

## Harrow Beijing Safeguarding Appendices

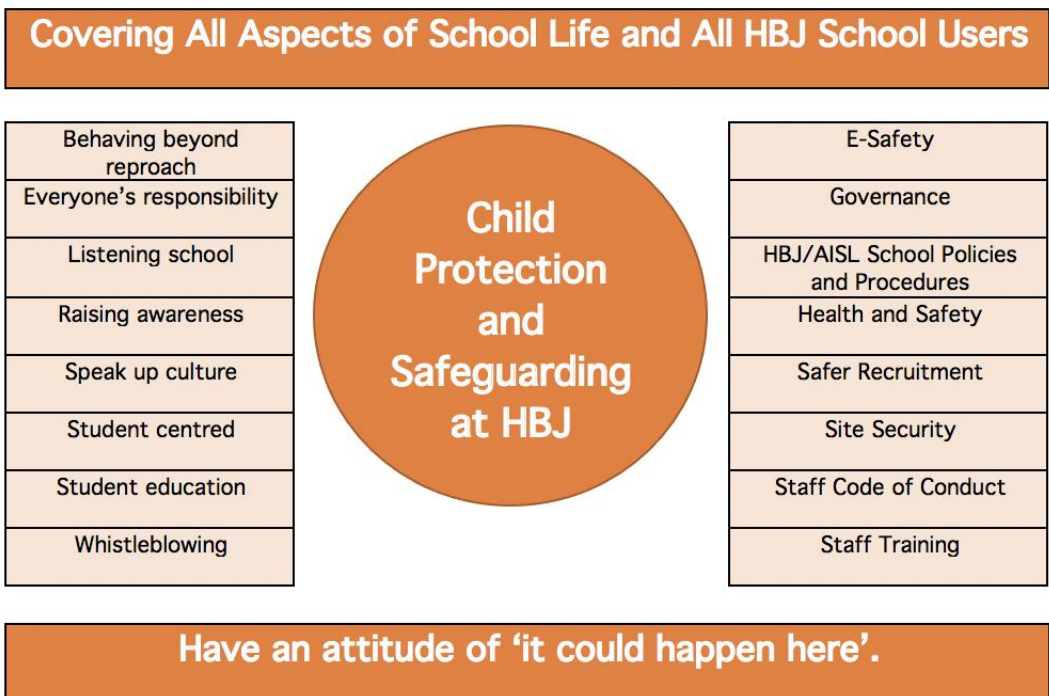
<a href="#">Appendix 1</a>	<i>Key definitions of Safeguarding and Child protection at HBJ</i>	<a href="#">Pg. 2</a>
<a href="#">Appendix 2</a>	<i>Designated Safeguarding Leadership Team at HBJ</i>	<a href="#">Pg. 3</a>
<a href="#">Appendix 3</a>	<i>Our Safeguarding guiding principles</i>	<a href="#">Pg. 4</a>
<a href="#">Appendix 4</a>	<i>The HBJ Student Support Committee</i>	<a href="#">Pg. 5</a>
<a href="#">Appendix 5</a>	<i>Safeguarding reporting procedure at HBJ</i>	<a href="#">Pg. 6</a>
<a href="#">Appendix 6</a>	<i>E-safety</i>	<a href="#">Pg. 8</a>
<a href="#">Appendix 7</a>	<i>Low Level Concern Guidance 2023-24</i>	<a href="#">Pg. 9</a>
<a href="#">Appendix 8</a>	<i>Allegations against Staff or Volunteers report template</i>	<a href="#">Pg.16</a>
<a href="#">Appendix 9</a>	<i>Distance learning Protocol – Code of Conduct</i>	<a href="#">Pg.18</a>
<a href="#">Appendix 10</a>	<i>Level of need threshold 2023</i>	<a href="#">Pg.23</a>

APPLIES TO	All Staff, Governors, Contractors, Visitors etc.
SLT RESPONSIBILITY	DSL
LAST UPDATED	Aug 2023
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Appendix 1

**Key definitions of Safeguarding and Child protection at HBJ**

Key Terminology
<b>Safeguarding and promoting the welfare of children</b> 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.
<b>Child protection</b> refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.
Members of <b>staff</b> 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.
<b>Child</b> 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.
<b>Parent</b> refers to birth parents and other adults who are in a parenting role, for example step-parents, guardians, foster carers and adoptive parents.



## Appendix 2

### **Designated Safeguarding Leadership Team at HBJ**

Designated Safeguarding Lead (Whole School)	Peter Lynch	<a href="mailto:plynch@harrowbeijing.cn">plynch@harrowbeijing.cn</a>
Deputy Safeguarding Lead (Upper School)	Lee Olsson	<a href="mailto:lolsson@harrowbeijing.cn">lolsson@harrowbeijing.cn</a>
Deputy Safeguarding Lead (Lower School)	Clare Boyden	<a href="mailto:cboyden@harrowbeijing.cn">cboyden@harrowbeijing.cn</a>
Deputy Safeguarding Lead (Chinese Culture)	Rosemary Zhao	<a href="mailto:rzhao@harrowbeijing.cn">rzhao@harrowbeijing.cn</a>
Deputy Safeguarding Lead (City Campus)	David Mayers	<a href="mailto:dmayers@harrowbeijing.cn">dmayers@harrowbeijing.cn</a>
Deputy Safeguarding Lead (City Campus)	Portia Gao	<a href="mailto:pgao@harrowbeijing.cn">pgao@harrowbeijing.cn</a>

