Haileybury Bhaluka

Safeguarding and Child Protection Policy

HBB-POL-01 | Academic Year 2026–27

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Policy owner	Headmaster
Policy lead	Designated Safeguarding Lead (DSL)
Reviewed by	Leadership Team (LT) and Education and Safeguarding Committee
Approved by	Board of Governors
Intended audience	All staff, Governors, volunteers, pupils and parents
Location	Staff Portal, Governor Portal and School website
Related policies	Suicide and Self-Harm Risk Policy (HBB-POL-02); Safer Recruitment Policy (HBB-POL-03); Boarding Policy (HBB-POL-04); ICT and AI Acceptable Use Policy (HBB-POL-08); Data Protection Policy (HBB-POL-09); Staff Code of Conduct; Behaviour Policy; Countering Bullying Policy; Whistleblowing Policy; Visitors and Site Security Policy; Registration and Missing Pupil Policy

PART 1: SAFEGUARDING AT HAILEYBURY BHALUKA

1. What is safeguarding?

1.1 Safeguarding is the action taken to promote the welfare of all children (everyone under the age of 18) and to protect them from harm, whether within or outside the home, and including online. Safeguarding means:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from abuse and maltreatment;
- preventing harm to children's mental and physical 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 and young people to have the best outcomes.

2. Commitment to safeguarding

2.1 Haileybury Bhaluka is committed to being a welcoming, friendly school where unkindness, discrimination and bullying have no place and pupils are protected from harm. Safeguarding and child protection are at the core of everything we do and are everyone's responsibility.

2.2 Our aim is for all our pupils to develop their skills and abilities to the full, and for their achievements and successes to be recognised and valued. Pupils must be able to develop and achieve in a secure and positive environment, free from fear and abuse.

2.3 Pupils can get support from a range of people in the school community, including the School Counsellor, the School Doctor and nurses, their HM and their Tutor. They can also raise a concern with any member of staff they trust and feel comfortable talking to. All staff are responsible for responding to concerns and escalating them appropriately.

2.4 Haileybury Bhaluka takes a whole-school approach to safeguarding that puts the pupil at the centre and always focuses on the child's best interests. The DSL takes lead responsibility for safeguarding and child protection, but all staff have a role to play.

3. Key safeguarding personnel

3.1 At Haileybury Bhaluka, the Child Protection Team is led by the **Designated Safeguarding Lead (DSL)**:

Dr Tajrin Samiha Azmi – RMO and Pastoral Counsellor, Designated Safeguarding Lead

The DSL is supported by the **Deputy DSLs** and the Child Protection Team:

- Capt. Mushfiqur Rahman – Housemaster, Deputy DSL
- Ms Sumaiya Kabir – Housemistress, Deputy DSL
- Mr Wahiduzzaman, Assistant Head: Student Welfare
- Ms Rome – School Nurse

Lead responsibility for safeguarding and child protection at Haileybury Bhaluka lies with the DSL and cannot be delegated.

3.2 During term time, a member of the Child Protection Team is always available for staff, pupils or parents to discuss any safeguarding concern. Out-of-hours arrangements are agreed with the Headmaster and published on the boarding duty rota. All members of the Child Protection Team keep their knowledge and skills up to date and complete appropriate training at least annually, in line with *Keeping Children Safe in Education* (KCSIE 2026) and *Working Together to Safeguard Children* (2026).

3.3 The Governor with responsibility for safeguarding and child protection (the **Safeguarding Governor**) is: (Bangladesh-based).

3.4 To strengthen the School's commitment to pupil safeguarding and wellbeing, the Governors' **Education and Safeguarding Committee** meets every term. The Safeguarding Governor is Deputy Chair of this Committee. Its meetings are attended by the DSL, the Headmaster and the COO. The Committee receives and reviews reports on pupil welfare and safeguarding at every meeting. Its terms of reference are available from the COO.

3.5 Haileybury Bhaluka also has a Pastoral Team, which includes the DSL, the Medical Centre nursing team, the School Doctor, the School Counsellor and the House teams. Members of the Pastoral Team work closely together and meet regularly to share information and discuss pastoral care across the School.

4. Contact details

Role	Name	Contact
Designated Safeguarding Lead	Dr Tajrin Samiha Azmi	safeguarding.bhaluka@haileybury.com.bd
Deputy DSL	Capt. Mushfiqur Rahman (Housemaster)	via safeguarding.bhaluka@haileybury.com.bd
Deputy DSL	Ms Sumaiya Kabir (Housemistress)	via safeguarding.bhaluka@haileybury.com.bd
Headmaster	Mr Simon O'Grady	headmaster.bhaluka@haileybury.com.bd
Chair of Governors	Prof SMA Faiz	via the COO
Safeguarding Governor	TBC	via the COO

Role	Name	Contact
Chief Operating Officer (COO)	Mr Burhan Uddin	burhan.uddin@haileybury.com.bd

Emergency and external contacts (Bangladesh):

Service	Number
National Emergency Service (police, fire, ambulance)	999
Child Helpline (Department of Social Services)	1098
National Helpline for Violence against Women and Children	109

5. Legal framework and guidance

5.1 Haileybury Bhaluka follows the law of Bangladesh and, as a British international school and member of COBIS, adopts UK statutory guidance as best practice. All staff are told during recruitment, induction and training that the School follows international safeguarding and child protection standards.

5.2 This policy and the School's procedures are informed by:

- **Bangladesh:** the Children Act 2013; the Prevention of Oppression against Women and Children Act 2000; the Child Marriage Restraint Act 2017; the Narcotics Control Act 2018; the Pornography Control Act 2012; the Cyber Security Ordinance 2025; and the Personal Data Protection Ordinance 2025;
- **UK statutory guidance (adopted as best practice):** Keeping Children Safe in Education 2026 (in force from 1 September 2026); Working Together to Safeguard Children 2026; the Prevent duty guidance for England and Wales (2023, as updated);
- **UK advice:** Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (May 2024); What to do if you're worried a child is being abused (2015); Sharing nudes and semi-nudes: advice for education settings (UKCIS, March 2024); Multi-agency statutory guidance on female genital mutilation; Generative AI in education (DfE) and the DfE filtering and monitoring standards;
- **International:** COBIS safeguarding standards and guidance, and the UN Convention on the Rights of the Child.

6. External and inter-agency work

6.1 Bangladesh does not have statutory multi-agency safeguarding partnerships equivalent to those in the UK. The School therefore builds its own relationships with local services and expert partners, and seeks advice whenever a child may be at risk.

6.2 Locally, the School may refer to or seek help from: the police (999), including the Child Affairs Desk at police stations established under the Children Act 2013; the Department of Social Services and its Child Helpline (1098); the National Helpline for Violence against Women and Children (109); and medical services including local hospitals and Evercare Hospital, Dhaka.

6.3 The School follows the procedures of COBIS and its partner The Safeguarding Alliance (TSA), and seeks their advice on complex cases. Haileybury Bhaluka has also championed international safeguarding standards across education in Bangladesh, including by setting up B-SAFE, the Bangladesh Safeguarding Alliance for Educators (https://www.bsafe.education/).

6.4 Where a pupil, family member or member of staff has links to another country, the DSL will consider whether to contact the relevant authorities in that country, through COBIS, TSA or the relevant embassy where appropriate.

PART 2: SAFEGUARDING MEASURES

7. Safeguarding training for staff

7.1 Every member of staff (including temporary staff, volunteers and Governors) receives appropriate safeguarding and child protection training. Training is given by the DSL or a trained line manager, and is delivered to all new starters as part of induction. All teaching staff also complete online training in Child Protection for International Schools (TES).

7.2 Governors receive training appropriate to their role, so that they can make sure the School's safeguarding policies and procedures are effective. This includes ensuring the School meets its duties under the law of Bangladesh, including the Children Act 2013, and follows the principles of UK equality and human rights law as best practice.

7.3 Safeguarding and child protection training is overseen by the HR Department with the DSL. HR keeps up-to-date records of when staff completed training, to make sure everyone has met this requirement.

7.4 Staff receive full refresher training at least every three years, with safeguarding and child protection updates (by email, e-bulletins and staff meetings) at least annually. All new staff receive induction training, and all new teachers complete the TES online course.

7.5 This policy is the foundation of the child protection training given to all staff. Staff are also made aware of other policies relevant to safeguarding, including the Behaviour Policy, the ICT and AI Acceptable Use Policy, the Countering Bullying Policy, the Equal Opportunities for Pupils Policy, the Safer Recruitment Policy, the Staff Code of Conduct and the Visitors and Site Security Policy, all available on the Staff Portal. The Staff Code of Conduct sets out the standards of behaviour and conduct expected of staff. These standards are covered at induction and in staff training, so that no member of staff's actions place any pupil (or themselves) at risk of actual or alleged harm. Examples of situations where this is particularly relevant include one-to-one tuition, sports coaching and electronic communication with pupils.

