



AISL
HARROW
BEIJING 哈罗北京

HBJ SAFEGUARDING POLICY

APPLIES TO:	All staff
LAST UPDATED:	January 2026
REVISIONS:	

Contents

1. Introduction and Key Personnel
2. Child Protection and Safeguarding Policy
3. Roles and Responsibilities
4. Child Abuse
5. Procedure for Reporting Concerns
6. What to do if a child discloses
7. Concern/Allegation made about a member of staff
8. Cases where abuse may have been inflicted by a pupil (child-on-child abuse)
9. Staff Code of Conduct
10. Safer Recruitment
11. Training
12. Appendices

1. INTRODUCTION

Harrow Beijing is committed to safeguarding and promoting the welfare of all pupils at the school. Safeguarding, in addition to Child Protection, includes other issues such as pupil health and safety, anti-bullying/cyber-bullying, digital safety (which should be taken to mean online safety as well as misuse of technology, including AI), medical provision, and alcohol and drugs and substance misuse. Policies and guidelines on these areas should be read in conjunction with this document and, in particular, the following: HS19 AISL Safeguarding Policy, Staff Code of Conduct, HS35- Digital Devices and IT Access (Staff) and other digital related documents, Prevention of Bullying Policy, Behaviour Policy, HS22 Mental Health and Counselling Procedures, HS24 Restraint and Reasonable Force Policy, Low-Level Concerns Guidance / HS 41 Whistleblowing Policy, HS 47 Recruitment Policy, HS55 Campus Access and Security Policy, Attendance Policy, Health and Safety Policy, Staff Handbook, HS 26 Intimate Care policy and Educational Trips Policy.

This Child Protection and Safeguarding Policy applies to all members of staff, pupils, external contractors, volunteers and guests of the school, who must ensure that the policy is adhered to at all times. In all cases of actual or suspected abuse, the Designated Safeguarding Lead (DSL) must be informed and the school's procedures followed. The Designated Safeguarding Lead will inform the Head of all cases of actual or suspected abuse. The exceptions to this would be if a member of staff / volunteer were implicated in the concerns, in which case the Head must be informed. If the Head is implicated in the concerns, the Governor with responsibility for Child Protection must be informed. It is vital to stress that any concerns about child protection or safeguarding must be reported to the relevant person. In the UK Children Acts of 1989 and 2004, a child is defined as anyone who has not yet reached their 18th birthday, and this is the definition which the School adopts, although we will implement this policy for all pupils in our care insofar as local law allows- including the Law of the People's Republic of China on the Protection of Minors.

Key Personnel

Designated Safeguarding Lead (Whole School)	Peter Lynch	plynch@harrowbeijing.cn
Designated Safeguarding Lead – Chinese Culture Advisor (Whole School)	Rosemary Zhao	rzhao@harrowbeijing.cn
Designated Safeguarding Lead (Whole School)	Pauline Gradden	pgradden@harrowbeijing.cn
Deputy Safeguarding Lead (Upper School)	Mollie O'Connor-Convery	moconnor-convery@harrowbeijing.cn
Deputy Designated Safeguarding Lead (Upper School)	Zahara Sattar	zsattar@harrowbeijing.cn
Designated Safeguarding Lead (Lower School)	Clare Boyden	cboyden@harrowbeijing.cn
Deputy Designated Safeguarding Lead (Lower School)	Cassie Lockwood	clockwood@harrowbeijing.cn
Designated Safeguarding Lead (Early Years)	David Mayers	dmayers@harrowbeijing.cn
Designated Safeguarding Lead (Early Years Chinese Culture)	Portia Gao	pgao@harrowbeijing.cn

Phil Akerman	Head of Harrow Beijing	pakerman@harrowbeijing.cn
Ahmed Hussain	Nominated Safeguarding Governor	ahussain@aisl-edu.com
Lisa Lin	School Counsellor (Bilingual)	llin@harrowbeijing.cn
Cherry	School Counsellor (Bilingual)	cherwang@harrowbeijing.cn
Imogen Dunhill	Safeguarding Support Officer	idunhill@harrowbeijing.cn



EXTERNAL CONTACTS:		
Tim Gerrish OBE	International Child Protection Advisor	tim@icpa.co.uk
Council of International Schools: Safeguarding		info@cois.org
SRE in Schools		susie.march@live.com
School Police Liaison Officer		GA office
Government Offices and Agencies		
Marie Stopes: Beijing		www.mariestopes.org.cn
National Embassies in Beijing		As appropriate via website
Save the Children (Beijing)		public@chinadevelopmentbrief.cn
NSPCC (UK)		+44 (0)800 800 500
Olivia's Place (Elliott's Corner)		Tel: +86 (0)10 6461 6283

2. CHILD PROTECTION AND SAFEGUARDING POLICY

Harrow Beijing recognises its responsibilities for child protection and believes that the welfare of the child is paramount, as enshrined in the UK Children Act 1989 and 2004. Whilst the School strives to minimise risk, it is fully aware that child protection risk cannot be eliminated.

