



AISL  
**HARROW**  
HENGQIN · ZHUHAI  
哈罗横琴 · 珠海

# Harrow Hengqin Safeguarding Policy (HS13)

<b>APPLIES TO:</b>	All staff, visitors, volunteers, contractors, governors, guests, residents etc.
<b>Harrow Hengqin RESPONSIBILITY:</b>	DSL: K. Lowery
<b>LAST UPDATED:</b>	7 <sup>th</sup> December 2023
<b>REVISIONS:</b> (Reviewer to enter initials and date)	

## 1 INTRODUCTION

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### 1.1 A Note on Language

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

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

### 1.2 Scope of this policy

Under the Children Acts (UK) and the Law of the People's Republic of China on the Protection of Minors (China), a child is anyone who has not yet reached their 18th birthday. Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (UK) as:

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

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

### 1.3 Purpose of this policy

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

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

Harrow Hengqin is committed to working to ensure that children and young people never experience abuse of any kind.

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

### 1.4 Our core beliefs

We recognise - and believe to the core of our being - that:

- the wellbeing of students and staff is more important than all other consideration in school;
- all children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse;
- some children are additionally vulnerable because of the impact of previous experiences, because of special educational needs, or because they have a high level of dependency, communication difficulties or other issues; working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people’s welfare.

## 1.5 Legal framework

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

1. [Keeping children safe in education \(2020\)](#)
2. [Law of the People's Republic of China on the Protection of Minors \(1992\)](#)
3. [Working together to safeguard children \(2015\)](#)
4. [Children Act \(1989\)](#)
5. [Children Act \(2004\)](#)
6. [Data Protection Act \(1998\)](#)
7. [United Nations Convention on the Rights of the Child \(1991\)](#)

## 1.6 Roles and responsibilities

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

Harrow Hengqin roles and named person table lists the people responsible for the roles described below and their contact information.

Safeguarding Role	Named Person
Designated Safeguarding Lead (DSL)	Ms Kirsty Lowery
Deputy DSL (DDSL)	Mr Jack Benstead
DDSL	Ms Ying Yuan
DDSL	Ms You Li
DDSL	Ms Selene Zhang
Safeguarding Team	DSL + 4 x DDSL
Designated Governor	Dr Ahmed Hussain
External Listening Ear	Mr Tom Hicks (Harrow HK)

**To contact the Safeguarding Team:** [safeguarding@harrowzhuhai.cn](mailto:safeguarding@harrowzhuhai.cn)

**External Listening Ear:** [thicks@harrowschool.hk](mailto:thicks@harrowschool.hk)

Schools must have in place a:

- Designated Safeguarding Lead (DSL) – responsible for policy generation; systems and compliance related to safeguarding; oversight of staff safeguarding training; coordination of safeguarding audits; devising the safeguarding action plan; maintaining the momentum of the safeguarding action plan; conducting internal audits of safeguarding; leading the safeguarding taskforce; maintaining the confidentiality and integrity of safeguarding records; leading on difficult or stressful safeguarding cases; ensuring that safeguarding remains at the forefront of the school's corporate consciousness; reviewing, and acting upon, serious case reviews; and any other duties which may periodically be necessary to maintain or improve the school's safeguarding policy and procedures. DSLs should help promote educational outcomes by working closely with their teachers and sharing information about their welfare, safeguarding and child protection concerns. The role of the DSL will also include:
  - Advise and act promptly upon all safeguarding concerns reported to them
  - Refer cases of suspected abuse as appropriate, support staff who make or consider making any such referrals and liaise with the local authorities as required and under guidance from the Head and Chinese Principal
  - Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service or other relevant service
  - Refer cases where a crime may have been committed to the police
  - Maintain detailed, accurate, secure written records of concerns or referrals (e.g. CPOMS)