### *Key safeguarding contacts:*

Phil Akerman	Head of Harrow Beijing	<a href="mailto:pakerman@harrowbeijing.cn">pakerman@harrowbeijing.cn</a>
Ahmed Hussain	Nominated Safeguarding Governor	<a href="mailto:ahussain@aisl-edu.com">ahussain@aisl-edu.com</a>
Mingzhu Wei	Bilingual School Counsellor	<a href="mailto:mwei@harrowbeijing.cn">mwei@harrowbeijing.cn</a>
Samantha Sys	School Counsellor	<a href="mailto:ssys@harrowbeijing.cn">ssys@harrowbeijing.cn</a>
Imogen Dunhill	Safeguarding Support Officer	<a href="mailto:idunhill@harrowbeijing.cn">idunhill@harrowbeijing.cn</a>
<b>EXTERNAL CONTACTS:</b>		
Tim Gerrish OBE	International Child Protection Advisor	<a href="mailto:tim@icpa.co.uk">tim@icpa.co.uk</a>
Council of International Schools: Safeguarding		<a href="mailto:info@cois.org">info@cois.org</a>
SRE in Schools		<a href="mailto:susie.march@live.com">susie.march@live.com</a>
Local Police Service Government Offices and Agencies		Contact via DSL (Chinese Culture): Contact GA office
Marie Stopes: Beijing		<a href="http://www.mariestopes.org.cn">www.mariestopes.org.cn</a>
National Embassies in Beijing		As appropriate via website
Save the Children (Beijing)		<a href="mailto:public@chinadevelopmentbrief.cn">public@chinadevelopmentbrief.cn</a>
NSPCC (UK)		+44 (0)800 800 500
Olivia's Place (Elliott's Corner)		Tel: +86 (0)10 6461 6283

## Appendix 3

### ***Our safeguarding guiding principles***

#### *Core safeguarding principles*

The School's core safeguarding principles are:

- Safeguarding children is everyone's responsibility.
- 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.
- All staff must have the attitude of 'it could happen here' with regard to safeguarding.

#### *1.4.2: Core operational principles*

- All staff have a responsibility for the implementation of this policy;
- Any concerns regarding safeguarding and/or child protection must be reported using the safeguarding reporting procedure on MyConcern as soon as practicable and within 6 hours.
- Any concerns where a child is at an immediate risk of harm or has disclosed abuse should be reported immediately to DSL or, when unavailable, a member of the DSL Team and followed up with a MyConcern Report as soon as practicable and within 6 hours.
- If a crime has been committed, it should be reported to the DSL or, when unavailable, the DSL team immediately and followed up with a MyConcern Report as soon as practicable and within 6 hours.
- All staff must know who the members of the Designated Safeguarding Leadership Team are;
- All safeguarding and child protection concerns must be treated in the utmost confidence;
- The DSL Team 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

## Appendix 4

### **The HBJ Student Support Committee**

In addition to the DSL Team, the following member of staff is a sitting member of the safeguarding committee:

Dr. James Rupasinha	Senior Educational Psychologist
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The chair-person of the safeguarding committee is the Designated Safeguarding Lead – Peter Lynch.

### **The HBJ Student Support Committee**

- will be chaired by the DSL
- membership comprises the DSL Team namely, but not exclusive to, the DDSLs, Educational 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 House Leader / Tutor / Class Teacher that appropriate support and safeguards are in place together with a Care Plan where appropriate.

