

HBJ SAFEGUARDING POLICY

APPLIES TO	All staff, visitors, volunteers, contractors, governors, guests and others working in or on behalf of Harrow Beijing
SCHOOL RESPONSIBILITY	Head / Designated Safeguarding Lead
GROUP FRAMEWORK	AISL Safeguarding Policy HS19 (2026–27)

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The School respects pupils' lawful rights, personal dignity, privacy, safety, participation and expression. When decisions affect a pupil's rights or welfare, the pupil's views should be heard in a manner appropriate to age, development and circumstances, and given due consideration.

No member of staff may use corporal punishment, disguised corporal punishment, humiliating treatment or other conduct that infringes a pupil's dignity. Safeguarding and behaviour responses must be cautious, fair, proportionate and protective.

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Any report of sexual violence, sexual harassment or harmful sexual behaviour will be treated as a safeguarding concern in the first instance. Behaviour, anti-bullying or disciplinary procedures may operate alongside or following the safeguarding response, but must not replace or delay it.

All incidents involving the making or sharing of nude or semi-nude images of children require a safeguarding response, whether described as consensual or non-consensual. This includes images taken by a child, created by another person, digitally altered, or wholly generated using artificial intelligence, including deepfakes/deep nudes. Misogynistic or misandrist abuse, including online messaging and content, should be recognised where it forms part of harmful sexual behaviour, harassment, coercion or a wider safeguarding concern.

Child-on-child harmful behaviour should be understood on a continuum. Developmentally expected or inappropriate behaviour, problematic behaviour, harmful sexual behaviour, sexual harassment and sexual violence require different but proportionate responses. The safeguarding needs of both the child who has

experienced harm and the child alleged to have caused harm must be considered; harmful behaviour may itself indicate that the latter child has unmet safeguarding needs.

The safeguarding risk levels in Appendix B and the Category 1–4 behaviour framework serve different purposes and must not be treated as equivalent. Behaviour categories assess conduct and disciplinary response; safeguarding risk levels assess vulnerability, likelihood and immediacy of harm. A low behaviour category can still raise a safeguarding concern, and serious behaviour does not automatically establish a safeguarding risk level.

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1. Introduction, Purpose and Scope

Harrow Beijing is committed to safeguarding and promoting the welfare, rights and development of all pupils. The School operates within the laws and regulations of the People's Republic of China. It also draws upon AISL Group requirements and recognised international safeguarding guidance, including Keeping Children Safe in Education and Working Together to Safeguard Children, as frameworks for good practice where compatible with PRC law and the local context. Safeguarding encompasses protection from maltreatment, abuse, neglect, exploitation, bullying, sexual violence and harassment, online harm and other threats to a child's physical or psychological wellbeing.

This policy applies to all staff, pupils, visitors, volunteers, contractors, governors, guests and anyone working in or on behalf of the School. Every adult has a personal and professional responsibility to safeguard children and to report concerns.

The policy should be read alongside relevant AISL and HBJ policies, including the Staff Code of Conduct, Behaviour Policy, Anti-Bullying/Prevention of Bullying Policy, digital and AI policies, Mental Health and Counselling Procedures, Restraint and Reasonable Force Policy, Low-Level Concerns Guidance, Whistleblowing Policy, Recruitment Policy, Campus Access and Security Policy, Attendance Policy, Health and Safety Policy, Intimate Care Policy and Educational Trips Policy.

Policy interface principle: where behaviour or bullying may indicate abuse, neglect, exploitation, sexual harm, significant harm or another safeguarding concern, safeguarding assessment takes precedence. Behaviour and Anti-Bullying procedures may run alongside or follow safeguarding action, but must not replace, delay or narrow it.

2. Safeguarding Principles and Framework

- The wellbeing of pupils and staff is more important than other considerations in school.
- All children have a right to equal protection from abuse, neglect and exploitation.
- Safeguarding applies to harm within and outside the home and to harm occurring or facilitated online, including misuse of artificial intelligence, misinformation and disinformation.
- Some children are additionally vulnerable because of previous experiences, SEND, disability, dependency, communication difficulties or other individual circumstances.
- Early, positive and proportionate intervention should be provided as soon as problems emerge.
- Children should know that adults in school will listen to them and take concerns seriously.
- The School maintains an attitude that abuse can happen here and encourages staff to report even apparently minor concerns.

2.1 Legal and Safeguarding Framework

The School operates under PRC law and AISL Group requirements. For international good-practice benchmarking, this policy has also been reviewed against Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026. These England-specific frameworks do not displace PRC law or create English statutory referral duties for HBJ; relevant principles are adopted where appropriate to the Beijing context.

2.3 Application to International Students

The protections and safeguarding procedures set out in this policy apply equally to all pupils under the age of 18, irrespective of nationality. For an international pupil whose parents do not ordinarily reside in China, references in

this policy to a parent or carer include, where appropriate, the pupil's formally appointed guardian in China. The nationality or immigration status of a pupil does not alter the School's safeguarding threshold or its obligation to take protective action or make required reports to the relevant authorities.

3. Key Safeguarding Personnel and Contacts

The existing HBJ policy identifies the following safeguarding personnel. Names and roles is maintained as the School's current arrangement.

Role	Name	Contact
Designated Safeguarding Lead (Whole School)	Pauline Gradden	pgradden@harrowbeijing.cn
Chinese Culture Advisor (Whole School)	Rosemary Zhao	rzhao@harrowbeijing.cn
Designated Safeguarding Lead (Upper School)	Mollie O'Connor-Convery	moconnor-convery@harrowbeijing.cn
Designated Safeguarding Lead (Upper School)	Rebecca Gardner	bgardner@harrowbeijing.cn
Designated Safeguarding Lead (Lower School)	Cassie Lockwood	clockwood@harrowbeijing.cn
Designated Safeguarding Lead (Lower School)	Clare Boyden	cboyden@harrowbeijing.cn
Designated Safeguarding Lead (Early Years)	David Mayers	dmayers@harrowbeijing.cn
Early Years Chinese Culture Advisor	Portia Gao	pgao@harrowbeijing.cn
Head of Harrow Beijing	Phil Akerman	pakerman@harrowbeijing.cn
Nominated Safeguarding Governor	Ahmed Hussain	ahussain@aisl-edu.com
School Counsellor (Bilingual)	Lisa Lin	llin@harrowbeijing.cn
School Counsellor (Bilingual)	Cherry Wang	cherwang@harrowbeijing.cn
Safeguarding Support Officer	Imogen Dunhill	idunhill@harrowbeijing.cn

4. Roles and Responsibilities

4.1 All staff

- Maintain an attitude of vigilance and understand that safeguarding is everyone's responsibility.
- Know the identity and contact arrangements of the DSL and deputies.
- Recognise signs and indicators of abuse, neglect, exploitation and other safeguarding concerns.
- Report all safeguarding concerns promptly using the School's procedures; staff must not decide alone that a concern is too minor to report.
- Do not conduct their own safeguarding investigation.
- Listen to children, take disclosures seriously, avoid leading questions and never promise secrecy.
- Maintain professional confidentiality on a need-to-know basis.