- Keep the Head informed of all concerns and actions
  - Monitor records of pupils in the school who are subject to a child protection plan, to ensure that they are maintained and updated as notifications are received
  - Monitor the confidentiality and storage of records relating to safeguarding and when a pupil leaves, ensure their child protection file is copied for the new school as soon as possible and transfer it separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained.
- Deputy Designated Safeguarding Lead (DDSL) – responsible for day-to-day safeguarding issues in their designated area of the school. Duties in this regard include, but are not restricted to: acting as the first port of call (designated focal point) for disclosures; maintaining the integrity and confidentiality of safeguarding records; keeping the DSL informed of safeguarding issues as they arise; liaising with parents, caregivers and other agencies to ensure the safety of children; organising case conferences where these are required; devising and implementing welfare plans for students where these are required.
  - Safeguarding team – responsible for developing an annual development plan and a report to the SLT; are responsible for reviewing policy and procedure; are responsible for agreeing a timetable of training for staff and other adults. The team meet regularly to review safeguarding cases and concerns; they operate under the direction of the DSL to ensure the effective implementation of policy and procedures.
  - Designated Governor – responsible for overseeing policy and procedure; reporting back to the board on all issues to do with safeguarding; ensuring that safeguarding sits firmly within the board’s collective consciousness; sampling first-hand the procedures in place at the school as often as is practicable, but no less than annually.
  - Board of Governors (BOG) – the BOG has overall responsibility to ensure policy and procedures for safeguarding. It is the role of the BOG to provide scrutiny of safeguarding policy and practice. The BOG takes seriously its responsibility to fulfil its duty of care in promoting the welfare and wellbeing of students, ensuring their security and protecting them from harm. To this end the BOG will ensure that:
    - An effective, up to date safeguarding policy is in place and made available on the on the school website and to all staff;
    - Appropriate policies and procedures are in place and are operational
    - Required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register
    - All staff receive safeguarding training in accordance with this policy
    - Students are taught about safeguarding, including online safety
    - Appropriate filters and monitoring systems are in place to keep students safe online
  - Filtering and Monitoring – Senso is installed on all school devices including “Class Cloud: The filtering system is monitored by the Digital Manager, IT lead teacher and the DSL. A list of flagged words has been translated into Chinese to fit the school culture. The school governors are also responsible members for ensuring “all staff undergo safeguarding and child protection training” which includes filtering and monitoring systems in the school. This training should be regularly updated.

## 1.7 Record keeping

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

Any member of a school community (including parents and carers) receiving a disclosure of abuse or noticing signs or indicators of abuse, must make an accurate record as soon as

possible, and within 24 hours, noting what was said or seen, putting the event in context, and giving the full date,

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

Safeguarding concerns are kept on CPOMS a secure online platform. All school staff make reports here and it is confidential.

Any notes written are to be uploaded to CPOMS and kept confidential. For third party staff there is a document for reporting safeguarding concerns that is passed to the DSL. No paper copies of information are kept. Everything is securely disposed of once uploaded on to CPOMS.

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

At Harrow Hengqin school nurses are third party staff and must report immediately to their line manager in the school operations department.

## **1.8 How we keep young people safe**

At Harrow Hengqin we keep young people safe by:

- employing rigorous recruitment procedures for all staff to check their suitability to work with children
- raising awareness of safeguarding and equipping children with the skills needed to keep them safe
- training all staff in safeguarding awareness
- ensuring that all staff have read and understand the Safeguarding Policy (HS13)
- ensuring that all staff are aware of the indicators of child abuse
- ensuring that all staff know how to respond to concerns or disclosures of abuse
- establishing a safe environment in which children can learn and develop
- adopting best practice as it relates to safeguarding
- establishing clearly defined procedures and a code of conduct for all staff, volunteers and visitors
- developing and implementing effective social media and e-safety policies and related procedures
- effective management for all staff and contractors through supervision, support and training
- sharing information about safeguarding and best practice with students, parents, staff outside providers, interns, volunteers and visitors
- sharing concerns with agencies who need to know and involving parents and students appropriately
- ensuring school medical staff are up to date with current practices in China and how to recognize signs of abuse. Training is given by the agent inline with guidelines form the school.
- Filtering and monitoring technology is installed on all school devices including that of staff – a system called SENSO is used for this as well as the classroom support pack – “Class Cloud”.

