

SAFEGUARDING AND CHILD PROTECTION POLICY

Including E-Safety



HARROW
LITTLE LIONS
EARLY YEARS CENTRE
哈罗小狮幼教中心



HARROW
INTERNATIONAL
SCHOOL
HAIKOU



HARROW
INNOVATION LEADERSHIP
ACADEMY
哈罗礼德学校
HAIKOU 海口

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Section 1: Introduction and Context

1.1: Harrow International School Haikou and Harrow Innovation Leadership Academy safeguarding philosophy and vision

Harrow International School Haikou and Harrow Innovation Leadership Academy (hereafter, HIS and HILA) unique philosophy is '*Educational Excellence for Life and Leadership*'. This drives the school's mission of ensuring that students are supported and empowered to achieve their academic and personal potential. The foundation for enabling this to be realized is our strong commitment to ensuring the highest standards of safeguarding and our active promotion of the welfare of children and young people. Safeguarding is a key component of the ethos of the school and there is an expectation that all stakeholders in our school community share and understand this commitment

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

HIS and HILA philosophy and vision are aligned with those of the United Nations Convention on the Rights of the child (UNCRC). Central to this is the acknowledgment that every child has basic fundamental rights. These include the right to:

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

Therefore, the welfare of the child is paramount;

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

This document outlines the various procedures we have implemented to make sure every child remains safe and happy. It applies to staff, volunteers and contractors working with pupils on school premises or away from the school on an activity, visit or other educational pursuit.

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

1.2: What is safeguarding?

1.2.1: Key definitions

Key Terminology
Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.
Members of staff refers to all those working for or on behalf of the school, full time or part time, including contracted staff such as cleaners and kitchen staff, temporary or permanent, in either a paid or voluntary capacity.
Child includes everyone under the age of 18. However, our duty to promote the welfare and health and safety applies to all students in our care whether they are under or over the age of 18.
Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, guardians, foster carers and adoptive parents.

1.2.2: Safeguarding at HIS and HILA



This includes:

- ensuring pupil health and safety;

- referring concerns or allegations about a child to the appropriate bodies promptly;
- bullying;
- all forms of abuse;
- harassment and discrimination;
- use of physical intervention;
- meeting the needs of pupils with medical conditions;
- providing first aid;
- drug and substance misuse;
- educational visits;
- intimate care;
- internet safety;
- issues which may be specific to a local area or population, for example gang activity;
and
- school security.

1.3: Designated Safeguarding Leadership Team

1.3.1: Designated Safeguarding Leadership Team at HILA:

Designated Safeguarding Lead	Jo Evans Assistant Headteacher	jevans@harrowhaikou.cn
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1.3.2: Safeguarding Committee Members

In addition to the DSL Team noted in 1.2, the following members of staff are sitting members of the safeguarding committee:

DDSL Boarding: Hattie Milton

DDSL E-Safety: Carlo Acosta

DDSL EY (EN): Meryl Fossey

DDSL EY (ZH): Selina Sun

DDSL PP (EN): Angus Moore

DDSL PP (ZH): Hailey Li

DDSL US (EN) Bonnie Ward

DDSL US (ZH) Lynne Li

The chair-person of the safeguarding committee is the Designated Safeguarding Lead, **Jo Evans**

1.3.3: Key safeguarding contacts:

Kelly Wailes	Headmistress	kwailes@harrowhaikou.cn
	Nominated Safeguarding Governor	Debra Price
EXTERNAL CONTACTS:		
Tim Gerrish OBE	International Child Protection Advisor	tim@icpa.co.uk
Council of International Schools: Safeguarding		info@cois.org
Local Police Service Government Offices and Agencies		Contact via Chinese Principal

1.4: Our safeguarding guiding principles

1.4.1: Core safeguarding principles

The School's core safeguarding principles are:

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

1.4.2: Core operational principles

- This policy applies to all students in the School policy but legally as some students will be 18 years and over they may be treated differently outside of school. Any student under the age of 18 will be regarded as a child for the purpose of this policy.
- All staff have a responsibility for the implementation of this policy;

- Any concerns regarding safeguarding and/or child protection must be reported using the safeguarding reporting procedure CPOMS 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 CPOMS 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 CPOMS Report as soon as practicable and within 6 hours.
- All staff must have read, completed an assessment on and act in accordance with Part One of the DfE Statutory Guidance *Keeping Children Safe in Education* (2019);
- All staff must know who the members of the Designated Safeguarding Leadership Team are;
- All safeguarding and child protection concerns must be treated in the utmost confidence;
- The DSL Team must report all concerns in line with the requirements of the People's Republic of China and in line with best practice as defined in the UK and through organisations such as CIS.
- Allegations of abuse in relation to adults must be dealt with in line with the associated policy.

1.5: Aims of the policy

- To raise awareness of all school staff of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To provide all staff with the necessary information to enable them to meet their child protection responsibilities;
- To promote safe practices and challenge poor and unsafe practices.
- To provide an environment where pupils feel safe, secure, valued and respected; confident to talk openly and sure of being listened to.
- To demonstrate the School's commitment with regard to child protection to students, parents and other partners.

There are seven main elements to our policy:

1. Establishing a safe environment in which students can learn and develop; include in the curriculum activities and opportunities, which equip children with the skills needed

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

1.6: Confidentiality and information sharing

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

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

Child protection information will be stored and handled in line with GDPR principles (please see data protection policy). Information is:

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

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

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

Child protection information will be stored separately from the child's and the file will be 'tagged' to indicate that separate information is held. Child protection records are normally exempt from the disclosure provisions of data protection. This means that students and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Head Master. In line with best safeguarding practices, data protection does not prevent the DSL from sharing information with relevant agencies/future schools, where that information may help to protect a child.

1.7: Key safeguarding policy links

Throughout this policy we refer to the following policies:

- [Keeping Children Safe in Education](#) (DfE, 2019)
- [The Education \(Independent School Standards\) Regulations](#) (DfE, 2014)
- [The Education Act](#) (DfE, 2002)
- [The Non-Maintained Special Schools Regulations](#) (DfE, 2015)
- [The Teacher Standards](#) (DfE, 2012)
- [Working Together to Safeguard Children](#) (DfE, 2018)
- [Prevent Duty Guidance](#) (DfE, 2015)
- [United Nations Convention on Rights of the Child](#) (UNCRC, 1990)
- [The PRC Law on the Protection of Minors](#) (PRC, 1991)

Section 2: Safeguarding Legislation, Guidelines and Procedures

2.1: Safeguarding legislation, guidance and compliance

HIS and HILA is committed to being compliant with all standards for safeguarding in China, in line with UK and the standards of the Council of International Schools (CIS). Due to their day-to-day contact with students, members of staff in schools and colleges are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that members of

school staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The School will act on identified concerns and provide early help to prevent concerns from escalating.