### *Functions of the Student Support Committee*

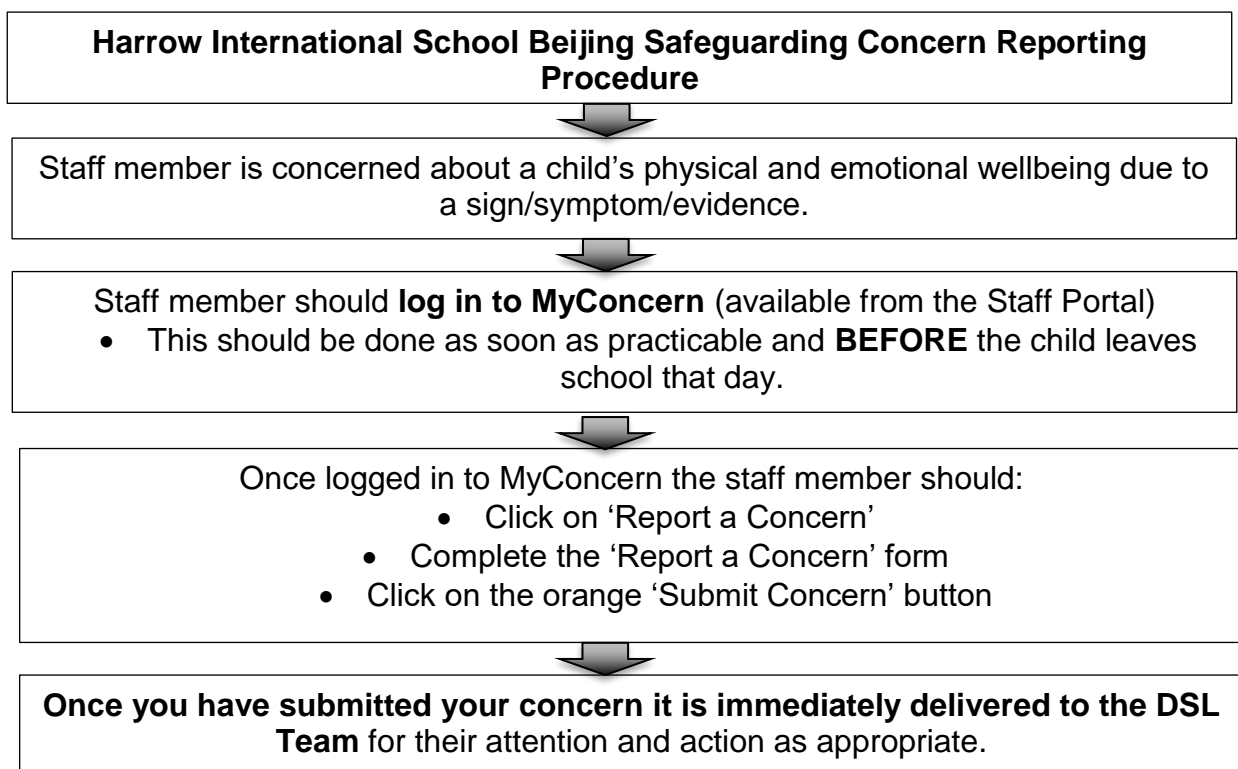
- *Communication:* to work with all stakeholders in communicating the needs of the child, focusing on ensuring student physical and mental well-being and safety. To maintain a flow of information into the committee about the different needs of students and the flow of information out to different stakeholders about supporting those needs.
- *Discussion:* the scope and scale of the committee will involve different staff at different times depending on the agenda. The professionals consider a 360 review of the child. The committee will also review and agree referrals to the school counsellors.
- *Administration:* to work with all stakeholders in keeping all relevant material, notes and documents relating to the work the SSC does.
- *Support and guidance:* to design and implement support plans and provide guidance for students that are a safeguarding concern.

## Appendix 5

### **Safeguarding reporting procedure at HBJ**

#### *What to do if you have a safeguarding concern about a child*

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. The child may have a sign or their behaviour may indicate possible abuse. In this circumstance, **where the child is NOT at immediate or significant risk of harm**, the following action should be taken by the member of staff:



It is not the role of staff members to commence their own investigations into safeguarding concerns. This must be the role of the DSL team. The staff member can, however, provide the child with an opportunity to talk. This information should then be included in your MyConcern Report.

#### *What to do if a child discloses abuse or significant harm 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.

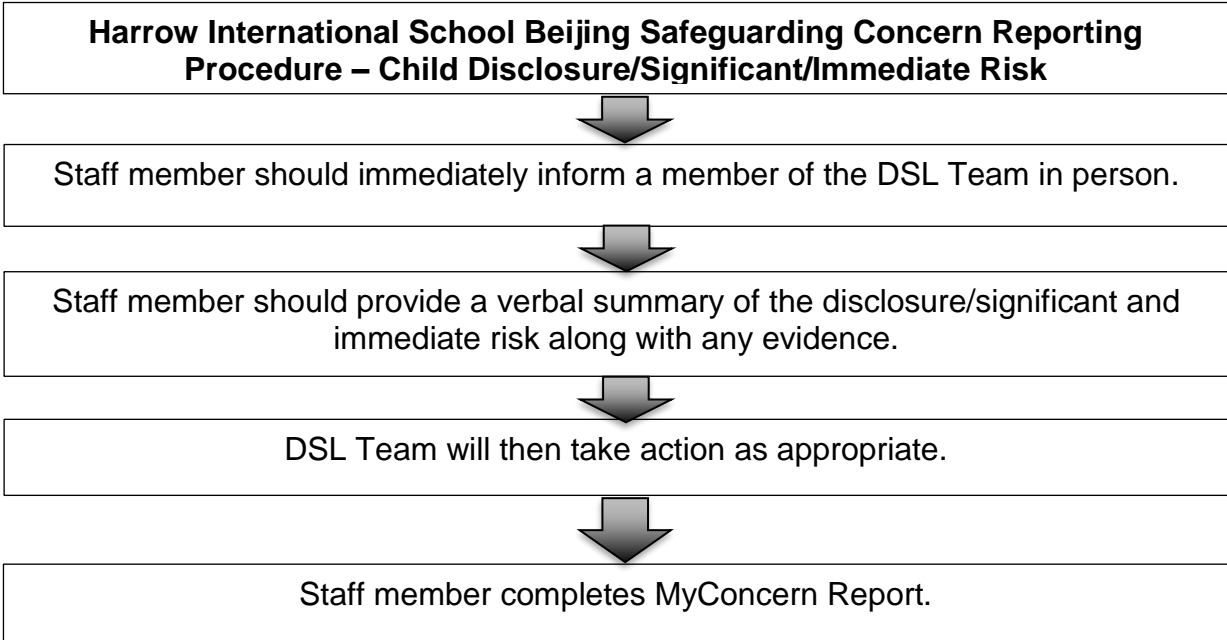
If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the child know that they must pass the information on – **staff are not allowed**