## **1.9 Key contacts**

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

Responsibility does not fall only on teachers, or only on a select group of managers. However, as an Appendix to this policy, schools will produce and publish details of Safeguarding Leads within each school – these details will be publicly viewable throughout each school.

## 2 RECOGNISING ABUSE – WHAT STAFF SHOULD LOOK OUT FOR

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### 2.1 Importance of vigilance

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

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

### 2.2 Types of abuse and neglect

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

**Physical abuse;** a form of abuse which may involve; hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

- It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate.
- It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another (e.g. witnessing domestic violence). It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Children’s mental health was added to the KSCIE 2020 guidance, ensuring that staff should consider when this might become a safeguarding concern.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The

activities may involve:

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

**Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

- Neglect may occur during pregnancy as a result of maternal substance abuse.
- Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- This would include failure to provide proper adult guardianship such as leaving children unsupervised at home for an extended period of time.

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

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

### 3 PROCEDURES DEALING WITH DISCLOSURES/REPORTING

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

#### Step 1

You have a concern about a child's well-being, based on:

- a) Something the child or another child or adult has told you;
- b) Something you have noticed about the child's behaviour, health, or appearance;
- c) Something another child or adult said or did.

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

#### Step 2

Decide whether you need to find out more by asking the child/young person, or their parent to clarify your concerns, being careful to use open questions:

...beginning with words like: 'how', 'why', 'where', 'when', 'who'?

#### Step 3

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

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

#### Step 4

Use CPOMS (school staff member) to make a written record as soon as possible after the event, noting:

- d) Date, time and place
- e) Who else was present?
- f) What was said/What happened/What you noticed ... speech, behaviour, mood, drawings, games or appearance/injuries. If child or parent spoke, record their words rather than your interpretation
- g) Analysis of what you observed and why it is a cause for concern

3<sup>rd</sup> Party Staff use the My Concern form (Appendix 3). Ensure the full name and grade of the child is recorded, English and Chinese. Give the form to the DSL. This includes nursing staff who report to the operational line manager who assists with entry of information in CPOMS.



## Step 5

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

## 4 PROFESSIONAL CONFIDENTIALITY

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

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

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

## 5 MANAGING ALLEGATIONS AGAINST STAFF

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- 5.1** Allegations of abuse can be made by children and they can be made by other concerned adults.
- 5.2** Any concern about the behaviour of a member of staff or volunteer, or allegation of abuse against a member of staff must immediately be reported to the Head Master who will take the necessary action. This is recorded on CPOMS but only the Head Master will receive the information.
- 5.3** Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- 5.4** Malicious allegations against staff will be investigated and dealt with by the Head and, if appropriate, a committee of governors.

## 6 CONCERNS ABOUT A COLLEAGUE – WHAT TO DO

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### 6.1 Reporting channels

If a staff member has a concern about another staff member or volunteer this should be referred to the Head Master through CPOMS.

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

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

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

### 6.2 Types of allegations

As specified in the UK's, 'Keeping Children Safe in Education' (2022) the following definitions should be used when determining the outcome of allegation investigations:

- a) Substantiated: there is sufficient identifiable evidence to prove the allegation;
- b) False: there is sufficient evidence to disprove the allegation;
- c) Malicious: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false;
- d) Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw; alternatively, they may not have been aware of all the circumstances; Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- e) The content below is informed by *MANAGING ALLEGATIONS OF CHILD ABUSE BY EDUCATORS AND OTHER ADULTS IN INTERNATIONAL SCHOOLS*. This document accompanies this policy and supports the content below.

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

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

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

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

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

If the allegation made to a member of staff concerns the Head Master, the person receiving the allegation will immediately inform the safeguarding governor, who will consult as above, without notifying the Head Master first.

