

HARROW BEIJING

SAFEGUARDING AND CHILD PROTECTION POLICY & GUIDELINES



HARROW
BEIJING

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1. KEY CONTACTS

School Contacts	
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External Contacts	
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Sex and Relationship Programmes in Schools	Suzie March susie.march@live.com
Police: Beijing Government Bodies such as Ministry of	Contact through Tony Tian Director of Operations

Public Security, Immigration	Email: ttian@harrowbeijing.cn
Marie Stopes: Beijing	Bryony Thorpe - Fundraising Advisor Marie Stopes International China (MSIC) Room 103, Building 18, Euro-Classic Compound, No.172 Beiyuan Road, Chaoyang District, Beijing (100101), China Tel: (+86) 186 0017 0074 Fax: (+86 10) 8485 4988-20 www.mariestopes.org.cn
Embassies in Beijing	Depending on the student's nationality the embassy should be contacted as appropriate via websites
Save the Children: Beijing, China	General Inquiries: public@chinadevelopmentbrief.cn Gabriel Corsetti, Deputy Director of the Media and Communications Department: gabriel.corsetti@cdb.org.cn Luo Bing, Senior Media Officer, luo.bing@cdb.org.cn Address: 15 Zhonggu Hutong, Dongcheng District, Beijing 100009, PRC (北京市东城区钟鼓胡同 15 号 100009)
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2. POLICY STATEMENT AND PRINCIPLES

Key Points

- This policy applies to all students in the School policy but legally as some students will be 18 years and over they may be treated differently outside of school. Any student under the age of 18 will be regarded as a child for the purpose of this policy.
- All staff have a responsibility for the implementation of this policy;
- Any concerns regarding safeguarding and/or child protection must be reported immediately to the Designated Safeguarding Lead (DSL) or in their absence to the Deputy Designated Safeguarding Lead (DDSL);
- If a crime has been committed, it should be reported to the DSL immediately who will then report to the police;
- All staff must have read and act in accordance with Part One of the DfE Statutory Guidance *Keeping Children Safe in Education* July 2016 (KCSIE);
- All staff must know who the trained DSL and DDSLs are;
- All safeguarding and child protection concerns must be treated in the utmost confidence;
- The DSL or DDSL must report all concerns in line with the requirements of the People's Republic of China and in line with best practice as defined in the UK and through organisations such as CIS.
- Allegations of abuse in relation to adults must be dealt with in line with the associated policy.

Introduction

Harrow Beijing is committed to safeguarding and promoting the welfare of children and young people and expects all staff and those connected to the school to share this commitment.

This policy applies to staff, volunteers and contractors working with pupils on school premises or away from the school on an activity, visit or other educational pursuit.

This policy therefore complements and supports a range of other policies (e.g. Complaints, Behaviour, Expeditions, Health and Safety). When undertaking development or planning of any kind, the School will consider safeguarding aspects. The School's safeguarding arrangements are inspected by the Council of International Schools standards. The School will conform to the National Minimum Standards for

Boarding Schools in the UK.

The School's core safeguarding principles are:

- the School's responsibility to safeguard and promote the welfare of children is of paramount importance;
- safeguarding children is everyone's responsibility. Everyone who comes into contact with children and families has a role to play in keeping children safe;
- listening to Children and to all members of the community is fundamental to safeguarding and is in the best interest of the child
- Harrow Beijing school is committed to a 'speak up culture' and believes in the notion that if you see something or sense something then you should say something – no concern is considered too small. If concerns are raised early then help can be provided at an early stage
- early indication that a child may need help is critical and a crucial part of our 'speak up culture'.
- all staff must have the attitude of 'it could happen here' with regard to safeguarding.
- safer children make more successful learners;
- representatives of the whole School community will be involved in safeguarding policy development and review; and
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

Terminology Key

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Members of **staff** refers to all those working for or on behalf of the school, full time or part time, including contracted staff such as cleaners and kitchen staff, temporary or permanent, in either a paid or voluntary capacity.

Child includes everyone under the age of 18. However our duty to promote the welfare and health and safety applies to all students in our care whether they are under or over the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, guardians, foster carers and adoptive parents.

Safeguarding in Harrow Beijing



This includes

- ensuring pupil health and safety;
- referring concerns or allegations about a child to the appropriate bodies promptly;
- bullying;
- all forms of abuse;
- harassment and discrimination;
- use of physical intervention;
- meeting the needs of pupils with medical conditions;
- providing first aid;
- drug and substance misuse;
- educational visits;
- intimate care;
- internet safety;

- issues which may be specific to a local area or population, for example gang activity; and
- school security.

Child Protection Statement

Harrow Beijing fully recognises its moral and statutory responsibility in China as well as meeting international standards to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that receive effective support, protection and justice.

Policy Principles

Harrow Beijing's principles are aligned with those of the United Nations Convention on the Rights of the child (UNCRC). Central to this is the acknowledgment that every child has basic fundamental rights. These include the right to:

- **life, survival and development**
- **protection** from **violence, abuse** or **neglect**
- an **education** that enables children to **fulfil their potential**
- be **raised by**, or have a **relationship with, their parents**
- **express their opinions** and be **listened to**.