**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:

<b>Do:</b>	<b>Don't</b>
<ul style="list-style-type: none"> <li><input type="checkbox"/> Be accessible and receptive</li> <li><input type="checkbox"/> Listen carefully</li> <li><input type="checkbox"/> Take it seriously</li> <li><input type="checkbox"/> Reassure them that they were right to tell</li> <li><input type="checkbox"/> Say what will happen next</li> <li><input type="checkbox"/> Consult immediately with DSL</li> <li><input type="checkbox"/> Make a careful record of what was said</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> React strongly</li> <li><input type="checkbox"/> Jump to conclusions especially about the abuser</li> <li><input type="checkbox"/> Speculate or accuse anybody</li> <li><input type="checkbox"/> Tell them you will keep his secret</li> <li><input type="checkbox"/> Ask leading questions</li> <li><input type="checkbox"/> Make promises you cannot keep</li> <li><input type="checkbox"/> Stop them from speaking freely</li> <li><input type="checkbox"/> Tell them to stop talking so you can go and fetch the DSL</li> </ul>

In summary, if a child makes a disclosure of abuse and/or significant or possible immediate harm then the following actions should be taken:



## Appendix 6

### **E-safety**

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

The School's e-safety policy is incorporated in the Digital Literacy, E- Safety & IT Access (Student) (HS27), and can be found on the Student Portal. 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:

- **Digital Literacy, E- Safety & IT Access (Student) (HS27)**- protects all parties by clearly stating what is acceptable and what is not. Upper School students who bring their own devices (BYOD) are expected to sign the digital code of conduct 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, US House Tutors remind children at the start of each academic year about their obligations and code of conduct.
- **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).



**Low Level Concern Guidance 2023/24**  
**(Adapted with Guidance from KCSiE 2023)**

**Low Level Concern School Statement**

At Harrow Beijing Low-level concerns are about a member of staff, supply staff, volunteer or contractor should be reported as per **paragraph 432 KCSiE 2023**.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Harrow Beijing will ensure there is an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

**Low level concerns**

At Harrow Beijing, the safety and wellbeing of children and adults in our school is dependent on the vigilance of all our staff and community and their prompt communication to the DSL or Head, of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. It is to be made clear that all references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated.

Harrow Beijing is conscious of its duty of care to pupils and colleagues and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting. The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. At Harrow Beijing those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

**Code of Conduct**

At Harrow Beijing, all staff must behave responsibly and professionally in all dealings with children/colleagues and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct including the Safeguarding Policy/KCSiE2023'.

At Harrow Beijing staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

**Our low-level concern guidance**

At Harrow Beijing the aim of the school's Low-Level Concern Guidance is to facilitate a culture in which the clear values and expected behaviours which are set out in our Staff Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this guidance is to:

- Staff at Harrow Beijing to maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
- Staff at Harrow Beijing to ensure they feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Staff Code of Conduct.
- Staff at Harrow Beijing to provide for responsive, sensitive, and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

### **What is a low-level concern?**

At Harrow Beijing a low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the school's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

Low-Level Concerns about self (self-reporting) From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

### **Guidance Continued...**

#### **Allegation**

Behaviour which indicates that an adult who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

#### **Low-Level Concern**

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- Relates to their conduct outside of work which, even if not linked with a particular act or omission, has caused a sense of unease about that adult's suitability to work with children

#### **Appropriate Conduct**

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

### **Low-Level Concerns about an adult**

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a Low-Level Concern.

### **What should I do if I have one?**

Where a low-level concern exists, it should be reported to the DSL or to the Head as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (Where the concern relates to a particular incident). This is done by creating a referral using Harrow Beijing's electronic CONFIDE system which can be logged into using MYCONCERN.

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### **How will my low-level concern be handled?**

The DSL will discuss all low-level concerns s/he receives with the Head as soon as possible and in any event within 24 hours of becoming aware of it. The Head will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure outlined in the safeguarding policy. The circumstances in which a low-level concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation
- b) there is a pattern of low-level concerns which collectively amount to an allegation or
- c) there is other information which when taken into account leads to an allegation. Where the Head is in any doubt whatsoever, advice will be sought from the Designated Group Safeguarding Lead and HR and if necessary, on a no-names basis. Having established that the concern is low-level, the DSL or Head (with the support of HR) as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

### **What records will be kept?**

At Harrow Beijing where a low-level concern has been communicated, a confidential record will be kept in the CONFIDE system which acts as a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above; or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability, or disciplinary procedure.

### **Examples of Low-Level Concerns**

At Harrow Beijing a low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority. Low-level concerns are part of a spectrum of behaviour.

**This includes:**

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse. Examples of such behaviour could include:
- being over friendly with children
- having favourites
- adults taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door • using inappropriate sexualised, intimidating or offensive language

### **Social Platforms**

Staff at Harrow Beijing will not use personal email accounts, social networking sites, mobile phones or other means of communication to contact children, unless required to do so for professional reasons. Please be aware that electronic communication that takes place over a school network or platform may be subject to periodic monitoring.

### **Definitions for outcomes of allegation investigations**

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the headteacher (or Safeguarding Governor where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

Immediately discuss the allegation with the DSL. Where threshold of significant harm has been met, the DSL Governor at AISL should be informed. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police. The case manager may, on occasion, consider it necessary to involve the police *before* consulting the DSL and Head – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the DSL/Head (and the police or AISL, where necessary). Where the police and/or AISL are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place.

**If immediate suspension is considered necessary**, agree and record the rationale for this with the DSL. The records will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

**If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the DSL what information should be put in writing to the individual and by whom, as well as what

action should follow both in respect of the individual and those who made the initial allegation.