The UK

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

The statutory guidance '*Keeping Children Safe in Education*' (KCSIE) (2018) is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise, such as in conflict with the requirements of the PRC and as a result of the differing social services provisions in China compared to the UK.

All members of staff are required to have signed a Code of Conduct in relation to Safeguarding which includes a clause to confirm that they have read and understood at least Part One of the KCSIE (2021) guidance.

This guidance underpins HIS and HILA commitment to safeguarding.

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

The statutory guidance *Working Together to Safeguard Children* (DfE, 2021) covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children.

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

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

The People's Republic of China

The People's Republic of China (PRC) declares that it protects a wide range of children's rights through domestic legislation and by ratifying and joining the relevant international treaties such as the UNCRC. The PRC Constitution provides for the state protection of children, and prohibits maltreatment of children. Among many laws and regulations providing children's rights protection, the primary law in this field is *The PRC Law on the Protection of*

Minors (first passed in 1991, revised in 2006) (Minors Protection Law). The revised Minors Protection Law entered into force on June 1, 2007. This law sets up responsibilities of the families, the schools, and the government with regard to the protection of children's rights, and judicial protection, as well.

China has ratified major international documents with regard to children's rights protection. China's domestic legislation also provides protection for a wide range of children's rights.

2.2: Child protection procedures

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

KCSIE (2021) states that: 'Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.'

Sometimes a single traumatic event may constitute significant harm, such as poisoning or a violent assault. However, more often it is a compilation of significant events, both acute and longstanding, which can change or damage a child's physical and psychological development. Some children have a family and/or social circumstances where their health and development are neglected. For them it is the corrosiveness of long-term neglect, emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm.

2.2.1: Recognising abuse

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

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

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

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

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

This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The above categories are identified by the NSPCC, and definitions have been taken from *Working Together to Safeguard Children* (DfE, 2018) and *KCSIE* (DfE, 2018).

Peer on Peer Abuse (Child on Child)

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse).

Peer on peer abuse is most likely to include, but may not be limited to:

bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- threatens and/or encourages physical abuse); sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

All staff should recognise that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature.

Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

This may include an online element which facilitates, threatens and/or encourages sexual violence); ‘upskirting’, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and initiation/hazing type violence and rituals causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery); harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

2.2.2: Specific safeguarding issues

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

- bullying including cyber bullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults strategy
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking

Annex A of KCSIE (2019) contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff that work directly with children should read the annex.

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

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

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

2.2.3: Bullying

This should be read in conjunction with the School's Anti-Bullying Policy.

Bullying is defined as: when an individual or group of people with more power, repeatedly and intentionally cause hurt or harm to another person or group of people who feel helpless to respond. Bullying is not:

- single episodes of social rejection or dislike
- single episodes or acts of nastiness or spite
- random acts of aggression or intimidation
- mutual arguments, disagreements or fights.

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures. Housemasters/Year Group Leaders will keep records of bullying-type behavior and through consultation with the Head of School and Assistant Head, who will record and track as a bullying incident through CPOMS. The School's Anti-Bullying Policy is reviewed on an annual basis.

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

2.2.4: Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that members of staff are also aware of the range of behavioural indicators of abuse and report any concerns following the School's safeguarding concern reporting procedure.

A child who is being abused or neglected may:

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

- display sexual knowledge or behaviour beyond that normally expected for their age.

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

2.2.5: Impact of abuse

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

2.2.6: ‘It could happen here’ culture

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

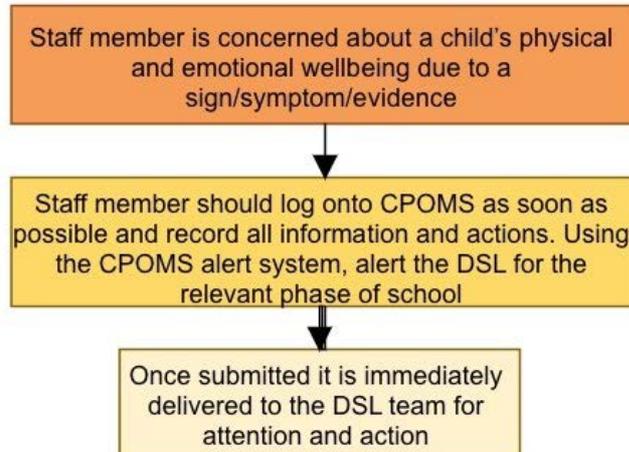
- in an emergency take the action necessary to immediately help the child;
- follow the School’s safeguarding reporting procedure.
- do not start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- seek support for yourself, if you are distressed.

2.3: Safeguarding reporting procedure

2.3.1: 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 Haikou Safeguarding Concern Reporting Procedure



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 CPOMS Report.

2.3.2: What to do if a child discloses abuse or significant harm to you

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

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

During their conversations with the children members of staff will:

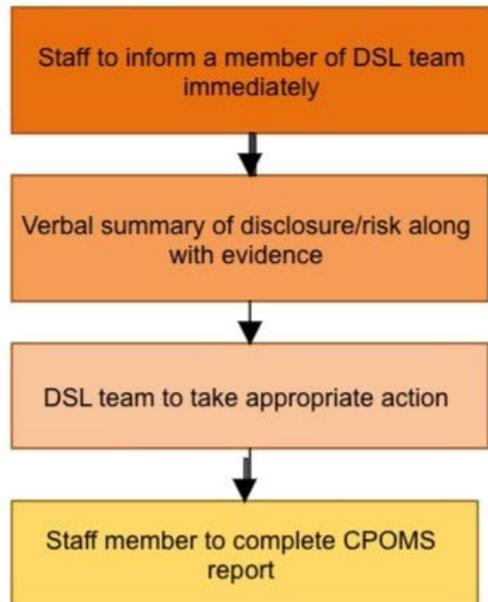
- allow them to speak freely;
- remain calm and not overreact – the child may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’;
- not be afraid of silences – members of staff must remember how hard this must be for the child;
- under no circumstances ask investigative questions – such as how many times this

has happened, whether it happens to siblings too, or what does the student's parent(s) think about all this;

- at an appropriate time tell the child that in order to help them, the member of staff must pass the information on;
- not automatically to offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but could be interpreted by the child to mean that they have done something wrong;
- tell the child what will happen next. The child may agree to go to see the DSL. Otherwise let the child know that someone will come to see them before the end of the day;
- report verbally to the DSL, even if the child has promised to do it by themselves;
- write up an accurate and objective account of the conversation as soon as possible;
- once you have spoken to the DSL and handed over your written account, complete a CPOMS report.
- seek support from a member of the DSL team if you feel distressed.