Therefore the welfare of the child is paramount;

- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- All members of staff have equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- Children and staff involved in child protection issues will receive appropriate support.

Policy Aims

To provide all staff with the necessary information to enable them to meet their child protection responsibilities;

To ensure consistent good practice;

To demonstrate the School's commitment with regard to child protection to students, parents and other partners;

To contribute to the School's portfolio of safeguarding policies.

The School's Commitment

There are seven main elements to our policy:

1. Establishing a safe environment in which students can learn and develop; include in the curriculum activities and opportunities, which equip children with the skills needed to stay safe from abuse and will develop resilience and realistic attitudes to the responsibilities of adult life;
2. Ensuring the governance of safeguarding and promotion of welfare is fully embedded within the school;
3. Raising awareness of child protection issues and ensuring staff, volunteers and contractors working at the school are fully aware of presenting issues and how to act in the event of concerns being raised;
4. Ensuring staff recruitment practice is safe and fully accords with the requirements of Keeping Children Safe in Education and CIS Standards so the school operate safe recruitment procedures and makes sure that all appropriate checks are carried out on new staff and volunteers who will work with the children;
5. Supporting pupils who are in need of protection or require additional help to achieve good outcomes.
6. Listening to the children in our care and ensuring that children know that there are adults in the School whom they can approach if they are worried or are in difficulty, as the ethos is one where children feel secure and are encouraged to talk, and are listened to;
7. Creating an open-culture where staff feel confident to speak-up whenever they have concerns about a child or a particular adult, and are aware of how and when to act on concerns that they have and work in a safe and appropriate manner at all times.

Confidentiality

Harrow Beijing recognises that all matters relating to child protection are highly confidential. The Head Master or the Designated Safeguarding Lead will share that information on a 'need to know, what, and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the School unless in confidential meetings for that purpose.

3. SAFEGUARDING LEGISLATION AND GUIDANCE:

Harrow Beijing is committed to being compliant with all standards for safeguarding in China, in line with UK and the standards of the Council of International Schools (CIS). Due to their day-to-day contact with students, members of staff in schools and colleges are uniquely placed to observe changes in children's behaviour and the

outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that members of school staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The School will act on identified concerns and provide early help to prevent concerns from escalating.

The UK

Section 94 of the Education and Skills Act 2008 requires the Secretary of State to prescribe standards for independent educational institutions to safeguard the welfare, health and safety of children. The relevant standards are set out in the Education (Independent School Standards) Regulations 2014 (the ISS Regulations 2014).

The statutory guidance *'Keeping Children Safe in Education'* (DfE, May 2016) is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise, such as in conflict with the requirements of the PRC and as a result of the differing social services provisions in China compared to the UK.

All members of staff are required to have signed a Code of Conduct in relation to Safeguarding which includes a clause to confirm that they have read and understood at least Part One of the KCSIE 2016 guidance. This guidance underpins Harrow Beijing's commitment to safeguarding.

The *Teacher Standards 2012* state that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The statutory guidance *Working Together to Safeguard Children* (DfE, March 2015) covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children.

Prevent Duty Guidance 2015: With effect from 1st July 2015 all schools became subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 in exercising their functions "*to have due regard to the need to prevent people from being drawn into terrorism*". The School recognises that "*safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm*".

The NSPCC estimates that over half a million children are abused in the UK each year. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event, and it can increasingly happen online.

The People's Republic of China

The People's Republic of China (PRC) declares that it protects a wide range of children's rights through domestic legislation and by ratifying and joining the relevant international treaties such as the UNCRC. The PRC Constitution provides for the state protection of children, and prohibits maltreatment of children. Among many laws and regulations providing children's rights protection, the primary law in this field is *The PRC Law on the Protection of Minors* (first passed in 1991, revised in 2006) (Minors Protection Law). The revised Minors Protection Law entered into force on June 1, 2007. This law sets up responsibilities of the families, the schools, and the government with regard to the protection of children's rights, and judicial protection, as well.

China has ratified major international documents with regard to children's rights protection. China's domestic legislation also provides protection for a wide range of children's rights. The reality, however, is disputable. Few accurate statistics can be obtained directly from the official source. In practice, enforcement of the treaty obligations and the legislative declarations remains a huge problem.

However prior to and during the 2017 Nation People's Congress some deputies were highlighting the scale of children suffering abuse and the high numbers of vulnerable children. New measures are expected to be released during 2017 and 2018 to combat the problem. The Government is working with UNICEF on the Barefoot Social Worker Programme due to the shortages of social workers in China. This is to raise awareness among parents about good practices to raise children. There are also moves to make sexual abuse awareness education compulsory in schools and establishing a proper custody system for minors.

According to research done by China's Agricultural University for the World Health Organisation in 2015, 9.5 per cent of girls and 8 per cent of boys have suffered some form of sexual abuse. In China that means up to 25 million people under the age of 18 could be victims.

4. CHILD PROTECTION PROCEDURES

Providing early help is more effective in promoting the welfare of children than reacting later. We are aware that all our members of staff have a responsibility in school to identify the symptoms and triggers of abuse and neglect, to share information and work together to provide children and young people with the help they need.