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

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

## **7 IMMUNITY & SPEAKING UP PROCEDURES**

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

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

**7.3** To make a disclosure, you only need to act in good faith, e.g. with an honest belief about the concern you raise. Through its policies and practice, an AISL school actively encourages you to raise concerns internally making use of the accepted channels of reporting – either through the school’s Safeguarding Team or directly to the Head Master. Your concern will be treated in the strictest confidence. AISL and, more directly, the school will ensure that your concerns are investigated promptly and efficiently and, whenever possible, you will be advised of the outcome.

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

## 8 SAFEGUARDING AND THE PHYSICAL ENVIRONMENT

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

- Doors should have clear glass windows. Any film or blinds must still allow occupants to be visible from outside the room
- Staff bathrooms are available and are clearly identified as such. Staff must not use the same bathrooms as students. In cases where it is necessary to enter a student allocated bathroom, such as to attend to a behavioural or health and safety issue, leave the door open and announce your reason for entering the space as a warning to other students using the bathroom. Where possible in such situations avoid being alone. We understand that with very young children, staff will be assisting with children's toileting and intimate care needs. In this case please refer to the Intimate Care Policy (HS16).
- If staff are in a one-to-one situation with students in a room, (e.g in boarding, on expeditions or trips etc.) they should ensure that the door remains open, or move to a more public space where this is possible and appropriate.

## 9 SAFER RECRUITMENT

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### 9.1 Our aims

The safer recruitment of all staff working in AISL schools is the first step to safeguarding and promoting the welfare of children in education. Our safer recruitment processes aim to:

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

### 9.2 Achieving our aims

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

- Up-to-date police records (ICPC/DBS or local equivalent) from the country of origin and previous any countries of employment, have been received and checked by the school
- After two years – usually at the time of contract renewal – we renew this police check;
- We have at least two appropriate professional references, one of which must be from a candidate's current, or most recent, employer. A telephone reference from the current employer is included for all staff and recorded on the SCR. If a teacher has worked in two or more schools, within 5 years, telephone contact is made with those schools to ask why the teacher is leaving and if there were any concerns of a safety nature with children;
- All new staff read and sign the Safeguarding (HS13), Staff Code of Conduct, IT Acceptable
- Use Policy plus Keeping Children Safe in Education (2022);
- We give new staff online training on arrival in safeguarding and refresh this training formally on biennial basis. All school staff are trained yearly with a session lead by the DSL in September at the start of each school year.

### 9.3 Minimum safeguarding requirements expected of third party staff

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

- Induction training provided which covers safeguarding given by the DSL;
- Updated training with school DSL is given in addition at the start of each academic year
- in September
- A designated senior member of the Operations team (or, in alternate School structures, the Head) ensures that CSP information is shared with relevant managers through regular meetings;
- Contractors read, complete and sign the CSP Self Declaration Form;
- Police checks for any member of staff who will be employed on-site for longer than 6 days;
- Our Code of Conduct for contractors is shared and a record is kept of their having read and understood it;
- Toolbox Talks - daily reminders given on CSP awareness.

### 9.4 Minimum safeguarding requirements expected of all adults living on campus In schools where

### **staff live on campus:**

- The *Safeguarding Policy (HS13)* and our Code of Conduct; made available to all at induction meeting (during new staff induction);
- Expectation for all residential occupants to adhere to the Safeguarding Policy (HS13) and our Code of Conduct;
- Resident adults read, complete and sign the CSP Self Declaration Form.
- All Expat staff live in the school accommodation and are fully SG trained along with local staff who live in the staff accommodation
- Staff accommodation is completely separated from school buildings and access is restricted from school side. All dependents of school staff use a separate entrance and cannot access school from the accommodation.

### **9.5 Explicitly tell job applicants about online searches:**

New guidance states that schools and colleges must let potential candidates know that online searches will be done as part of due diligence checks ahead of their interview. This will be part of the job adverts and told to staff at interview.

This will help to provide reassurance to our school that we can conduct online checks of potential new hires to check for any public incidents or issues that might need to be discussed ahead of a hiring. It will also help candidates to prepare to answer questions around public incidents from their history.