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

Harrow Haikou safeguarding Concern report procedure for Child Disclosure/significant or immediate risk



2.3.3: Notifying parents about safeguarding concerns

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

2.3.4: Children and families requiring external/additional support

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

Section 3: Specific Safeguarding Issues:

3.1: Children with sexually harmful behaviour

Staff will be sensitive to the nature of relationships within a boarding setting which will be different to students in a day school and respond accordingly. It is important to recognise the potential for abuse by peers. With regards to student-on-student abuse staff will refer such abuse to the DSL Team using the safeguarding concern reporting procedure. The DSL will consult with external professional and/or agencies where there is a risk of significant harm. Allegations of student-on-student abuse will involve parents being contacted.

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

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

3.2: Sexual exploitation of children

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

3.3: The Prevent Duty

The Prevent Duty is an effort to prevent people from being drawn into terrorism – this is a global concern. We expect school staff to use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Members of staff, who have concerns about a pupil, will make these concerns known following the School's safeguarding reporting procedure. The DSL will then make a judgement as to whether or not it is appropriate to make a referral to external agencies in China or the appropriate embassies for foreign nationals.

3.3.1: Signs of vulnerability to terrorist influence/attraction or radicalisation

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

Signs of vulnerability include:

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

3.3.2: Indicators of radicalization or extremism

Early indicators of radicalisation or extremism may include:

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

3.4: Female Genital Mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. FGM is illegal in the UK and not a practice that is deemed safe for children at HBJ.

Members of staff should recognise the possibility that a girl may disclose information relating to a sibling or close friend who has suffered abuse in the form of FGM. At HBJ any disclosures

of information or concern regarding possible FGM should be reported to the DSL Team immediately following the procedure for disclosure/immediate and significant harm reporting.

Section 4: Roles and Responsibilities

4.1: Professional expectations

At Harrow Haikou safeguarding is the responsibility of all staff members. Their primary duty is to ensure the safety and well-being of our students.

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

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

4.2: The Designated Safeguarding Lead (DSL)

- has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff;
- receives updated child protection training at least every two years;
- acts as a source of support and expertise to the School community;
- encourages a culture of listening to children and taking account of their wishes and feelings;
- is alert to the specific needs of children in need or those with Special Educational Needs;
- has a working knowledge of Harrow Haikou procedures;
- has an understanding of locally agreed processes for providing early help and intervention;
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from the child's general file;
- immediately refers cases of suspected abuse to local services or the Police as appropriate;
- where students leave the School, ensures the child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file;
- attends and/or contributes to child protection conferences;
- coordinates the School's contribution to child protection plans;

- develops effective links with relevant statutory and voluntary agencies
- ensures that all staff sign to indicate that they have read and understood the Child Protection Policy and safeguarding code of conduct;
- ensures that the Child Protection Policy is regularly reviewed and updated annually;
- liaises with the Nominated Governor and the Headmistress as appropriate;
- ensures that a record of staff attendance at child protection training is kept;
- makes the Child Protection Policy available publicly, on the School's website or by other means;
- ensures parents are aware of the School's role in safeguarding and that referrals about suspected abuse and neglect may be made;
- in the Headmistress' absence, ensures cases concerning a member of staff are referred appropriately to the Chair of Governors and/or the Disclosure and Barring Service (DBS); and
- submits an annual report to the Governing Body about how the School's duties have been carried out. Any reported weaknesses will be rectified by the DSL without delay.

4.3: The Deputy Designated Safeguarding Lead (DDSL)

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

4.4: The Governing Body

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

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

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

4.5: The Head Mistress

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

4.6: The Student Support Committee

- will be chaired by the DSL
- membership comprises the Headmistress, Assistant Headteacher, Chinese Principal, Heads of School, Boarding and Day HMs, Head of Inclusion, who will review or raise Child Protection or Safeguarding issues as part of their work;
- will help to coordinate arrangements for the longer-term protection and support of each child who has made allegations of abuse, or is alleged to have suffered from abuse, taking his/her wishes into account;
- will make arrangements where feasible for any child who has been the subject of abuse to receive necessary counselling and support by agreement with his parents, where appropriate;
- will support any child who is subject to a Child Protection Plan; and
- will ensure through a Housemaster/ class teacher that appropriate support and safeguards are in place together with a Care Plan where appropriate.

4.6.1: Functions of the Student Support Committee

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

4.7: Residential Boarding Staff (Housemistress/masters, Matrons and Assistant Housemistress/master)

All residential staff, principally Housemistress/masters, and Assistant Housemistress/masters will be trained to Level III safeguarding. Matrons will undergo internal safeguarding training and dependent on English levels will complete at least to level 2 training. Harrow Haikou recognises that, as a boarding school, as well as a day school, Housemasters, Assistant Housemasters and Matrons are likely to be on the frontline in terms of safeguarding and child protection. Housemasters, Assistant Housemasters and Matrons will report all child protection and safeguarding concerns using the appropriate safeguarding reporting procedure. Harrow Haikou has a procedure for dealing with a lost or missing child. In addition to the Safeguarding policy, reference can be made to the Attendance policy. A Housemistress/master or a duty member of the boarding staff is most likely to deal with such instances. Directions on how to report and manage a safeguarding concern in the boarding house are detailed in the Boarding Handbook.

4.8: Senior students in positions of responsibility

Senior children who hold positions of responsibility over other children (e.g. School Prefects) will be briefed on appropriate action to take should they have concerns or receive any allegations of abuse. This training will be provided by the DSL within 4 weeks of appointment/election. Senior students and the house council will meet with the DSL at least annually to review and reflect upon safeguarding issues through the lens of the student body.

