

Dulwich College I Bangkok I

Student Safeguarding Policy

This policy is written by the Education in Motion (EiM) Designated Safeguarding Lead, the EiM Safeguarding Consultant and the School Designated Safeguarding Leads and is subject to annual review and final approval by the EiM Group Executive Board. The EiM Chief Education Officer will ensure compliance with this policy across the EiM Group of Schools.

Terms used:
Education in Motion*: EiM*
School *refers to the Colleges, Schools and High Schools that are part of the EiM group.*
Head *refers to the Heads of Colleges, Principals and Directors who lead Schools in the EiM group.*

- Any EiM School must seek approval from the EiM Safeguarding Lead to amend this policy to reflect local context and regulations.
- The policy and appendices along with other materials and resources are available to staff on the online platform ConnectED.
- Each School will add local server hyperlinks for staff to access the related policies listed below.
- The safeguarding policy is published on the school website.
- The policy is reviewed in detail every 2 years and updated annually in response to changes in best practice and to local and global circumstances.

1. INTRODUCTION

Education in Motion (EiM)'s family of schools include Dulwich College International, Dulwich International High School, Dehong®, Green School International, Hochalpines Institute Ftan, Sherfield School.

Each EiM school is driven by the same core values, one of which is safeguarding our students. We define safeguarding as the way in which we provide a supportive, protective and safe environment so that all our students can fully develop and learn. This policy applies to all adults visiting or working with students in our colleges and schools, including staff, volunteers, interns, gap students, contractors, consultants, board members, guests and visitors.

1.1 Our commitment

Education in Motion takes every step to ensure that students in our care are protected from all forms of abuse and neglect.

"*At Education in Motion we believe that safeguarding is everyone's responsibility. Everyone in our colleges and schools who comes into contact with our students and their families has a significant role in playing. To do this effectively, all our staff and volunteers must always make sure that they consider what is in the best interests of the child. Students come first*."

Fraser White, Founder, Chairman, Education in Motion

1.2 Our guiding principles:

- We listen to our students and put them first
- We ensure that safeguarding is central to all we do
- We recruit safely
- We ensure that safeguarding is a standing item on all meeting agendas
- We train every adult working or volunteering in our schools/HQs
- We support the needs of individual students and recognise that some students are more vulnerable than others

1.3 Our core competencies

Through professional learning and dialogue, we ensure that staff and volunteers meet the following competencies:

1. Placing the student at the centre of all that we do
2. Understanding possible signs and indicators of abuse and neglect
3. Knowing how to respond to and communicate with students
4. Always responding to safeguarding needs
5. Understanding what might make some students more vulnerable
6. Understanding your Safeguarding policy, related policies and Code of Conduct
7. Knowing how to share key information safely and with whom to share

1.4 Our context

"*We have a shared approach and standards to the way we keep students safe across our Colleges and Schools. However, we respect that each school must consider their cultural context and any local or national regulations."* Lesley Meyer Chief Education Officer, Education in Motion (EiM Designated Safeguarding Lead)

In all our Schools our student-centered approach is modelled on the United Nations Convention on the Rights of the Child. All our students have a right to be safe and we draw upon best practice internationally and apply the safeguarding standards of the Council of International Schools (CIS).

Local support and context are identified in the School Mapping Document.

2. WHAT IS CHILD ABUSE?

Child abuse is:

- physical, sexual or emotional, in person or online
- when a student is intentionally harmed by an adult in an isolated incident or over a period
- when a student experiences a lack of love, care and attention, this is neglected.
- when a student witnesses abuse and its effects
- when a student is exploited: an individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a student online or offline.

Peer on peer abuse:
Peer-on-peer abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control exercised between students, and within student relationships (both intimate and non-intimate), friendships, and wider peer associations. (Appendix M)

Protecting vulnerable students:
All students, regardless of age, disability, gender reassignment, race, religion or belief, gender, or sexual orientation, have an equal right to be protected from all types of harm or abuse. Extra safeguards may be needed to keep students who are additionally vulnerable safe from abuse.