This policy applies to all members of staff, pupils, external contractors, volunteers and visitors of the school, who must ensure that the policy is adhered to at all times. It is a fundamental philosophy that staff should always act in the best interests of the children and should take a proactive approach to enabling all children to have the best outcomes.

- There are five main elements to the policy:
 - Establishing a positive, supportive, secure environment in which children can learn and develop, together with a school ethos that promotes, in all pupils, a sense of being valued.
 - Ensuring we practise safer recruitment in checking the suitability of all staff, contractors and volunteers who work at the school.
 - Raising awareness of child protection issues and equipping children with the skills needed to keep themselves and others safe through the content of the curriculum.
 - Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
 - Supporting pupils who have been abused.
- The School recognises that because of the day-to-day contact with children, members of staff are well placed to observe the outward signs of abuse. Therefore, Harrow Beijing will:
 1. Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
 2. Ensure children know that there are adults in the school whom they can approach if they are worried.
 3. Include opportunities in the formal and informal curriculum for children to develop the skills they need to recognise and stay safe from abuse, including recognising and reporting child-on-child abuse, harmful sexual behaviour and online abuse.
 4. We follow, where possible, guidance issued in the UK by the NSPCC, DfE, the Independent Schools' Inspectorate (British Schools Overseas), in particular Keeping Children Safe in Education (KCSIE 2025); and worldwide through the UN Convention on the Rights of the Child (UNCRC).
 5. Ensure there is a Designated Safeguarding Lead and Deputy Designated Safeguarding Leads who have received appropriate training and support for this role. Training in child protection is carried out every two years for the DSL and the DDSLs.
 6. Ensure there is a Nominated Governor responsible for Child Protection. The Governing Body undertakes an annual review of the child protection policy, and procedures and the efficiency with which the related duties have been discharged, including remediation of deficiencies or weakness. Governors receive appropriate training in safeguarding.
 7. Ensure safer recruitment practices are followed for all staff and volunteers who have a role in the school, including appropriate pre-appointment checks on all staff and volunteers, and when possible, on contractors and other individuals.
 8. Ensure every member of staff (including temporary staff, supply staff, contractors and volunteers) and the governing body knows who the Designated Safeguarding Lead is, what their role is, how to contact them and who to go to in their absence.
 9. Ensure all staff and volunteers are aware of child protection arrangements, understand their

responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead.

10. Through regular staff training we will foster a culture of mutual respect between pupils and members of staff, with adults modelling good practice in this context. This may include opportunities for mental health first aid, suicide prevention, harmful sexual behaviours, and child-on-child abuse as appropriate to roles and responsibilities. Training in child protection is provided annually to all permanent staff. All part-time and voluntary staff are made aware of the arrangements for child protection.
11. Develop effective links with relevant agencies in Beijing and co-operate as required with their enquiries regarding child protection matters.
12. Keep electronic records of concerns about children, even where there is no need to refer the matter immediately through MyConcern.
13. Records will be transferred to new international schools in as timely a manner as possible, within the context of local laws and being compliant with regulations.
14. Follow the statutory guidance procedures and work closely with the authorities where an allegation is made against any member of staff, volunteer, or the Head; in the case of an allegation against the Head, the Governor with responsibility for Child Protection would be informed. Good practice requires clear records of investigations and outcomes of allegations to be held on confidential staff files.
15. Risk assess all activities organised by the school that take place off the school's site; this includes, wherever possible, ensuring that the offsite providers have undertaken appropriate checks for their staff that will have contact with pupils from the school.
16. Ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay.
17. Reinforce the notion that all children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity (so-called 'protected characteristics'), have a right to equal protection from all types of harm or abuse, within our local context.
18. Remember that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs, specific educational needs, disability or other individual needs (ie: contextual safeguarding).
19. Ensure that systems for digital safeguarding are robust, including appropriate filtering and monitoring software which is checked regularly by staff and clear expectations for pupils around digital safety. See the AISL digital related policies.
20. Ensure that the school campus is secure, by employing a variety of means such as CCTV, security guards, perimeter fencing, effective securing of key areas / risky areas as well as promoting safety through a robust approach to supervision, health and safety and risk management in the workplace, using data and regular review and an ongoing programme of maintenance.

The Children Act (1989) and KCSIE (2025) state that the "welfare of the child is paramount". This means that considerations of confidentiality which might apply to other situations should not be allowed to override the right of children to be protected from harm. However, every effort should be made to ensure that confidentiality is maintained for all involved when a concern has been expressed and is being investigated.

We recognise that children who suffer any form of abuse may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The School may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging, or they may be withdrawn. In such cases, we will liaise with other agencies that support them.

Harrow Beijing's policy on Prevention of Bullying must be read in conjunction with the Child Protection and Safeguarding Policy. Any bullying concerns will be referred to the appropriate member of staff and followed in line with the Prevention of Bullying and Behaviour Policies.