4.9: School doctors and the clinic staff

The Clinic will hold copies of Working together to Safeguard Children (DfE, 2019) and Keeping Children Safe in Education (DfE, 2019) and have its own protocols for recognising and acting upon signs of child abuse. These will include [RCN Safeguarding children and young people \(2014\)](#). Nurses will work in accordance with the [Nursing & Midwifery Council's Code of Conduct](#). They will liaise closely with the DSL Team.

The School on Call Doctor will have his/her own legal and contractual obligations to report the same. Clinic staff will undergo annual safeguarding training delivered by the school's DSL and will be invited to participate in any school CPD that is concerned with the welfare and protection of children.

Section 5: Good practice guidelines and staff code of conduct

5.1: Staff professional conduct

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

Members of staff are expected to follow the guidance given in the document 'Guidance for Safer Working Practice for Adults who Work with Children and Young People' (DfE, 2009) and Working Together to Safeguard Children (DfE, 2018).

Good practice includes:

- treating all children with respect;
- setting a good example by conducting themselves appropriately;
- involving children in decisions that protect them;

- encouraging positive, respectful and safe behaviour among children;
- being a good listener;
- being alert to changes in children' behaviour and to signs of abuse and neglect;
- recognising that challenging behaviour may be an indicator of unhappiness or abuse;
- reading and understanding the School's Child Protection Policy and guidance documents on wider safeguarding issues, including: Anti-Bullying, Behaviour, Expeditions, E-Safety, First Aid, Health & Safety, Confidentiality & Information-sharing, Drugs & Legal Highs;
- asking the child's permission before initiating physical contact, physical support during PE, touching during music lessons for the purposes of demonstration or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language;
- meeting with a child in a room where the teacher can be seen so that a child is never a risk or the teacher open to false allegations
- ensuring that students bathrooms and changing rooms are never used or frequented by adults and staff
- being aware that the personal and family circumstances and lifestyles of some children may lead to an increased risk of abuse;
- applying the use of reasonable force/restraint only as a last resort and in compliance with the School policy on Safer Restraint;
- referring all concerns about a child's safety and welfare using the appropriate reporting procedure;
- following the School's rules with regard to communication with children and use of social media and online networking;
- following the School's policy on Screening and Searching in Behaviour Management Policy students; and
- following the School's Transport and Bus Policy.

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

5.2: Abuse of trust

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

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

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

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

5.3: Children who may be particularly vulnerable

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

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

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

This list provides examples of particularly vulnerable groups but is not exhaustive. These students are monitored primarily through the SSC. They are discussed at termly

Safeguarding Committee meetings and information on their well-being is provided through our close, personal approach to tutoring.

5.4: Missing children

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

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

The Governing Body recognises that it should put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

5.5: Helping children to keep themselves safe

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

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

5.6: Support for those involved in a child protection issue

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

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

Section 6: Staff training and complaints procedure

6.1: Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. Academic staff have access to online training via the AISL Academy and will be expected to undertake regular training in this on specific modules. All staff have face to face training annually to ensure that they understand KCSIE (part 1) and our safeguarding procedures at Harrow Haikou.

- New staff and governors will receive an explanation during their induction, which includes the School's child protection and safeguarding policy and procedures, reporting and recording arrangements, professional guidelines and the staff code of conduct.
- All staff will receive an electronic version of Part 1 of KCSIE (2021) as part of their induction and/or annually as part of their safeguarding training. Each staff member must complete an electronic form to indicate their understanding of the document and its application to Harrow Haikou.
- All staff will attend an annual safeguarding procedure update, for which a paper register is taken, that will cover the following content:
 - What is safeguarding and child protection
 - The membership of the DSL Team
 - What are the types of abuse
 - What are the signs and indicators of abuse
 - How to report safeguarding concerns about students and staff
 - How to respond to student disclosures of abuse or significant harm
 - The School's safeguarding reporting procedure
 - Context important safeguarding issues

- Whistleblowing procedures
- All staff, including the Head Mistress and governors will receive training that is regularly updated, in line with advice from the relevant statutory bodies in the UK and internationally and must read at least Part One of KCSIE (2019);
- The DSL, DDSL and other staff as appropriate will receive child protection training updated at least every two years, including training in inter-agency procedures as appropriate in an international setting;
- Temporary staff and volunteers in regulated activity will have receive safeguarding training at induction and annual refresher.
- Visitors and visiting staff will be supervised by a member of the School staff at all times;
- All staff supplied by other bodies will be made aware of the School's procedures, policy and the contact details of the DSL team.

6.2: Safer recruitment

The School endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in '*Keeping Children Safe in Education*' (DfE, 2018) and the School's own policies and procedures together with procedures pertaining to contractors, coaches and partners etc.

Safer recruitment means that all applicants will:

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

For local staff:

- Last two employers' employment certificate showing the employment duration and the roles you once took in these places
- Social insurance participation history matching your employment as above (previous two employers)
- Name and contact details of someone we can contact for an oral check in your two previous posts
- Updated non-criminal history check by the police – HR will contact you if you haven't provided a recent update (within the last 12 months)

Safer recruitment also means that the School will ensure that:

- the candidate's mental and physical fitness to carry out their work responsibilities is verified;

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

Full details of the School's recruitment procedures are to be found in the Safer Recruitment Policy.

6.2.1: Volunteers and supervised volunteers

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

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

6.2.2: Contractors

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

6.3: Complaints Procedure

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

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

6.4: If a staff member has concerns about a colleague

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

to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported directly to the Head Mistress. If the Head Mistress is unavailable you should consider reporting to the DSL. Complaints about the Head Mistress should be reported to the Chair of Governors.

6.5: Allegations against staff

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

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

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

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

The full procedures and UK statutory guidance for dealing with allegations against staff can be found in KCSIE (DfE, 2021).

Section 7: Site Safety and Security

7.1: Site safety

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

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

7.2: Third Party use and off-site arrangements

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

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

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

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

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

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

7.4: External organisations who have responsibility for children on another site

When our children attend offsite activities, including day and residential visits and work-related activities, we will check that child effective child protection arrangements are in place, as outlined in the Schools' trip risk assessments.

7.5: Children staying with host families

The School may in the future make arrangements for children to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the School follows the guidance in 'Keeping Children Safe in Education' (DfE, 2021), Annex C to ensure that hosting arrangements are as safe as possible.