4.2 Designated Safeguarding Lead and Team

- Lead policy, systems, compliance and oversight of safeguarding procedures, including online safety and filtering and monitoring.
- Lead staff training, safeguarding action planning, internal audit and review of safeguarding practice.
- Receive, review and respond to safeguarding concerns and ensure concerns are assessed on the day of receipt.
- Act as a source of advice and expertise and coordinate case management, support, safety planning, referrals and ongoing review.

- Ensure accurate records are maintained of concerns, discussions, decisions, actions and the rationale for decisions.
- Develop effective links with relevant external agencies and providers.
- Promote safeguarding through the curriculum and wider school life.
- Ensure safeguarding arrangements are considered in trips, events and third-party provision.
- Report to the Head and governors and ensure lessons from incidents inform policy and practice.
- Maintain clear, reliable and known DSL cover arrangements whenever the Whole School DSL is unavailable, so that concerns can be received, monitored and acted upon without delay. The School should maintain a secure shared safeguarding route or equivalent mechanism alongside named trained DSL.

4.3 Head

- Ensure staff are competent and supported to carry out safeguarding duties and safe working practices are maintained.

The Head is the person with primary responsibility for pupil protection at school level. The Whole School DSL is the designated school leader with direct operational responsibility for safeguarding and student protection systems.

- Meet regularly with the DSL and ensure safeguarding risks are recognised and responded to.
- Ensure the policy and procedures are robust, current and appropriately resourced.
- Ensure safer recruitment requirements and records are maintained.
- Support appropriate communication with parents unless doing so may increase risk.
- Manage concerns or allegations about staff in liaison with the Safeguarding Governor as required.

4.4 Governance and AISL oversight

- Provide strategic challenge and assurance that safeguarding arrangements are effective.
- Ensure the Nominated Safeguarding Governor receives appropriate training and meets regularly with the DSL.
- Receive at least annual reporting on safeguarding and review the annual safeguarding audit and action plan.
- Ensure filtering and monitoring arrangements are appropriate and their effectiveness is reviewed.
- Participate in AISL safeguarding oversight, network activity and external review arrangements.

5. Recognising Safeguarding Concerns and Abuse

Abuse may take several forms and forms of abuse are not mutually exclusive. Harm can occur in person, wholly online, or technology may facilitate offline abuse.

Physical abuse

May include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, including fabricated or induced illness.

Emotional abuse

Persistent emotional maltreatment that adversely affects emotional development, including humiliation, rejection, inappropriate expectations, overprotection, exposure to ill-treatment of others, bullying, exploitation or corruption.

Sexual abuse

Forcing or enticing a child to take part in sexual activities, including contact and non-contact activity, sexual imagery, grooming and technology-facilitated abuse.

Neglect

Persistent failure to meet a child's basic physical and/or psychological needs, including food, clothing, shelter, supervision, protection and access to medical care.

5.1 Other safeguarding concerns

Staff should also be alert to overlapping and extra-familial harms, including modern slavery and trafficking; serious youth violence; financial exploitation; teenage relationship abuse (including coercive control, stalking and physical, sexual or emotional abuse); child-to-parent/caregiver abuse; young carers; children affected by parental offending; children with medical conditions; repeated or prolonged absence from education; and pupils repeatedly removed from class, suspended, placed on reduced timetables or otherwise experiencing patterns that may indicate unmet need or increased vulnerability.

- Children missing from education
- Child sexual exploitation
- Child criminal exploitation
- Domestic abuse
- So-called honour-based abuse, FGM, forced marriage and breast ironing
- Radicalisation
- Children with family members in prison
- Child-on-child abuse
- Sexual violence and sexual harassment
- Online abuse and technology-facilitated harm

Appendix A retains the more detailed indicators and contextual factors from the existing HBJ policy.

6. Reporting a Safeguarding Concern

Any safeguarding concern must be reported. A concern that appears minor may form part of a wider pattern known to the DSL.

Behaviour or peer incidents must also be recorded on MyConcern where they raise a safeguarding concern. Recording an incident through behaviour, pastoral or Anti-Bullying systems does not remove the requirement to make a safeguarding record or inform the DSL where the safeguarding threshold is met or may be met.

- Routine/non-immediate concerns: record on MyConcern as soon as practicable and within six hours.
- Immediate or significant risk, disclosure of abuse, or suspected crime: inform the DSL or an available member of the DSL team immediately in person, then complete the MyConcern record as soon as practicable and within six hours.
- Records should distinguish fact from opinion, include the child's exact words where relevant, and record date, time, place, people present and what was observed or reported.
- Staff must not investigate safeguarding concerns themselves.

7. Responding to a Disclosure

- Stay calm and listen; allow the child to finish.
- Take what the child says seriously and reassure them that they have done the right thing by speaking.
- Do not interrogate, press for detail, suggest answers or ask leading questions.
- Do not promise confidentiality. Explain that information will be shared only with people who need to help keep them safe.
- Explain what will happen next.
- Record the child's words as accurately as possible and report immediately to the DSL
- Preserve relevant evidence securely and pass it to the DSL; do not retain personal copies.
- Consider whether the child is safe and sufficiently settled to return to class/activity and arrange appropriate support if not.

8. DSL Response, Risk Assessment and Case Management

8.1 Initial response principles

- All concerns are reviewed on the day of receipt; immediate-risk concerns require immediate action.
- The DSL applies professional curiosity and seeks the full picture without making assumptions.
- The child's welfare and voice remain central.
- Information is shared on a need-to-know basis.