KCSIE states that: 'Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.'

Sometimes a single traumatic event may constitute significant harm, such as poisoning or a violent assault. However, more often it is a compilation of significant

events, both acute and longstanding, which can change or damage a child's physical and psychological development. Some children have a family and/or social circumstances where their health and development are neglected. For them it is the corrosiveness of long-term neglect, emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm.

Recognising abuse

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm (for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler). Abuse may be committed by adult men or women and by other children and young people. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Internet abuse is a growing concern and schools should be vigilant to this.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. All staff should be aware that abuse, or safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Physical abuse

Physical abuse is 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

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

Sexual abuse

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

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

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

This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The above categories are identified by the NSPCC, and definitions have been taken from *Working Together to Safeguard Children* (DfE July 2015 and 2) and *KCSIE* (DfE May 2016)

Specific safeguarding issues

All staff should have an awareness of safeguarding issues-some of which are listed below:

- bullying including cyber bullying - see below
- children missing education—and Annex A
- child missing from home or care
- child sexual exploitation (CSE)—and Annex A
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)—and Annex A
- forced marriage-and Annex A

- gangs and youth violence
- gender based violence/violence against women and girls(VAWG)
- hate
- mental health
- missing children and adults strategy
- private fostering
- preventing radicalisation—and Annex A
- relationship abuse
- sexting
- trafficking

Annex A of KCSIE May 2016 contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff that work directly with children should read the annex.

Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting put children in danger.

All staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting.

Staff should be clear as to Harrow Beijing's policy and procedures with regards to peer on peer abuse.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures. Housemasters will keep records of bullying-type behaviour, which should be submitted termly to the DSL. The School's [Anti-Bullying Policy](#) is annually reviewed and published to all children at the start of each academic year.

The subject of bullying is addressed at regular intervals via the school's policies and curriculum for Personal Development. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Head Master and the DSL will consider implementing child protection procedures.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or

embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that members of staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; or
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is therefore essential that staff report their concerns. Staff do not need 'absolute proof' that a child is at risk but should act on any hunches or worries in the knowledge that they will be supported in their safeguarding role. Reports made in good faith will always be dealt with in accordance with the School's [Whistleblowing Policy](#), regardless of outcome.

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Taking action

Any child, in any family, in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”. Key points for staff to remember for taking action are:

- in an emergency take the action necessary to immediately help the child;
- report your concern to the DSL as soon as possible;
- do not start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern; and
- seek support for yourself, if you are distressed.

If you are concerned about a child’s welfare

There will be occasions when a member of staff may suspect that a child may be at risk, but have no ‘real’ evidence. The child’s behaviour may have changed, his actions may reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, the member of staff must try to give the child an opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a close friend or relative has died, a grandparent is very ill. It is fine for staff to ask the child if they are OK or if they can help in any way.

Staff should report their concerns to the child’s Housemaster. If the child does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with the DSL.

If a child discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the child know that they must pass the information on – staff are not allowed to keep secrets and must never promise to do so. The point at which they tell the child this is a matter for professional judgement. If they jump in immediately, the student may think that they do not want to listen. If left until the very end of the conversation, the child may feel that he has been misled into revealing more than he would have otherwise.

During their conversations with the children members of staff will:

- allow them to speak freely;
- remain calm and not overreact – the child may stop talking if they feel they are upsetting their listener;

- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’;
- not be afraid of silences – members of staff must remember how hard this must be for the child;
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the student’s parent(s) think about all this;
- at an appropriate time tell the child that in order to help them, the member of staff must pass the information on;
- not automatically to offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but could be interpreted by the child to mean that they have done something wrong;
- tell the child what will happen next. The child may agree to go to see the DSL or his Housemaster. Otherwise let the child know that someone will come to see them before the end of the day;
- report verbally to the DSL, even if the child has promised to do it by themselves;
- write up their conversation as soon as possible on the record of concern form and hand it to the DSL; and
- seek support if they feel distressed.

Notifying parents

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively. The DSL will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the School believes that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought from other agencies where possible.

Children with sexually harmful behaviour

Staff will be sensitive to the nature of relationships within a boarding setting which will be different to students in a day school and respond accordingly. It is important to recognise the potential for abuse by peers. With regards to student-on-student abuse

staff will refer such abuse to the DSL who will consult with external where there is a risk of significant harm. Allegations of student-on-student abuse will involve parents being contacted.

Staff will be aware of harm caused by bullying and will use the School's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex. The School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Members of Staff, who become concerned about a child's sexual behaviour, should speak to the DSL immediately.

Sexual exploitation of children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the DSL.

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence. Members of staff should only discuss concerns with the DSL or a Deputy, the Head Master, Head of School or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with UK Data Protection Act 1998 principles. Information is:

- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;
- kept no longer than necessary;
- processed in accordance with the data subject's rights; and

- secure.

Child Protection Records and other written information will be stored in a locked facility and any electronic information such as on My Concern will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. When members of staff write up safeguarding concerns on their laptops etc. once the files are sent to the DSL or logged on My Concern they must be deleted from their email accounts and own computers.