Early Help

It is acknowledged that acting as early as possible to support children at risk. The NSPCC states: 'Providing timely support is vital. Identifying and addressing a child or family's needs early on can increase protective factors that positively influence a child's wellbeing and decrease risk factors that may be impacting a child's life negatively. Research suggests that early help and intervention can protect children from harm, reduce the need for a referral to child protection services, improve children's long-term outcomes, improve children's home and family life and support children to develop strengths and skills to prepare them for adult life.'

Harrow Beijing has a well-developed counselling team.

The school's support systems are best placed to intervene at an early stage and will work with the DSL/DDSLs, the child and their family to signpost the most appropriate follow-up support on a case-by-case basis.

Staff are reminded regularly that action should be taken as soon as there are concerns about a child.

Also see Level of Need documentation

3. ROLES AND RESPONSIBILITIES

Designated Safeguarding Lead (DSL): The School has a Designated Safeguarding Lead who is responsible for dealing with any concerns about the protection of children.

The role of the DSL includes:

1. Ensure all staff and volunteers read, understand and follow the school's safeguarding policy and procedures and code of conduct for adults.
2. Read and understand national and local guidance about preventing and responding to abuse
3. Ensure all staff and volunteers receive regular child protection training
4. Put support systems in place for children who have experienced abuse, for example by arranging school counselling or contacting external support services.
5. Ensure healthy relationships are promoted through the whole school ethos, lessons and assemblies.
6. Make sure children know they can approach any member of staff or volunteer if they have a problem and that they will be listened to and taken seriously.
7. Make sure sources of help are promoted around school so children know where to go to get help if they don't feel able to talk to a trusted adult
8. Provide parents with information about safeguarding
9. Liaising with the external agencies, as appropriate (see further info in China legislation documents)
10. Acting as a source of advice and expertise and keep relevant people within the school informed about any action taken and any further action required.
11. Ensuring that a proper record is kept of any referral and action taken, and that this is kept safely and in confidence;
12. Managing and delivering staff child protection training and review the operation of the Child Protection Policy annually (with the Head and Safeguarding Governor) to ensure the procedures are working and that it complies with current best practice.
13. To perform regular checks of the Single Central Record
14. To monitor safety through reviewing regular reports of internet misuse or inappropriate online behaviour, taking action where appropriate. A review of the school's internet filtering and monitoring systems should be undertaken on at least an annual basis.
15. To promote online safety through the taught and wider curriculum, such as assemblies and awareness days.
16. Ensure that safeguarding and child protection policies and procedures are in place for school trips and events and that suitable risk assessments have been carried out.
17. Update safeguarding and child protection policies and procedures in the light of any lessons learned from a child protection incident.
18. The DSL should provide the Head and governors with a report on child protection at least annually.

It is important that the DSL does not work in isolation and, therefore, they work closely with a team of appropriately trained senior staff from each part of the school, who can deputise in the absence of the DSL.

The DSL and DDSLs must all renew their advanced training at least every two years.

The Head: in terms of safeguarding, the role of the Head is to:

1. Ensure staff are competent to carry out their safeguarding duties, for creating an environment where staff feel supported and can raise concerns and ensuring those who work with children have regular reviews of their own practice so that they have knowledge, skills and experience that improve over time. Ensure there are on-going safe working practices in school.
2. Meet regularly with the DSL to ensure child protection risks are being appropriately recognised and responded to.
3. Along with the governing body, make sure the school's child protection policy and procedures are robust, up to date.
4. Understand what's happening in the school's local area and how the safeguarding policies and procedures can meet the school's specific needs
5. When recruiting new staff and volunteers to work in school, the Head and governors must follow safer recruitment principles. They should ensure the appropriate checks have been carried out on staff and volunteers and make sure the school's records are up-to-date.
6. The Head and governors should ensure DSL/DDSLs have sufficient time and resources to carry out their role.
7. Help the DSL inform parents about what's happening (unless there is reason to believe that doing so would put the child at further risk of harm).
8. Regularly review all safeguarding and child protection policies and procedures
9. If there are allegations or concerns about abuse by a member of school staff or a volunteer, the Head should liaise with the Safeguarding Governor.

• **Responsibilities of all Members of Staff**

1. There is an inescapable, personal and professional responsibility by all staff for the protection of children from harm.
2. Members of staff have a duty to report all suspicions of abuse to the Designated Safeguarding Lead, (or a DDSL in their absence), who will then inform the Head. The Head or the DSL will then inform the Governor with responsibility for child protection. If the allegation involves any of the persons named here, the member of staff should report to one of the other designated persons. If the allegation involves the DSL, the Head must be informed. If the Head is absent, it should be passed to the nominated Governor, who must also be informed if the allegation relates to the Head.