**If it is decided that further action is needed**, take steps as agreed with the DSL to initiate the appropriate action in school and/or liaise with the police and/or EDB as appropriate.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with the GA/Communications Department and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

Make a referral to the ICPC/Interpol/CEOP (or equivalent organisation if non-UK staff) and inform embassy for their country of origin where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child. All concerns pertaining to local staff should be reported to the Ministry of Education, the EDB and the police.

All significant safeguarding concerns also need to be shared with DSL of AISL who is obliged to report it to the Charity Commission.

### **Early Years**

We will inform the Police and any relevant embassy of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations.

If the school is made aware that the UK secretary of state has made an interim prohibition order in respect of a British teacher, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

### **Timescales**

This is a guide based on best practice but is subject to outside agencies:

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

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the DSL and DSL (AISL), including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or EDB.

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel make a referral to:

- the ICPC for consideration of whether inclusion on the barred lists is required and UK embassy (if person is from the UK)
- Embassy from country of origin and equivalent of ICPC for non-UK staff
- Ministry of Education, the EDB and the police if staff member is Chinese.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the DSL AISL whether to refer the matter to the Teaching Regulation Agency (or equivalent in country of origin for staff member) to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

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

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

### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the head, will consider whether any disciplinary action is appropriate against the pupil(s)/Staff who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

### **Confidentiality**

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

The case manager will take advice from the DSL/ police and EDB as appropriate, to agree:

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

### **Record-keeping**

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file. **We will retain all records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.**



We will retain all records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

### **Learning lessons**

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

**Pete Lynch**  
**Designated Safeguarding Lead 2023**  
**August 2023**

Appendix 8:

**Allegations against Staff or Volunteers report template**

Purpose of this report.

- Consider the referral
- Share information
- Consider the current allegation in the context of any previous allegations or concerns
- Determine a way forward and agree actions to be taken by whom and by when.
- Risk assess to enable Safeguarding There are up to three strands in the consideration of an allegation:
  - A police investigation of a possible criminal offence;
- Social care enquiries and/or assessment about whether a child is in need of protection or services;
- Consideration by an employer of disciplinary action.

**Confidentiality Statement**

Those involved are reminded that this is strictly confidential. Discussions should not be shared outside of those who are involved in the investigation unless they form part of the actions in this report. All agencies should develop procedures to ensure that the report is retained in a confidential and appropriately restricted manner. The report will aim to reflect that all individuals who are discussed should be treated fairly, with respect and without improper discrimination. All decisions undertaken will be informed by a commitment to equal opportunities and effective practice issues in relation to race, gender, sexuality, religion and disability. This report could be shared as part of criminal, civil or disciplinary proceedings, or as part of investigations concerning whether an individual should be barred from working with children or vulnerable adults. If further disclosure is felt essential, permission must be sought from the author of the report. The report should not be photocopied or shared without the agreement of the author and must be kept in a restricted or confidential section of the agency files.

**Template –**

Employer and key people involved in the investigation. Name Job Role / Organisation	
Chair/Lead:	
Date:	
Venue:	
Minute Taker:	
Running Order:	
Report 1 - Detail of the concerns/allegations (to include current and any previous allegations, details of person/s any historical allegation relate to-where necessary/appropriate):	



2. How this is relevant to their professional role/employment (including volunteering) with children:	
3. Facts:	
4. Risk assessment (consider the safety and wellbeing of child/ren identified):	
5. Confirm support to subject (where necessary):	
6. Agree feedback mechanism to the referrer (who, what, when):	
7. Planning the management of the investigation/fact-finding:	
8. Strategy for media or other enquiries (if relevant):	
9. Next Steps / Actions (as Relevant):	
10. Outcome: (Substantiated, False, Malicious, Unfounded, Unsubstantiated)	
11. AOB	

## Appendix 9

### **‘HBJ Child Safeguarding Policy’ remains in place during all aspects of online learning**

哈罗北京儿童安全保护政策全面适用于线上学习期间

#### **Rationale基本原则**

In addition to the HBJ Staff Code of Conduct specific guidelines will apply during external online learning periods.

HBJ Staff should treat all students and colleagues with respect and dignity both face-to-face and online and provisions should be made by the Learning Support Team for all students to access learning platforms and engagement. Wellbeing and Mindfulness approaches of the school community to be monitored by the ALT, DSL and Phase Leadership Teams.

居家在线学习期间，员工除了须要遵守2023年哈罗北京员工行为准则，还须贯彻以下指导方针。

哈罗北京员工在线上 and 线下教学中均应尊重所有学生和同事，学术支持团队应为所有学生访问学习平台及出勤提供支持。学校社区的福祉和关怀由学校高级管理层、儿童安全负责人和各阶段领导团队负责监督。

#### **Protocol行为规范**

- Online communication with students should always be professional and objective but relaxed.

老师与学生的线上交流应始终保持专业、客观和积极轻松的态度。

- HBJ Staff should always maintain a professional relationship with the students whether at school or not, including during online learning.

无论是否在学校，哈罗北京员工应始终与学生保持专业的关系，包含线上教学期间。

- HBJ Staff should always be vigilant in maintaining their privacy, for example, staff should be mindful of what is in the background or what is on your screen when screen sharing when you are online with students.