7.6 All staff receive a copy of **Part One of KCSIE 2026** at induction, and the latest version electronically every year. In line with KCSIE 2026, all staff, including those who do not work directly with children, must read the full Part One. (The shorter Annex A no longer exists. The "Part One: Overview for All Staff" may be used as a quick reference but does not replace reading Part One.) All staff complete a questionnaire after reading Part One and this policy, and sign to confirm that they have read and understood both. Staff repeat this process whenever KCSIE is updated.

7.7 The professional development programme gives staff further training from internal and external providers. All key pastoral staff are trained in Youth Mental Health First Aid, and further staff are being trained.

8. Educating pupils about safeguarding

8.1 As set out in this and other policies, such as the Countering Bullying Policy and the Behaviour Policy, Haileybury Bhaluka is committed to being a welcoming and friendly community where unkindness, discrimination and bullying have no place. Respect for one another, and being helpful, tolerant and supportive, are part of the culture of the School.

8.2 All pupils learn about safeguarding, online safety (including AI), radicalisation and child protection through the School's Wellbeing and Tutorial programme. The programme also covers relationships and sex education, consent, healthy relationships, diversity and inclusion, misogyny and prejudice, hazing and initiation, and the sharing of nudes. At the start of each academic year, all pupils are introduced to the Child Protection Team, the Medical Centre nurses and the School Counsellor, and told how each can help them and how to contact them. Emergency contacts, including the Child Protection Team and the Medical Centre, are available to pupils at all times.

8.3 The School will continue to consult parents about Relationships and Sex Education (RSE). The DSL makes sure that visiting speakers and all staff teaching RSE are fully prepared to handle any disclosures.

8.4 All pupils and parents receive a Pupil and Parent Handbook with helpful information about safeguarding, including online safety and how to raise child protection concerns. The Handbook is covered in tutorial sessions and referred to often in House meetings. These ideas are reinforced in the Houses and across the School, where pupils mix across year groups and Houses, so that mutual respect is developed and valued.

8.5 Staff talk to pupils, formally and informally, about relationships between pupils and why unacceptable behaviour will never be ignored or dismissed as "banter" or "part of growing up". Child-on-child abuse, including abuse rooted in misogyny or prejudice, is unacceptable and taken very seriously. HMs also hold House meetings to remind pupils of the importance of online safety.

9. Online safety and artificial intelligence

9.1 The DSL takes lead responsibility for online safety, including understanding the filtering and monitoring systems in place, and is the School's Online Safety Coordinator. The Online Safety Group (the DSL, the Headmaster, the ICT Manager and the HMs) meets every half term and is responsible for online safety, filtering and monitoring. Its terms of reference are on the Staff Portal.

9.2 The Staff Code of Conduct and the ICT and AI Acceptable Use Policy cover online safety. All staff and residents must complete a form at the start of each academic year confirming that they have read and understood these policies. Pupils also confirm each year that they have read the ICT and AI Acceptable Use Policy.

9.3 The School has a robust filtering and monitoring system, which the ICT Manager reviews and tests regularly, with external organisations where relevant, in line with the DfE filtering and monitoring standards. The ICT Manager reports on these matters to the Online Safety Group and the Education and Safeguarding Committee. Through induction, training updates and the ICT and AI Acceptable Use Policy, all staff know what filtering and monitoring systems are in place and how to escalate concerns from filtering alerts. The School communicates regularly with parents to reinforce online safety and share helpful information.

9.4 The Education and Safeguarding Committee reviews the ICT and AI Acceptable Use Policy annually and receives reports from the Headmaster.

9.5 In line with KCSIE 2026, the School recognises that children can be harmed online as well as face to face, and that safeguarding duties extend to digital environments. The four areas of online risk are content, contact, conduct and commerce. Exposure to harmful online content, including misinformation, disinformation and conspiracy theories, is a safeguarding issue. As AI and generative technologies become more widely used in and beyond education, the School:

- teaches pupils about the risks of AI-generated material, including deepfakes and AI-generated or altered nude images;
- makes sure that any AI tools used in school are approved, age-appropriate, and subject to filtering, monitoring and human oversight;
- treats any creation or sharing of AI-generated sexual images of children as child sexual abuse material and a serious safeguarding matter, reported to the DSL; and
- builds these commitments into its ICT and AI Acceptable Use Policy, staff training and risk assessments, to help protect and empower children in a changing digital world.

10. Safeguarding pupils off site

10.1 Child protection and safeguarding extend beyond the Haileybury Bhaluka campus. Care is shown for all pupils when they are off site, and the School only works with appropriately vetted organisations and institutions. When a pupil is off site but in the School's care, each situation is risk assessed in line with COBIS guidance and the Educational Visits Policy (HBB-POL-07). Examples include community service, Duke of Edinburgh's International Award expeditions and sports tours.

10.2 When a pupil is off site, every effort is made to make sure they are never left alone under the sole supervision of an adult who is not a member of Haileybury Bhaluka staff.

11. Safer recruitment

11.1 All staff employed or engaged by the School in work with children undergo pre-appointment vetting checks consistent with Part Three of KCSIE 2026. The checks carried out by the School, including online searches of shortlisted candidates, are set out in the Safer Recruitment Policy (HBB-POL-03).

11.2 At least one member of every interview panel has completed safer recruitment training, so that safeguarding and child protection are tested directly at interview.

11.3 On appointment, all staff receive safeguarding and child protection training, so that their behaviour and actions do not place pupils or themselves at risk of harm, or give rise to allegations of harm. Further details are in the Safer Recruitment Policy on the Staff Portal.

11.4 The Visitors and Site Security Policy controls contractors, so that any contractors working close to pupils provide sufficient evidence that their staff have undergone appropriate safeguarding checks. Contractors working in or near pupil areas must also follow paragraphs 11.7 to 11.10.

11.5 All staff must know and follow the Staff Code of Conduct (on the Staff Portal), which covers relationships between staff and pupils. It is made clear at induction and in later training that staff relationships with pupils must be appropriate and professional at all times, and that this applies beyond the campus and to online communication.

11.6 Haileybury Bhaluka has a culture of safety, of raising concerns, of valuing staff and of reflective practice. There is a clear procedure for reporting and handling concerns, including concerns about poor or unsafe practice and possible failures in the School's safeguarding arrangements. This includes provision for mediation and dispute resolution.

11.7 **Pupil toilets, washrooms and changing areas.** Toilets, washrooms, showers and changing areas set aside for pupils are for pupils only. Staff, contractors, visitors and parents must not use them. Separate adult facilities are provided and clearly signed.

11.8 A member of staff may enter a pupil facility only when there is a good reason: an emergency, a medical need, a behaviour or welfare concern, or supervision during sports fixtures or boarding routines. Where possible, they call out first to say they are coming in. Staff enter a facility used by pupils of the opposite sex only in an emergency or with a second adult present. Cleaning and maintenance staff work in pupil facilities only when no pupils are inside; otherwise the area is closed and signed while they work.

11.9 In the boarding Houses, only House staff of the same sex as the boarders enter bathroom and shower areas, except in an emergency. Any intimate or personal care for a pupil follows an agreed care plan and is recorded.

11.10 Pupils use the facilities designated for their sex and, where the site provides separate facilities, for their age group, unless the DSL and the Headmaster have agreed other arrangements for an individual pupil under paragraph 33.1. Any breach of paragraphs 11.7 to 11.9, by an adult or a pupil, is reported to the DSL. A breach by an adult is dealt with as a low-level concern or as an allegation, depending on the circumstances.

12. Hiring school premises and third-party activities

12.1 Where an organisation or individual hires or uses School facilities (for example community groups, sports associations, or providers running community or extra-curricular activities), the School makes sure appropriate arrangements are in place to keep children safe. Further information is in the Visitors and Site Security Policy.

12.2 Where an external party provides services or activities on behalf of the School, the School seeks assurance that it has appropriate safeguarding and child protection policies and procedures (and inspects them as needed). Safeguarding requirements are included in any agreement with such a third party, and failure to comply leads to termination of the agreement (for example with a Duke of Edinburgh's International Award activity provider).