2.1 Categories of abuse

We consider abuse under the following broad headings:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect (including affluent neglect)

Indicators of Abuse and Neglect (Appendix A) give more information on categories of child abuse and guidance on how to identify them.

2.2 Speak Out Stay Safe

We encourage students to report when they have been abused, neglected or made to feel uncomfortable by adults or peers in school, outside of school and online. We are committed to responding to any reports from students about their own wellbeing or that of peers.
The school ensures that regular learning opportunities are delivered to students to recognise, resist and report abuse/neglect by adults or peers. This will be delivered at the beginning of each academic year as part of the Speak Out Stay Safe learning framework but also revisited regularly throughout the year.

Posters around the school encourage students of all ages to reach out to a Trusted Adult of their choice if they have any concerns about their own protection or that of another student. Every student is asked to identify with and choose their Trusted Adult(s) at the beginning of each school year. All adults will know how to respond

as guided in training. The chosen Trusted Adults are reviewed during the year as the adult may change as the year progresses.

3. HOW DO WE KEEP OUR COMMUNITY SAFE?

3.1 Key safeguarding roles and responsibilities

Safeguarding is the responsibility of all staff. Key safeguarding roles and responsibilities are listed below.

Role	Contact details
EiM Chairman	Fraser White Chairman@eimglobal.com
EiM Designated Group Safeguarding Lead (DSL)	Richard Henry Richard.Henry@eimglobal.com
EiM Deputy Designated Group Safeguarding Lead (DDSL)	Lesley Meyer Lesley.meyer@eimglobal.com
EiM Safeguarding Consultant	Kate Beith Kate.Beith@eimglobal.com
Head of College	Thomas Banyard Thomas.banyard@dulwich.org
Designated Safeguarding Lead (DSL)	Mark Verde mark.verde@dulwich.org
Child Protection Officers (CPO)	Ian Sanidad Ian.sanidad@dulwich.org
Deputy Child Protection Officer (DCPO) - DUCKS	Rachel Armstrong rachel.armstrong@dulwich.org
Deputy Child Protection Officer (DCPO) - Junior School	Chloe Brooks-Carter chloe.brooks-carter@dulwich.org
Deputy Child Protection Officer (DCPO) - Senior School	Jonathan Humphreys jonathan.humphreys@dulwich.org
Deputy Child Protection Officer (DCPO) - AEN Lead	Amy Woolaston Amy.woolaston@dulwich.org
Deputy Child Protection Officer (DCPO) - Mandarin	Xiaoya Li Xiaoya.li@dulwich.org
Deputy Child Protection Officer (DCPO) - Thai	Patty Vongvanij napat.vongvanij@dulwich.org
Trainer Lead	To be confirmed
E-Safety Lead	David Hopkinson david.hopkinson@dulwich.org

Photos and contact details will be displayed on posters in our School and can also be found by staff on ConnectED and My ConnectED. Important telephone numbers are listed on the back of staff lanyards. Visitor



lanyards direct them to the school office/reception in case of any concern, who will direct them to the appropriate person.

Descriptions of the roles are provided in key safeguarding roles and responsibilities (Appendix B). These descriptions are added to individual HR files. Below are brief summaries.

EiM Safeguarding Council

- The strategic oversight of safeguarding activities within the EiM Group of schools
- Supports and advises on safeguarding best practice, making any relevant recommendations for action to the Chairman and Schools as required

EiM Chairman

- Accountable to external boards
- Overall responsibility for safeguarding across the group

EiM Designated Group Safeguarding Lead (DSL)

- Accountable for all aspects of group-wide safeguarding
- Ensures the Chairman is kept fully informed
- Provides updates to Group Executive Team (GET)
- Manage serious cases
- Provides guidance and support to Schools
- Leads the EiM Safeguarding Council
- Will meet with each School safeguarding working group annually to review compliance