Harrow Hengqin will make use of the external agency in China provided by HQ to conduct online searches for potential staff. HR will conduct the search as part of the SCR checks and inline with Safer recruitment procedures.

## **10 STAFF TRAINING**

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**10.1** Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care.

**10.2** Each school's HR Manager (or in schools with alternate structures, the Head), supported by the Safeguarding team, keeps detailed records of all staff safeguarding training and issue reminders when training updates are required.

**10.3** It is good practice to include a safeguarding agenda item in all staff meetings.

**10.4** All paid and unpaid members of staff have regular, mandatory safeguarding training, including school governors, senior managers, outside providers, volunteers, interns, and contractors, or anyone working on behalf of the school.

**10.5** New staff have safeguarding training as part of the induction process and that this is kept up to date by refresher training at two-yearly intervals. HR keep records and organize for updated training.

**10.6** In addition, the designated members of staff (DSL, and DDSL) will undertake multi-agency training every two years to keep their knowledge and skills up to date. We aim to ensure that this group of staff is all Level 3 safeguarding trained. All members of senior leadership to be Level 3 safeguarding trained.

**10.7** Standards of behaviour expected of staff, are outlined in the Staff Professional Code of Conduct. It is expected that all staff read this code and sign to acknowledge that they have done so. All members of staff



(and all adults working with students) read and agree to this Policy before their duties begin.

**10.8** Safeguarding and child protection training includes an “understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring”. All staff receive safeguarding and child protection (including online safety) updates as required...to continue to provide them with relevant skills and knowledge to safeguard children effectively.” Filtering and monitoring technology is a vital part of ensuring pupils are not accessing harmful or illegal content on school owned devices.

## **11 SELF-ASSESSMENT AND INTERNAL QUALITY CONTROL**

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

- a) A biennial external audit is carried out, which forms part of our safeguarding improvement action plan;
- b) An internal audit occurs annually.
- c) Safeguarding provision is to be evaluated against Harrow Standards 1.7 A Safeguarding culture and associated Success Descriptors.
- d) The DSL conducts an annual internal safeguarding audit.



## 12 BUDGETING FOR SAFEGUARDING

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

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

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

## 13 RISK ASSESSMENT

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



## 14 IMPLEMENTATION ACTIONS

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

- a) Designate a senior person for as DSL, providing appropriate training, support and time for this role;
- b) Ensure a nominated governor takes a lead role for safeguarding including championing safeguarding issues within the school and liaising with the Head, having an overview of the safeguarding and all related policies, auditing safeguarding measures annually alongside the Head following a calendared timeline;
- c) Ensure every member of staff, volunteer, site user, employee and governor know the name of the designated safeguarding officer responsible for safeguarding and their role through the training programme and the display of posters around the site;
- d) Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for recording any concerns and referring any concerns to the designated teacher responsible for safeguarding;
- e) Ensure all visitors are aware of child safeguarding expectations and reporting procedures by having information on signed acknowledged visitor slips and CS reporting posters at key points around the school;
- f) Ensure all staff receive safeguarding training as a minimum expectation of every two years, and that lead people (Designated Safeguarding Leads, Safeguarding Team members and Nominated Safeguarding Governor) are trained every two years;

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

## 15 CONTACT INFORMATION FOR SAFEGUARDING SERVICES

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**15.1** Each school will maintain a database of local child safeguarding agencies and support services. Details of these services will be available to the Safeguarding Team. At Harrow Hengqin the Chinese Principal is the liaison DDSL between school and outside agents.

**15.2** AISL schools will endeavour to keep these links fresh by making personal contact with the agencies on a biennial basis. This ensures that if the worst were ever to happen, schools have the contacts necessary to make the most of the services available to us.