• **Governance and Oversight**

1. The school undergoes regular oversight visits at least annually from AISL (Asia International School Limited) which incorporate a review of safeguarding.
2. It is expected that the school undertakes an annual internal audit of its safeguarding procedures (with a summary report presented to Governors).
3. The DSL and DDSL team are invited to be part of the AISL Harrow Schools Safeguarding Network which provides up-to-date discussion and a chance to share best practice
4. The Safeguarding Governor has regular check-in meetings with the DSL
5. All governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
6. Governors should ensure the school has appropriate filters and monitoring systems in place and also regularly review their effectiveness. They should also ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

4. CHILD ABUSE

All members of the school staff should be alert to the possible signs of abuse of a pupil, keeping an open mind that ‘abuse could happen here’ and to refer concerns as soon as they arise. Conversations with the DSL or deputies starting ‘This may be nothing, but...’ can help staff overcome barriers to reporting.

Abuse may take several forms, which are not mutually exclusive. It is also important to remember that abuse can take place online as well as in-person:

1. **Physical abuse** 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.
2. **Emotional abuse** is harder to detect and may result from conveying to a child they are worthless, teasing or humiliation, the denial of love and affection, interests or friendships. It may include developmentally inappropriate expectations being imposed on children including interactions that are beyond a child’s developmental capability or over protection and the limitation of opportunities to explore and learn.

Emotional abuse can include seeing or hearing the ill treatment of another person, bullying (including cyber-bullying) and the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may occur alone.

3. **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, or 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). It is a common misconception that adult males are the sole perpetrators of sexual abuse; women can also commit acts of sexual abuse, as can other children. As per KCSIE 2025, schools should take a zero-tolerance approach to sexual violence and sexual harassment. Any incidences of these will be pursued following the School’s Prevention of bullying and behaviour policies

4. The UK Government’s statutory definition of child sexual exploitation is:

“Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. “The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.”

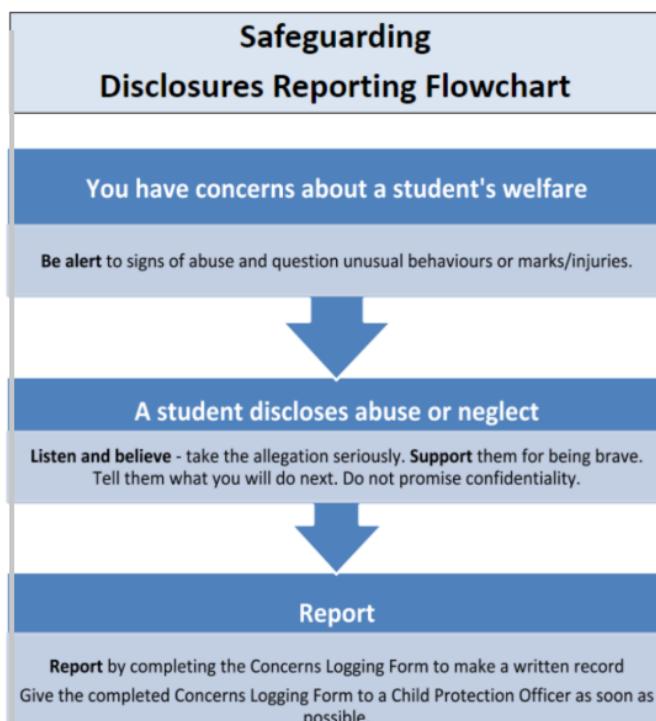
5. **Neglect** is the persistent failure to meet a child’s basic physical and/or psychological needs, such as the provision of adequate food, clothing and shelter (including exclusion from home or abandonment), protection from physical and emotional harm or danger, adequate supervision (including the use of inadequate care-givers), and access to appropriate medical care or treatment.

There will be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of pupils. Questions of the young person being in moral danger, being uncared for, engaging in antisocial or inappropriate behaviour and so on may be referred to the Designated Safeguarding Lead, who will discuss the matter with the Head. Such cases may also be referred to the School Health Care Centre and Counselling Team. In each case the School’s Designated Safeguarding Lead must be informed.

5. PROCEDURES FOR REPORTING CONCERNs

Staff could have suspicions or concerns raised in a number of ways, the most likely of which are:

- The conduct of a member of staff;
- A child, parent or member of staff “disclosing” abuse;
- Bruising or evidence of physical hurt; which may or may not be accompanied by unusual behaviours by a child.



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:

Harrow Beijing Safeguarding Concern Reporting Procedure

Staff member is concerned about a child's physical and emotional wellbeing due to a sign/symptom/evidence.

Staff member should **log in to MyConcern** (available from the Staff Portal)

- This should be done as soon as practicable and **BEFORE** the child leaves school that day.

Once logged in to MyConcern the staff member should:

- Click on 'Report a Concern'
- Complete the 'Report a Concern' form
- Click on the orange 'Submit Concern' button

Once you have submitted your concern it is immediately delivered to the DSL Team for their attention and action as appropriate.