13. Reasonable force

13.1 In line with KCSIE 2026, the safeguarding and child protection training given at induction and through regular updates covers what is meant by "reasonable force" and when it may be used. The use of force must always be the minimum necessary, must be recorded, and must be reported to the DSL and the Headmaster.

14. Reviewing this policy

14.1 This policy is reviewed in full every year by the Leadership Team and the Education and Safeguarding Committee, and approved by the Board of Governors. The Committee reviews any changes made during the year at its termly meetings, and also reviews how the School's safeguarding policies and procedures are being implemented.

14.2 This policy is also reviewed after any serious safeguarding incident, and any weaknesses found are put right without delay. All staff are encouraged to contribute suggestions, so that the policy is as specific to our context as possible and the highest standard of safeguarding is achieved.

PART 3: DEALING WITH CONCERNS AND MAKING REFERRALS

15. Dealing with concerns about a child

Logging and reporting concerns

15.1 An important part of safeguarding is recognising the signs and types of behaviour that may show a pupil is affected by more serious issues. Definitions and indicators of abuse are given later in this policy. Even seemingly small concerns can point to something more serious, and staff are trained to show "professional curiosity". Staff should also remember that children may not feel ready, or know how, to tell someone they are being abused, and may not recognise their experiences as harmful.

15.2 All staff may see possible signs of abuse, changes in behaviour or a failure to thrive. Staff must report anything that concerns them about a child's welfare, however insignificant it seems, to the DSL or another member of the Child Protection Team at the earliest opportunity. Staff are regularly reminded of their duty to report, because while one sign alone may not cause serious concern, several signs noticed by different members of staff may show a more serious picture. No single person can have the full picture of a child's needs and circumstances. Staff must remember their role in the early identification of possible abuse, neglect, exploitation and radicalisation.

15.3 Staff report concerns through **CPOMS**, the School's online child protection recording system. Any member of staff can log a concern on CPOMS. Logged concerns can only be seen by the Child Protection Team and specified pastoral staff. If a concern is reported to the Child Protection Team another way (e.g. verbally or by email), the Team will log it on CPOMS so that it is recorded there.

15.4 All communication about concerns about a child (as opposed to a child in immediate danger, covered below) should go to the Child Protection Team. The DSL monitors all concerns through CPOMS and reports regularly to the Headmaster.

15.5 Staff should pay particular attention to pupils who are repeatedly removed from class, frequently absent, on reduced timetables, or who repeatedly go missing, as these can be signs of unmet needs or safeguarding risk.

More serious concerns

15.6 All staff can refer any concern to the DSL, to any member of the Child Protection Team, or through CPOMS. If a referral is made by someone outside the Child Protection Team, the Team must be told as soon as possible.

15.7 Where there is a serious concern, the pupil is placed on the School's "pupils at risk" register, which the DSL monitors systematically.

15.8 Information about a child protection or safeguarding concern is shared with appropriate staff and external agencies on a need-to-know basis, keeping the pupil's welfare and safety at the centre of every decision (see "Information sharing" below).

15.9 The Child Protection Team gives staff extra support and guidance whenever they are asked to support other agencies or professionals (for example COBIS or TSA) in an early help assessment or an individual referral.

15.10 Where the Headmaster or the Child Protection Team are concerned that a pupil has suffered, or is likely to suffer, significant harm, the Safeguarding Governor is informed immediately so that any legal or regulatory duties can be met.

A child at risk of immediate harm

15.11 If a child is in immediate danger or at risk of immediate harm, call for help immediately: the police on **999**, and the Medical Centre if medical help is needed. Anyone can make this call. The DSL (or, in their absence, a Deputy DSL or the Headmaster) must be told at once. The DSL will decide on any further referral, for example to the Child Affairs Desk at the local police station or the Department of Social Services.

15.12 All concerns, discussions, decisions, actions and outcomes must be recorded on CPOMS, which provides a secure record for each child.

16. Child-on-child abuse

16.1 Child-on-child abuse can take many forms, including: bullying (including online bullying and prejudice-based or discriminatory bullying, such as racism and faith-targeted abuse); abuse in intimate personal relationships between children; physical abuse; sexual violence and sexual harassment, including misogynistic behaviour; causing someone to engage in sexual activity without consent; the consensual and non-consensual sharing of nudes and semi-nudes (including AI-generated or altered images); upskirting; and initiation or hazing-type violence and rituals. When a disclosure of child-on-child abuse is made, all the children involved, whether seen as perpetrator or victim, are treated as being at risk. The matter is dealt with under this policy and the School's Countering Bullying Policy and Behaviour Policy, all available on the Staff Portal.

16.2 Where child-on-child abuse involves the consensual or non-consensual sharing of nudes or semi-nudes, including AI-generated or altered images, the School follows the UKCIS advice *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (2024). The DSL works closely with the Assistant Head: Student Welfare to ensure an appropriate response.

16.3 Any member of staff with a concern about child-on-child abuse must pass it on immediately to the Child Protection Team, in person or through CPOMS. The Child Protection Team will advise staff on managing it. Staff must never view, copy, forward or save images they suspect are nudes on a pupil's device. They should secure the device and pass their concerns to the Child Protection Team, following the Searching and Confiscation Policy (on the Staff Portal).

16.4 Where the Headmaster or the Child Protection Team believe a pupil may need support from one or more external agencies, the School Doctor and the School Counsellor will be consulted.

16.5 Any pupil who has been abused, whether by another child or otherwise, will be given additional support as set out in the Countering Bullying Policy and the Behaviour Policy. Victims will be taken seriously, kept safe and never made to feel that they are creating a problem by reporting abuse.

16.6 Where an allegation or report is found to be unsubstantiated, unfounded, false or malicious, the School will consider the needs of the child concerned (it may be a cry for help) and, where appropriate, disciplinary action under the Behaviour Policy.

17. Allegations of abuse against staff and other adults

17.1 Any allegation of abuse against a member of staff (including teachers, support staff, supply, temporary and volunteer staff, and members of the Child Protection Team) or any other adult must be reported immediately to the Headmaster. The member of staff concerned must not be

told that an allegation has been made. The Headmaster will tell the Safeguarding Governor within one working day of any allegation of abuse against a member of staff.

17.2 If the Headmaster is absent or cannot be contacted, the allegation should be passed to the Chair of Governors, Prof SMA Faiz, will keep the Headmaster informed. The Chair of Governors can be contacted by phone or email via the COO, Mr Burhan Uddin (burhan.uddin@haileybury.com.bd).

17.3 If the Chair of Governors cannot be contacted, the allegation should be passed to the Safeguarding Governo, whose contact details can be obtained from the COO.

17.4 An allegation against the Headmaster must be reported to the Chair of Governors (see contact details above). The Headmaster must not be told that an allegation has been made against him.

17.5 Any member of staff wishing to make an allegation against the Headmaster, a member of the Child Protection Team or another member of staff should follow the School's Whistleblowing Policy on the School website. The NSPCC whistleblowing advice line is also available to staff who do not feel able to raise concerns about child protection failures internally.

17.6 Where an allegation is made against a member of staff, the School follows the principles of Part Four of KCSIE 2026 and acts promptly, avoiding unnecessary delay.

17.7 The Headmaster and the Chair of Governors will not make any judgement or decision, or investigate an allegation, without first consulting TSA. Where a crime may have been committed, the police will be informed.

17.8 Whether or not an allegation against a member of staff is substantiated, the School will work with TSA to identify any improvements to its procedures or practice that could help prevent similar events in future.

17.9 If a member of staff who lives on site has a child protection allegation made against them and the Headmaster (or, in his absence, the Chair of Governors) considers that it would be inappropriate for them to remain in their accommodation, alternative accommodation off site will be provided until the matter is resolved.

17.10 Where the School stops using the services of a person (employee, contractor, volunteer or student), or a person leaves, because they were considered unsuitable to work with children, the School will report this, within one month of their leaving, to the relevant authorities. Where applicable, this includes the UK Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) for teachers who may be subject to a prohibition order, together with the relevant authorities in Bangladesh and the person's home country. Reasons might include "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or "conviction, at any time, for a relevant offence".

17.11 Where an allegation of abuse has been made against a member of staff, the School will make every effort to maintain confidentiality and guard against unwanted publicity, at least until the member of staff is charged with an offence.

17.12 Decisions about when to tell a member of staff about an allegation against them will be made in consultation with TSA.

17.13 If you feel that a safeguarding concern you raised has not been dealt with appropriately, and that this may be a failure of this policy, report it to the Safeguarding Governor.