## **APPENDIX 1: DEFINITIONS OF TERMS**

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

1. Teachers (including supply teachers)
2. Teaching Assistants
3. Administrative staff
4. Operations staff
5. Maids
6. Senior managers
7. Governors
8. All paid staff who are working for the School
9. Outside activity providers
10. Coaches
11. Volunteers
12. Graduate interns
13. Contractors/Outsource Staff
14. Consultants

15. Visiting speakers

16. Visiting professionals delivering training on-site

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

1. Spouses of staff residing in school houses or boarding residences on campus, who are not employed by the school;
2. Long-term guests or visitors of staff residing in staff houses or boarding residences on campus. For example, staying for an extended period (more than 6 days);
3. Any individual, employed by a residential occupant, to work in the staff houses or boarding residences on campus on a regular basis. For example, nannies and maids.

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

## **APPENDIX 2: INDICATORS OF ABUSE**

Things to watch out for:



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

**Other safeguarding risks**

In addition, concerns or incidents of the following should be reported as part of this Safeguarding Policy:

- **Children missing from education;** A child going missing from education is a potential indicator of abuse or neglect. Staff and community members (including parents and carers) should report any poor student attendance or absences which cause concern to the safeguarding officers or the DSL, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual



exploitation, and to help prevent the risks of the child going missing in future. Being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

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



### APPENDIX 3: LOGGING CONCERNS FORM (Bilingual)

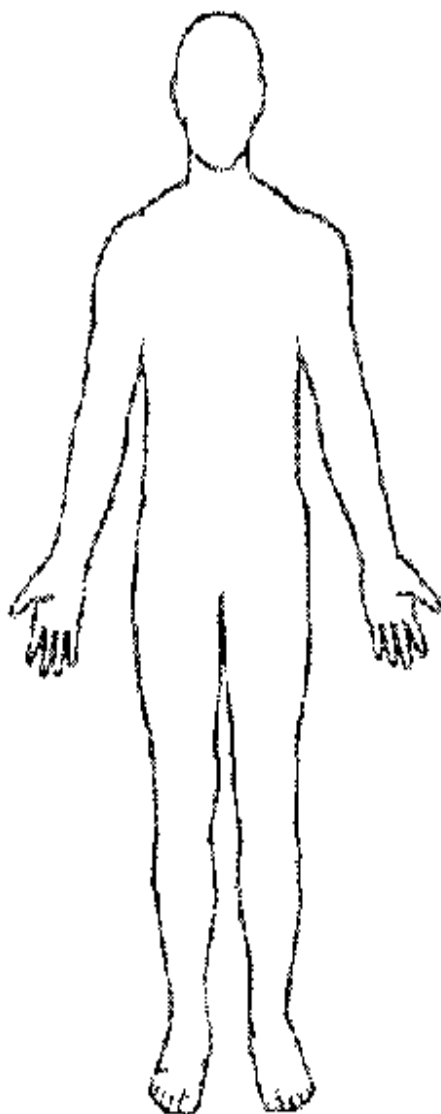
<b>My Concern - Safeguarding Report 我的担忧 - 安全保护报告</b>	
<b>Name of Student 学生姓名:</b>	<b>Grade 年级:</b>
<b>Date of Time of Concern 日期和时期:</b>	<b>Date and time of form Completion 报告完成日期和时间:</b>
<p><i>Description of concern (please describe your concern, detail all relevant information and outline any conversations you have had with the pupil.) Please stick to the facts and be as accurate as possible. (Use another sheet of paper if necessary and give direct to DSL/DDSL).</i></p> <p>描述你所关注的问题（请描述你所关注的问题，详细说明所有相关信息，并概述你与该学生的任何对话）。请实事求是，并尽可能准确。（如有必要，请用另一张纸，并直接交给安全保护主任/副主任）。</p> <p>Ms. Kirsty Lowery (DSL) 安全保护主任- Mr. Jack Benstead (DDSL) 安全保护副主任 - Ms. Ying Yuan (DDSL) 安全保护副主任 - Ms. You Li (DDSL) 安全保护副主任 - Ms. Selene Zhang (DDSL) 安全保护副主任</p>	
<b>Signature and Name of those completing report</b> 签名以及提交报告者姓名:	
<b>Passed to DSL/DDSL (Name)</b> 已提交给安全主任/安全副主任	
<b>Signature of DSL/DDSL</b> 安全主任/安全副主任签名	