Harrow International School Beijing Safeguarding Concern Reporting Procedure – Child Disclosure/Significant/Immediate Risk

Staff member should immediately inform a member of the DSL Team in person.

Staff member should provide a verbal summary of the disclosure/significant and immediate risk along with any evidence.

DSL Team will then take action as appropriate.

Staff member completes MyConcern Report.

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.

- 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. [1]

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.

Suspicion or knowledge of abuse must be reported to the Designated Safeguarding Lead or a Deputy who will share such information with the Head on a ‘need to know’ basis.

Any adult to whom abuse is reported by a pupil has a duty to listen to the pupil, to provide reassurance, and subsequently to record the pupil’s statements. They must not press the pupil, ask probing questions or suggest answers. The situation should then be reported and discussed with the Designated Safeguarding Lead who will consult with the Head. The School’s Child Protection Procedures must be referred to at all stages.

Expert medical diagnosis may be required quickly. The Designated Safeguarding Lead, their Deputies or the Head will arrange this following consultation with clinic.

6. WHAT TO DO IF A CHILD DISCLOSES

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.

The following information is intended to assist you if you become involved in a potential child protection situation when a child or young person makes a disclosure. Note that this is a completely different procedure to interviewing pupils on disciplinary issues.

1. Listen, and allow the pupil to finish without directly questioning or stopping them. Let them tell you what they want to and no more. They may need to disclose to a specialist later and too much detail now may interfere with later investigations.
2. When the interview has finished, make sure the pupil feels secure and explain what you are going to do next.
3. Record as much as you can remember as soon as possible (preferably immediately) afterwards, using the pupil’s own words, on MyConcern.
4. Stay calm and convey this through word and action; reassure the pupil that you are taking what they have to say seriously.
5. Report to the Designated Safeguarding Lead and provide the written record of the incident on MyConcern the same working day.
6. Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer. Notes may be scanned and uploaded onto MyConcern.

Confidentiality

1. The management of confidentiality is an essential factor in all issues relating to Child Protection.
2. Staff should never give pupils or adults an absolute guarantee of confidentiality, but must ensure that the information is disclosed only to the people who need to know. Make sure that this is clear early on, not sprung on the pupil at the end.
3. It should be explained to children and young people that secrets cannot and should not be kept if keeping them means that they, or others, may continue to be harmed, or if there is evidence of law-breaking.

After Disclosure

- **Stay Calm**

Try not to transmit your anger, shock, distress, or embarrassment to the child - either verbally or through body language.

- **Act as though you believe in the child**

- **Reassure the child**

It's not their fault; glad they told you etc.

- **Allow the child to talk / finish the story**

Don't question the child until they have finished speaking, and then you can prompt by open questions such as 'is there anything else you would like to tell me?'. Avoid closed or leading questions.

- **Report the incident immediately to the Designated Safeguarding Lead (DSL), or in their absence, a Deputy DSL (DDSL), or the Head, passing on the notes you have made (as described above).**
- **Explain to the child that you will need to tell another member of staff to keep them safe and because you care.**
- **Check that the child is safe and ready to go back to their class or activity.** If they are too distressed to do so, they should be accompanied to the Health Care Centre. A school counsellor can be called to support them.

7. CONCERN/ALLEGATION MADE ABOUT A MEMBER OF STAFF

If there is a Safeguarding concern or allegation made about a member of staff, including supply teachers, volunteers and contractors then procedures would be followed depending on whether the concern/allegation meets the harm threshold (as defined in KCSIE, 2025).

1. Concerns / allegations that may meet the harm threshold

Cases of concerns/allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college.

If it is alleged that anyone working in the school 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.

3. Concerns / allegations that do not meet the harm threshold, are referred to as 'low-level concerns'*.

The term 'low-level' concern (KCSIE, 2025) does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the harm threshold. Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

*At Harrow BJ all low-level concerns are recorded on 'Confide' and these will be reviewed by the DSL and the Head. Ultimately the Head has responsibility to decide on actions taken.

If you become aware that a member of staff/volunteer may have

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved in a way that indicates they pose a risk of harm to a child

Or

A Young person discloses abuse or neglect by a member of staff/volunteer

- Listen & Believe - take the allegation seriously.
- Support them for being brave.
- Never promise confidentiality.

You must:

Report it to the Head immediately

- **Any concern or allegation against a member of staff / volunteer must be reported directly to the Head in person immediately and follow up the report in writing on ‘Confide’.**
- **Any concern or allegation against the Head must be reported directly to the Governor with responsibility for Child Protection**

The Head:

Mr Phil Akerman pakerman@harrowbeijing.cn

The Governor with responsibility for Child Protection:

Mr Ahmed Hussain ahussain@aisl-edu.com

3. Following a substantiated allegation:

If the allegation is substantiated and the person is dismissed; resigns, or otherwise ceases to provide his or her services, or Harrow Beijing ceases to use the person’s services, the case manager in consultation with the safeguarding governor must consider whether to refer the matter to the TRA and to consider whether the individual should be prohibited from teaching (see KCSIE 2025 paragraph 357-358 for further information).