EiM Deputy Designated Group Safeguarding Lead

- Deputises for the EiM DSL
- Keeps the CEdO fully informed
- Liaises with the EiM Safeguarding Consultant in the absence of the EiM DSL

EiM Safeguarding Consultant

- Supports the EiM DSL and Schools in all aspects of safeguarding
- Develops policy, procedures and associated professional learning
- Supports and reviews serious cases
- Provides individual and group supervision to DSLs and CPOs
- Member of the EiM Safeguarding Council
- Will meet with each School safeguarding working group annually to review compliance

External Auditor

- Conducts biannual audits in Schools
- Reviews the action plans as part of the audit cycle
- Member of the EiM Safeguarding Council

Head of School

- Accountable for all aspects of safeguarding in the school
- Oversees the safeguarding action plan based on audits and compliance reviews
- Ensures that the safeguarding policy is adapted to local context and followed by all
- Responds to concerns about the actions of staff or volunteers



Designated Safeguarding Lead (DSL):

- Maintains an overview of all aspects of safeguarding in the school
- Leads the School Safeguarding Working Group
- Coordinates and supports the two-year audit cycle and safeguarding action plan
- Accountable for the School Mapping Tool

Deputy Designated Safeguarding Lead (DDSL)

- Supports all the above and takes responsibility in the absence of the DSL

Child Protection Officer (CPO)

- Manages School child protection cases, including recording, reporting, and reviewing concerns about students
- Takes the lead on individual cases in accordance with EiM procedures

Deputy Child Protection Officer (DCPO):

- Is aware of all cases
- Takes on all the CPO responsibilities on the absence of the CPO

Focal point

- In place if there is not a CPO who speaks the language of the host community
- Speaks the local language of the host community
- Ensures report is taken straight to the CPO.
- Is Safeguarding trained

Safeguarding Lead Trainer:

- Leads safeguarding training
- Liaises with other safeguarding trainers across EiM
- Trains other staff to become safeguarding trainers

Safeguarding Trainers:

- Provides School-based safeguard learning as required
- Attends meetings

E Safety Lead:

- Acts as a point of contact on online safety issues and liaising with other members of staff as appropriate
- Works with the leadership team to ensure policies and procedures that incorporate online safety concerns are in place
- Assisting with regular online safety training for all members of staff (including as part of induction)

3.2 Safeguarding Working Groups

The EiM Safeguarding Council is composed of the following people:

- EiM Designated Group Safeguarding Lead
- EiM Safeguarding Consultant
- EiM External Auditor
- EiM HR Director



- EiM IT Director
- A DSL from one of the EiM schools

The Safeguarding Working Group is composed of the following people:

- The Designated Safeguarding Lead (DSL) - chairs the meetings and reports directly to the Head
- Child Protection Officer(s)
- Lead Trainer(s)
- The E-Safety Lead
- Other representative staff selected by the DSL and the Head

The Safeguarding Working Group meets at least three times a year to:

- Monitor safeguarding practices across the School
- Develop an action plan covering practices and development relating to most recent audits or compliance reviews
- Oversee professional learning with regards to safeguarding
- Review every year the Safeguarding Policy and recommend updates

3.3 Disclosure, reporting and recording child protection concerns

Child protection concerns are where a student is:

- At significant or immediate risk of harm
- Is vulnerable, but not at significant or immediate risk of harm

The school will ensure that all direct and outsourced staff, visitors and members of staff are familiar with the procedures for reporting and recording a confidential record of any incidents/concerns. There is a culture of safe reporting for all members of our community, including concerns about peer-on-peer abuse, either online or in person.

Members of staff and volunteers must not investigate; staff or volunteers who believe that a student may be at risk must immediately refer concerns to the CPO/DCPO or for outsourced staff to an immediate designated person who may be a focal point.