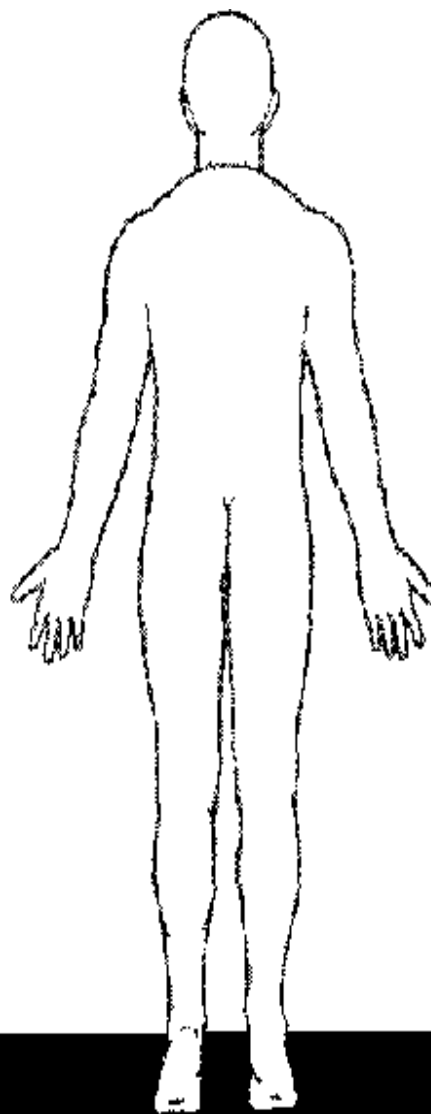
<b>Safeguarding Report 安全保护报告</b>	
Description of following up and agreed actions 情况跟进以及商定的行动	
<b>Checklist to be completed by DDL/DDSL 需安全主任/副主任完成的事项清单</b>	<b>Yes or No</b>
Has the form been discussed with more than one DSL/DDSL? 是否与多个安全主任/安全副主任讨论过该表单?	
Have you checked CPOMS for any other incidents that are relevant? 您是否为其其他相关事件检查过COPMS?	
Have you fed back to the member of staff who gave you the form? (with in 48 hours) 您在48小时内给提交表单的职员回馈了吗?	
Have parents been contacted? 已联系过家长吗?	
Have the Board or any other authorities been contacted? 已联系过董事会其他改成管理人员吗?	
<b>Signature 签名:</b>	
<b>Time and Date 时间和日期:</b>	