哈罗北京员工应始终注意保护个人隐私，例如，当您与学生在线共享屏幕时，员工应注意背景或屏幕上的内容。

- HBJ Staff should **ONLY** communicate with students through their official school accounts including @harrowbeijing and Seesaw.

哈罗北京员工仅允许通过学校平台账户（包括@harrowbeijing 和Seesaw）与学生沟通。

- HBJ Staff should always ensure that all communications are transparent and open to scrutiny.

哈罗北京员工应始终确保所有沟通都是透明的，并接受学校的儿童安全监管。

- HBJ Staff should not give our personal contact details to students including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with the appropriate people or there are exceptional circumstances (this should be signed off by the appropriate member of SLT and or DSL).

哈罗北京员工不应向学生提供个人联系方式，包括私人邮件、家庭或手机号码，除非有相关人员批准，或有特殊情况(此类情况应由学校高级管理层成员和/或儿童安全负责人签字同意)。

- Communication with students, by whatever method, should take place within clear and explicit & professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, webcams, websites, social networking sites, online gaming and blogs.

无论采用何种方式与学生进行交流，沟通内容都应遵循清晰、明确和专业的原则。此原则也涵盖如使用手机、短信、电子邮件、数码相机、视频、网络摄像头、网站、社交网站、在线游戏和博客等情境下。

- When working in one-to-one situations with children and young people every attempt should be made to ensure the safety and security needs of both staff and students are met.

Pre-arranged meetings with students away from the school premises are ill-advised in every circumstance unless a welfare visit needs to take place in line with the AISL Harrow Safeguarding Procedures.

员工在与儿童和青少年一对一工作的情况下，应尽一切努力保障员工和学生的安全需求。除非依照

AISL哈罗学校儿童保护政策，经过相应的授权，否则员工在任何情况下都不允许和学生在校外会面。

- One-on-one sessions between a teacher and a student are OK. For these sessions online, the student should be given the option of just using voice (no video).

老师和学生之间可以进行一对一的谈话。线上教学期间，应允许学生仅开启语音（不开启摄像头）。

- For data protection in line with the Chinese **Data Protection Act**, all audio/video files should only be shared within the HBJ school community.

为符合《中华人民共和国数据安全法》中的数据保护政策，所有音频/视频文件只能在哈罗北京社区内共享。

- When arranging face-to-face sessions with students at least one member of the Leadership Team should be invited to each session. All online learning should be accessible to parents through Seesaw.

在安排与学生面对面交谈时，应至少邀请一名学校领导团队成员参与会话。家长可以通过 Seesaw 了解孩子在线学习的情况。

- HBJ Staff should continue to monitor the Social and Emotional health of each student and each other, and flag any concerns to the SLT and or DSL.

哈罗北京员工应持续关注每名学生及同事的社交和情绪健康，并将可能出现的问题报告给学校高级管理层成员和/或儿童安全负责人。

- Students who are not engaged in their learning should be flagged with the appropriate Pastoral lead, DSL and or Head of School.

未参与学习的学生应由相应的德育领导、儿童安全负责人和/或校长予以标记。

- During online learning, if abuse of any kind is suspected these should be immediately reported to a Designated Safeguarding Lead in line with our Child Protection Policy.

线上学习期间，如果疑似有任何形式的虐待体罚，应根据我校  
年儿童安全保护政策立即报告给指定的儿童安全负责人。

## **References参考**

[NSPCC Lone Working](#)

[CIS Distance/Online Learning Procedures](#)

[ICPA Covid-19 Procedures](#)

**Pete Lynch**

**DSL AISL Harrow Beijing**

哈罗北京儿童安全负责人

**August 2023**

## Appendix 10

### **Single Central Record Guidance (SCR) 2023 SENTRY (February)**

*This guidance has been created with due regard to the following DfE and BSO guidelines:*

- DfE 'Keeping children safe in education' 2023

#### **Statement of Intent**

At Harrow Beijing we are committed to promoting the safety and wellbeing of our staff, pupils and visitors. Ensuring the safety of our school community is of paramount importance and, as a result, these guidelines have been created to establish a more comprehensive safer recruitment procedure so that pupils feel safe at school.

A SCR (Single Central Record) is required as part of this process as it provides our school with a record of all pre-employment checks, ensuring staff are safe to work in the school and with children.

To ensure the school is recruiting suitable individuals for a role, employment checks will be carried out by the Human Resources Team, Administration and the Head, in line with our school's Recruitment and Selection Policy. The checks will include identity checks, right to work overseas checks, varying levels of Criminal Bureau checks/ICPC (depending on the role), as well as extended reference checks including online and social media presence. These guidelines outline Harrow Beijing's procedure for maintaining an up-to-date SCR in line with statutory requirements and guidance. It has been written in conjunction with Keeping Children Safe in Education (2023).

#### **British School Overseas Legal framework**

This guidance has due regard to legislation, including, but not limited to the following:

- The Data Protection Act 1998
- The General Data Protection Regulation
- The Freedom of Information Act 2000
- The Education Act 2002
- The Education (Independent School Standards) Regulations 2014

#### **Roles and responsibilities**

The DSL is responsible for:

- Ensuring all prospective members of staff and all employed members of staff have the required level of ICPC checks.
- Deciding whether any prospective member of staff who holds a criminal conviction is suitable to work within the school.
- Informing AISL and the Designated Governor of any decisions made regarding disclosure of information.
- Ensuring the identity of all existing and prospective employees.