When managing concerns, we consider:

- The needs of each student to include those with mental health needs and special educational needs and disabilities (SEND)
- The role and responsibilities of those involved
- Family and environmental factors
- The impact of all decisions on the student concerned

All adults working in, volunteering, or visiting the school must report concerns immediately. They must maintain confidentiality and follow the reporting procedure (Appendix H).

CPOMS:

CPOMS (a digital platform) is used for reporting, recording, and monitoring child protection concerns. Incidents and concerns are added directly to CPOMS by staff with access to the platform.

A direct entry onto CPOMS should be completed immediately when a staff member is asked to do so by the CPO/DCPO.



Record of Concern (RoC)
Staff who do not have access to CPOMS will be asked to record on a Record of Concern form (RoC Appendix C). The CPO/DCPO will scan and upload Records of Concern to CPOMS on their behalf.

Any paper record of concern should be signed and dated by the individual making the report and then scanned into CPOMS to avoid the report being treated as hearsay if it is ever called for in a court of law.

All reports of child protection concerns should be in the student's best interests, rooted in child development and informed by evidence. Staff must feel confident that they will be supported if they report concerns about a student.

On receipt of a specific child protection concern, the CPO/DCPO will ensure that the Head and the DSL are alerted.

In all serious child protection incidents, the EiM DSL must be informed or in her absence the EiM DDSL. The EiM Safeguarding Consultant will be contacted.

For less urgent concerns, the CPO/DCPO will consult with the DSL to ensure that the appropriate strategy is agreed and implemented. This may involve seeking further advice from the EiM DSL or in her absence the EiM DDSL who will then consult the EiM Safeguarding Consultant.

It is the responsibility of the EiM DSL to ensure that the Chairman is kept informed on a regular basis and always involved in serious matters.

3.4 Managing concerns about a student
It is the responsibility of the CPO to manage the process. All relevant information relating to actions and communications will be recorded and tracked on CPOMS or a RoC if CPOMS is not used

The Head may instruct the CPO to form a response team to assess a reported child protection concern. The participants chosen will depend upon the nature of the situation. The team will take a holistic approach, addressing the student's needs within their family, the school, the wider community and the local or international context.

Involvement of School Social/Emotional Counsellors to support students and/or families must be considered but is not automatic. In many cases counselling will be considered appropriate. CPOs must meet frequently with counsellors to facilitate support when needed. In cases where there is significant engagement with School Counsellors, the CPO ensures that any relevant counselling files are added to CPOMS.

The school must follow local laws and regulations concerning the reporting of suspected instances of domestic abuse and any other circumstance under which the physical and mental health of a minor is seriously harmed, or the minor is facing the risk of unlawful infringement (minor's personal rights, property rights or other rights being infringed). Should a circumstance arise, that may lead to a reporting obligation, guidance should be immediately sought from the EiM DSL who may consult with a member of the EiM legal department.

All adults working in, volunteering, or visiting EiM Schools will fully cooperate with law enforcement agencies in accordance with local laws and regulations.

Decisions made by the response team should be agreed with the students and family where possible.

3.5 Confidentiality

The school will ensure that all data relating to all students is managed confidentially on CPOMS/RoC in accordance with the requirements of EiM and national or local laws or regulations.
Those reporting concerns will adhere to the lines of communication, ensuring confidentiality. The CPO will support the process, and staff will be given detailed information about lines of communication when joining EiM and at the beginning of every academic year.

Any member of staff who has access to confidential information about a student and/or the student's family must take all reasonable steps to maintain confidentiality. The Head and CPO will agree to the appropriate next steps regarding this information. Regardless of confidentiality, any member of staff who has reason to believe that a student is at immediate or significant risk of harm, must pass on information to the CPO.

Unless otherwise expressly required by local laws or regulations, volunteers and visitors are strictly limited to reporting if they are concerned or have witnessed any concerning behaviour while in the school.

CPOMS allows staff members in positions of responsibility for child protection and/or safeguarding to be blocked from viewing their own child(ren's) records. This is recommended in any method of recording to maintain confidentiality. If this situation arises, a senior member of staff will be identified to ensure continuity of care.