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



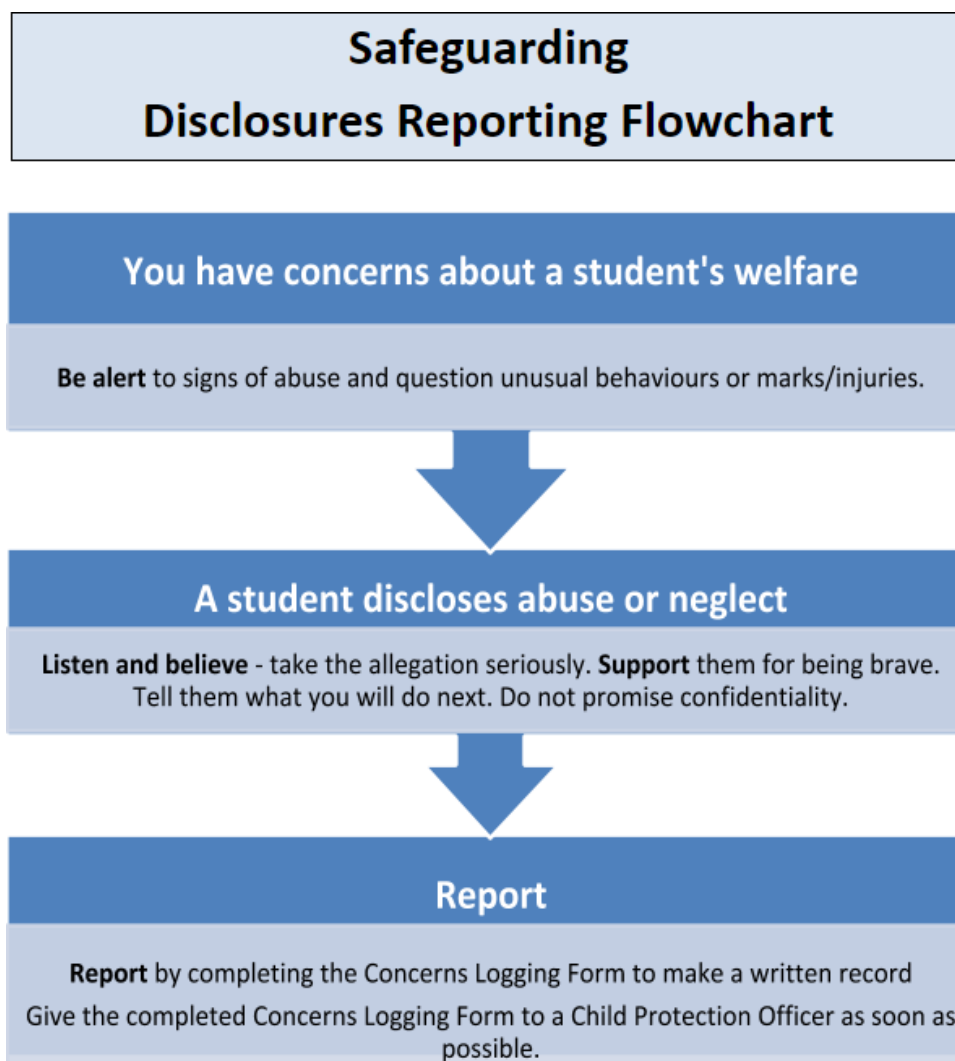
**Front**



**Back**



## APPENDIX 4: REPORTING FLOWCHART



## APPENDIX 5: ACKNOWLEDGEMENT OF COMPREHENSION

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

I have read, understand and agree to abide by the *Safeguarding and Children Protection Policy (HS13)* and the Staff Professional Code of Conduct. I acknowledge that their scope covers both my private and professional life.

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

FULL NAME (capitals, please):

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SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

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



## APPENDIX 6: Safeguarding Team Poster



HARROW  
LIDE  
SCHOOL  
哈罗礼德学校  
HENGQIN 横琴

# SAFEGUARDING TEAM 儿童安全保护团队

Designated Safeguarding Lead  
指定儿童安全负责人



Ms. Kirsty Lowery  
Deputy Head (Whole School)  
副校长

Deputy Designated Safeguarding Lead  
指定儿童安全第二负责人



Ms. Ying Yuan  
Assistant Pastoral Lead  
助理人文关怀主管



Mr. Jack Benstead  
Head of Lower School  
低年级校长



Ms. You Li  
Executive PA  
校长执行助理



Ms. Selene Zhang  
School Counselor  
心理咨询老师

If you have any concerns regarding the safety or welfare of our students, then please speak to a member of our Safeguarding Team, or contact us through email.

如果您在关于学生安全健康方面有任何担忧和考虑，请立即与我们的安全保护团队取得联系，或发送邮件联系我们。

Our external listening ear is Mr. Tom Hicks who will be available via email below if you do not want to talk to a staff member at Harrow Zhuhai.

如果您希望向学校外部的第三方监管机构反馈意见，请通过以下邮箱地址联系Tom Hicks 先生。

[safeguarding@harrowschool.hk](mailto:safeguarding@harrowschool.hk)

[thicks@harrowschool.hk](mailto:thicks@harrowschool.hk)