8.2 Information gathering

The DSL gathers sufficient information to make a structured vulnerability and risk assessment. This may include:

- Clarifying with the referrer exactly what was seen, heard or reported, when and where it occurred, whether there is immediate risk and whether concerns have been observed before.
- Checking safeguarding, attendance, behaviour, academic, medical and relevant family records.
- Speaking, with appropriate confidentiality, to staff who know the child or have relevant observations.
- Speaking with the child where appropriate, sensitively and using open, non-leading questions.

8.3 Vulnerability assessment

Domain	Questions to consider
Nature of concern	What harm is alleged or suspected? Is it a one-off incident or a pattern?
Timing	When did it occur? Is the child currently at risk? Does the alleged perpetrator still have access?
Child's presentation	Is the child injured, distressed, withdrawn or frightened? Can they articulate what happened?
Child's vulnerability	Age, development, SEND, language/communication needs, previous concerns and ability to seek help.
Family context	Who cares for the child? What stressors and protective adults are present?
Alleged perpetrator	Relationship to child, access and any power imbalance.
History	Previous concerns relating to the child, family or alleged perpetrator.

Disclosure	What has been disclosed and what is known about the circumstances of disclosure?
Protective factors	Safe adults, willingness to accept help, safe places, routines and support networks.

8.4 Risk analysis and decision making

The DSL weighs risk factors against protective factors and reaches a professional judgement about the level and urgency of response. The decision and rationale must be recorded.

Risk level	General description	Typical source-document response
Immediate / Imminent	Significant harm is likely within hours without action.	Immediate protective action; child not returned to an unsafe situation; emergency services/external reporting before end of day.
High	Significant harm has occurred or is likely, although not necessarily within hours.	Urgent safety plan and external referral; parents informed unless they are a source of risk; urgent multi-agency/team-around-the-child response.
Moderate	Concerns could escalate without intervention; child is vulnerable but there is no evidence of immediate significant harm.	Parents normally informed; school-based and/or external support; monitoring plan and review date.
Low	Concern appears minor or explained by benign factors; no evidence of abuse or neglect.	Log, monitor and offer universal support as appropriate.

8.5 Decision safeguards and review

- Consider the risk of doing nothing and the risk of unnecessary intervention.
- Choose the least intrusive response that remains protective.
- Record information gathered, risk and protective factors, conclusion, rationale, action, responsible person and review date.
- Reassess when new information emerges, the plan is not working, the child's presentation changes or the review date is reached.

9. Actions, Support and Safety Planning

9.1 Internal school-based support

- In-school counselling
- Pastoral support plan
- Learning support review
- Peer mentoring/buddy support where appropriate
- Regular check-ins with a named adult
- Access to a safe/quiet space

9.2 External support

The DSL should maintain a current directory of vetted local and international providers, including mental-health providers, hospitals/clinics and appropriate community resources.

9.3 Safety planning

- School arrangements such as a trusted adult, supervised times/transitions and safe-space access.
- Home arrangements agreed with protective adults, including supervision and removal of means of harm where relevant.
- Community arrangements such as safe transport, avoidance of identified locations and emergency contacts.
- A clear review date and named person responsible for monitoring the plan.

9.4 Ongoing monitoring

- Maintain appropriate contact with the child.
- Liaise with relevant staff on a need-to-know basis.
- Review new information.
- Update risk assessment and plans.
- Document contact, observations and review decisions.

10. Information Sharing, Confidentiality and Record Keeping

- Confidentiality exists to benefit and protect the child; no member of staff may guarantee secrecy.

Safeguarding information must be processed and shared lawfully, necessarily and proportionately, with appropriate security and access controls. Under PRC personal-information law, information relating to children under 14 is sensitive personal information and requires heightened protection. The School will maintain specific rules and safeguards for processing such information. Statutory safeguarding or reporting duties, immediate protective needs and other lawful bases may require information to be shared without, or before obtaining, parental consent; the reason and legal/protective basis should be recorded.

- Information is shared on a need-to-know basis and decisions about sharing should be recorded.
- Clear records must be made of concerns, discussions, decisions, actions and the rationale for decisions.
- Records should be accurate, timely, secure and appropriately confidential.
- Where a pupil transfers school, safeguarding information should be transferred separately and securely from the main pupil file as soon as practicable, with confirmation of receipt. The transfer should include a clear structured summary distinguishing current risk and support needs from historic information. Where risk or support needs require continuity before transfer, the DSL should communicate directly with the receiving school in advance where lawful and appropriate. Receiving safeguarding information must be actively reviewed and used to support, not disadvantage, the child.

11. Working with Parents and Carers

The normal expectation is that the DSL will involve and inform parents/carers in supporting a child. The DSL has professional discretion over the timing and manner of parental involvement. Information should not be shared with a parent where doing so may increase risk to the child, compromise an investigation or protective response, expose another person to risk, or otherwise be contrary to the child's welfare or legal requirements. The decision

and rationale must be recorded. Routine parental contact does not require prior approval from the Head, although complex or high-risk cases should be discussed with the Whole School DSL and/or Head as appropriate.

Where a matter is also being managed under the Behaviour or Anti-Bullying Policy, the DSL's safeguarding decision about whether and when information may safely be shared takes precedence over routine expectations for parental notification. This does not prevent behaviour/ABC communication with parents once the DSL is satisfied that doing so will not increase risk or compromise protective action.

Where parents are involved, communication should be planned, proportionate and focused on the child's welfare, agreed actions, responsibilities and review.

12. External Reporting and Referrals

External reporting is coordinated by the Whole School DSL or the Head. Where delay would place a child at risk, an appropriately senior DSL may act in consultation with them where practicable. The School will make reports to relevant external authorities where required or necessary to protect a child. In Beijing this may include the Chaoyang Education Bureau (EDB) and/or the police, in liaison with the School's Government Affairs (GA) Department as appropriate. The absence of a single local referral pathway must not delay necessary protective action.

The DSL must record the concern, risk assessment, decision to refer or not refer, authority contacted, advice received, action taken and outcome. Where there is immediate danger or suspected criminal conduct, emergency or police involvement should not be delayed by internal process.

13. Child-on-Child Abuse

The School recognises that children can abuse other children and that the absence of reports does not mean abuse is not occurring. Concerns must first be treated as safeguarding matters and assessed through the safeguarding process. Where the reported conduct may constitute bullying, the matter will also be referred for determination and response under the Anti-Bullying Policy.