3.6 Transferring child protection files

When a student with an active child protection file moves to another school, there is a moral duty to inform the school about any issue which they should be aware of.

The school must check the legal requirements of the country in which they are operating. The first duty is to protect the students; if in doubt it is better to telephone the future school and raise concern. Further guidance can be sought from the EiM DSL.

There is a duty to talk to the Head of the new school about any significant issue. It is not appropriate to leave information with another member of staff, including admissions.

If the Head makes a phone call, a note of the conversation should be kept on CPOMS/RoC (paper file), to include:

- The date and time of the call
- The position of the person receiving the call
- Who the call was made to
- The nature of the communication

Before transferring any child protection information legal requirements must be checked.



3.7 Access to files

It is generally good practice to share information with parents. If a parent makes a request to access the file on their child's behalf, it should be done in writing in accordance with the school policy, including the Data Protection Policy.

Subject to applicable laws, there may be circumstances under which parents may be refused access to the child protection files.

The school may decide to withhold information in the following circumstances:

- It could cause serious harm or is likely to cause serious harm to the physical or mental health of the student or another person
- It could reveal that the student has been subject to, or at risk of, child abuse, and the disclosure is not in the best interests of the student
- It is likely to prejudice an ongoing criminal investigation
- If the abuse may involve a parent or family member

When sharing information, the school must consider the right to confidentiality of other students or adults named or involved.

The school must always take advice from the EiM DSL about sharing information with parents if they are concerned about doing so.

All file documentation relating to concerns about a student or adult will be kept indefinitely in a secure file on CPOMS in case it is required as future evidence.

The Head will regularly monitor current child protection cases on CPOMS with the CPO(s)/DCPO(s).

3.8 Early help and local resource mapping

All school staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs.
- has special educational needs.
- has a Care Plan.
- has a mental health need.
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour.
- is frequently missing/goes missing from education, home or care.
- has experienced multiple suspensions, is at risk of being permanently excluded from school.
- is at risk of being exploited.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- is misusing alcohol and other drugs.
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.

The school will ensure that any internal, cross-school local, national, or international sources of support are identified through the local resource mapping tool. Contacts may be used to support students and their families when early signs of any challenges to a student's safety or wellbeing are evident. Resource mapping is a dynamic process that helps to identify local sources of support. The resource mapping tool is regularly checked



and updated by the DSL as circumstances change. The mapping tool is made available as part of the biannual audit process.

3.9 Risk assessments

Rigorous risk assessments are undertaken to ensure safety for students when they participate in educational visits or other significant events. Details of the process for trip planning are to be found in the EiM School Educational Visits (trips) policy.

Any safeguarding concerns during a school trip must be reported to the Trip Leader who is acting as the CPO for the trip and will then report concerns to the relevant School CPO.

3.10 Reflection, reviewing and evaluating for impact

During the academic year, the School Safeguarding Team will meet with the EiM DSL and EiM Safeguarding Consultant, using the EiM Safeguarding Compliance Review protocol. Any action arising from this will be incorporated into the ongoing Safeguarding Action Plan.

The school will be alternately internally and externally audited on a two-year cycle.

The internal audit uses the EiM Internal Audit Protocol (Appendix K) and is carried out by the DSL and invited participants from other Schools if deemed appropriate. The findings of the audit will be discussed in an online meeting with the EiM Audit Consultant.

The external audit is conducted using an agreed protocol by an external consultant. The action plan resulting from the audit will be agreed and signed by the following:

- The school trained auditors
- The Head of School
- School DSL
- The EiM DSL

The Head will ensure that the Safeguarding Working Party, chaired by the DSL, will meet at least three times a year to review the action plan. The DSL will also discuss the plan with the Head at their regular safeguarding meetings, and the Head will report progress at each meeting of the Board of Management. The EiM DSL and the EiM Safeguarding Consultant will meet with each school safeguarding working group annually to review compliance (Appendix J).