If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Child protection information will be stored separately from the child's and the file will be 'tagged' to indicate that separate information is held. Child protection records are normally exempt from the disclosure provisions of the UK Data Protection Act. This means that students and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Head Master. The UK Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Children and families requiring additional support

As distinct from cases where a child has suffered or is likely to suffer significant harm, where children and families need support from agencies beyond our School, we will respond according by consultation with the School Counsellor, Director of Student Well Being in the US and Assistant Head: Pastoral in the LS. We will liaise closely to co-ordinate support, with the agreement of the child and their parent/carer(s), and in accordance with local children's social care procedures in China where available.

5. PREVENT DUTY AND FGM

The Prevent Duty is the duty in the UK Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. This is a concern of the PRC as well. The UK Prevent Duty Department of Education advice for schools and childcare providers, June 2015, states that, 'School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.'

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Members of staff, who have concerns about a pupil, will make these concerns known

to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether or not it is appropriate to make a referral to external agencies in China or the appropriate embassies for foreign nationals.

In the UK, Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. www.gov.uk/government/publications/channel-guidance

Signs of vulnerability:

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are number of signs that together increase the risk.

Signs of vulnerability include:

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events
- religious conversion
- change in behaviour
- extremist influences
- conflict with family over lifestyle
- confused identify
- victim or witness to race or hate crimes
- rejection by peers, family, social groups or faith

Recognising Extremism:

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Female Genital Mutilation (FGM):

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Members of staff should recognise the possibility that a girl may disclose information relating to a sibling or close friend who has suffered abuse in the form of FGM. Members of Staff should alert to the mandatory reporting requirement for suspected cases of FGM, which became a statutory duty from October 2015 in the UK and disclose this immediately to the DSL.

6. ROLES AND RESPONSIBILITIES

Professional expectations

Everyone who comes into contact with our children and their families has a role to play in safeguarding children. We place a high priority on identifying concerns early and provide help for children, to prevent concerns from escalating. We do this because we are acutely aware that we play a vital role in the wider safeguarding system for children. Together with our colleagues in the police, health and other children's services, we promote the welfare of children and protect them from harm.

All our staff are aware that *Teacher Standards 2012* states that teachers, including Heads, should safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties. These standards also apply to trainees, inductees and Newly Qualified Teachers and we fully adhere to these standards with rigour; applying our school disciplinary procedures, where appropriate, in cases of misconduct.

The Designated Safeguarding Lead (DSL)

- has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff;
- receives updated child protection training at least every two years;
- acts as a source of support and expertise to the School community;
- encourages a culture of listening to children and taking account of their wishes and feelings;
- is alert to the specific needs of children in need or those with Special Educational Needs;
- has a working knowledge of Harrow Beijing procedures;
- has been trained in the Prevent Duty and how to make referrals to the appropriate agencies or Channel in the UK;
- has an understanding of locally agreed processes for providing early help and intervention;
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from the child's general file;

- immediately refers cases of suspected abuse to local services or the Police as appropriate;
- where students leave the School, ensures the child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file;
- attends and/or contributes to child protection conferences;
- coordinates the School's contribution to child protection plans;
- develops effective links with relevant statutory and voluntary agencies
- ensures that all staff sign to indicate that they have read and understood the Child Protection Policy and safeguarding code of conduct;
- ensures that the Child Protection Policy is regularly reviewed and updated annually;
- liaises with the Nominated Governor and the Head Master as appropriate;
- ensures that a record of staff attendance at child protection training is kept;
- makes the Child Protection Policy available publicly, on the School's website or by other means;
- ensures parents are aware of the School's role in safeguarding and that referrals about suspected abuse and neglect may be made;
- in the Head Master's absence, ensures cases concerning a member of staff are referred appropriately to the Chair of Governors and/or the Disclosure and Barring Service (DBS); and
- submits an annual report to the Governing Body about how the School's duties have been carried out. Any reported weaknesses will be rectified by the DSL without delay.

Deputy Designated Safeguarding Lead (DDSL)

- The DDSL must be appropriately trained in child protection at least every two years. In the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of the boys.
- the DDSL must have the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff .
- in the event of the long-term absence of the designated person, the DDSL will assume all of the functions as for the DSL, above.

The Governing Body

- will appoint a Governor for child protection who will undertake training in inter-agency working, in addition to basic child protection training;
- will ensure that the School has a Designated Safeguarding Lead (DSL), whose role is explicit in the role holder's job description;
- will ensure that the School has a child protection policy and procedures, including a staff safeguarding code of conduct, that are consistent with UK and China statutory requirements, as well as CIS standards, reviewed annually and are signed off by the Chairman of Governors;
- will ensure that the School's child protection policy and procedures are made available publicly on the School's website or by other means;

- will ensure that the School has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head Master and allegations against other children;
- will ensure that the School follows safer recruitment procedures that include statutory checks on staff suitability to work with children;
- will ensure that the School develops a training strategy that ensures all staff, including the Head Master, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated in line with any changing statutory and CIS requirements
- will ensure that the School makes all contract staff, temporary staff and volunteers aware of the School's arrangements for child protection;
- will ensure that the School contributes to any inter agency working and plans;
- will ensure that the School provides a coordinated offer of early help when additional needs of students are identified;
- will ensure that the School considers how students may be taught about safeguarding, including online, as part of a broad and balanced curriculum; and
- will address and rectify without delay any deficiencies or weaknesses in the School's child protection and safeguarding policy and procedures, which are brought to the attention of the Governing Body.