18. Listening to a child who tells you they are being abused

18.1 Any member of staff to whom a child discloses abuse should:

- find a quiet place and make time to listen;
- stay calm, because overreacting may frighten the child and add to feelings of guilt;
- not promise confidentiality: child protection matters must be passed on, and you should reassure the child that you will only tell the people who need to know;
- take what the child says seriously and listen carefully;
- keep questions to the minimum needed to clarify, strictly avoiding "leading" the child with suggestions or questions that introduce ideas about what may have happened (do not ask "Did they do 'x' to you?"; use open prompts such as "Tell me what happened");

- stop asking questions as soon as the child has disclosed that they believe something abusive has happened to them or to someone else;
- reassure the child that they are not to blame, as it is all too easy for victims of abuse to be blamed and to feel guilty;
- check your understanding of what happened if you are not clear;
- use the child's own words, because if you are reluctant to repeat them, the child may stop talking to you;
- reassure the child that they were right to tell you and that you are glad they did;
- avoid criticising the alleged perpetrator;
- tell the child that you will now make sure the right people are involved to help (a member of the Child Protection Team and possibly external agencies);
- ask the child what they would like to happen to keep them safe now that they have told you, and assure them that the School will try to follow their wishes where it safely can;
- record as soon as possible what you have been told and how the child behaved, including non-verbal signs (e.g. the child was visibly distressed or shaking);
- inform the right person immediately: usually a member of the Child Protection Team, or the Headmaster if the concern is about a member of staff, or the Chair of Governors if it is about the Headmaster;
- record the disclosure on CPOMS and/or give your written record promptly to the Child Protection Team, the Headmaster or the Chair of Governors, as appropriate, as it may be used in later legal proceedings;
- seek support for yourself if you need it, as listening to accounts of abuse can be very distressing. You can talk to any member of the Child Protection Team.

19. Record keeping and next steps

19.1 When a child has made a disclosure, staff should:

- record it on CPOMS and alert the appropriate members of the Child Protection Team through the system;
- include a body map showing the position of any bruising or other injury (staff must not examine or photograph injuries);
- use the child's own words;
- record statements and observations, not interpretations or assumptions;
- record the date, time and place of the conversation;
- if they cannot access CPOMS, make brief notes as soon as possible and give them promptly to a member of the Child Protection Team, without keeping a copy.

19.2 The Child Protection Team is responsible for next steps, which depend on what other information the School holds. They are likely to include some of the following:

- close monitoring by the School;
- liaison with parents where appropriate, in consultation with TSA;
- a decision not to send a child home if doing so would endanger their safety or wellbeing;
- referral to the police or other local agencies;
- reporting to the relevant authorities (see "Allegations of abuse against staff" above) any person whose services are no longer used because they are considered unsuitable to work with children;
- logging the concern on CPOMS and adding all later correspondence about it.

20. Information sharing

20.1 To safeguard the pupils in our care, the School requests child protection files from pupils' previous schools and transfers child protection files to new schools or colleges. This information is shared, held and used in line with Part Two of KCSIE 2026.

20.2 The School processes personal information fairly and lawfully and keeps it safe and secure, in line with the Data Protection Policy and *Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers* (May 2024). Information is shared where it is relevant, necessary and proportionate to keep a child safe.

20.3 The safety of the child, and of other children, is paramount. Data protection law is not a barrier to sharing information for the purposes of keeping children safe. As KCSIE makes clear, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare of children and protect their safety.

21. Low-level concerns about staff

21.1 The School encourages the reporting of all concerns about adults, however trivial they may seem. It is important that pupils and staff feel able to raise concerns, so that there is a culture of openness and transparency in which the School's values, ethos and expected standards of behaviour are upheld.

21.2 A low-level concern is any concern, however small, that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the Staff Code of Conduct, including outside work, but that does not meet the harm threshold for an allegation. Low-level concerns should be reported to the Headmaster or the DSL. A concern raised with any member of the Leadership Team is always referred on. The DSL records the concern and refers it to the Headmaster, who decides whether further action is needed and, if so, what. The Headmaster may ask the DSL to look into the concern, and the Staff Disciplinary Procedure may be followed where applicable.

21.3 The DSL keeps a log of all low-level concerns and of the decisions and actions taken. The number of low-level concerns, and any trends, are reported to the Education and Safeguarding Committee every term.

21.4 Examples of low-level concerns include a suspicion or "nagging doubt" that an adult has acted inappropriately or inconsistently with the Staff Code of Conduct, including behaviour that may have been accidental or inadvertent. Examples of such behaviour include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone;
- being alone with a child in a secluded area or behind a closed door;
- going into pupil toilets, washrooms or changing areas without good reason; or
- using inappropriate sexualised, intimidating or offensive language.

21.5 Staff are encouraged to self-refer if, for example, they have found themselves in a situation that could be misinterpreted or might look compromising to others, or if on reflection they believe they have behaved in a way that falls below expected professional standards.

21.6 The DSL reviews records of low-level concerns to identify any patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures or, where the behaviour moves from a concern to meeting the harm threshold, as an allegation under this policy. The DSL will also consider whether wider cultural issues in the School allowed the behaviour to occur and, where appropriate, policies will be revised or extra training given to reduce the risk of it happening again.

22. Non-recent (historical) allegations

22.1 Non-recent allegations of abuse (sexual or otherwise) are taken extremely seriously at Haileybury Bhaluka. If you become aware of a non-recent allegation involving current staff, it must be passed to the Headmaster or, if it involves the Headmaster, to the Chair of Governors via the COO (burhan.uddin@haileybury.com.bd).

22.2 The School will refer the matter to the police and seek advice from TSA.

PART 4: TYPES AND INDICATORS OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

23. Definitions of abuse

23.1 Although definitions of abuse are given below, abuse, neglect and safeguarding issues are rarely standalone events that can be covered by a single definition or label. In most cases several issues overlap.

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm includes ill treatment that is not physical, and the impact of witnessing the ill treatment of others. This is particularly relevant, for example, to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. A child may be abused in a family, an institutional or a community setting, by people known to them or, more rarely, by others. Children may be abused by an adult or adults, or by another child or children. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- **Physical abuse:** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child, causing severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet another person's needs. 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 involve age- or developmentally inappropriate expectations, including interactions beyond the child's developmental capability, overprotection and limitation of exploration and learning, or preventing the child from taking part in normal social interaction. It may involve seeing or hearing the ill treatment of another, or serious bullying (including cyberbullying) that causes children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may also include bullying or harassment based on sex or gender (including misogyny and misandry), race, religion or belief, disability or sexual orientation. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may also occur alone.
- **Sexual abuse:** involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving 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 clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images (including AI-generated images), watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including online. Sexual abuse can be committed by men, women and other children. A child under 13 can never legally consent to sexual activity.
- **Domestic abuse:** any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between people aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. It can include psychological, physical, sexual, financial or emotional abuse. Children can be victims of domestic abuse by seeing, hearing or experiencing its effects, and/or through abuse in their own intimate relationships. Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children. In some cases a child may blame themselves for the abuse, or may have had to leave the family home as a result.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect may occur during pregnancy, for example 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. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- **Serious violence and gangs:** encouraging others to engage in, encourage or assist gang-related violence and gang-related drug dealing.
- **Modern slavery and trafficking:** subjecting a person to slavery, servitude, forced labour or trafficking.

23.2 Staff must also be aware that certain behaviours, such as drug taking, alcohol misuse, truancy and the sharing of nudes, put children in danger and must be reported to the Child Protection Team. Safeguarding issues can also show themselves through child-on-child abuse (see above).

23.3 All staff should be aware that safeguarding incidents and behaviours can be linked to factors outside the School and can occur between children outside these environments. All staff, but particularly the Child Protection Team, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms, and children can be vulnerable to several harms at once, including (but not limited to) sexual exploitation, criminal exploitation, serious youth violence and radicalisation.

24. Indicators of abuse

Indicators of physical abuse

- bruises and abrasions, especially on the face, head, genitals or other parts of the body where they would not be expected given the child's age. Some types of bruising are particularly characteristic of non-accidental injury, especially when the child's explanation does not match the injury or when it occurs frequently;
- slap marks, which may be visible on the cheeks or buttocks;
- twin bruises on either side of the mouth or cheeks, which can be caused by pinching or grabbing, sometimes to force a child to eat or to stop them talking;
- bruising on either side of the ear, often caused by grabbing a child who is trying to run away;
- grip marks on the arms or trunk, which can be associated with shaking a child. Shaking can cause one of the most serious injuries to a child, a brain haemorrhage. Grip marks can also indicate sexual abuse;
- black eyes, most commonly caused by an object such as a fist hitting the eye socket;
- damage to the mouth, e.g. bruised or cut lips, or torn skin where the upper lip joins the gum;
- bite marks;
- fractures;
- poisoning and other drug misuse, e.g. overuse of sedatives;
- burns and/or scalds, especially round burns on protected parts of the body and any burns that look like cigarette burns, or scalds that suggest deliberate immersion.