#### **The School HR Manager, Head and DSL are responsible for:**

- Maintaining an up-to-date SCR by updating it upon employment of any member of staff, as well as recording the identity and background checks made for other visiting staff to school.
- Ensuring any cover teachers, volunteers, contractors and/or any other visiting party to school hold the relevant level of security check, including a DBS check.
- Analysing whether any members of staff or returning volunteers, contractors or any other visiting party require an updated ICPC check.
- Ensuring the school obtain legible copies of documentation used to prove workers' right to work in the UK, e.g. a copy of a passport.
- Ensuring that documentation evidencing workers' right to work in the UK is up-to-date, especially if visas have an expiry date on them.
- Informing the LA of any decisions made regarding ICPC and other security checks.
- Ensuring that the data stored in the SCR is stored safely.
- Acting in accordance with this policy.

### **Harrow Beijing staff are responsible for:**

- Providing accurate and up-to-date information required for the SCR so that they can continue their employment at school.
- Informing the head of any changes in personal data or additions that need to be made to the SCR.

### **Volunteers, contractors and other visiting parties are responsible for:**

- Providing accurate and up-to-date information required for the SCR, so that they can continue their employment at school.
- Informing the head of any changes in personal data or additions that need to be made to the SCR.

### **Contents of our SCR**

The SCR will detail checks for any member of staff or volunteers who will likely come in to contact with a pupil. This includes the following:

- Full time teachers, supply teachers and trainees
- All other school staff, e.g. senior leaders
- All members of the governing board
- Any other individual likely to work in close proximity to the school's pupils such as students (including volunteers).

The dates of the checks will be recorded on the school's SCR in line with statutory requirements outlined in KSIE 2023 para 129. When employing agency staff from a third-party organisation, the school will obtain written notification that the organisation has carried out all of the relevant checks. The dates of the checks will be recorded on the school's SCR in line with statutory requirements outlined in KSIE 2023 para 130. The DSL must ensure that the individual who presents themselves on their first day of employment is the subject of all pre-employment checks.

A copy of photographic identification will be obtained and retained in line with data protection requirements (see KCSIE 2023 para 135). School records will include the following, as detailed in KCSIE 2023 para 129:

- An identity check
- A barred list check
- An enhanced ICPC check (every 5 years)
- A teacher prohibition check
- Right to work abroad check
- Professional qualifications check
- Meet China Visa requirements

### **Storage**

There will be only one copy of the SCR, created using the school electronic SENTRY platform, which is only accessible to appropriate staff members. The school will not keep copies of Criminal Bureau certificates (in line with KCSIE) but staff have to be prepared to present them upon request. The school will keep a legible copy of employees' evidence for their right to work in their country of origin, e.g., a copy of their passport, in employees' personnel files. All other documentation, such as photocopied proof of qualifications, will be safely stored in a secure, electronic personnel file in SENTRY. All certificates will be stored in accordance with Harrow Beijing's Data Protection policy.

### **Monitoring and review**

At Harrow Beijing the SCR will be updated after each instance of an individual attending school in an employment or voluntary capacity, or when any variation to the fields on the SCR is required. Records kept on school leavers will be destroyed at least 6 months after

their departure. The SCR will be reviewed half-termly by the Head and DSL, ensuring all safety checks are present and up-to-date. This will be reported to the school's Safeguarding Governor termly, via the DSL report. The scheduled review date for this guidance is annual or in line with Harrow Beijing's safeguarding policies. The Safeguarding Governor will review the Single Central Record annually as part of the deep dive. Any changes to this guidance will be communicated to the Head and HR and any staff members affected by the change.

**Pete Lynch**  
**Designated Safeguarding Lead**  
**Assistant Headteacher**  
**August 2023**

Appendix 10

**Identifying levels of need and what to do next at HBJ**

This document is a guide to assessing and meeting the needs of children and their families at AISL Harrow Beijing. It is not a 'tick list' and is to be used as an aid to assist our school and internal systems and professional judgments/decision-making. It is important that HBJ Pastoral/Welfare Assessments are based on a 'big picture' view of the child and their circumstances. This means that a clear system of identification, assessing, reporting, and acting is in place and consistent across the school.

This information is to help colleagues assess and understand the needs of a student and or family who may require additional support to thrive. Most students will never go beyond Universal Services.

Other students will only dip into noted concern while others will need varying levels of support throughout their time at HBJ. The Levels of Need are designed to support our school safeguarding and pastoral professionals when making decisions about what level of support a student/students need and what tools and other departments/agencies are available to support this process.

**This table tells you what action to take once you have identified the level of need**

Level of need identified	Description	Pastoral/Welfare Assessment required?	Action /Support
<b>Accessing Universal Services</b> (Universal services are services that are available to everybody and can be accessed by anyone without additional support)	Student/Child is thriving without requirement for additional support and all needs are being met by universal services, for example School, School Nurse, external health or other	<p style="text-align: center;"><b>No</b></p>	Ensure that all students and families are aware of the Support Services and Provisions such as Health Services and Support Groups/People that are available to them to access both internally and externally.
<b>Level 1: Noted concern</b>	Student/child may require or would benefit from additional input or support from a department in school or agency/agencies.	Referral made at the safeguarding/Pastoral Welfare Meeting.  <b>No Pastoral/Welfare assessment required.</b>	Students, children, young people, or families may need to access relevant universal services for advice/support such as school, counselling, medical, dentist, optician, tutor, and support staff.  Students/Families may need support in doing this as capacity is not there.