7.6: Photography and images on site

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

To protect our children we will:

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

7.7: E-safety (including staff use of social media – see Appendix)

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

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

- **ICT Acceptable Use Policy** - protects all parties by clearly stating what is acceptable and what is not. Children are expected to sign up to this at the start of each academic year and before access can be given to the School's ICT facilities.
- **Induction and Education** - all children are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. Subsequently, House Tutors remind children at the start of each academic year about their obligations and code of conduct. This is reinforced by a presentation in Houses about E-Safety.
- **Monitoring** -the School will exercise its right to monitor the use of computer systems, including the monitoring of internet use, interception of e-mails and the deletion of inappropriate materials at all times. In circumstances where the School believes unauthorised use of the computer system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the School reserves the right to inform appropriate authorities and provide documentary evidence. The computer network is owned by the School and may be used by children to advance and extend their knowledge and understanding.

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

7.7.1: Direction for staff on e-safety

Staff should:

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

END

APPENDIX A: SAFEGUARDING COMMITTEE

1.1. Terms of reference

The committee is responsible for:

- The development and regular review of the school's policies and procedures with regard to Safeguarding
- The development and delivery of relevant and up-to-date safeguarding policy training for all staff
- Maintaining a safeguarding action plan to ensure constant reflection and improvement in operations
- Ensuring easy access to the safeguarding policies, procedures and guidance for all staff

The committee meets, as a minimum, once every term.

APPENDIX B: INFORMATION FOR PARENTS

Child Protection: Safeguarding Students – Information for Parents

Harrow Haikou aims to safeguard and promote the welfare of the children in its care and protect them from serious harm. This applies to the boarding and day environment and all the activities the School undertakes. Staff and volunteers are vetted for their suitability to work with children prior to appointment. They receive training in safeguarding and child protection. They will report any concerns in accordance with official local safeguarding procedures. The School has a Child Protection and Safeguarding Policy, which is regularly reviewed and this is available on the School's website. ^[1]_[SEP]

It is important for parents to be aware that:

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

APPENDIX C STAFF SOCIAL MEDIA USE

A. PURPOSE AND PRINCIPLES

1. To provide guidelines for the use of social media by school employees.
2. It is crucial that pupils, parents and the general public have confidence in the school's decisions and standards. The principles set out in this policy are designed to ensure that staff members use social media responsibly so that confidentiality of pupils and other staff and the reputation of the school are safeguarded.
3. The school recognizes – embraces even – the potential of social media and other Web 2.0 technologies to impact positively on education and the workplace.
4. Nonetheless, there are pitfalls. This policy aims to draw attention to these and to guide staff appropriately so that their use of social media is judicious and edifying.
5. Not least, staff members must be conscious of the need to keep their personal and professional lives separate at all times. The unique context within which we operate in Harrow Beijing can blur some of these lines. Staff, spouses and dependents are expected to be appropriately mindful of this complexity.

B. SCOPE

1. This policy applies to Harrow Haikou teaching and other staff employed directly by the School, their spouses, partners and dependents, external contractors providing services on behalf of the school (such as school trip/expedition external providers, PCS, consultants, "chaperones", etc.), teacher trainees and other trainees, volunteers and other individuals who work for or provide services on behalf of the school. These individuals are collectively referred to as 'staff members' in this policy. Essentially, if you are an adult on campus, whether employed or not by the School, this policy applies to you.
2. This policy covers personal use of social media as well as the use of social media for official school purposes, including sites hosted and maintained on behalf of the school.
3. Harrow Haikou could be held vicariously responsible for acts of their employees in the course of their employment. For example, staff members who harass students, parents, co-workers online or who engage in cyber bullying or discrimination on the grounds of race, sex, disability, etc. or who defame a third party while at work may render Harrow Haikou liable to the injured party.

C. SPECIFIC GUIDANCE

1. As in all your interactions with others, whether on or offline, be professional, responsible and respectful.
2. When using social media, be conscious at all times of the need to keep your personal and professional life separate. You should not put yourself in a position where there is a conflict between your work for the School and your personal interests. Err on the side of caution.
3. You must not engage in activities involving social media which might bring Harrow Beijing into disrepute.
4. You must not represent your personal views as those of Harrow Beijing on any social medium.
5. You must not discuss personal information about Harrow Beijing pupils, staff and other professionals you interact with as part of your job on social media.

6. You must not use social media and the internet in any way to attack, insult, abuse or defame pupils, their family members, colleagues, other professionals, other organisations or Harrow Haikou as an institution.

7. You must be accurate, fair and transparent when creating or altering online sources of information on behalf of Harrow Haikou.

8. Staff members must not edit open access online encyclopedias such as Wikipedia in a personal capacity at work. This is because the source of the correction will be recorded as the employer's IP address and the intervention will, therefore, appear as if it comes from the Harrow Haikou itself.

9. Staff must not upload any content regarding Harrow Haikou students and parents to their own personal social media accounts.

D. PERSONAL USE OF SOCIAL MEDIA

1. Staff members must not identify themselves as employees of Harrow Haikou or service providers for the school in their personal web space (use of professional web space such as LinkedIn is up to the user's discretion, keeping in mind that anyone such as parents, students and colleagues can access your profile). This is to prevent information on these sites being linked with the School and to safeguard the privacy of staff members, particularly those involved in providing sensitive front line services.

2. Staff members must decline 'friend requests' from current pupils they receive in their personal social media accounts.

3. Staff members must not 'check in' or tag their photos/videos at Harrow Haikou (this includes, but is not limited to, Facebook, Instagram, Twitter, Pinterest).

4. Harrow Haikou only permits limited personal use of social media while at work. Staff members are expected to devote their contracted hours of work to their professional duties. Personal use of the internet or social media should not occur during contact time (for teachers and teacher assistants). Caution is advised when inviting work colleagues to be 'friends' on personal social networking sites. Consider carefully the amount of personal information you want to disclose to those you work with on a daily basis.

5. Staff members are strongly advised to ensure that they set the privacy levels of their personal sites as strictly as they can and opt out of public listings on social networking sites in order to protect their own privacy. For Facebook we have set up this document to help staff – though things change regularly, please check.

E. COMMUNICATION

1. School email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such media. The use of a School email addresses to create or join a School sanctioned social media site is, however, appropriate. Staff should refer to the Staff Code of Conduct.

2. On leaving the service of Harrow Haikou, staff members must not contact Harrow Haikou's current pupils by means of personal social media sites. Similarly, staff members must not contact current pupils from their former schools by means of personal social media unless they are family-related/close friends with parents. You are advised to maintain professional conduct while communicating with former students for work or personal reasons

3. Staff members must not have any contact with pupils' family members through personal social media if that contact is likely to constitute a conflict of interest or call into question objectivity.