Indicators of emotional abuse

- self-harm (including changes in eating patterns and habits);
- over-reaction to mistakes;
- inappropriate emotional responses;
- chronic running away;
- abnormal or indiscriminate attachment;
- drug or solvent misuse;
- low self-esteem;
- compulsive stealing;
- extremes of passivity or aggression;
- making a disclosure;
- social isolation (withdrawn, a "loner");

- developmental delay;
- depression;
- desperate attention-seeking behaviour.

Indicators of sexual abuse

- detailed sexual knowledge inappropriate to the child's age;
- behaviour that is excessively affectionate or sexual towards other children or adults;
- lack of trust in adults, or a marked fear of particular people;
- attempts to disclose, which often begin with sharing limited information with one adult. Such children often show an excessive preoccupation with secrecy and try to bind adults to secrecy or confidentiality;
- fear of medical examinations;
- fear of being alone with particular people;
- a sudden loss of appetite, compulsive eating, or disordered eating (see also the School's Eating Disorders and Disordered Eating Policy);
- sexualised behaviour that is unusual for the child's age, or takes place in public;
- sexual approaches to, or assaults on, other children or adults;
- pregnancy, urinary tract infections or sexually transmitted infections, which are all cause for immediate concern in young children, or in adolescents where the partner cannot be identified;
- bruising to the breasts, buttocks, lower abdomen, thighs or genital or rectal areas;
- discomfort or pain, particularly in the genital area;
- drawing pornographic or sexually explicit images.

Possible warning signs of grooming by an adult

- a pupil receiving special attention or preferential treatment;
- excessive time spent alone with a pupil outside the classroom;
- frequently spending time with a pupil in private or isolated areas;
- transporting a pupil, possibly to or from school;
- making friends with a pupil's parents and visiting their home;
- acting as a particular pupil's "listening ear";
- giving small gifts, money, cards or letters to a pupil;
- using texts, calls, emails, social media or messaging apps to communicate inappropriately with a pupil;
- overly affectionate behaviour with a pupil;
- flirtatious behaviour, or suggestive remarks or comments of a sexual nature around a pupil;
- other pupils being suspicious and making jokes or references.

Indicators of neglect

- being underweight: a child may be frequently hungry, preoccupied with food, or in the habit of stealing food. There is particular cause for concern where a persistently underweight child gains weight when away from home;
- being inadequately dressed, dirty or smelly, where the lack of care is preventing the child from thriving;
- persistent stomach aches, feeling unwell and apparent anorexia, which can be associated with physical neglect;
- untreated medical or dental needs.

Signs of stress and distress

24.1 A child who is suffering any of the categories of abuse above will nearly always show signs of stress and distress, such as:

- a lack of concentration and a deterioration in school performance;

- aggressive or hostile behaviour;
- moodiness, depression, irritability, listlessness, fearfulness, tiredness, temper tantrums, a short concentration span, being withdrawn, or crying at minor things;
- difficulties in relationships with peers;
- regression to more immature behaviour, e.g. bed-wetting;
- self-harming or suicidal behaviour;
- low self-esteem;
- wariness, insecurity, running away or truancy (children who persistently run away from home may be escaping abuse);
- disturbed sleep;
- general personality changes, such as unacceptable behaviour or severe attention-seeking;
- a sudden change in school performance.

25. Parental behaviours that may indicate abuse

25.1 If the School believes a parent's behaviour is endangering a child, it will put the safety of the child first, above the wishes of the parent. The wellbeing and safety of pupils is paramount.

25.2 Parental behaviours that could raise or reinforce concerns include:

- implausible explanations of injuries;
- unwillingness to seek appropriate medical treatment for injuries;
- an injured child being kept away from school until injuries have healed, without adequate reason;
- a high level of hostility expressed towards the child;
- grossly unrealistic expectations of the child's development or achievement;
- a general dislike of child-like behaviour;
- inappropriately labelling the child's behaviour as bad or naughty;
- leaving children unsupervised when they are too young to be left alone.

26. Affluent neglect

26.1 Staff should be mindful of "affluent neglect", where children from wealthier families may experience neglect, particularly emotional neglect. For example, it can happen when parents work long hours and leave children unsupervised for long periods, or in the care of paid staff, which can lead to an emotional disconnect. Emotional neglect can be harder to detect when pupils board and parents are "absent".

26.2 Children from affluent families may be more vulnerable to harmful sexual activity when unsupervised, or may have the money to engage in illicit activities such as drug use. Pupils may also feel significant pressure to perform at school because of the financial cost and family expectations.

26.3 Affluent parents may also be vulnerable to alcohol or substance misuse or mental illness, which increases the vulnerability of the children in their care.

26.4 Staff must remember that affluence is not a barrier to abuse, stay alert to possible signs and symptoms, and be aware of possible unconscious bias when considering whether a pupil might be suffering abuse.

27. Mental health

27.1 All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Only appropriately trained professionals, such as a doctor, should attempt to diagnose a mental health problem. Staff are, however, well placed to observe children day to day and to identify those whose behaviour suggests they may have, or be at risk of developing, a mental health problem.

27.2 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are made aware of how these experiences can affect children's mental health, behaviour and education.

27.3 Where staff are concerned about a pupil's mental health, or a pupil discloses a mental health concern, this must be reported through CPOMS or directly to the DSL. Where necessary, the School Doctor and/or School Counsellor will assess the case and identify further support, including working with external specialists. Where there is any risk of suicide or self-harm, the Suicide and Self-Harm Risk Policy (HBB-POL-02) must be followed.

28. Preventing radicalisation

28.1 **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to: (1) negate or destroy the fundamental rights and freedoms of others; (2) undermine, overturn or replace democratic systems and rights; or (3) intentionally create a permissive environment for others to achieve the results in (1) or (2).

28.2 **Radicalisation** is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

28.3 **Terrorism** is an action that endangers or causes serious violence to a person or people, causes serious damage to property, or seriously interferes with or disrupts an electronic system, where the use or threat is designed to influence a government or intimidate the public, and is made to advance a political, religious or ideological cause.

28.4 Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. It is possible to intervene during the process of radicalisation to stop vulnerable people being radicalised.

28.5 There is no single way of identifying someone who is likely to be susceptible to an extremist ideology. Radicalisation can happen in many different ways and settings. Specific background factors may contribute to vulnerability, often combined with influences such as family, friends or online communities, and with specific needs for which an extremist or terrorist group may seem to offer an answer. The internet and social media, including algorithm-driven content and AI-generated material, are a major factor in the radicalisation of young people.

28.6 As with other safeguarding risks, staff should be alert to changes in a child's behaviour that could show they need help or protection. Staff should use their professional judgement to identify children who might be at risk of radicalisation and act proportionately, by referring concerns to the DSL.

28.7 All teaching and pastoral staff are expected to understand the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means having a general understanding of the risks affecting children and young people locally, and a specific understanding of how to identify individual children who may be at risk and what to do to support them.

28.8 All staff complete Prevent awareness training, so that they can identify children at risk of being drawn into terrorism and challenge extremist ideas.

28.9 Through ICT lessons, online safety education, internet filtering, firewalls and automatic alerts, the School works to keep children safe from terrorist and extremist material when using the School network. The ICT Manager makes sure the sites pupils access on the School network are monitored, and liaises regularly with the DSL. Whenever a pupil accesses a site or searches for information on a topic of concern (for example extremist organisations), a check is run on what other sites they are accessing and, where necessary, the matter is referred to the Child Protection Team.

28.10 Any pupil about whom a concern is raised about susceptibility to radicalisation or extremism will be referred to the Child Protection Team and placed on the School's "pupils at risk" register. Each case is dealt with individually, with consideration given to the most appropriate response. This may include engaging with parents, family or guardians, seeking specialist advice through

COBIS or TSA, or a referral to the police. For pupils with links to the UK, a referral to the Channel programme may be considered.

Possible indicators that a pupil may be at risk of radicalisation

28.11 The characteristics below do not necessarily mean that a person is committed to terrorism or may become a terrorist.