The Governing Body nominates a member (normally the Chair) to be responsible for liaising with the agencies on strategic issues of child protection, and in the event of an allegation being made against the Head Master or a member of the Governing Body. It is the responsibility of the Governing Body to ensure that the School's safeguarding, recruitment and managing allegations procedures are in accordance with the ISS Regulations(UK) and CIS and national guidance both in China and the UK.

The Head Master

- ensures that the Child Protection Policy and Safeguarding Procedures are implemented and followed by all staff ;
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures;
- ensures that children are provided with opportunities throughout the curriculum and in Personal Development to learn about safeguarding, including keeping themselves safe online;
- liaises with the Chair of Governors where an allegation is made against a member of staff or of the Governing Body; and
- ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service, if a UK national, or to the relevant embassy for other foreign nationals

The Pastoral Support Committee for each school

- will include in its membership either the DSL or her Deputy;
- will be chaired by the School's Director of Student Wellbeing in the US and the Assistant Head: Pastoral in the LS and also comprise the School Counsellor/ Psychologist, who will review or raise Child Protection or Safeguarding issues as part of their work;
- will help to coordinate arrangements for the longer-term protection and support of each child who has made allegations of abuse, or is alleged to have suffered from abuse, taking his/her wishes into account;
- will make arrangements where feasible for any child who has been the subject of abuse to receive necessary counselling and support by agreement with his parents, where appropriate;
- will support any child who is subject to a Child Protection Plan; and
- will ensure through a Housemaster that appropriate support and safeguards are in place together with a Care Plan.

Residential Boarding Staff (Housemasters, Matrons and Assistant Housemasters)

All residential staff, principally Housemasters, and Assistant Housemasters will be trained to Level III safeguarding. Matrons will undergo internal safeguarding training and dependent on English levels will complete at least to level 2 training. Harrow Beijing recognises that, as a boarding school, as well as a day school, Housemasters, Assistant Housemasters and Matrons are likely to be on the frontline in terms of safeguarding and child protection. Housemasters, Assistant Housemasters and Matrons will report all child protection and safeguarding concerns immediately to the DSL. Harrow Beijing has a procedure for dealing with a lost or missing child. A Housemaster or a duty member of the boarding staff is most likely to deal with such instances. The procedure is contained in the [Housemasters'](#) and [Boarding Tutor's](#) Handbooks.

Senior Students in positions of responsibility

Senior children who hold positions of responsibility over other children (e.g. School Prefects) will be briefed on appropriate action to take should they have concerns or receive any allegations of abuse. Peer Mentoring Training for them will be facilitated in Houses to enhance awareness and empower senior students in carrying out their pastoral responsibilities.

School Doctors and the Sanatorium (Clinic)

The Clinic will hold copies of [Working together to Safeguard Children](#) (DfE March 2015) and [Keeping Children Safe in Education](#) (DfE 2016) and have its own protocols for recognising and acting upon signs of child abuse. These will include [RCN Safeguarding children and young people 2014](#). Nurses will work in accordance with the [Nursing & Midwifery Council's Code of Conduct](#). They will liaise closely with the DSL and other members of the School's Safeguarding Team.

The School Doctor will have his own legal and contractual obligations to report the same, either to the Head Master or hospital. Clinic staff will be invited to participate in any School INSET concerned with the welfare and protection of children.

7. GOOD PRACTICE GUIDELINES AND STAFF CODE OF CONDUCT

To meet and maintain our responsibilities towards the students Harrow Beijing will agree standards of good practice, which will be published as professional guidelines in the relevant handbooks. These include guidelines on physical contact, use of reasonable force, visiting students' rooms and other sensitive areas, language, searching and confiscation, when and where to meet students, alcohol, social events, communications, use of sanctions, bullying and psychological abuse, favouritism, gifts and hospitality.

Members of staff are expected to follow the guidance given in the document '[Guidance for Safer Working Practice for Adults who Work with Children and Young People](#)' (DfE 2009) and [Working Together to Safeguard Children](#) (DfE March 2015).

Good practice includes:

- treating all children with respect;
- setting a good example by conducting themselves appropriately;
- involving children in decisions that protect them;
- encouraging positive, respectful and safe behaviour among children;
- being a good listener;
- being alert to changes in children' behaviour and to signs of abuse and neglect;
- recognising that challenging behaviour may be an indicator of unhappiness or abuse;
- reading and understanding the School's Child Protection Policy and guidance documents on wider safeguarding issues, including: Anti-Bullying, Behaviour, Expeditions, E-Safety, First Aid, Health & Safety, Confidentiality & Information-sharing, Drugs & Legal Highs;
- asking the child's permission before initiating physical contact, physical support during PE, touching during music lessons for the purposes of demonstration or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language;
- meeting with a child in a room where the teacher can be seen so that a child is never a risk or the teacher open to false allegations
- ensuring that students bathrooms and changing rooms are never used or frequented by adults and staff
- being aware that the personal and family circumstances and lifestyles of some children may lead to an increased risk of abuse;
- applying the use of reasonable force only as a last resort and in compliance with the School policy on [Reasonable Force](#);
- referring all concerns about a child's safety and welfare to the DSL, or, if necessary through the DSL to external agencies;

- following the School's rules with regard to communication with children and use of social media and online networking;
- following the School's policy on Screening and Searching in Behaviour Management Policy students; and
- following the School's [Transport and Bus Policy](#).