4. Staff members must not have contact through any personal social medium with any current pupils, whether from Harrow Haikou or any other school, unless it is for professional contact or the pupils are family members.

5. If staff members wish to communicate with pupils through social media sites or to enable pupils to keep in touch with one another, they may only do so with the approval of the School and through official school sites created according to the requirements in the Appendix.

6. Staff members using social networking tools to support professional practice must thoroughly research the privacy settings, follower options and linking opportunities of the proposed social medium and ensure the safety and reputation of the school, and those associated with it, as outlined within this policy.

F. PHOTOGRAPHS, VIDEOS

Photographs, videos or any other types of image of pupils must not be uploaded onto personal social media unless family consent has been given. For example if your child is friends with a fee-paying student whose parents have agreed to the upload of pictures of the children, then this is acceptable. If not, then it is not.

1. Staff may often find themselves organizing events at which parents wish to take photographs of children. We do not prevent parents from doing this – indeed we encourage it: childhood is fleeting and special. The principal exception to this liberal approach to photography is around the swimming pool and in any other areas of the school where children may be in partial states of dress (signs are often posted in such areas).¹ Nonetheless, we advise staff to read out this statement, or something very similar, before a given event begins:

Please do not take photographs during today's proceedings. However we ask that, as a matter of courtesy, you do not post photographs of other people's children onto publicly accessible sites unless you have actively sought permission to do so.

2. We do not proscribe the taking of photographs and videos on a personal device (special moments that merit capturing often occur at unexpected moments), however we ask that staff delete such photos from their devices and any personal cloud storage within 72 hours of being connected to the School network.

G. EXAMPLES OF DO'S AND DON'TS (for further clarification)

DO:

- Take a photo of your own child winning an award
- Take a photo of Harrow Lake with captions "It's a beautiful day!"
- Use your Harrow email account to communicate with students at their Harrow email account
- Use your school-sanctioned social media account to post asynchronously about off-site trips and events

DON'T:

- Take a photo of your class in school or on a school trip and upload it on social media, whilst indicating the location of where the picture has been taken
- Take a photo of Harrow students and 'check in' or indicate that you are at Harrow Haikou or elsewhere

- Use social media (such as Facebook, Instagram, Twitter, YouTube, etc) or chat (iMessage, WhatsApp, SnapChat, LINE, etc) to communicate with students for non-professional purposes or in ways which contravene safeguarding best practice.

H. CHILD PROTECTION AND SOCIAL MEDIA

1. Any images of students that are of sexual nature, whether distributed on social media or stored privately, are child abuse images (child pornography). Staff who are aware of any student possessing such images should confiscate the device that contains the images and immediately report this to the relevant DSL.

2. Any member of staff found in possession of such images will immediately be referred to the authorities where criminal proceedings will begin.

3. Please refer to our Safeguarding policy for further clarification.

I. USING SOCIAL MEDIA ON BEHALF OF HARROW HAIKOU

1. Staff members can only use officially sanctioned school social media tools for communicating with pupils or to enable pupils to communicate with one another. Staff must follow the procedures outlined in the Appendix when setting up these accounts.

2. There must be a strong pedagogical or business reason for creating official school social network sites to communicate with pupils or others. Staff must not create sites for trivial reasons which could expose the School to unwelcome publicity, unsuitable material, or damage its reputation 3. Official school sites must be created according to the requirements specified in the Appendix of this document. Sites created must not breach the terms and conditions of social media service providers, particularly with regard to minimum age requirements. Staff members must not mention names or places when posting photographs. If posting a photograph of a student, they must not be posted at the time of the event nor specify location.

4. Staff members must at all times act in the best interests of children and young people when creating, participating in or contributing content to social media sites. We are responsible for the safeguarding and protection of children.

J. BREACHES OF POLICY

1. Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved, in line with Harrow Haikou disciplinary policy and procedures.

2. A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of Harrow Haikou or any illegal acts or acts that render Harrow Beijing liable to third parties may result in disciplinary action.

K. SOCIAL MEDIA SITE CREATION APPROVAL FORM

Use of social media on behalf of Harrow Haikou must be approved prior to setting up sites. It is vital that staff members wishing to use social networking tools to support their professional role properly research the security and privacy settings of the proposed medium in order to ensure the safety, security and reputation of Harrow Haikou and its community. Please find the form attached to this policy.

APPENDIX D – INTIMATE CARE POLICY

1. Policy Statement

This policy applies to staff with responsibilities for the intimate care of children at Harrow Haikou. This policy outlines the guidelines for best practice.

Intimate personal care includes hands-on physical care in personal hygiene, and physical presence or observation during such activities.

Intimate personal care tasks can include:

- body bathing other than to arms, face and legs below the knee.
- toileting, wiping and care in the genital and anal areas.
- dressing and undressing.
- application of medical treatment, other than to arms, face and legs below the knee
- supporting with the changing of sanitary protection

This policy and the provision's practices will be reviewed periodically.

Harrow Haikou is committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times. Harrow Haikou recognises that all children need to be treated with respect when intimate care is given. No child should be attended to in such a way as to cause distress, discomfort or pain.

Intimate care is discussed with all employees involved in the intimate care of children. Staff receive regular supervision and appraisals, which are used to identify any areas for development or further training.

2. Our approach to best practice

All aspects of intimate care need to be carefully planned and consistently carried out. The child who requires intimate care is treated with respect at all times. The child's welfare, dignity and right to privacy are of paramount importance.

Each child should be involved in their intimate care and should therefore be supported to achieve the highest level of autonomy. However, age and abilities of each child need to be taken into consideration. Staff should allow all children to be as independent as possible. This may mean giving the child responsibility for removing their clothes or cleaning themselves. All adults involved in intimate care tasks should inform the child about all actions carried out throughout. Only adults that are known to the child will be tasked with intimate care responsibilities.

Individual intimate care plans will be drawn up if required by individual circumstances.

Parents should be informed about the intimate care given to their child.

Each child's right to privacy will be respected. Individual care tasks will be carried out in our toilet areas which are separate from the learning areas but still visible to other staff. Staff should carefully consider and regularly review individual situations to determine how many adults may need to be present during intimate care tasks. Should it be deemed necessary for more than one adult to be present, appropriate reasons to be given and recorded.