Engagement with a group, cause or ideology. Engagement factors (sometimes called "psychological hooks") include needs, susceptibilities, motivations and contextual influences. They can include:

- feelings of grievance and injustice;
- feeling under threat;
- a need for identity, meaning and belonging;
- a desire for status;
- a desire for excitement and adventure;
- a need to dominate and control others;
- susceptibility to indoctrination;
- a desire for political or moral change;
- opportunistic involvement;
- family or friends' involvement in extremism;
- being at a time of transition in life;
- being influenced or controlled by a group;
- relevant mental health issues.

Intent to cause harm. Not everyone who engages with a group, cause or ideology develops an intention to cause harm. Intent factors can include:

- over-identification with a group or ideology;
- a "them and us" mentality;
- dehumanisation of the "enemy";
- attitudes that justify offending;
- harmful means to an end;
- harmful objectives.

Capability to cause harm. Factors can include:

- individual knowledge, skills and competencies;
- access to networks, funding or equipment;
- criminal capability.

29. Child sexual exploitation (CSE) and child criminal exploitation (CCE)

29.1 CSE and CCE are both forms of abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Age may be the most obvious source of this imbalance, but it can also come from a range of other factors, including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

29.2 In some cases the abuse is in exchange for something the victim needs or wants, and/or is to the financial or other advantage (such as increased status) of the perpetrator or facilitator.

29.3 The abuse can be committed by individuals or groups, males or females, and children or adults. It can be a one-off or a series of incidents over time, and can range from opportunistic to complex organised abuse. It can involve force and/or enticement and may or may not be accompanied by violence or threats of violence.

29.4 Victims can be exploited even when the activity appears consensual. Exploitation can be physical and can also be facilitated by, or take place, online, including through financially motivated sexual extortion ("sextortion").

29.5 **Child sexual exploitation** is a form of child sexual abuse. It can include contact (penetrative and non-penetrative) and non-contact sexual activity, and may happen without the child's immediate knowledge (e.g. through others copying videos or images they have created and posted online).

29.6 Any member of staff who believes a pupil may be at risk of CSE, or to whom a pupil discloses information about CSE, must make clear to the pupil that this information cannot be kept confidential, and must refer it immediately to the Child Protection Team.

29.7 **Child criminal exploitation**, including involvement in drug supply networks and trafficking, is another form of harm that can damage a child's development and outcomes. Staff should be aware that girls' experience of criminal exploitation can be very different from boys', and that the indicators may differ.

29.8 Indicators of CCE include children who:

- appear with unexplained gifts, money or new possessions;
- change friendships or relationships, or associate with older individuals or groups, or with other young people involved in exploitation;
- show changes in emotional wellbeing or a significant decline in performance;
- appear with signs of assault or unexplained injuries;
- misuse drugs or alcohol, or self-harm;
- go missing for periods of time or regularly return late;
- regularly miss school or education.

30. So-called "honour"-based abuse, FGM, and forced and child marriage

30.1 So-called "honour"-based abuse (HBA) covers incidents or crimes committed to protect or defend the "honour" of a family and/or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse, whatever the motivation, and must be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can involve multiple perpetrators. The School takes this, and other additional risk factors, into account when deciding what safeguarding action to take.

30.2 If in any doubt, staff should speak to a member of the Child Protection Team. All staff must be alert to the possibility that a child is at risk of, or has already suffered, HBA.

30.3 **Female genital mutilation (FGM)** is child abuse. There is a range of possible indicators that a child may be at risk of FGM. Individually they may not indicate risk, but two or more together could. Girls at risk may not yet be aware of the practice or that it may be carried out on them, so sensitivity must always be shown. Any member of staff who believes a pupil may be at risk of FGM, or to whom a pupil discloses FGM, must make clear that this cannot be kept confidential and must inform the DSL immediately. Where a pupil is found to have undergone FGM, the police must be informed. Further information is in Appendix 2, which reproduces the UK mandatory reporting guidance as a reference.

30.4 **Forced marriage** is a marriage entered into without the full and free consent of one or both parties, where violence, threats or any other form of coercion is used. Threats can be physical, emotional or psychological. A lack of full and free consent can be where a person does not consent or cannot consent (for example because of a learning disability). Some communities use religion and culture to coerce a person into marriage.

30.5 **Child marriage** (marriage under the age of 18 for women and 21 for men) is prohibited under the Child Marriage Restraint Act 2017 of Bangladesh. Any concern that a pupil may be at risk of forced or child marriage, including being taken abroad for marriage during the holidays, must be reported to the DSL immediately.

31. Upskirting

31.1 "Upskirting" is taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, to view their genitals or buttocks (with or without underwear), to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. It is a form of

sexual harassment and is treated as child-on-child abuse. Anyone of any gender can be a victim.

32. Prejudice-based harm, racism and misogyny

32.1 In line with KCSIE 2026, the School recognises that racism, faith-based prejudice and other forms of discrimination (including on grounds of sex, nationality, disability or sexual orientation) can be safeguarding issues, causing significant harm to children's wellbeing, mental health and sense of safety.

32.2 Misogyny, and the online influences that promote it, are linked to harmful sexual behaviour and child-on-child abuse. Staff challenge misogynistic and prejudiced language and behaviour, and the School's Wellbeing and Tutorial programme teaches respect and healthy relationships.

32.3 Prejudice-based incidents are recorded on CPOMS, monitored by the DSL for patterns, and dealt with under the Behaviour Policy and the Countering Bullying Policy, with support for those affected.

33. Children who are questioning their gender

33.1 Any request from a pupil, or about a pupil, relating to questioning their gender is handled with care, sensitivity and the child's welfare as the paramount consideration, taking account of the guidance in KCSIE 2026 and the law and cultural context of Bangladesh. Each case is considered individually by the DSL and the Headmaster. Parents are involved in decisions except in the rare cases where doing so would put the child at significant risk of harm. The School considers the child's wellbeing, the safety and privacy of all pupils (including in boarding accommodation, toilets and changing facilities), and any wider safeguarding vulnerabilities.

34. Children with special educational needs and disabilities

34.1 Children with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges, including greater vulnerability to child-on-child abuse. Staff are aware that there can be additional barriers to recognising abuse and neglect in children with SEND, including:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's condition without further exploration;
- children with SEND being disproportionately affected by things like bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming them.

34.2 The Countering Bullying Policy, the Behaviour Policy and the Equal Opportunities for Pupils Policy give more information on how pupils with SEND are supported. Where reasonable force is used, staff are reminded that it must be minimised, particularly with pupils with SEND.

35. Pupils with medical conditions

35.1 Pupils with medical conditions, including allergies, are supported through individual healthcare plans managed by the Medical Centre. In line with KCSIE 2026, a medical incident alone (for example an allergic reaction) does not usually need a safeguarding referral. A referral to the DSL is made where there is concern that a child may be at increased risk of neglect, abuse or exploitation because of their condition, for example if treatment is being withheld or a condition is not being properly managed at home.

36. Young carers

36.1 Some pupils may have caring responsibilities for a family member at home, which can affect their wellbeing, attendance and learning. Staff who become aware that a pupil may be a young carer should tell the DSL, so that appropriate support can be put in place.

37. Looked-after children and children who need a social worker

37.1 Children who are, or have been, in the care of the state, or in the care of extended family or guardians because their parents cannot care for them, can be particularly vulnerable. Staff are reminded that previously looked-after children remain vulnerable.

37.2 Children may need the support of social services because of safeguarding or welfare needs, such as abuse, neglect or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm and educationally disadvantaged, facing barriers to attendance, learning, behaviour and mental health. The DSL holds and uses this information so that decisions can be made in the child's best interests, including on pastoral and academic support and the response to any absence.

38. Advocacy for pupils

38.1 Pupils at Haileybury Bhaluka always have adult support, such as their HM or Tutor, when they need it, for example at disciplinary meetings. The DSL will advise pupils who may need advocacy support on the options available.

39. Children and the court system

39.1 Due care is shown for pupils who may have to appear in court, or whose families are involved in court proceedings, both of which can be extremely stressful for children. Where children are required to give evidence, appropriate support and guidance are sought, according to their age. Where a family is in court following separation, and conflict may become entrenched, the School offers support through its pastoral and counselling services, led by the Child Protection Team with the relevant HM.

40. Children with family members in prison

40.1 Haileybury Bhaluka recognises that children with a parent or family member in prison are at increased risk of poor outcomes, including poor mental health. Support is offered through the School's pastoral and counselling services to help reduce the negative consequences for these pupils, led by the Child Protection Team with the HM.

41. Homelessness and domestic abuse at home

41.1 Homelessness, or the risk of becoming homeless, and domestic abuse at home pose a risk to a child's welfare and wellbeing, even when the child is a boarder. Where the School becomes aware of such circumstances, the DSL will consider the wider safeguarding picture, make sure the pupil is supported, and share information appropriately. Where there is also a risk of harm to the child, a referral to the appropriate authorities will be made.