Supervision is available for all EiM staff involved in safeguarding on a regular basis. Or during a specific case. During supervision, emotional counselling may be further recommended to support a staff member because of a safeguarding case

4. PROFESSIONAL AND PERSONAL CONDUCT OF STAFF, VOLUNTEERS AND VISITORS

4.1 Safer recruitment

To ensure that students are protected while at the school, all staff will be carefully selected, screened, trained and supervised. More details of procedures followed can be found in the EiM Recruitment Policy.



4.2 Professional learning for safeguarding and child protection
The school has a Safeguarding Training Team consisting of:

- At least two lead safeguarding trainers (one fluent in English, and one fluent in the local language).
- An appropriate number of Safeguarding Trainers.

All training supports staff in ensuring that they meet the required EiM Safeguarding Competencies. All training materials will be kept in a designated central location. The Professional Learning Director will support the safeguarding training programme.

There is a commitment to delivering face-to-face training, supplemented by online learning where appropriate. Training is evaluated every year.

For contractors, volunteers, Governors, Trustees, and others, safeguarding training will be organised as required and delivered by safeguarding trainers. Training requirements for every staff member can be found in the EiM Competency and Training Framework (Appendix E).

To ensure that the EiM approach to safeguarding remains consistent across the group, any School considering engaging with an external provider of any safeguarding and child protection training must seek approval from the EiM Safeguarding Council.

4.3 Staff Code of Conduct
The school has a duty to ensure that appropriate behaviour and professional boundaries apply to all relationships between adults and students. Induction training will be provided to staff and will be based upon the Code of Conduct. Once completed, all staff will sign the EiM Safeguarding Code of Conduct (Appendix D). This will be re-signed annually by all staff.

4.4 Volunteers, visitors and contractors
Volunteers
A volunteer is someone with specific skills who spends regular time in the school. Examples of volunteer roles include:

- Class helpers or readers
- Trip support
- Mentors
- Parent volunteers
- Gap students or interns

It is recognised that some people who may be unsuitable for working with children may use volunteering as an opportunity to gain access to students. The Head will ensure that a risk assessment is undertaken on regular volunteers (including gap students and interns) and will determine whether to proceed with criminal records and identity checks.

All gap students and interns must have police checks and go through the same recruitment process as employed staff members.



If a regular parent volunteer cannot obtain a police check because of regulatory reasons, a risk assessment is made by the school, and a self-declaration signed before any regular volunteering takes place. Any regular volunteer without a police check must always be supervised.

All regular volunteers, including parents, will receive the relevant level of safeguarding training and sign the Safeguarding Code of Conduct and self-declaration. This will be recorded on the single central record (SCR).

Parents or other volunteers who help occasionally must work under the direct supervision of a staff member and may not have any unsupervised contact with students. They must sign the Volunteer Safeguarding Statement and self-declaration (Appendix F).

Visitors
A visitor is someone who spends a short amount of time, through appointments at the school, with a specific short-term remit. The school maintains a Safeguarding Guide for all visitors. All visitors who come on campus will be asked to read the Safeguarding statement before being issued a visitor's pass (Appendix G).

Contractors
Contractors are external parties that have a contract to provide a service to the school, on campus or off campus (with students). The school will annually audit the contractor's safeguarding procedures.

The school will ensure that all service providers and contractors they work with sign a standard supplier agreement.

Any contractors on campus for a short amount of time (i.e. to repair a photocopier) must be considered as visitors and will be supervised and follow visitor guidelines

Contracted service providers are required to and responsible for:

- Checking that their personnel have no criminal or violent record
- Checking that they have no history of unsafe behaviour
- Ensuring that their personnel sign the Safeguarding Code of Conduct and self-declaration
- Providing supervision on site
- Providing appropriate training

A copy of the safeguarding policy will be included in all contracts.