Harrow Beijing would also make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child (see KCSIE 2025 paragraph 353-356 for further information).

8. CASES WHERE ABUSE MAY HAVE BEEN INFILCTED BY A PUPIL (Child-on-child abuse)

See Child-on-Child Abuse Protocols

Whilst the school holds a ‘zero-tolerance’ stance on child-on-child abuse, each case will be considered in its own way as appropriate, taking into account the child’s wishes (and the family’s, where appropriate), their age, any specific risk factors such as SEND or disability, and a support plan will be put in place. This may include referral to counselling support in-school or externally.

Follow-up action could include disciplinary and/or restorative action for the perpetrator, including exclusion.

Where a case is being investigated, a risk assessment should be put in place to mitigate further harm.

The school recognises the heightened vulnerability of SEND pupils to child-on-child abuse

The school recognises that even when there are no reported cases of child-on-child abuse, this does not mean it is not happening. A healthy vigilance at all times is encouraged, with any signs of concern to be reported immediately.

9. STAFF CODE OF CONDUCT

Please see Staff Code of Conduct

The Code of Conduct needs to be read in conjunction with HS35- Digital Devices and IT Access (Staff).

In addition:

Special care must be taken when using cameras or mobile devices, especially in Early Years. Mobile phones must not be used anywhere within the Early Years Centre in the presence of children (unless in the case of urgent situations).

Only digital devices owned by the school should be used to take photos and / or videos of pupils and their learning.

Visiting speakers will always be supervised by a member of school staff and will never be alone with any students. A log of visiting speakers is kept.

10. SAFER RECRUITMENT

Our safer recruitment processes aim to:

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

Before commencing employment at the school, all staff and contractors will have appropriate checks made about them to ensure that there are no reasons why they should not be working with children. These recruitment checks will be based upon guidelines in the UK from the September 2025 ‘Keeping Children Safe in Education’ guidance. The HR Department ensure all necessary checks are in place and recorded on the Single Central Register (SCR).

Full details of the school’s recruitment procedures can be found in the Recruitment Policy.

11. STAFF TRAINING

New staff have safeguarding training as part of the induction process and this is kept up to date by refresher training annually. In addition, the designated members of staff (including DSLs & DDSLs) will undertake advanced level training every two years to keep their knowledge and skills up to date- in addition many senior leaders also undertake the same advanced training.

12. Appendix A: WHO TO TALK TO?

It is very normal to have worries and concerns about life at School or at home, such as:

- Feeling unable to cope with your work or other activities.
- Struggling with friendships or relationships with other pupils.
- Concerns that others (a pupil, a member of staff or somebody outside the School) are being unkind, disrespectful or abusive.
- Concerns of being treated differently from others because of race or religion or some other reason.

A person's life may be made unhappy through the deliberate actions of others, but also through careless actions. Bullying type behaviour is any act that is perceived to insult, humiliate, intimidate or hurt another person intentionally or repeatedly; such behaviour will not be tolerated at Harrow Beijing.

If any of these issues make a pupil worried or unhappy, or if any pupil is aware that someone else in the school community is feeling unhappy, talking to someone who can be trusted is essential. Pupils who keep things to themselves only end up feeling more unhappy and the initial problem grows. No pupil should ever feel that nobody cares.

There are many possible people that could help:

- Parents or guardian
- Another member of the family
- A close friend
- Any member of the House Pastoral Team
- Any teacher
- A member of staff in the School Health Care Centre
- The School Counsellors
- A member of SLT

Harrow Beijing adopts an out of hour emergency contact for Upper School students including holiday periods, evenings and weekend should a child be at risk or in need. Help@harrowbeijing.cn

Appendix B: Definitions and Potential Indicators of Abuse

1 Understanding of Child Abuse

- 1.1 In a broad sense, child abuse is defined as any act of commission or omission that endangers or impairs the physical / psychological health and development of an individual under the age of 18. Such an act is judged on the basis of a combination of community standards and professional expertise. It is committed by individuals, singly or collectively, who by their characteristics (e.g. age, status, knowledge, organisational form) are in a position of differential power that renders a child vulnerable. Child abuse is not limited to a child-parent / guardian situation, but includes anyone who is entrusted with the care and control of a child, such as child-minders, relatives, teacher, etc. For child sexual abuse, acts may also be committed by strangers to the child. Abuse can also be perpetrated by other young people (ie: child-on-child abuse). Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- 1.2 The definition of child abuse set out in this Procedural Guide is provided to facilitate relevant professionals or personnel to safeguard the welfare of children being abused or at risk of abuse. It is not a legal definition. When prosecution against an abuser is required, reference should be made to the relevant Ordinances in force. It should also be noted that cases involving child welfare, but not defined as child abuse in this Procedural Guide, should also be handled with care and appropriate services should be rendered to ensure the best interest of children.
- 1.3 In determining whether a case should be defined as a child abuse case, the responsible professionals should make their assessment based on individual case merits and take into consideration various factors (such as the child's age, the act, the consequences of the act on the child, etc.) instead of just focusing on the frequency and nature of incident that has occurred.