All staff will be expected to sign a Professional Code of Conduct and also a Safeguarding Code of Conduct at the start of each academic year and at the commencement of their employment.

8. ABUSE OF TRUST

All members of staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards the children must be beyond reproach.

In addition, members of staff should understand that, under the UK Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have any kind of sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the School staff and a student under 18 would be a criminal offence, even if that student is over the age of consent. It is also offence for minors to distribute child pornography to each other including photos and sexting including through social media.

Members of staff must not use their status and standing to form or promote relationships with students which are of a sexual nature, **or which may become so once the student leaves the school**. Therefore sexual relationships with former students once they leave school, may be open to scrutiny that the member of staff was grooming the person while they were a student of the school and constitute an abuse of trust.

In China having sexual intercourse with a girl under fourteen years of age is statutory rape, with a sentence of heavier punishment within the range of punishments for rape. Committing rape in China may result in sentencing of a fixed-term imprisonment from three years to ten years, and if one of a list of "serious circumstances" spelled out in the PRC Criminal Law happens, a fixed-term imprisonment from ten years up to the death penalty may be imposed. Indecent assault against a woman's will, or by force, may result in up to five years imprisonment. If the offence happens in public, the sentence may be over five years. Sodomy committed against minors under fourteen years old may result in heavier punishment. The PRC Criminal Law does not specifically regulate child pornography. Distributing pornography to minors under age eighteen is punishable by a heavier penalty within the punishments for distributing pornography

9. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

Some children may be at an increased risk of abuse. It is important to understand that this increase in risk is more likely due to societal attitudes and assumptions, and failures to acknowledge children's diverse circumstances, rather than the individual's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that our children receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs;
- young carers at home during term time, pauses and holidays;
- living in a domestic abuse situation;
- affected by parental substance misuse;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- involved directly or indirectly in sexual exploitation;
- or who whose level of English makes it more difficult for them to express themselves to staff in school

This list provides examples of particularly vulnerable groups but is not exhaustive.

10. MISSING CHILDREN

The School will follow its robust procedures for registration and attendance to ensure the safety of all children and to carry out its duty of care. The School recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore members of staff will respond promptly to absences and follow the School's [Missing Child procedures](#), which are part of the [Attendance Policy](#) as appropriate. The DSL, through the Housemasters, will monitor any unauthorised absence at the start or end of any leave period, and will be particularly cautious if a child goes missing on repeated occasions.

The School recognises the duty to inform the parents of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period as determined in the Attendance Policy. In some cases this may involve informing the Education Committee in Beijing if a child has a file number. If concerns are raised then the DSL may inform the police or, if foreign children, the embassies.

The Governing Body recognises that it should put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat

occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

11. HELPING CHILDREN TO KEEP THEMSELVES SAFE

Children are taught to understand and manage risk through numerous programmes (for example Anti-Bullying Workshops, Health Education, the Pants Programme,) some of which are part of the Personal Development Programme and through all aspects of their life at the School. Children are encouraged to think about risks they may encounter and to work out how such risks can be overcome. These discussions are empowering and enabling. They aim to promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves in a safe and responsible manner. They are also regularly reminded about E-Safety and counter-bullying procedures. The School continually promotes an ethos of care and respect for others. Children are encouraged to speak to a member of staff in confidence about any worries they may have.

The School conducts PASS surveys which helps to inform our pastoral strategies as well as shedding light upon areas of concern or specific trends in behaviour which is fed back to individual Housemasters, who cascade back to their Houses. The Pastoral Support Committee analyses the data from a school-wide perspective. A statement of primary findings is provided by the Head Master to staff collectively as well as the Governing Body.

12. SUPPORT FOR THOSE INVOLVED IN A CHILD PROTECTION ISSUE

Child abuse is devastating for the child. It can also result in distress and anxiety for staff who become involved. The School will support children, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (normally the DSL) who will keep all parties informed and be the central point of contact;
- where a member of staff is the subject of an allegation made by a child, separate (independent) link people will be nominated to avoid any conflict of interest and appropriate support provided for him or her;
- responding sympathetically to any request from children or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of help lines, counselling or other avenues of external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures; and
- cooperating fully with relevant statutory agencies.

13. COMPLAINTS PROCEDURE

The School's complaints procedure will be followed where a student or parent raises a concern about poor practice towards a pupil that does not initially reach the threshold for child protection action. Examples of poor practice include unfairly singling out a student or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Such complaints are managed by Heads of Department, Housemasters, members of the Senior Management Team, and Governors.