Any incidents occurring during intimate care should be immediately reported to the line manager. Such incidents might be:

- Staff accidentally hurting a child
- The child seemed sore or unusually tender in the genital area

- The child misunderstood or misinterpreted something
- The child had a very strong emotional reaction without apparent cause (sudden shouting or crying)

All staff must ensure that they protect themselves by following these guidelines.

- Always tell another member of staff when you are doing a change or accompanying a child to the toilet
- Always ensure that a child's privacy is protected
- Always ensure that you are visible to other members of staff

3. **Safeguarding**

Children learn best when they are healthy, safe and secure, when their individual needs are met, and when they have positive relationships with the adults caring for them. (EYFS 2014)

All children will be taught personal safety skills carefully matched to their level of development and understanding.

All staff have a duty to be aware that abuse does occur. Due to the many hours of care that we provide, our staff will often be the first to notice any problems; they may also be the first people in whom children confide about abuse.

Harrow Haikou's Safeguarding Policy lays out the procedures that must be followed if staff have any reason to believe that a child in their care is subject to emotional, physical or sexual abuse or neglect.

Our first responsibility must be the welfare of the child and we have a duty to children, parents/carers and staff to act quickly and responsibly to any instance that comes to our attention.

If a child becomes distressed or unhappy about being cared for by a particular member of staff, the matter will be looked into and outcomes recorded. Parents/carers will be contacted at the earliest opportunity as part of this process in order to reach a resolution. Staffing schedules will be altered until the issue(s) are resolved so that the child's needs remain paramount.

If a child makes an allegation against a member of staff, all necessary procedures will be followed.

4. **Children wearing nappies**

Should parents raise safeguarding concerns due to students wearing nappies, staff should provide a copy of the Intimate Care Policy and the Safeguarding Policy outlining the school's procedures regarding this matter.

All children should be supported and encouraged to begin using the toilets independently unless there is a significant developmental reason for a delay in this area.

Parents are responsible to provide nappies, wipes, and creams. HBJ will provide plastic bags, gloves, a bin and liners.

5. **Health and Safety**

Staff should always wear gloves when dealing with a child who is bleeding, soiled or when changing a soiled nappy. Any soiled waste should be placed in a polythene waste disposal bag, which can be sealed. This bag should then be placed in a bin (complete with liner).

6. **Special needs**

Children with special needs have the same rights to safety and privacy when receiving intimate care. Additional vulnerabilities that may arise from a physical disability or learning difficulty must be considered and provided for appropriately. If the circumstances require an individual intimate care

plan, it should be drawn up and discussed with the child, those with parental responsibilities and the organization. This should be reviewed on a termly basis.

Regardless of age and ability, the views and/or emotional responses of children with special needs should be actively sought.

Guidance to safeguard children and staff with regard to situations which may lend themselves to allegations of abuse (e.g. physical contact, changing clothes)

7. Physical Contact

All staff engaged in the care and education of children and young people need to exercise caution in the use of physical contact.

At Harrow Haikou Early Years we care for very young children. There will be times when staff are required to have close physical contact with a child. It is also important for the children to feel safe, secure and loved in their environment. We understand that children can react differently to physical contact and we respect this.

The expectation is that staff will work in 'limited touch' cultures and that when physical contact is made with pupils this will be in response to the pupil's needs at the time, will be of limited duration and will be appropriate given their age, stage of development and background.

It should always be the child who instigates any sort of physical contact such as cuddles. If a child is very upset then the adult must ask the child if they want a cuddle. Children should not be kissed by staff under any circumstances.

Children in Pre-Nursery may require nappy changing and help on a regular basis. Children in Nursery and Reception, once able to use a toilet independently, should not receive frequent or regular help with toileting unless they have an intimate care plan in place. If an adult needs to assist a child from these year groups with intimate care, then they should inform the parents that they have done so.

Staff should be aware that even well intentioned physical contact might be misconstrued directly by the child, an observer or by anyone the action is described to. Staff must therefore always be prepared to justify actions and accept that all physical contact will be open to scrutiny.

Physical contact which is repeated with an individual child or young person is likely to raise questions unless the justification for this is formally agreed by the child, the organization and those with parental responsibility.

Children with special needs may require more physical contact to assist their everyday learning. The general culture of 'limited touch' will be adapted where appropriate to the individual requirements of each child. The arrangements must be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and be open to scrutiny and review. Wherever possible, consultation with the line manager should take place if any deviation from the arrangements is anticipated. Any deviation and the justification for it should be reported.

Extra caution may be required if a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to staff being vulnerable to accusations of abuse. Staff also need to be aware that, occasionally, such children display needy behaviour and will seek out inappropriate physical contact. Should such circumstances arise, staff should deter the child without causing a negative experience. Ensuring that other members of staff observe any interactions with the child, will help to protect staff from any abuse allegations.

8. SUPERVISION OF CHANGING ROOMS

These guidelines should be read in conjunction with the school's Safeguarding Policy and the guidelines on Intimate Care. Changing for PE can cause anxiety for some pupils, can influence their perception of the subject and determine whether it is an enjoyable and positive experience. The concern caused by changing can influence a pupil's participation and lead to a variety of avoidance strategies.

For staff there can be confusion and/or worry about supervision and how it accords with safer working practice. There can be a tension between the need to ensure that bullying or teasing does not occur and the risk of being accused of acting inappropriately or even being perceived as someone who might pose a sexual risk to children.

General Guidance

1. Adults must always change or shower privately - never in the same space as children.
2. For students in Years 3 and above designated single sex changing rooms or areas must be used. For swimming lessons, single sex changing rooms are used for Year 1 and above.
3. All adults should avoid just standing in the changing room watching pupils, or repeatedly going in and out without good reason.
4. When supervising students from outside the changing rooms, clear systems/rules must be established so students are clear about expectations of their conduct while they are unsupervised.
5. For after school activities parents/carers are not allowed in changing rooms and staff must be vigilant to this except in the case of students in Reception to Year 2 who are unable to dress themselves. These students are allocated to a designated 'Parents and Children' changing room.
6. In Year 3 to Year 11, supervising adults should remain in close proximity to the room so that students are aware. Students should know that the adults will enter the room if necessary (in response to a disturbance for example).
7. Where student privacy is not compromised, the door of changing rooms should be left slightly ajar. If there is a need for adults to enter the room it is recommended they should alert pupils to this by announcing it (e.g. a countdown) to give them the opportunity to cover up if they want to.
8. Pupils who express disquiet or concern about the behaviour of a member of staff should be listened to and appropriate enquiries conducted by the relevant Head of School.
9. Once students are in Year 6 members of staff should supervise or assist pupils of the same sex. In Year 5 down, this is preferable where it is possible.