2 Types of Child Abuse: See Section 4 of the Policy

3 Indicators Of Possible Child Abuse

- 3.1 In conducting an investigation into any suspected child abuse case, the responsible professionals should make reference to indicators manifested by the child, the parents and the family. Physical indicators are indicators that are usually readily observable and may be mild or severe. The child's behaviour can sometimes be a clue to the presence of child abuse. Behavioural indicators may exist alone, or in combination with physical indicators. They may be subtle or they may be graphic statements by the child. The behaviour and attitudes of the parents, their own life histories, or even the conditions of their home, can also offer valuable clues to the presence of child abuse.
- 3.2 The list of indicators presented here is not intended to be exhaustive. Neither does the presence of a single or even several indicators necessarily prove that child abuse exists. However, the possibility of child abuse should be seriously considered in case of repeated occurrence of an indicator, presence of several indicators in combination, or presence of serious injury. The behavioural indicators in different categories of child abuse might be interchangeable and should be applied as appropriate.
- 3.3 These indicators are only useful for professionals with training and experience in dealing with children and families. They are an aid to assessment by professionals and should be used with caution.

4 Checklist for Identifying Possible Child Abuse

The following checklist aims to help concerned professionals and parties for identifying possible child abuse and is listed for reference only. It is not exhaustive and due consideration should be taken according to the age of the child and any added factors which may make them more vulnerable (e.g.: protected characteristics, SEND, disability)

4.1 Physical Abuse

If there is doubt about the nature or severity of the physical signs of injury, the child concerned should be brought to medical attention as soon as possible.

4.1.1 Bruises and Welts

- Should be interpreted with reference to the developmental age (e.g. whether the child is able to walk), number, size and distribution of the bruises, and whether they form a specific pattern that suggests direct impact with an object, punching, grasping, and/or bites.

- Bruises that are unlikely to be accidental, e.g. large bruises, bruises at unusual locations, multiple bruises of different ages, or injuries around the genitalia are suspicious.
- Bite marks are specific signs of injuries. If identified early, the injury itself may contain sufficient information to help identify the perpetrator.
- Dermal melanocytosis (Mongolian Spots) are non-cancerous blue or blue-gray spots on the back, buttocks, base of spine, shoulders, or other body areas and can affect younger, often Asian, children. The markings may cover a large area of the back and are usually flat with irregular shape and unclear edges, normal in skin texture and 2 to 8 centimetres wide or larger. Dermal melanocytosis is sometimes mistaken for bruises. This can raise a question about possible child abuse. It is important to recognize that dermal melanocytosis is a birthmark, not bruises.

4.1.2 Lacerations and Abrasions

- Lacerations over the hands, arms or feet that damage the underlying tendons may be potentially crippling.
- Laceration to the frenulum, the piece of tissue that connects the upper lip to the upper gum in the middle, may be indicative of forced feeding.

4.1.3 Burns and Scalds

- Burns / scalds from unintentional and intentional origin may be difficult to differentiate.
- Some inflicted burns may assume the shape or pattern of the burning objects, e.g. heated plate, cigarette.
- “Glove and/or stocking” distribution is indicative of dunking (immersion) scald of a limb or buttock.

4.1.4 Fractures

- These should be interpreted / handled individually.

4.1.5 Internal Injuries

- Brain / head injuries

May be due to direct impact, shaking or penetrating injuries.

The “Shaken Baby Syndrome” is the most common cause of death in physical child abuse.

- Abdominal injuries

Perforation of internal organs may lead to abdominal pain and vomiting.

Serious injuries or even death may occur without any external signs of injuries. Hence, a high degree of suspicion is required if abdominal injury is not to be missed.

4.1.6 Others

- Fabricated or induced illnesses, including Munchausen’s Syndrome by Proxy
- Poisoning
- Hair loss by pulling or burning
- Drowning
- Cot death

4.2 Sexual Abuse (Both sexes)

4.2.1 Physical Indicators

- Torn, stained or bloody underclothing
- Complaints of pain, swelling or itching in the genital area
- Complaints of pain on urination
- Bruises, bleeding, or lacerations in external genitalia, vaginal or anal area, mouth or throat
- Vaginal / penile discharge
- Sexually transmitted disease

- Early adolescent pregnancy

4.2.2 Behavioural Indicators

- Appetite disturbance
- Sexual exploitation of young children
- Poor peer relationships
- Unwilling to participate in physical activities
- Behaviour disturbance (anorexia nervosa, obesity, self-mutilation, runaway, suicide, promiscuity, drug abuse)
- Sexual knowledge/behaviour/language that is abnormally advanced for the respective age of the child
- Marked change in academic performance
- Sleep disturbance
- Excessive masturbation
- Excessive reaction to being touched
- Intensive dislike for being left somewhere or with someone

