or medical advice. They should be advised to contact their trade union representative if they have one.
- Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police.
- The Principal will appoint a named representative to keep the individual informed of the progress of the case and consider what other support would be appropriate for the individual.

### Procedure

- The Principal will inform the Chair of the Advisory Board of the allegation immediately. Discussions should be recorded in writing.
- The Principal will then inform the accused person about the allegation as soon as possible.
- The parents of the pupil involved will be informed of the allegation as soon as possible, if they do not already know about it.
- If the police or the local agencies need to be involved, the Principal should not inform the accused or the parents until these agencies have been consulted and it has been agreed what information can be disclosed.
- The parents should be kept informed of the progress of the case, including the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing and the information taken into account in reaching a decision cannot normally be disclosed, but the parents of the child should be told the outcome in confidence. Parents should be told to see legal advice regarding any sharing of information publicly.
- Where it is clear that an investigation by the police or any other agency is unnecessary, the Principal will discuss options with the safeguarding team (or the Chair of the Advisory Board of Governors where the allegation is against the Principal). The action taken will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in future.
- Care will be taken to ensure that the person assigned as lead investigator has the skills and is in a position to carry out the process.

The following definitions should be used when determining the outcome 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;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

### Suspension

- Suspension should not be an automatic response to an allegation and should only be considered in a case where:
- There is a cause to suspect a child or other children at the School is/are at risk of significant harm;
- The case is so serious that it might be grounds for dismissal; or
- The case is so serious that the police or legal advice have advised suspension.
- Where the Principal is concerned about the welfare of other children in the community or the teacher's family, those concerns should be shared with local support NGOs or the police.
- The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, false or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, with assessment of risk:
- redeployment with the School so that the individual does not have direct contact with the child or children concerned;
- provision of an assistant to be present when the individual has contact with children;
- redeploying to alternative work in School so the individual does not have unsupervised access to children; or
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted;
- If there is no reasonable alternative to suspension and suspension is deemed appropriate, the reasons and justification for this should be agreed by the Principal (after consulting legal advice and with the nominated governor) will be recorded and the individual notified of the reasons.
- It is important that a suspended member of staff is kept informed of both the progress of their case and current work-related issues and given a named contact who will provide support throughout the process.

- Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.
- If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the Principal and Chair of the Advisory Board of Governors. This should also include what alternatives to suspension have been considered and why they were rejected.
- Where it has been decided to suspend an individual, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. At this point the person should be informed of their named contact and given their contact details.
- If a member of the boarding staff is suspended pending a child protection investigation, arrangements will be made for alternative accommodation away from children.

### Information Sharing

- Where the police are involved the Principal should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process.

### Confidentiality

- When an allegation is made the School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- The School will not publish any material that may lead to the identification of the teacher who is the subject of an allegation.
- The will seek legal advice and consult with appropriate experts, police and support services to agree the following:
  - who needs to know and, importantly, exactly what information can be shared;
  - how to manage speculation, leaks and gossip;
  - what, if any information can be reasonably given to the wider community to reduce speculation; and
  - how to manage press interest if and when it should arise.

### Criminal Proceedings

- The School will consult legal advice following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

## Return to Work

- If it is decided, on conclusion of a case, that the person who has been suspended can return to work, the Principal should consider how best to facilitate that. It may be that the most appropriate course of action would be to institute something such as a phased return to work and/or the provision of a mentor to provide assistance in the short term. The Principal should also consider how the person's contact with the child or children who made the allegation can best be managed.

## Ceasing to Use Staff

- If the School ceases to use the services of a member of staff/governor/volunteer because they have harmed, or pose a risk of harm to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence; or if there is a reason to believe that individual has committed a listed relevant offence; if that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (in the case of a UK citizen)
- Where the School ceases to use the services of a member of teaching staff because of "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction at any time for a relevant offence" consideration must be given whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002 and to the Teaching Regulation Agency (TRA) (<https://www.gov.uk/teacher-misconduct-referring-a-case> ) Should the case also involve matters of safeguarding then it may be necessary/possible to make a separate referral to the Disclosure and Barring Service (To be confirmed)
- Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.
- A compromise agreement will not be used in cases of refusal to cooperate or resignation before the person's notice period expires.

## Resignation

- If a member of staff/governor/volunteer tenders his/her resignation, or ceases to provide his/her services, any child protection allegations will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the UK Disclosure and Barring Service and National College for Teaching and Leadership in appropriate circumstances.

## Timescales

- All allegations must be investigated as a priority to avoid any delay.
- Where it is clear immediately that the allegation is unfounded or malicious, they should be resolved within one week.
- It is expected that most cases of allegation of abuse against staff will be resolved within one month.
- Some cases may take up to three months to resolve.
- Exceptional cases should be resolved within twelve months.
- If the nature of the allegation does not require formal disciplinary action, the Principal should institute appropriate action within three working days.
- If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within fifteen working days.

## Unfounded or malicious allegations

- If an allegation is shown to be deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's Behaviour and Discipline policy (yet to be developed).
- Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the School or a member of staff unreasonably.
- Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.
- Allegations that are not substantiated are unfounded or malicious will not be referred to in employer references.

## Record Keeping

- Details of allegations that are found to have been malicious will be removed from personnel records.
- Details of any other allegation will be recorded on the employee's file and retained at least until the employee reaches normal pension age or for a period of ten years from the date of the allegation, if this is longer.
- For all allegations a clear and comprehensive summary will be recorded including:
  - details of how the allegation was followed up and resolved;
  - a note of any action taken; and
  - the decisions reached.
- A copy of this will be provided to the person concerned.

## References

- Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of

repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

### Learning Lessons

- At the conclusion of a case in which an allegation is substantiated, the safeguarding team will review the circumstances of the case to determine whether there are any improvements to be made to the school or college's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The Principal will consider how future investigations of a similar nature could be carried out without suspending the individual.