Complaints from staff are dealt with under the School's Complaints and Disciplinary and Grievance procedures for the relevant contractor.

14. IF A MEMBER OF STAFF HAS CONCERNS ABOUT A COLLEAGUE

A member of staff who is concerned about the conduct of a colleague towards a child is undoubtedly placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all staff must remember that the welfare of the child is paramount. The School's [Whistleblowing Policy](#), which is available on the School's intranet, enables members of staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Head Master. Complaints about the Head Master should be reported to the Chair of Governors.

15. ALLEGATIONS AGAINST STAFF

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals can pose a serious risk to children and we must therefore act on every allegation. Members of staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff – including the DSL or DDSL - should be reported to the Head Master. If the Head Master is absent, allegations against all staff should be reported to the Chair of Governors.

Allegations against the Head Master or a member of the Governing Body should be reported to the Chair of Governors.

The full procedures and UK statutory guidance for dealing with allegations against staff can be found in '[Keeping Children Safe in Education](#)' (DfE, May 2016).

16. STAFF TRAINING

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. Academic staff have access to online training Educare and will be expected to undertake regular training in this on specific modules. All staff have face to face training annually.

- New staff and governors will receive an explanation during their induction, which includes the School's child protection and safeguarding policy and procedures, reporting and recording arrangements, professional guidelines in the various staff handbooks, contact details for the DSL and a copy of Part One of KCSIE;
- All staff, including the Head Master and governors will receive training that is regularly updated, in line with advice from the relevant statutory bodies in the UK and internationally and must read at least Part One of KCSIE;
- The DSL and DDSL will receive child protection training updated at least every two years, including training in inter-agency procedures as appropriate in an international setting;
- Temporary staff and volunteers in regulated activity will have regular child protection training;
- Visitors and visiting staff will be supervised by a member of the School staff at all times;
- All staff supplied by other bodies will be made aware of the School's procedures, policy and the contact details of the DSL and her deputies.

17. SAFER RECRUITMENT

The School endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in '[Keeping Children Safe in Education](#)' (DfE, May 2016) and the School's own policies and procedures together with procedures pertaining to contractors, coaches and partners etc.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children; check verbally at least one of these references.
- provide evidence of identity and qualifications;
- be checked in accordance with the Disclosure and Barring Service (DBS) if worked in the UK and other agencies for other foreign nationals, meeting regulations as appropriate to their role;
- include prohibition checks with the NCTL for teaching staff;

- provide evidence of their right to work in the China to obtain the working visa; and
- be interviewed.

Safer recruitment also means that the School will ensure that:

- the candidate's mental and physical fitness to carry out their work responsibilities is verified;
- at least one member of each recruitment panel will have attended safer recruitment training;
- all new members of staff undergo an induction that includes familiarisation with the School's Child Protection and Safeguarding Policy and Procedures and identify their child protection training needs;
- all staff sign to confirm they have received a copy of the Child Protection and Safeguarding Policy and Procedures; which is part of the Safeguarding Code of Conduct and
- written confirmation is obtained from supply agencies that agency staff have been appropriately checked.

Full details of the School's recruitment procedures are to be found in the [Safer Recruitment Policy](#).

Volunteers

Volunteers, including governors, will undergo checks commensurate with their work in the School and contact with the children.

Supervised volunteers

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, in accordance with the School's risk assessment process and statutory guidance.

Contractors

The School checks the identity of all contractors working on site and requests police checks where appropriate.

18. SITE SECURITY

Harrow Beijing is an enclosed site in Hegezhuang Village. However once on the site the buildings allow access to all areas of the school during the school day. All members of the School's community are required to take responsibility for site security and remain vigilant about trespassers. The School's Security Department provides oversight of the site and can be contacted 24/7 in the event of an emergency via Customer Service and the School Operations team.

Visitors to the School, including contractors, are required to sign in at the main gate where they will be given a visitor badge on a lanyard with safeguarding information. Subject to their position and purpose, visitors should be escorted. All visitors are expected to observe the School's safeguarding and health and safety regulations to ensure that children in the School are kept safe.

19. THIRD PARTY USE AND OFF-SITE ARRANGEMENTS

Procedure for third party users of the School facilities

The School's facilities, particularly sporting facilities, may be hired by Third Party Users (TPUs), including children's clubs such as Beijing Kickers, and under these arrangements the School has no control over, and assumes no liability for the conduct of individuals from TPUs. However, the School will ensure, as far as it is able, that TPUs have appropriate child protection and safer recruitment procedures in place. TPUs are also made aware of the School ground areas which are out of bounds, including specific parts of the building such as the boarding houses.

TPUs will be required to provide the School with a copy of the organisation's Child Protection Policy prior to approval being given for their use of the School's facilities and all TPUs providing activities, which involve children, will be required to sign a declaration to confirm that:

- the TPU has a child protection policy in place;
- safer recruitment procedures are followed for the TPU's staff and volunteers; and
- all staff and volunteers are appropriately trained in child protection and safeguarding procedures.

The Head Master or the DSL will be informed of any child protection allegation or incident which takes place on the School premises during use by that organisation.