Child-on-child abuse and bullying overlap but are not synonymous. A serious single incident may constitute child-on-child abuse without meeting the School's definition of bullying, while repeated bullying may become a safeguarding concern because of its nature, severity, cumulative impact, power imbalance or the vulnerability of the child affected. Unkindness and mutual peer conflict should not be labelled as bullying unless the Anti-Bullying Policy criteria are met.

The School's Anti-Bullying Committee (ABC) fulfils the role of the student bullying governance body for HBJ. It is responsible, in accordance with the Anti-Bullying Policy, for prevention and education, determination of bullying where required, coordinated response, support and appropriate corrective action. Serious bullying involving suspected criminal conduct or public-order offences will be reported to relevant external authorities, including the police and education authority as appropriate.

Where both safeguarding and bullying procedures apply, the DSL leads the safeguarding risk assessment and protective response; the ABC determines whether conduct meets the School's definition of bullying and oversees the Anti-Bullying process. The two processes should coordinate information and avoid unnecessary repeated

interviews. Neither the ABC nor pastoral/behaviour staff should undertake safeguarding investigation beyond the information necessary for their role where this could compromise protective action or an external investigation.

- Take account of the wishes and needs of the child, age and developmental stage, SEND/disability and other vulnerabilities.
- Assess and manage risk, including the risk of further harm.
- Put support in place for affected children.
- Consider disciplinary and/or restorative action in accordance with the Positive Behaviour and Anti-Bullying Policies where appropriate. Detention, internal exclusion, suspension and other sanctions are behaviour responses, not safeguarding interventions. Safeguarding information may inform the proportionality, timing and safety of a sanction, taking account of age, development, SEND, vulnerability, context and impact.
- Maintain vigilance for sexual violence, sexual harassment, harmful sexual behaviour, bullying and online abuse.

14. Concerns and Allegations About Adults

14.1 Concerns that may meet the harm threshold

- An adult has behaved in a way that harmed or may have harmed a child.
- May have committed a criminal offence against or related to a child.
- Has behaved towards a child in a way indicating a risk of harm.
- Has behaved in a way indicating they may not be suitable to work with children.

Any concern or allegation against a member of staff, trainee teacher, volunteer, supply worker or contractor is reported directly to the Head immediately and followed up through the School's designated confidential recording system. A concern about the Head is reported directly to the Nominated Safeguarding Governor. Where the adult is employed, supplied or placed by a third-party organisation, HBJ retains responsibility for safeguarding pupils and will coordinate appropriately with that organisation rather than transferring responsibility to it.

14.2 Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted inconsistently with the Staff Code of Conduct but the behaviour does not meet the harm threshold. At HBJ these concerns are recorded on Confide and reviewed by the DSL and Head.

Post-allegation referral provisions are applied only where relevant to HBJ and the applicable jurisdiction.

15. Mental Health, Self-Harm and Suicidal Ideation

Mental-health concerns may be safeguarding concerns in their own right, indicators of abuse, neglect, exploitation or trauma, or factors that increase vulnerability. Staff should be alert to changes in behaviour, attendance, engagement, relationships, self-care, self-harm, suicidal ideation and other indicators of distress. Safeguarding and mental-health responses should be coordinated rather than treated as separate systems, with the DSL, counselling/mental-health staff and pastoral staff sharing relevant information on a need-to-know basis.

The School should also recognise the possible lasting impact of adversity and trauma on behaviour, mental health, wellbeing, attendance, engagement and educational outcomes. Support plans should consider both immediate safety and the child's ability to access learning and maintain trusted relationships.

the operational screening questions and response table are retained in Appendix B rather than the main policy. Use of the protocol must remain within staff competence and the School's approved safeguarding and counselling arrangements.

16. Staff Code of Conduct and Safer Working Practice

All staff must follow the Staff Code of Conduct and relevant digital-device requirements. Only authorised school devices should be used to photograph or video pupils for school purposes. Particular restrictions apply in Early Years. Visiting speakers must be appropriately supervised and recorded in accordance with school procedures.

17. Online Safety, Filtering and Monitoring

- Safeguarding includes online harm and misuse of technology and AI.

Online safeguarding should consider risks arising from content, contact, conduct and commerce, including misinformation/disinformation, pornography, grooming, exploitation, coercion, financially motivated sexual extortion, AI-generated abusive or sexual content, and harmful or discriminatory online cultures.

- The School assigns appropriate roles and responsibilities for filtering and monitoring internet/network use.
- The effectiveness of filtering and monitoring is reviewed at least once every academic year by the relevant senior leader, with support from the DSL and IT. The review should include checks that filtering is operating appropriately on internet-connected devices in relevant school locations, consideration of identified risks and incidents, and a written record of the review and any actions required.
- Relevant staff understand the systems in place, how concerns are identified and how they are escalated.
- Online safety is promoted through curriculum and wider-school provision.

The School should maintain clear expectations for pupil and staff mobile-phone/device use as part of its wider online-safety framework, with safeguarding, privacy, supervision and age appropriateness considered in the relevant digital/device policies.

- Cybersecurity arrangements should be robust, monitored and regularly tested.

18. Safer Recruitment

The School follows safer recruitment practices designed to deter unsuitable applicants, reject inappropriate candidates and prevent harm. Appropriate identity, qualification, employment-history, reference, criminal-record and other suitability checks are completed in accordance with PRC law, AISL requirements and the jurisdictions relevant to the candidate's history, and are recorded on the Single Central Register. HBJ uses KCSIE 2026 safer-recruitment principles as an international benchmark, including careful scrutiny of volunteers, contractors, trainees and third-party personnel, without importing UK-only DBS or regulated-activity duties where they do not apply.

The Group policy requires internal audit of safer recruitment and the SCR as part of safeguarding assurance.

19. Training

All staff, including staff who do not work directly with pupils, must receive and understand the School's core safeguarding information and procedures. HBJ will not rely on a shortened safeguarding briefing for non-teaching or non-pupil-facing staff; induction and annual updates must ensure a common baseline of safeguarding knowledge.

- New staff receive safeguarding training as part of induction.
- All staff receive safeguarding refresher training annually.
- DSLs, safeguarding team members and the Nominated Safeguarding Governor receive advanced/Level 3 training at least every two years, in accordance with the AISL Group Safeguarding Policy.
- Training includes online safety and is supplemented according to role and identified need.
- Training records are maintained.