4.5 Allegations against a member of staff, volunteer or board member

An allegation is made when an adult has a concern that a staff, volunteer or board member may have:

- behaved in such a way that may have harmed a student or may have intended to harm a student
- acted outside of the law in relation to dealings with a student.
- behaved in any way that suggests they may be unsuitable to work with students.
- behaved in a way that is harmful to the reputation of the school.
- had contact with an Alumni in the two years after they have left the school without using the official school channels.

When an allegation is made against a staff member or other adult, whether by a student or another adult, the EiM procedure for managing allegations will be followed by the Head as outlined in the Management of Safeguarding Allegations Policy and Appendix I.



4.6 Safeguarding whistleblowing guidance

A staff member, volunteer or visitor may recognise that something is wrong but may not feel able to express concerns because of loyalty to colleagues or a fear of harassment or victimisation. All adults are encouraged to ensure that students are their priority and should not be unnecessarily at risk. This is known as 'whistleblowing' when adults are encouraged to speak up and speak out.

Reasons for whistleblowing:

- Every individual has a responsibility to raise concerns about unacceptable practice or behaviour in relation to the safety and wellbeing of our students
- To prevent a problem from becoming more serious
- To protect or reduce risks to other students

How to raise a concern:

- Concerns should be expressed as soon as possible. The earlier a concern is expressed the sooner action can be taken
- The concern should express exactly what practice is causing concern and why
- The person raising a concern should approach the Head immediately and, in her/his absence, the EiM CEdO, (in her absence the EiM DDSL) or the EiM Chairman.
- If a concern is expressed about the Head, it should be referred to the EiM Chief Education Officer (in her absence the EiM DDSL or the EiM Chairman).
- If a concern is expressed about the EiM CEdO, it should be referred to the EiM Chairman.
- If a concern is expressed about the EiM DDSL, it should be referred to the EiM CEdO.

4.7 Self-reporting

Staff should raise with their line managers any personal difficulties or situations which may impact on their professional behaviour. Staff also have a responsibility to discuss any situation in which their professional competency has been compromised. While such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of students. Where appropriate professional and personal support can be offered.

Staff may seek advice or self-report if they feel compromised as parents of the school in any aspect of safeguarding.

Infatuation

It should be noted that students may develop an infatuation with an adult. If a staff member or volunteer is concerned about this, they must report it to their line manager who will consult with the CPO/DCPO who will decide on the best way to proceed and give advice accordingly.

4.8 Low level concerns

Adults and students are encouraged to report low level concerns about an adult's behaviour towards any student. Whilst a low-level concern may not meet the threshold for an allegation against a member of staff, board member or volunteer, staff must feel confident in reporting any concern.



A low-level of concern is one that does not meet the harm threshold as stated in the Managing Allegation Policy. A low-level concern is any concern – no matter how small, and even if it does no more than cause a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Staff Safeguarding Code of Conduct, including inappropriate conduct outside of work
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the appropriate authority

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

- Being over friendly with students
- Having favourites
- Being inappropriate, overfamiliar informal
- Using negative language towards a student
- Taking photographs/videos of students on a mobile device contrary to school policy
- Using unnecessary or inappropriate touch
- Engaging with a student on a one-to-one basis in a secluded area without any visibility such as CCCTV cameras or glass panels.

Such behaviours must be reported and investigated. It is recognised that such behaviours can vary from the inadvertent or thoughtless, through to that which is intended to enable abuse.

All concerns must be reported to the Head (or DSL in his/her absence) and the level of the concern and subsequent actions will be managed by the Head.

Further information can be found in Appendix L Low Level Concerns policy.

4.9 Safe touch

There are occasions when physical contact with a student is appropriate. Examples of this could include, but are not exclusive to:

- Holding the hand of a young student when going to assembly or when walking together around school and school trips (dependent on age/need)
- Comforting a distressed student
- A student being congratulated or praised (shaking their hand)
- Demonstrating how to use a musical instrument
- Demonstrating exercises or techniques during PE lessons
- Giving first aid treatment

Students should always be notified that touch is going to happen.