Guidance for those supervising students from toddler age to Year 2

1. Younger students will usually change together in a classroom or a unisex changing room. Where appropriate consideration may be given to utilising furniture or screens to provide discrete areas and/or ask girls and boys to be in different parts of the classroom.
2. In Early Years classes a sign should be put on the door to deter visitors from entering.
3. At least two members of staff should remain in the room while students are changing.
4. If pupils need assistance getting changed, refer to the Intimate Care Policy.
5. Students of all ages should be encouraged to be as independent as possible and in most cases adults should prompt and give verbal help/encouragement before they offer assistance.
6. Assistance should take place openly, not out of sight of others.
7. Students in Reception to Y2 must have this same level of supervision during extra-curricular activities.
8. Young students walking from their classroom to the swimming pool area in their swimming kit should cover their bodies with a towel.

9. In special circumstances, should a parent request, teachers may find somewhere separate for a student to change such as a cloakroom area or toilets, alone or with a same sex class friend depending on the circumstance.

APPENDIX H: COUNSELLING POLICY

Counselling Referral at Harrow Haikou

Intended use for reference to SLT, SMT, Hm's, Pastoral Care Staff

Harrow Haikou does not have an in house counsellor. Referrals can be made via the Student Support Committee for external counselling with the preferred counsellor being Dr Stephen Guo at Haikou People's Hospital.

A counsellor's role is to facilitate the clients (typically students) work in ways that respect their values, personal resources and capacity for self-determination. Counselors draw from a number of theoretical approaches, including those that are cognitive, affective, behavioral, and systemic. These theories may be applied to individuals, groups, and families.

Counselling is a service sought by people in emotional distress, experiencing confusion or conflict, having difficulty managing behaviors or thoughts, as well as those who are in crisis or have been determined to be at risk via safeguarding assessment or report. Further, Counseling is conducted with persons who are considered to be emotionally high functioning as well as those who may be struggling with emotional wellness. In some cases, counselling may be prescribed as part of a treatment plan for student or staff members with a diagnosed disorder. The counselor may also explore with a client any evidence of abuse or neglect in order to support the student appropriately in managing the effects of the abuse. The primary focus of all counselling is the client's goals. Thus, counseling involves both choice and change.

The service of counseling is meant as an avenue for processing and discovery through reflection and discussion, in order to reach a deeper understanding of self within one's circumstance: past, present and future. In addition, counselling may lead to resolution or provide a safe space for further processing of thoughts and feelings. Counseling may also provide a sounding board when airing frustrations, venting anger or when in search of applicable solutions and strategies for actionable plans. All action plans are selected or determined by the client. The counsellor relationship is disciplined and confidential: not to be confused with friendship. However, to establish an effective counselling relationship, building a highly connected relationship of trust is required. (This process can happen quickly or require several sessions before meaningful discovery of client need can be ascertained). Therefore, in each session the client's self-determined goals are paramount.

Confidentiality

Harrow Haikou recognises that matters arising in counselling are confidential. The Counsellor will share information on a 'need to know, what, and when' basis. The professional evaluations of the counsellor in this regard will vary dependent upon the age of the student, and their willingness for content to be shared. Any individual meeting with the counsellor does so in the knowledge that a counsellor is obligated to share any information necessary to protect individuals from significant harm (for more details please see Safeguarding policy).

What counselling involves

- An ongoing process, of connection, discovery, realisation and change.
- Offering support to students with various forms of stress or mood disorders, or simply those seeking some encouragement or personal connection.

- Facilitating a clients' identification of (and working towards) their own goals, rather than dispensing advice or advocating an agenda.
- Collaborating with other members of staff as required.

In addition to this the counsellor at HBJ may also conduct group therapy, work with families and run training sessions with adults and students.

What counselling is not

- Student discipline or a recipe for behaviour management.
- A substitute for a teacher-student relationship.
- A way of getting a student to apologise or consistently follow your instructions
- A medical or psychological assessment.
- A way to 'fix' students, parents or staff.
- A means of curtailing a child's expression of emotions.

Fitness to practice

In order to maintain fitness to practice, it is a school expectation and a professional requirement that the counsellor shall:

- seek supervision and consultation with other qualified professionals about client treatment and/ or professional practice responsibilities. It is anticipated that this will take the form of a skype and and a face-to-face session with an external professional counsellor each month, as well as fortnightly consultations with school's psychologist.
- Ensure that there is an adequate provision of time for this supervision, alongside any personal planning, research, note writing, reflection etc.

APPENDIX J: SAFEGUARDING STATEMENT

Harrow Haikou is committed to safeguarding and promoting the welfare of children and young people and expects all members of the Harrow Haikou community to share this commitment.

APPENDIX K: Harrow Haikou Safeguarding Posters

儿童权益保护

哈罗海口

如果你感到不安全, 或为其他学生感到担心, 我们可以帮助你。



Ms Evans
安全负责人



Mr Acosta
网络安全负责人



Ms Milton
寄宿安全负责人



电子邮箱: talk@harrowhaikou.cn

小狮幼儿园



Ms Meryl

小学



Ms Selina Sun

Mr Moore



Mr Moore

Ms Hailey Li



Ms Hailey Li

Ms Ward



Ms Ward

高年级学部



Ms Lynne Li

有访客到校?

我们共同承担保护学生权益的责任。
如果您有任何担心, 请告诉我们。

	吊牌
	员工
	学生
	外包公司人员
	家长
	访客

在校期间, 请务必全程佩戴好吊牌

Safeguarding

at Harrow Haikou

If you don't feel safe, or you are worried about another student, we can help.



Ms Evans
Safeguarding Lead



Mr Acosta
Digital Safeguarding Lead



Ms Milton
DSL for Boarding



or Email: talk@harrowhaikou.cn

EYC



Ms Meryl

Ms Selina Sun



Ms Selina Sun

Mr Moore



Mr Moore

Ms Hailey Li



Ms Hailey Li

Ms Ward



Ms Ward

US



Ms Lynne Li

Visitor to campus?

We have a shared responsibility for our students welfare.
If you have a concern, please let us know.

	Lanyard ID
	STAFF
	STUDENT
	EXTERNAL VENDOR
	PARENT
	GUEST

Please wear your lanyard at all times on campus