20. Governance, Quality Assurance and Review

- Undertake an annual internal safeguarding audit and maintain a safeguarding action plan, including a mid-year progress review.
- Provide safeguarding reporting to the Governing Body at least annually.
- Participate in AISL safeguarding network, oversight and external review arrangements.
- Review policy and procedures following significant incidents and lessons learned.
- Ensure safeguarding-related policies are mutually consistent and appropriately cross-referenced.
- Remedy identified weaknesses without delay.

21. Supporting Pupils and Early Intervention

The School recognises the importance of acting early and of shared responsibility for safeguarding. School-based pastoral, counselling and learning-support systems should address emerging needs, strengthen protective factors and prevent escalation. Assessment and support should be child-centred, culturally informed, inclusive and alert to discrimination, racism and other factors that may affect a child's experience, willingness to disclose or access to support. Children should know whom they can approach for help, and sources of support should be visible and accessible.

The School provides an out-of-hours safeguarding contact for Upper School students: Help@harrowbeijing.cn.

Appendix A — Indicators and Contextual Factors

The following checklist of possible indicators of physical abuse, sexual abuse, neglect and emotional abuse, together with contextual factors relating to children and families, should be retained here substantially from the existing policy. It is an aid to recognition, not proof of abuse, and should be used with professional judgement.

- Physical indicators: bruises/welts, lacerations, burns/scalds, fractures, internal injuries and other unexplained or concerning injuries.
- Sexual abuse indicators: genital injury/pain, sexually transmitted infection, pregnancy, age-inappropriate sexual knowledge or behaviour, marked behavioural change and avoidance/fear responses.

- Neglect indicators: malnutrition, unmet health/dental needs, chronic poor hygiene, inadequate supervision, unsafe living conditions, educational neglect and abandonment.
- Emotional abuse indicators: developmental delay, failure to thrive, self-harm/suicidal thoughts, marked behavioural or academic change, persistent humiliation, rejection, fear-inducing behaviour and domestic abuse.
- Contextual factors should never be treated as evidence by themselves.

Source-guidance risk level	Source-guidance response
Low	Inform parents unless they are the risk; counsellor referral; regular check-ins and monitoring.
Moderate	Immediate counsellor assessment; parents informed; safety plan; reduce access to means; consider external referral.
High	Child not left alone; immediate mental-health referral; parents attend; consider emergency protection if parents cannot/will not keep child safe.
Imminent	Call emergency services; child remains with staff until emergency services arrive.

Appendix B — Detailed DSL Follow-Up and Case Management Guidance

B1. Initial Response Principles

When a concern is raised to the DSL, the following principles guide all follow-up action:

- **Timely Response:** All concerns must be reviewed on the day of receipt. Where a child may be at immediate risk, action must be taken immediately.
- **Professional Curiosity:** The DSL approaches every concern with an open mind, seeking to understand the full picture rather than making assumptions.
- **Child-Centred:** All discussions and decisions must prioritise the welfare and voice of the child.
- **Confidentiality on a Need-to-Know Basis:** Information is shared only with those who need it to protect the child.

B2. Information Gathering: What the DSL Needs to Find Out

Before any action is taken, the DSL must gather sufficient information to make a vulnerability assessment. This involves:

Speaking with the Referrer

- Exactly what was seen, heard, or reported? Distinguish facts from opinions.
- When and where did the incident occur?
- Was the child involved in the conversation? If so, what exactly did they say? Use their exact words.
- Are there any immediate safeguarding concerns?
- Has this been observed before?
- Has anyone else been informed?

Checking School Records

- Previous safeguarding concerns or reports

- Attendance patterns, including unauthorised absence, late arrivals and frequent illness
- Behaviour records
- Academic progress or sudden changes
- Medical information
- Any known family circumstances

Speaking with Other Staff

- Class teachers, tutors, or other staff who know the child well
- The school counsellor, if already involved
- Any staff who may have observed changes in the child's presentation

Speaking with the Child

Where appropriate, this must be done sensitively and by appropriately trained staff. The purpose is to understand the child's experience and immediate safety, not to conduct an investigation. See B6 for structured sentence starters.

B3. Vulnerability Assessment Framework

The DSL uses this framework to assess the level of risk and determine the urgency of response. It should be used to analyse all gathered information and reach a structured conclusion.

Domain	Questions to Consider
Nature of Concern	What is the alleged or suspected harm? Is it physical, sexual, emotional, or neglect? Is it a one-off incident or an ongoing pattern?
Timing	Did it happen today, recently, or in the past? Is the child currently at risk? Is the alleged perpetrator still able to access the child?
Child's Presentation	Is the child visibly injured, distressed, or withdrawn? Are they able to articulate what has happened? Do they appear frightened of going home?
Child's Vulnerability	Age, developmental stage, SEND, language barriers, previous concerns? Is the child able to seek help or protect themselves?
Family Context	Who is caring for the child? Are there known stressors such as financial difficulty, health concerns, domestic abuse, substance misuse or mental-health concerns? Is the family supportive or hostile? Are there protective adults?
Alleged Perpetrator	Is the alleged perpetrator a parent, family member, staff member, or other student? Do they have ongoing access to the child? Is there a power imbalance?
History	Have there been previous concerns about this child or family? Have there been previous concerns about this alleged perpetrator?
Disclosure Quality	Has the child disclosed directly? What is known about the disclosure and any subsequent recantation or pressure?
Protective Factors	Are there adults who can and will protect the child? Is the child willing to accept help? Are there safe places or routines?

B4. Reaching a Conclusion: Risk Analysis and Decision Making

Step 1: Identify Risk Factors and Protective Factors

The DSL should create a mental or written balance sheet. The examples below are prompts, not a scoring system.