42. Pupils who self-harm

42.1 Self-harm is a serious matter, and young people who self-harm are at risk. Self-harm covers a wide range of things that people do to themselves deliberately, often secretly, and it can continue for a long time without being discovered. The School's detailed procedures are set out in the **Suicide and Self-Harm Risk Policy (HBB-POL-02)**, which all staff must follow.

42.2 Any member of staff to whom a pupil discloses self-harm, or who suspects self-harm, must make clear to the pupil that this cannot be kept confidential, and must refer it immediately to the Child Protection Team and the Medical Centre.

42.3 The Child Protection Team will seek specialist help immediately through the Medical Centre and the School Counsellor. The School Doctor will assess the pupil's needs and level of risk. Where the child is at immediate risk, any member of staff may call an ambulance (999) or take the child directly to a hospital emergency department.

42.4 In all cases of self-harm, active consideration must be given to informing the child's parents. Unless there is a compelling safeguarding reason not to, parents are informed and kept closely in touch with developments.

43. Children absent or missing from education

43.1 Children who are absent from education, particularly repeatedly or for long periods, can be at significant risk of underachievement, harm, exploitation or radicalisation. A child going missing from school, including from a boarding House, is a potential indicator of abuse, neglect, exploitation or radicalisation.

43.2 Full details of the procedure for unexplained absences and missing pupils are in the School's Registration and Missing Pupil Policy (on the Staff Portal). The School holds more than one emergency contact number for each pupil wherever reasonably possible. All cases where a pupil has left the School grounds without permission are referred to the Child Protection Team, which considers each case individually to identify any risk of abuse, neglect, sexual abuse, exploitation or radicalisation.

43.3 Pupil non-attendance is followed up by the HM in the first instance, with the Headmaster informed. Any pupil who repeatedly misses school, is repeatedly removed from lessons, or goes missing is brought to the attention of the Child Protection Team.

Appendix 1: Designated Safeguarding Lead (DSL) job description

The DSL reports to the Headmaster on all matters relating to safeguarding and child protection and takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems in place. As a member of the School's Senior Leadership Team, the DSL has the status and authority needed to carry out the role. The DSL is given the time, funding, training, resources and support to advise and support staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (or support other staff to do so), and to contribute to the assessment of children.

The DSL manages the Child Protection Team, which comprises the Deputy DSLs, the Assistant Head: Student Welfare and the School Nurse, and makes sure its members receive regular and appropriate training. Although the DSL can delegate activities and individual cases to the Deputy DSLs, the ultimate lead responsibility for child protection remains with the DSL and must not be delegated.

Manage referrals. The DSL is expected to:

- refer cases where a crime may have been committed to the police, as required (e.g. FGM);
- refer cases to local services (e.g. the Child Affairs Desk at the police station, or the Department of Social Services) and seek advice from COBIS/TSA, as appropriate;
- make sure the relevant authorities are informed (including, where applicable, the DBS and TRA) when a member of staff is dismissed or leaves because of risk or harm to a child.

Work with others. The DSL will:

- keep the Headmaster informed of issues;
- liaise with staff on matters of safety and safeguarding, including when deciding whether to make a referral;
- act as a source of support, advice and expertise for staff;
- liaise with the School Doctor and the School Counsellor, so that all pupils receive appropriate support and early intervention when needed;
- liaise with the ICT Manager on online safety, filtering and monitoring, and the ICT and AI Acceptable Use Policy;
- receive and review all bullying and prejudice-based incidents on CPOMS to consider escalation to child protection, and review the Countering Bullying Policy;
- act as Online Safety Coordinator, working with the Online Safety Group to promote online safety and a culture that counters all forms of bullying.

Training. The DSL (and Deputy DSLs) must undertake formal DSL training, updated at least every two years. In addition, the DSL must refresh their knowledge and skills at regular intervals, and at least annually (e.g. through e-bulletins, DSL networks such as B-SAFE and COBIS, and reading safeguarding developments), so that they:

- understand the early help process and how to assess a child's needs;

- understand how child protection case conferences and reviews work, and can contribute effectively when required;
- make sure every member of staff has access to, and understands, this policy and the School's procedures, especially new and part-time staff;
- are alert to the specific needs of children in need, children with SEND and young carers;
- keep detailed, accurate and secure written records of concerns and referrals on CPOMS;
- understand the Prevent duty and can advise staff on protecting children from radicalisation;
- understand the safeguarding risks posed by emerging technology, including generative AI;
- encourage a culture among all staff of listening to children and taking account of their wishes and feelings in any measures put in place to protect them;
- make sure all staff are trained to use CPOMS; and
- deliver induction and annual refresher child protection training for teaching and support staff, with full updates in August/September.

Raise awareness. The DSL must:

- make sure the School's child protection policies are known, understood and used appropriately;
- give the Leadership Team anonymised fortnightly updates on child protection issues;
- make sure this policy is reviewed at least annually and that procedures and their implementation are updated and reviewed regularly, working with Governors;
- make sure this policy is publicly available and that parents know that referrals about suspected abuse or neglect may be made, and the School's role in this;
- make sure all staff know about training opportunities and the latest safeguarding guidance;
- attend each termly meeting of the Education and Safeguarding Committee and provide a written report on pupil and staff wellbeing, safeguarding and discipline.

Pupils joining and leaving. The DSL will:

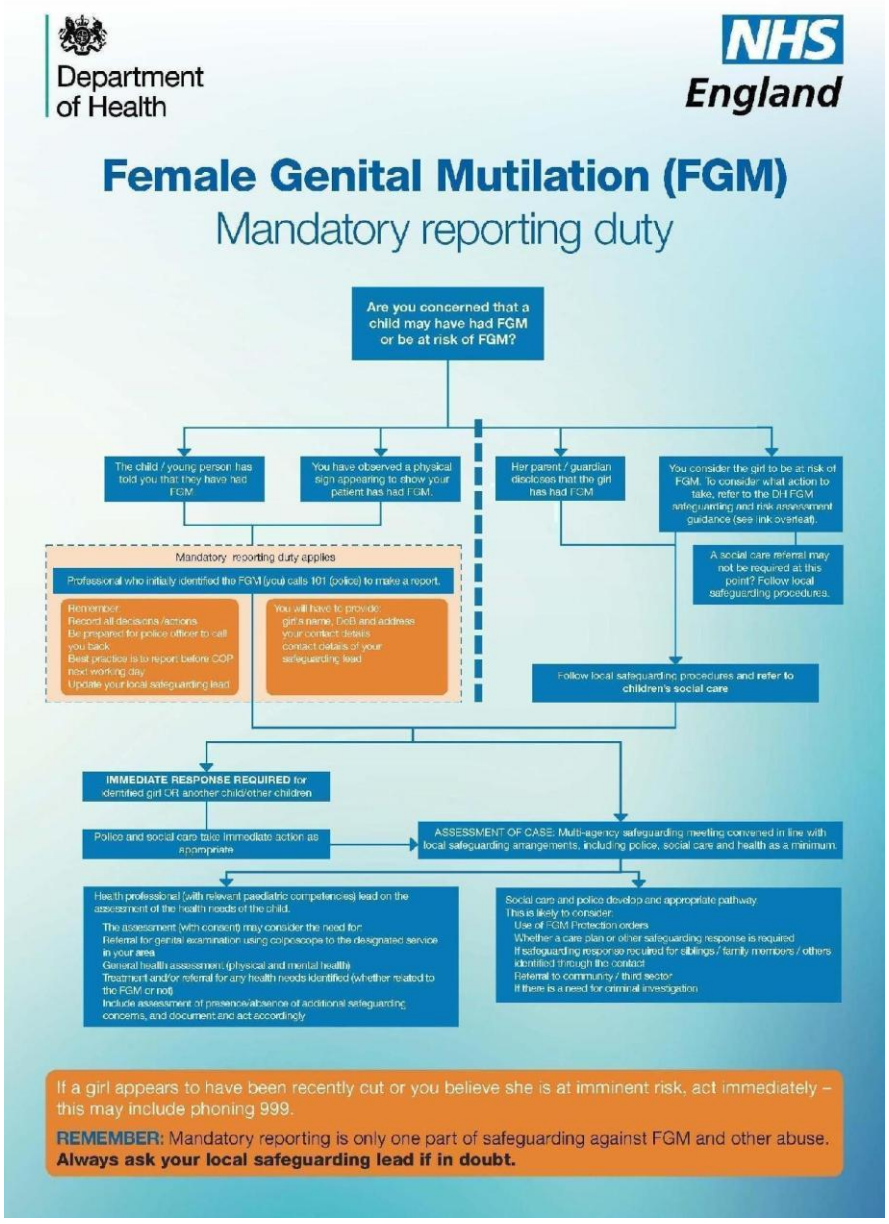
- request child protection information from previous schools for all new pupils at the start of T1 (and for in-year joiners on entry), and file the responses so that any concern is known to the Child Protection Team;
- make sure that, when a child leaves, their child protection file is transferred to the new school as soon as possible (and within five school days of the child starting there), separately from the main pupil file and securely, with confirmation of receipt obtained;
- work with the Admissions Department and the School Office to keep the Admissions Register accurate.