Procedure for dealing with an allegation of abuse by an individual of a third party user using the School's facilities

If an allegation of abuse is made about an adult in a TPU, the organisation's Safeguarding Officer must notify the Head Master or the DSL on the same day as the incident occurred or the disclosure was made, or as soon as possible. The School expects the TPU to follow its own Child Protection Policy and the Head Master will require confirmation that appropriate action has been taken before further use of the School's facilities will be allowed.

External organisations who have responsibility for children on another site

When our children attend offsite activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place, as outlined in the School's [Expeditions Policy](#).

Children staying with host families

The School may in the future make arrangements for children to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the School follows the guidance in '[Keeping Children Safe in Education](#)' (DfE, May 2016), Annex C to ensure that hosting arrangements are as safe as possible.

20. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect our children we will:

- seek parental consent for photography of our students through the School's Terms & Conditions when children are admitted to the School;
- seek parental consent for photography of students which may be extraordinary e.g. photos of children in advertising, a staff member's portfolio of drama productions;
- demonstrate respect, care and caution when including photographs of students in Newsletters, Blogs and any other School publication; and
- encourage children to tell us if they are worried about any photographs that are taken of them.

21. E-SAFETY

Children increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The Prevent Duty requires the School to safeguard vulnerable individuals from being radicalised or drawn into extremism through the internet or social media.

The School's e-safety policy is incorporated in the [Student ICT Acceptable Use Policy](#), and Students [ICT Acceptable Use Policy Wi-Fi Version](#), which can be found on Firefly and the Harrow Cloud. This explains how we try to keep children safe in School. Cyber-bullying and sexting by children, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our anti-bullying procedures. The following measures are in place to promote e-safety within the School:

- **ICT Acceptable Use Policy** - protects all parties by clearly stating what is acceptable and what is not. Children are expected to sign up to this at the start

of each academic year and before access can be given to the School's ICT facilities.

- **Induction and Education** - all children are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. Subsequently, House Tutors remind children at the start of each academic year about their obligations and code of conduct. This is reinforced by a presentation in Houses about E-Safety. Further information and advice is made available on Firefly.
- **Monitoring** -the School will exercise its right to monitor the use of computer systems, including the monitoring of internet use, interception of e-mails and the deletion of inappropriate materials at all times. In circumstances where the School believes unauthorised use of the computer system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the School reserves the right to inform appropriate authorities and provide documentary evidence. The computer network is owned by the School and may be used by children to advance and extend their knowledge and understanding.

Members of Staff also receive advice regarding the use of social networking and electronic communication with children, which follows the guidance given in the document '[Guidance for Safer Working Practice for Adults who Work with Children and Young People](#)' (DfE March 2009) and the School Communications Policy.

This means that staff should:

- ensure that personal social networking sites are set at private and students are never listed as approved contacts;
- never use or access social networking sites of students;
- avoid giving their personal contact details to students, including their mobile telephone number;
- only use equipment e.g. mobile phones, provided by the School to communicate with children such as on field trips and expeditions;
- only make contact with students for professional reasons and in accordance with the School's policy and this should be through the school's MIS:ISAMS;
- recognise that text messaging or social messaging should only be used as part of an agreed protocol and when other forms of communication are not possible; and
- not use internet or web-based communication channels to send personal messages to students.

APPENDIX 1: INFORMATION FOR PARENTS

Child Protection: Safeguarding Students – Information for Parents

Harrow Beijing aims to safeguard and promote the welfare of the children in its care and protect them from serious harm. This applies to the boarding and day environment and all the activities the School undertakes. Staff and volunteers are vetted for their suitability to work with children prior to appointment. They receive training in safeguarding and child protection. They will report any concerns in accordance with official local safeguarding procedures. The School has a Child Protection and Safeguarding Policy, which is regularly reviewed and this is available on the School's website.

It is important for parents to be aware that:

- Staff and volunteers in the School have a duty to report concerns about a child, whether this means the child may be in need of additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of harm. There are four categories of abuse: physical, sexual, emotional, neglect.
- In some cases the School is obliged to refer cases to external agencies so that a child's needs are assessed and to consider whether an investigation into possible child abuse is required. In many cases there will already have been discussions between the School and the parents of a child, and the situation and concerns will not come as a surprise to the parents. However, parents may not be told that the School has referred their child to external agencies if it is thought that this might either put the child at risk or it is in the best interests of the child for the parents not to be told.
- If you think your child may have been abused you can contact the School for support and advice. If you think the abuse may have happened in School (or during expeditions or extra-curricular activities), you should contact the DSL, who is Carlien Shelley (Head of Upper School). If the allegation of abuse involves a member of staff you should contact the Head Master directly, or if the Head Master himself is involved, the Chair of the Governing Body should be contacted (details are available on the School's website).
- If members of the School's staff need to express concerns about a child and refer a child to the DSL, it is understood that this can cause distress for the child's parents. It is important that all parties – parents and members of the School's staff – try to discuss these matters as calmly and sensibly as possible.
- Senior School Prefects are given basic training in Child Protection at the start of the academic year. There is also a programme of Peer Mentoring available to Senior School students

Index of Key Words