Risk Factors (increase danger)	Protective Factors (decrease danger)
Alleged perpetrator has ongoing access	Protective adult believes child and can supervise
Child is very young or has SEND	Child is able to articulate concerns and seek help
Family is hostile or denies concerns	Family is cooperative and engaged
Previous concerns have been raised	No previous concerns
Child is visibly injured or distressed	Child appears well and presents normally
Parent is the alleged perpetrator	Non-abusing parent is protective and willing to act
No other safe adults in the family	Extended family support available
Child is afraid to go home	Child feels safe at home
Family under significant stress	Family has support networks and resources

Step 2: Apply the Four Levels of Risk

Risk Level	Description	Indicators / Examples	Typical Response in Source Guidance
Immediate / Imminent Risk	The child is likely to suffer significant harm within hours if no action is taken.	Serious injury; alleged perpetrator has access now; active suicidal plan with means; child alone with alleged perpetrator tonight; caregivers intoxicated/incapacitated and child unsafe; disclosure of imminent abuse.	Immediate protective action. Child not returned to an unsafe situation. Emergency services called. External reporting before end of day.
High Risk	The child has suffered or is likely to suffer significant harm, but not necessarily within hours. There is clear evidence of abuse or neglect.	Clear disclosure of abuse; visible injuries; pattern of neglect; severe parental mental-health/substance misuse concerns; suicidal ideation with intent; alleged perpetrator has access but child is currently safe.	Child not returned home without a safety plan. Immediate external referral as appropriate. Parents informed unless they are the risk. Urgent Team Around the Child meeting.
Moderate Risk	Concerns exist that could escalate without intervention. There is no evidence of immediate significant harm, but the child is vulnerable.	Low-level neglect; parent-child conflict; emotional-abuse concerns; child withdrawn or anxious; previous concerns without escalation; suicidal ideation without plan or intent.	Inform parents unless contraindicated. School-based support. Referral to external support where appropriate. Monitoring plan with review date.
Low Risk	Concerns are minor or appear to be explained by benign factors. No	Isolated incident explained; child appears well and supported;	May not require formal action. Monitor, offer universal support and log

	evidence of abuse or neglect.	family responsive and engaged; no previous concerns; child not expressing distress.	concern for future reference.
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Step 3: Apply the “What If?” Test

- What if I’m wrong and I do nothing? Consider the risk of inaction.
- What if I’m wrong and I intervene unnecessarily? Consider the risk of action.
- What is the least intrusive but still protective response?
- If this child were my own, what would I want to happen?

Step 4: Record the Decision-Making Process

The DSL must record not only the conclusion but the reasoning that led to it. This is essential for accountability and future review.

Field	Illustrative Entry
Concern Summary	Year 8 student disclosed to a friend that “Dad hits me when he’s angry.” Friend reported to tutor.
Information Gathered	Spoke to tutor and friend; checked records; child spoken with briefly. Child said father hit her with a belt the previous night, leaving bruising, and that this happens “sometimes” when father drinks. Mother was present but did not intervene. Child is afraid to go home.
Risk Factors Identified	Physical abuse disclosed; pattern suggested; mother not protective; alleged perpetrator has ongoing access; child afraid; parental alcohol misuse.
Protective Factors Identified	Child able to disclose; school is a safe place; extended family not yet assessed.
Risk Level Conclusion	High Risk.
Rationale	Clear disclosure of physical abuse with visible injury; possible ongoing pattern; no safe adult identified at home; child expresses fear of returning.
Action Taken	Protective action and external reporting/referral in accordance with the applicable procedure.
DSL Signature	Name and date.

Step 5: Regular Review and Reassessment

- New information emerges
- The agreed plan is not working
- The child’s presentation changes
- A review date is reached

B5. Structured Conversations with Children

When speaking with a child about a concern, the DSL should use open, non-leading questions. The goal is to understand the child’s experience without putting words in their mouth.

Building Rapport

- “I’ve noticed that you seem a bit worried today. Is there anything you’d like to talk about?”
- “I’m here to help if something is bothering you. You’re not in any trouble.”

- “Sometimes it helps to talk about things that are on our mind.”

Opening the Conversation

- “I wanted to check in with you because [adult’s name] was a little worried about something they saw. Can you help me understand what was happening?”
- “You said something earlier that made me think you might need some help. Can you tell me a bit more about that?”

Asking Open Questions

- “Can you tell me what happened?”
- “What happened next?”
- “How did that make you feel?”
- “Is there anything else you’d like to tell me?”

Clarifying Without Leading

- “When you said [child’s word], what did you mean by that?”
- “Who was there when that happened?”
- “Where did this happen?”
- “Has this happened before?”

Checking Safety

- “Is there anyone or anywhere that makes you feel scared?”
- “Is there a safe adult you can talk to at home?”
- “Do you feel safe going home today?”

Closing the Conversation

- “Thank you for talking to me.”
- “I’m going to do everything I can to help keep you safe.”
- “I might need to talk to some other adults who can help, but I will only tell people who need to know.”

Important Boundaries

- Do not promise to keep secrets.
- Do not investigate or interrogate; gather only the information necessary to understand the concern and immediate safety.
- Record the child’s exact words in quotation marks where possible.

B6. Actions and Support

Internal School-Based Support

Support Type	Description	When Used
In-School Counselling	Referral to school counsellor for short-term school-based support	Low to moderate mental-health concerns; child needing a safe space; behavioural issues linked to wellbeing
Pastoral Support Plan	Structured plan developed with the child, tutor and parents	Ongoing low-level concerns; return after safeguarding issue; behaviour concerns with underlying causes

Learning Support Review	Review academic provision and needs	Where safeguarding concerns may be linked to unmet SEND needs
Peer Mentoring / Buddy System	Older student assigned as a point of contact/support	Social isolation, transitions and low-level friendship issues, where appropriate
Regular Check-Ins	Named staff member meets child at agreed intervals	Ongoing monitoring; low-level anxiety or wellbeing concerns
Safe Space / Quiet Area	Identified space the child can access	Anxiety, trauma history or sensory needs

External Services

The DSL should develop and maintain a current directory of trusted external providers, including appropriate mental-health providers, hospitals/clinics and vetted community resources.

Safety Planning

- At School: named trusted adult, supervised breaks, monitored transitions and safe-space access.
- At Home: agreement with protective adults about supervision and removal of weapons/means where relevant.
- In the Community: avoiding identified locations, safe transport and emergency contacts.
- Review Date: a clear date for reviewing and adjusting the plan.

Ongoing Monitoring and Review

- Maintain regular, discreet and appropriate contact with the child.
- Liaise with staff who work closely with the child on a need-to-know basis.
- Review new information or concerns.
- Update the risk assessment and plan as needed.
- Document all relevant contact, observations and decisions.

B7. Information Sharing: Who Needs to Know What

The child's welfare is the paramount consideration. The DSL decides what information is shared, with whom and in what form, and records the decision and rationale.