Availability. The DSL will:

- produce a rota, available to the Leadership Team, the Headmaster and HMs, showing which member of the Child Protection Team is available during the school day. The DSL or Deputy DSLs are expected to be available in person, although in exceptional circumstances availability by telephone is acceptable;
- arrange adequate cover for out-of-hours and out-of-term activities, agreed with the Headmaster, including evening and weekend cover in the boarding Houses.

Appendix 2: Female genital mutilation – mandatory reporting guidance (UK reference)

The following UK Department of Health / NHS England guidance is reproduced as a reference for staff. At Haileybury Bhaluka, any concern about FGM must be reported immediately to the DSL, who will inform the police.



Female Genital Mutilation (FGM) is child abuse and illegal.

Regulated health and social care professionals and teachers are required now to report cases of FGM in girls under 18s which they identify in the course of their professional work to the police.

How can I prepare?

FGM mandatory reporting duty and FGM safeguarding best practice guidance is available from: **www.gov.uk/dh/fgm**

FGM eLearning: **www.e-lfh.org.uk/programmes/female-genital-mutilation**

Videos: **www.nhs.uk/fgmguidelines**

FGM Multi Agency Practice Guidelines: **www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation**

- **www.workingtogetheronline.co.uk**

Search for guidance from Royal Colleges and regulators

Remember:

This is a personal duty; the professional who identifies FGM / receives the disclosure must make the report.

If a woman is over 18 when she discloses / you identify FGM, the duty does not apply and you should follow local safeguarding processes.

Do not undertake a genital examination unless this is already part of your role.

Complying with the duty does not breach data protection rules or other confidentiality requirements.

Non regulated healthcare staff should report through existing safeguarding procedures.

This duty is about reporting a crime. NHS organisations continue to be responsible for collecting and recording data on FGM.

FAQs

A girl is using another term which I think is FGM. Do I need to report?
Yes. Whether she uses the term 'FGM' or any other term or description, e.g. 'sunna' or 'cut', the duty applies.

Does the duty apply to professionals in private education/healthcare?
Yes, if working as a regulated professional, the duty will apply.

Should you only report if you are certain that FGM has been carried out?
When you see something which appears to show in your opinion that a girl has FGM, you should make the report. A formal diagnosis will be sought as part of the subsequent multi-agency response.

I have identified a case but the patient is over 18, what should I do?
The duty does not apply in this case. You should signpost the woman to services offering support and advice. You may also need to carry out a safeguarding risk assessment considering children who may be at risk or have had FGM.

Some FGM is very difficult to notice. What if I did not notice signs when I was caring for a patient who is later identified as having had FGM?
If an allegation of failure to report is made, all relevant circumstances will be taken into account by the regulators, including your experience and what could reasonably have been expected.

I am treating a girl under 18 with a genital piercing / tattoo / non-medically indicated genital surgery. What should I do?
You should make a report.

How quickly should I make a report?
The safety of the girl or others at risk of harm is the priority. You should report ASAP with the same urgency as for all other safeguarding cases. If you believe reporting would lead to risk of serious harm to the child or anyone else, contact your designated safeguarding lead for advice; you may need longer to take action, in exceptional circumstances.

Should I tell the girl / family about the report?
Yes, wherever possible you should explain why the report is being made and what it means. If you believe reporting would lead to risk of serious harm to the child or anyone else, do not discuss it but instead contact your local designated safeguarding lead for advice.

Following a risk assessment for a girl I've identified as being at risk of FGM, it isn't appropriate to refer to social care at this point. What should I do?
You should share information about the potential risk and your actions with your colleagues across health (GP, school nurse and health visitor as a minimum) and discuss next steps with your local safeguarding lead.

CPHVA unite the UNION · The Royal College of Midwives · Royal College of Nursing · Royal College of Obstetricians & Gynaecologists · RCPCH Royal College of Paediatrics and Child Health

Appendix 3: Glossary

Term	Meaning
B-SAFE	Bangladesh Safeguarding Alliance for Educators
CCE	Child criminal exploitation
COBIS	Council of British International Schools
CPOMS	Child Protection Online Monitoring System, the School's safeguarding recording system
CPD	Continuing professional development
CSE	Child sexual exploitation
DBS	Disclosure and Barring Service (UK)
DfE	Department for Education (UK)
DSL	Designated Safeguarding Lead
FGM	Female genital mutilation
HBA	So-called "honour"-based abuse
HM	Housemaster or Housemistress
KCSIE	Keeping Children Safe in Education (DfE statutory guidance; 2026 edition)
LT	Leadership Team
NSPCC	National Society for the Prevention of Cruelty to Children (UK)
SEND	Special educational needs and disabilities
STI	Sexually transmitted infection
TRA	Teaching Regulation Agency (UK)
TSA	The Safeguarding Alliance
UKCIS	UK Council for Internet Safety

44. Review record

Summary of changes (October 2026 review)

Area	Change made
Dates and review	Policy date October 2026; next review August 2027, after the publication of KCSIE 2027. The review date was moved from June to August so that it follows the annual KCSIE update.
KCSIE 2026	All references to KCSIE 2024 and 2025 updated to KCSIE 2026, in force from 1 September 2026. All staff now read the full Part One (Annex A no longer exists).
KCSIE 2026	New or strengthened content: "sexting" and "indecent images" replaced with "nudes" (including AI-generated and altered images); deepfakes and generative AI; misogyny; racism, faith-based prejudice and other discrimination as safeguarding issues; updated definition of sexual abuse ("forcing, causing or inciting"); relevant, necessary and proportionate information sharing; children questioning their gender; medical conditions; young carers; mental health; pupils repeatedly removed from class.

Area	Change made
Other guidance	"Working Together" (2018/2023) updated to Working Together to Safeguard Children 2026. Information sharing advice (2018) updated to May 2024. "Every Child Matters" and the 2015 social media radicalisation briefing removed. Hertfordshire SCP self-harm reference replaced with the School's own Suicide and Self-Harm Risk Policy (HBB-POL-02).
Bangladesh context	"Inter-agencies do not exist in Bangladesh" replaced with the local services the School uses: 999 national emergency, the 1098 Child Helpline, the 109 helpline for violence against women and children, and the Child Affairs Desk at police stations under the Children Act 2013. Relevant Bangladeshi legislation listed. UK-only processes (DBS, TRA, Channel, children's social care, MASH) now apply "where applicable", with local equivalents named.
Roles	"Nominated Safeguarding Lead" corrected to Designated Safeguarding Lead throughout. Deputy DSLs named (HM and Housemistress), and the Assistant Head: Student Welfare added to the Child Protection Team. "Operations Manager" / "Operating Officer" changed to COO. Duplicated "Bhaluka Bhaluka" heading and "& and" typos corrected. Committee name standardised as Education and Safeguarding Committee.
Co-education	Wording updated for co-educational boarding (Housemasters and Housemistresses; boys and girls).
Self-harm	The detailed list of self-harm methods removed, in line with good practice. Procedures now refer to HBB-POL-02.
Placeholders	Chair of Governors and Safeguarding Governor shown as highlighted placeholders, to be completed before approval.
Structure	Sections renumbered (the previous version had no section 27 and restarted at 1 part-way through). Contents grouped into four parts.

Version history

Date	Version	Reviewed by	Notes
August 2026	2026-27 draft	Headmaster	Annual update for KCSIE 2025; DSL appendix last reviewed June 2026
October 2026	2026–27 v1.0	Headmaster (SOG)	Full review: dates, statutory references, roles and consistent Haileybury Bhaluka policy format
November 2026	2026–27 v1.1	Headmaster (SOG)	Pupil toilets, washrooms and changing areas added (11.7 to 11.10); 11.4 and 21.4 updated to match

Approved by the Board of Governors	
Signed (Chair of Governors)	
Date	