		<p>Concern is monitored and recorded. Key staff are informed and the case is reviewed and documented through MyConcern and meetings.</p>	<p>This also relates to minor pastoral observations such as behaviour, attendance, punctuality, and health.</p> <p>This is recorded by DSL (Designated Safeguarding Lead) on MyConcern</p>
<p><b>Level 2: Additional support</b> <b>(Early Help)</b></p>	<p><b>Student may require or would benefit from additional input or support from an agency/agencies</b></p>	<p>If a clear issue or area of need is identified – School Safeguarding - Pastoral/Welfare Assessment or Care Plan may not be necessary.</p> <p>If several issues or needs at Level 2 are identified, a School Pastoral/Welfare Assessment should be undertaken.</p>	<p>Offer key support yourself through pastoral/support systems, work with another school professional or direct to relevant universal service for additional support.</p> <p>Based on results of Welfare Assessment – access appropriate early help services and set up in school and a Welfare Meeting to develop a Pastoral/Welfare Plan.</p> <p>KCSIE (Keeping Children Safe in Education) 22 requires us to really pinpoint early help as a priority in our structure.</p>



<p><b>Level 3: Academic/Pastoral Welfare Assessment &amp; Plan</b></p>	<p>Pupils are experiencing multiple and/or complex needs. The pupil is struggling to effect change without the support and intervention of additional services in school. There is a need for a greater level of support including perhaps a home visit.</p>	<p>School Academic Pastoral Welfare Assessment should be undertaken and recommendations made for colleagues/services required to meet assessed levels of need should start to form a Welfare Plan at a Pastoral Welfare Intervention Meeting.</p>	<p>When a child begins to display emerging needs requiring additional support, services already working with the child should support the family by undertaking Pastoral Welfare Assessment and developing an outcome Plan. This will identify support from within the local school community or a specific intervention.</p> <p>Appropriate support can be accessed by the Key Lead Professional involved with the Pastoral/Welfare Plan.</p> <p>All actions are recorded on MyConcern</p>
<p><b>Level 4: Child In Need/Child Protection</b></p>	<p><b>The child/student is unlikely to achieve or maintain a reasonable standard of health or development without the provision of support services. The child's health or development is likely to be significantly impaired, or further impaired without the provision of additional services. This is recorded as a serious Child Protection Case. A SCR (Single Central Record) (Serious Case Review Meeting) will have taken place. All previous levels of need have been exhausted and put in place.</b></p>	<p>Likely that a Welfare Assessment has been done. At this stage refer the case externally, Medical Service, NGO, Police or Embassy Assistance. During the investigation, a School Welfare Assessment and Plan may be of benefit as part of this process. You may put together a multi-agency team to support which may involve professionals that are external to HBJ.</p>	<p>Immediate referral externally where appropriate and possible.</p> <p>All details are recorded in detail on MyConcern and there is a clear record of actions and intervention on students chronology.</p> <p>A Child Protection Risk Assessment will be completed and logged on MyConcern</p> <p>*Possible Safety Plan (Using Clear Protocols)</p> <ul style="list-style-type: none"> <li>.Suicide</li> <li>.Self Harm</li> <li>.Eating Disorder</li> <li>.Child on Child Abuse</li> </ul>

## **Communication Structure**

### **Safeguarding & Pastoral/Welfare Phase Review Meetings**

In each phase of the school, a Safeguarding & Pastoral/Welfare steering Group is to be formed. There will be a steering group for each phase including City Campus, Lower School, Upper School(Possibly Sixth Form). Depending on the section of the school and availability in attendance should be:

**DSL, DDSL, Nurse, School Counsellor, SEND lead and Pastoral Lead. (Invited members may attend if there is a link to a specific case)**

The Steering Group should meet bi-weekly to discuss vulnerable pupils and to consider their needs in line with the school threshold level of need document (Above) and Safeguarding policy.

### **The AISL Harrow Beijing Safeguarding & Pastoral Welfare Team (Whole School)**

#### **Purpose**

The purpose of the AISL Harrow Safeguarding & Pastoral Welfare Team (S&PWT) is a steering group to ensure that members of the Associate Leadership Team & Governing Body can be fully briefed and thus enabled to scrutinise and hold to account those responsible for the safeguarding of all pupil members of the AISL Harrow Beijing School community.

#### **Membership**

Assistant Head of Safeguarding & Pupil Safety, Head of HR (Human Resources) (Safer Recruitment), Head of Admissions, Cross Phase School DSL's, Lead Educational Psychologist, Head of Learning Support, Head of EAL, Head of Sport, Lead Nurse, Head of ICT & Digital Platforms (Online Safety) & Head of PSHE.

#### **Reporting**

The S&PWT is a school committee which reports to the ALT (Associate Leadership Team) & Governance. Health and Safety compliance and Safeguarding Team who report directly to the Safeguarding Governor and Head of AISL Harrow Beijing.

The Agenda, Actions and Minutes of the S&PWT are shared half-termly with the ALT, Governance, Compliance and Safeguarding members prior to their meeting. Upon external inspection and Harrow Safeguarding Standards Reviews all minutes of the Safeguarding Team are shared with the Head of Harrow Beijing.