Party	Circumstances for Informing	Information Normally Needed
Head / Principal	Significant concerns; serious harm; external reporting; potentially significant school/media implications.	Overview of concern, actions taken and external reporting as relevant.
Class Teacher / Tutor	Concern affects day-to-day welfare or support at school.	Need-to-know information only, such as presentation to monitor, agreed strategies or practical safety arrangements.
Other Relevant Staff	They need to monitor or support the child.	Minimum information necessary to carry out the safeguarding role safely.
School Counsellor	Mental-health/wellbeing concerns or therapeutic support is required.	Relevant information necessary for safe and effective support.
Parents / Carers	Most concerns, unless informing them may increase risk or otherwise be contraindicated.	Information appropriate to the situation and the safeguarding purpose.

Chinese Authorities	Where reporting is required by applicable law/procedure or authority oversight is required.	Information required for the report. Specific legal triggers to be verified in review.
Other Schools	Where a sibling or transferring child may be at risk and information sharing is appropriate/permissible.	Sufficient safeguarding information to enable the receiving school to protect the child/sibling.

Information Relevant Staff May Need for Day-to-Day Safety

- Medical conditions requiring emergency response
- Behavioural strategies agreed in a Pastoral Support Plan
- Supervision requirements
- Changes to collection arrangements
- Other information necessary for day-to-day safety

Staff should not be given full details of abuse unless those details are essential to their safeguarding role.

Information Normally Restricted to DSL Team / Head

- Specific details of abuse or neglect
- Information that could prejudice an external investigation
- Information about a staff member under investigation
- Information where wider sharing could place the child at risk

B8. Team Around the Child (TAC) Meetings

A Team Around the Child meeting should be considered where multiple professionals are involved, needs are complex and require coordination, progress needs formal review, or transition planning is required.

- Potential attendees: DSL, class teacher/tutor, school counsellor, parents, relevant external providers and Head where appropriate. The child may attend for part of the meeting if age-appropriate.
- Purpose: share relevant information, coordinate support, review progress and agree next steps.
- Outcome: a clear plan specifying actions, responsibilities and a review date, shared appropriately with attendees.

B9. Reporting to Chinese Authorities

Circumstances requiring immediate police reporting

- Suspected sexual abuse or abnormal injury to genital/private areas
- Sexual abuse involving a girl under 14
- Pregnancy or miscarriage suspected to result from sexual abuse
- Multiple injuries, severe malnutrition, altered consciousness or suspected domestic violence, bullying, abuse, assault or drugging
- Serious injury/death resulting from self-harm, suicide attempt, poisoning, assault or other abnormal cause
- Abandonment or prolonged absence of care
- Child of unknown origin, missing child, trafficking or purchase of a child
- Organised begging
- Other serious infringement of a minor's physical or mental health or imminent unlawful harm

Police reporting procedure

- Call 110 immediately.
- Identify the School/DSL role and state the nature of the safeguarding report.
- Provide the child's identifying details, nature of concern, known alleged-perpetrator information and current location as required.
- Record time of call and identifying details of the receiving officer where available.
- Follow up in writing if required and inform the Head.

Education Bureau reporting

- Persistent absence of a child of compulsory-school age after intervention
- Serious student bullying incidents
- Other safeguarding concerns where required by the Education Bureau

B10. Guidelines for Informing Parents

General Principles

In most cases, parents should be informed when the School has a safeguarding concern about their child. The child's safety remains paramount. Before contacting parents, the DSL should consider:

- Would informing parents put the child at immediate or increased risk?
- Is the alleged perpetrator a parent or family member?
- Is there a history or concern of domestic abuse or violence?
- Would the child be safe following the conversation?
- What support can be offered to the family?

Where there is doubt about safety following parental notification, the DSL should seek appropriate external advice before contact where this can be done without delaying necessary protective action.

When the School should consider not informing parents

- The alleged perpetrator is a parent/family member and notification may increase risk.
- Notification could jeopardise an external/police investigation.
- The child may be removed, coerced, silenced or otherwise placed at immediate risk.
- The child refuses consent, has sufficient age/understanding, and notification would not be in their best interests.

Preparing for the Conversation

- Gather relevant information and records.
- Speak with relevant staff who know the family.
- Clarify the purpose and intended outcome.
- Plan the structure and key points.
- Arrange for a second staff member to attend for support and as a witness.
- Consider whether a neutral, appropriately skilled interpreter is needed.
- Consider whether parents need a support person.
- Use a private setting and allow sufficient time.

During the Conversation: Key Principles

Principle	Application
Respectful and Non-Judgmental	Use clear, respectful language; avoid blame and labelling.
Clear and Direct	Be explicit about the concern, the School's responsibilities and any action that must follow.
Curious, Not Accusatory	Use open questions to understand the parent's perspective.
Child-Centred	Keep the focus on the child's safety and welfare.
Transparent	Be honest about next steps and any external reporting, subject to safeguarding constraints.
Empathetic	Acknowledge that safeguarding conversations may be difficult for parents to hear.

Scenario-Based Examples

General Welfare Concern: "We've noticed that [child] seems really tired lately and has been falling asleep in class. We're worried about them and wanted to check in with you to see if everything is okay at home. Is there anything going on that might be affecting their sleep or energy levels?"

Physical Injury: "I'm calling because [child] came to school today with a bruise on their arm that looked concerning. We have a duty to follow up on injuries that worry us. Can you help us understand how that happened?"

Possible Neglect: "We're worried about [child]. We've noticed [specific factual observations]. We wanted to talk with you to understand what may be happening and how we can support [child]."

Disclosure of Abuse by a Family Member other than the Parent being contacted: "This is a difficult conversation. Our concern is [child]'s safety and wellbeing. [Child] has told us something that we are required to take seriously. [Brief factual summary.] We need to take safeguarding action and will explain what happens next."

Parent is the Alleged Perpetrator: Any conversation should occur only when it is safe and appropriate to do so and in accordance with external advice/procedure.

Suicidal Ideation: "We're very worried about [child]. They have shared thoughts about wanting to die. We need to work together to keep them safe and arrange appropriate professional assessment/support."

Requesting Consent for External Referral: "We're concerned about [child]'s emotional wellbeing. We think they may benefit from specialist support. We can explain the options and support you with the referral process."

Managing Difficult Reactions

Parent Reaction	Suggested Approach
Anger / Hostility	Acknowledge the emotion, avoid argument, restate the child-centred purpose and refocus on next steps.
Denial	Acknowledge disagreement while explaining that the School must respond to safeguarding information and does not determine truth through the parent meeting.
Blaming the Child	Do not endorse blame; reinforce that children must be able to speak to trusted adults and refocus on support/safety.