4.3 *Neglect*

4.3.1 Physical Indicators

- Malnutrition, under-weight, or lacking sufficient quantity and/or quality of food
- Delayed development
- Severe rash or skin disorder
- Left in care of inappropriate carer (e.g. young child)
- Inadequately supervised for long periods or when engaged in dangerous activities
- Unattended physical problems or unmet medical / dental needs
- Chronically dirty / unkempt
- Habitual absence from school or deprivation of schooling
- Spoiled food found at home
- Insanitary living conditions (garbage, excretion, dirt, etc)
- Young child unattended for long periods
- Abandoned: totally or for long periods of time
- Child confined at home

4.3.2 Behavioural Indicators

- Persistent complaints of hunger or rummaging for food, overtly aggressive eating habit or begs for / steals food
- Assumes responsibilities inappropriate to age
- Addiction
- Delinquency
- Complaints of inadequate care, supervision or nurturing
- Being made to work excessive hours / beyond physical ability
- Poor peer relationship
- Responds to questions in monosyllables
- Extreme apprehension
- Sexual activity caused by inadequate supervision
- Reluctant to return home
- Runs away from home

4.4 Psychological / Emotional Abuse

4.4.1 Physical Indicators

- Failure to thrive
- Developmental delay e.g. speech disorder
- Disordered eating

4.4.2 Behavioural Indicators

Indicators in the Child

- Alienation
- Habit disorder
- Wetting / soiling
- Learning disorder e.g. marked deterioration in academic performance
- Lags in mental, emotional, social development
- Self harm or suicidal thoughts / attempts
- Disruptive behaviour or conduct problems
- Sleep disturbance
- Appetite disturbance
- Speech impediment

Indicators in the Family

- Rejection
- Constant scolding
- Humiliating criticism
- Inducing fear
- Encouraging deviant behaviour
- Bizarre/Inappropriate punishment
- Domestic abuse

5 Characteristics Commonly Associated With Child Abuse

Child abuse may occur in any family and the background of families with a problem of child abuse may be different. The following characteristics, which are often found in child abuse cases, are listed for reference only and should not be taken as evidence of child abuse. On the other hand, child abuse may occur in families without any of the following identifiable features.

6 The Family

- Chaotic or obsessively organised home
- Social isolation
- Crisis or tension in family such as pregnancy, eviction, divorce / desertion / separation, in-law conflict
- Cultural / superstitious beliefs
- Domestic violence

7 The Parents

7.1 Biography

History of childhood abuse

- History of unhappy or being rejected in childhood; serious physical / emotional deprivation
- History / Experience of domestic or other violence
- History of serious recurrent illness and/or psychiatric disorder
- Alcoholism / Drug abuse / Gambling

7.2 Attitude and Behaviour

- Rigid or unreasonable expectations of the child
- Strong belief in harsh discipline / corporal punishment
- Overtly critical of or aloof to the child
- Immaturity of parents
- Low self-esteem
- Passiveness
- Low intelligence of one or both parents
- Low tolerance to stress
- Deficiency in anger control
- Diffusion and confusion in family roles
- Sexual problems
- Unconvincing or inconsistent explanations of the child's injury
- Failure or delay in seeking medical advice
- Inadequate parenting

8 The Child

- Premature birth
- Unwanted child
- Illegitimate child
- Baby with feeding or sleeping problem
- Non-thriving baby
- Early separation from parents
- Complicated birth delivery
- Child exposed to conflicting childcare practices
- Child with physical or mental disability
- Child associated with family misfortune
- Females in some cultures
- LGBTQ+
- SEND

9 Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation
- Child criminal exploitation
- Domestic abuse
- So called 'honour-based' violence, female genital mutilation (FGM), forced marriage and breast ironing
- Radicalisation

- Children with family members in prison
- Child on child abuse
- Sexual violence and sexual harassment

These may manifest as:

1. Children missing from education; A child going missing from education is a potential indicator of abuse or neglect. Staff and community members (including parents and carers) should report any poor student attendance or absences which cause concern to the safeguarding officers or the DSL, particularly on repeat occasions and/or over prolonged periods of time, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of the child going missing in future.

2. Child sexual exploitation (CSE); This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship to serious organised crime by gangs and groups. The perpetrator/s always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

3. Female Genital Mutilation (FGM); This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. AISL follows UK advice in this area: it is mandatory to report FGM disclosures that concern any female under the age of 18.

4. Radicalisation; This refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. As with managing other safeguarding risks, staff should be alert to changes in a child’s behaviour which could indicate that they may be in need of help or protection.

5. Forced marriage/abduction; In some cultures, forced marriages are still regarded as acceptable. Any member of staff who considers a child at risk of this particular form of abuse, should report it immediately to a member of the safeguarding team.