On rare occasions, a staff member may have to make a physical intervention to avoid injury to self, individuals, or property.



Staff should use their professional judgment, considering their own safety and that of the student before making the decision to physically intervene. The priority is to de-escalate any situation through talking, the use of body language and giving a calm but firm response. Staff should have exhausted their skills to de-escalate the situation through non-physical methods before resorting to any form of physical intervention.

A Record of Concern on paper or a direct entry onto CPOMS should be completed immediately when a staff member physically intervenes to de-escalate or prevent a harmful situation.

The CPO/DCPO will conduct a debrief with the relevant parties before the end of the working day and add a summary report to CPOMS or where appropriate a RoC.

If a student requires physical intervention as part of an individual care plan, this can only be delivered by a staff member who has received specific training in this area. Contractors, volunteers or other visitors should never initiate any physical intervention but instead contact a staff member.

Further guidelines are available in the School Safe Touch policy for staff on ConnectED. Specific briefings are provided for departments such as PE/Swimming, Dance/Drama, Music and Early Years. Attendance must be recorded.

Specific adults in the school will receive training, bespoke to their role, on how to use reasonable measures to prevent physical harm for any student who may require physical intervention as part of an individual care plan.

4.10 Alumni

During the 2 years after an Alumni (a student becomes part of the alumni the day that they leave school) has left the school, staff members should only make professional contact through official School channels.

5. E-SAFETY

The safe use of equipment, applications and systems is central to the school IT policy. This is monitored and appropriate actions are taken where issues are identified. The school is committed to ensuring a safe digital learning community through curriculum plans, professional development, auditing of systems and working with parents. This approach is described in an E-Safety policy and supported by the E-Safety Lead.

Online learning that takes place will do so on School approved platforms. During online learning, students and teachers may engage in learning activities in more informal locations different from the usual professional classroom environment. It is recognised that online learning can break down barriers and that students may speak more freely. It is important that clear guidance be given by the school leadership to staff, students and parents before online learning takes place.

Staff, students, parents, visitors and volunteers are expected to engage in the safe and responsible use of social media. Any member of staff who is alerted to any protection concerns related to the use of the internet or social media should follow the lines of communication set out in this policy.



We acknowledge that parents like to take photos and videos of their children in performances, sports events and other presentations. This is a normal part of family life. However, parents are expected to be mindful of sharing photos on social media, especially if other students are visible or if the school can be identified.

If parents indicate that they would not like their child's photograph or video to appear in the school's materials, brochures, websites, advertisements or press releases, the school will ensure that their wishes are fulfilled. The school cannot be held accountable for photos or videos taken by parents or members of the public at School functions and shared via social media or other means.

Staff are expected to take photos of students for educational purposes (such as Tapestry, Seesaw etc.) on School devices. In the event of taking photos on personal devices, these images must be deleted immediately after being uploaded to the school drive.

Appendices

A. Indicators of Abuse and Neglect
B. Key Safeguarding Roles and Responsibilities
C. Confidential Record of Concern (RoC)
D. Safeguarding Code of Conduct
E. EiM Competency and Safeguarding Training Framework
F. Volunteer Safeguarding statement
G. Visitor Safeguarding statement
H. Flow chart reporting a concern about a student
I. Flow chart managing allegations reporting about an adult
J. EiM Safeguarding Compliance Review
K. EiM Internal Audit protocol
L. EiM Low Level Concerns policy
M. School Peer on Peer abuse policy

Safeguarding Related Policies

The following related policy documents can all be accessed by staff via local hyper-links to the College server.

- Management of Safeguarding Allegations Policy.
- Safe Touch Policy (including de-escalation strategies)
- Educational Visits Policy (to include risk assessments)
- E-safety Policy
- Speaking Out Stay Safe Learning Framework
- EiM Recruitment Policy
- School Mapping doc