Threats / Intimidation	End the conversation if necessary for safety; continue required safeguarding action and seek external support where appropriate.
Distress / Tears	Pause, offer time and practical support, while remaining clear about any actions that cannot be delayed.
Withdrawal / Silence	Allow processing time and consider a short break or follow-up, while explaining that necessary safeguarding action will continue.

After the Conversation

- Document the date, time, attendees, what was said, significant quotations and outcomes immediately.
- Confirm agreed next steps, responsibilities and deadlines.
- Where appropriate, confirm agreements in writing.
- Inform the child in an age-appropriate way about what has been discussed and what will happen next.
- Debrief/support staff involved where appropriate.
- Update the safeguarding record, risk assessment and plan.
- Set a review or next-contact date.

Recording the Conversation

- Date, time and location
- Names and roles of those present
- Purpose of the conversation
- Summary of discussion, including verbatim quotes where significant
- Parent response and views
- Agreements reached
- Actions, responsible persons and deadlines
- Review/next-contact date
- Any safeguarding concerns arising from the conversation itself

B11. Suicidal Ideation: C-SSRS / Columbia Protocol

Where there are concerns about suicidal ideation, the School uses the Columbia Suicide Severity Rating Scale/Columbia Protocol as part of its safeguarding response.

Screening Question / Area		Purpose
Wish to be dead or go to sleep and not wake up		Passive suicidal ideation
Thoughts about killing oneself		Active suicidal ideation
Thoughts about how this might be done		Method ideation
Intention of acting on the thoughts		Intent
Worked out details/plan and intention to carry it out		Intent with plan
Previous suicide attempt		Additional risk factor
Recent self-harm		Additional risk factor
Protective factors / reasons for living		Protective factors
Access to means		Immediacy and safety planning
Source-Guidance Risk Level	Finding	Source-Guidance Action
Low	Thoughts of death but no active ideation, intent or plan	Inform parents unless they are the risk; school counsellor referral; regular check-ins; monitor.

Moderate	Active ideation with method considered but no intent or plan	Immediate counsellor assessment; parents informed; safety plan; remove/reduce access to means; consider external referral.
High	Active ideation with intent and/or plan	Child not left alone; immediate mental-health referral; parents attend to collect where safe/appropriate; consider emergency protection if caregivers cannot keep child safe.
Imminent	Current plan, means available and intent to act soon	Call emergency services; child remains with staff until emergency services arrive.

All responses and decisions should be documented accurately and dated.

Change	Why / effect	Compliance basis	Position vs Group
PRC legal primacy	PRC law expressly established as HBJ's governing legal framework; UK guidance is a benchmark only.	PRC/local compliance	More explicit than Group; prevents UK statutory routes being treated as directly binding.
Pupil rights and dignity	Added pupil voice/dignity and prohibition of corporal, disguised corporal and humiliating punishment.	PRC school-protection duties	PRC-specific addition beyond Group.
External referrals	WS DSL/Head coordinate referrals; Chaoyang EDB/police with GA liaison as appropriate; unclear route must not delay protection.	PRC/local procedure	More locally specific than Group.
Bullying governance	ABC designated as HBJ's bullying governance body and safeguarding-to-ABC interface clarified.	PRC school bullying requirements	Local mechanism not specified by Group.
Sexual harm safeguarding-first	Sexual violence, harassment and HSB treated as safeguarding first; disciplinary routes cannot replace/delay safeguarding.	PRC + KCSIE 2026	Strengthens older behavioural framing.
Personal information	Heightened safeguards for under-14 personal information and lawful/proportionate sharing.	PRC PIPL	PRC-specific addition beyond Group.
Detailed DSL case management	Same-day review, structured vulnerability/risk assessment, rationale, safety planning, monitoring, TAC and	Operational best practice	Substantially more detailed than Group; deliberate enhancement.

	parent-meeting guidance integrated.		
Whole-workforce safeguarding knowledge	Common safeguarding baseline for all staff, including those not directly working with pupils.	KCSIE 2026	Reflects removal of shortened Part One route; goes beyond minimal role-based briefing.
Expanded vulnerability indicators	Modern slavery/trafficking, financial exploitation, teenage relationship abuse, child-to-parent abuse, young carers, medical needs and attendance/disciplinary patterns added.	KCSIE 2026 / Working Together 2026	Broader than Group.
Mental health and trauma	Explicit link between mental health, trauma, safeguarding and educational outcomes.	KCSIE 2026	More operationally explicit than Group.
HSB continuum and AI imagery	Continuum approach; safeguarding response to all nude/semi-nude imagery including AI/deepfakes; misogyny/misandry where safeguarding-relevant.	KCSIE 2026	Newer and more detailed than Group.
Online safety and filtering	Expanded online risks and annual recorded effectiveness review involving senior leader, DSL and IT.	KCSIE 2026	More prescriptive/auditable than Group.
DSL cover	Explicit reliable cover and secure shared route/equivalent when WS DSL unavailable.	KCSIE 2026	Strengthens Group deputy arrangements.
Safeguarding file transfer	Secure separate transfer, structured summary, confirmation of receipt and active review by receiving school.	KCSIE 2026	More detailed than Group; England-only deadlines not imported.
Third-party adults	HBJ retains safeguarding responsibility for trainees, supply staff, contractors and third-party personnel.	KCSIE 2026	Strengthens Group.
Safer recruitment localisation	KCSIE used as benchmark while UK-only DBS/regulated-activity duties are not imported; checks reflect PRC/AISL and relevant jurisdictions.	Local compliance + KCSIE 2026	Deliberate localisation of UK-derived Group wording.

Inclusive/culturally informed practice	Child-centred, culturally informed and anti-discriminatory practice, including racism and barriers to disclosure/support.	Working Together 2026 / CIS	Enhances Group and international-school applicability.
Cross-policy safeguarding precedence	Clarified safeguarding-first routing; distinction between child-on-child abuse, bullying and behaviour; DSL/ABC roles; MyConcern dual-recording; sanctions vs safeguarding interventions; and separation of behaviour categories from safeguarding risk levels.	Internal consistency + KCSIE/PRC safeguarding principles	Local operational clarification beyond Group policy; prevents the Group policy's broad statement that most peer harm is handled under Behaviour/Anti-Bullying from being read as behaviour-first.