



Haileybury Bhaluka

## Safeguarding & Child Protection Policy

Policy date:	September 2024
Date of next review:	September 2025
Owner:	Headmaster
Policy links	Safer Recruitment Policy 2024
LT committee responsible:	-
Intended audience:	All
Location:	School portal and website

## 1. Commitment to Safeguarding

- 1.1 Haileybury Bhaluka is a safe, happy and successful school. It is committed to being a welcoming, and friendly school where unkindness and bullying have no place and pupils are protected from harm. Safeguarding and child protection are at the core of all we do and are the responsibility of everyone. It identifies the complex nature of safeguarding in a different context and this policy will be continually reviewed in collaboration with stakeholders to ensure best practice exists whilst ensuring that the local laws and context is reflected and followed.
- 1.2 Pupils can access support from a range of individuals within the school community, such as the School Counsellor, the School Doctor, their HM and their Tutor. In addition, they can raise a concern with **any member of staff** whom they trust and feel comfortable talking to. All staff are responsible for responding to concerns and escalating them appropriately. Members of Haileybury staff, in keeping with KCSIE, will be **empathetic, trusting and consistent** in response to concerns and in line with school values.

## 2. Key safeguarding personnel

- 2.1 At Haileybury the Child Protection Team is led by the Designated Safeguarding Lead (DSL) for Child Protection with all safeguarding and child protection matters: the School Doctor, the School Counsellor and the House Master.
- 2.2 During term time a member of the Child Protection Team will always be available for staff, pupils or parents to discuss any safeguarding concerns. All members of the Child Protection Team keep their knowledge and skills up to date, and undertake appropriate training at least annually and in accordance with the requirements set out in the UK government's '[Keeping Children Safe in Education](#)' (KCSIE, September 2022) and '[Working Together to Safeguard Children](#)' (July 2018). In addition to this, Haileybury Bhaluka aims to play an active role in developing safeguarding in English Medium Schools in Bangladesh. As this develops and central guidance is updated, staff will receive training and updates as appropriate.
- 2.3 Contact details for Haileybury's Child Protection Team:

**DSL:** Ms [Erika Johanna Segura](#)

Email address: [safeguarding.bhaluka@haileybury.com.bd](mailto:safeguarding.bhaluka@haileybury.com.bd)

The designated Governor for Child Protection and Safeguarding at Haileybury is **TBC** who can be contacted via: [safegovernance@haileybury.com.bd](mailto:safegovernance@haileybury.com.bd)

- 2.4 Haileybury is committed to working with local agencies to ensure that safeguarding is undertaken in accordance with a contextualised approach. As such, this policy will be updated regularly to reflect local regulatory requirements and KCSIE updates.
- 2.5 The DSL and the Child Protection Team liaise with its safeguarding partners (TSA, BSAFE and The British Council and work with other agencies as appropriate. Through our continued work with all stakeholders, Haileybury Bhaluka will seek to set the standard for best practice contextually whilst driving standards across Private English Medium Schools and beyond.
- 2.6 Haileybury Bhaluka is committed to safeguarding children and promoting their welfare and wellbeing. Staff are aware that whilst the DSL takes lead responsibility for safeguarding and child protection **all staff** have a role to play in safeguarding children. To fulfil this role effectively

Haileybury adopts a whole school approach, which is pupil-centred focusing on the best interest of the child at all times.

### **3. Safeguarding training for staff**

- 3.1 Every member of Haileybury Bhaluka staff and Governors are given appropriate Safeguarding and Child Protection training. Staff training is provided by the DSL or a member of the Child Protection Team. Safeguarding and child protection training is delivered to all new starters as part of the induction process. Certification is provided by TES Safeguarding for School Staff.
- 3.2 Governors receive training which is appropriate to their role, to equip them for ensuring that the School's safeguarding policies and procedures are effective. Training for governors is overseen by Haileybury UK.
- 3.3 Safeguarding and child protection training is overseen by the School's HR Department in conjunction with the DSL. The HR Department maintains up to date records of when staff have completed such training to ensure that everyone has complied with this requirement.
- 3.4 Refresher training is provided for all staff at least every three years with additional safeguarding and child protection updates being provided at least annually.
- 3.5 This Safeguarding and Child Protection Policy provides the foundations of the child protection training delivered to all staff at Haileybury Bhaluka. In addition, all staff are made aware of other policies relevant to safeguarding including the School's Rewards, Behaviour and Sanctions Policy; ICT Acceptable Use Policy; Anti-Bullying Policy; Equal Opportunities for Pupils Policy; Safer Recruitment Policy; Whistleblowing Policy; Staff Code of Conduct; and the Visitors, Contractors and Site Security Policy. These are all available on the School Portal. The Staff Code of Conduct sets out the standards expected of staff in terms of their behaviour and conduct. These standards are covered within induction and staff training and are in place to ensure that no member of staff's actions place any pupil (or themselves) at risk of actual or alleged harm. Examples of situations where this may be particularly relevant include one-to-one tuition, sports, drama or music coaching and tuition, and in electronic communication with pupils.
- 3.6 All staff are provided with an electronic copy of Part 1 (or Annex A if they do not work directly with children) of KCSIE during induction and receive an electronic copy of the up-to-date document annually. All staff are required to complete a questionnaire after they have read KCSIE (Part 1 or Annex A as appropriate to their role) and this Safeguarding and Child Protection Policy, and to provide a signed form stating they have read and understood both documents. Whenever an updated version of KCSIE is issued, all staff are asked to repeat this process. As the school is not directly accountable to the UK Government, it seeks to meet COBIS safeguarding standards as a minimum and staff should be aware of this as a matter of 'best practice'. HR will keep a record of all training and updates as deemed appropriate by LT (at least annually).
- 3.7 All staff are made aware of acceptable behaviour and criminal offences in the UK and Bangladesh context and through reading KCSIE and other updates. E.g. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. In the UK, it is a criminal offence.
- 3.8 All staff are made aware, through reading KCSIE and other updates, of indicators of contextualised serious crime, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained

gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs.

- 3.9 The Continuing Professional Development (CPD) Programme provides teaching staff with additional related training from both internal and external agencies. Several members of staff will be trained in Youth Mental Health First Aid and other staff members will receive training from senior leaders as appropriate.
- 3.10 All staff are made aware in their application process, induction and training that the School follows the Department for Education guidance on Child Protection:
- [Keeping Children Safe in Education \(KCSIE, September 2022\)](#)
  - [Working Together to Safeguard Children \(July 2018\)](#)
  - [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges \(September 2021\)](#)
  - Input appropriate COBIS documentation
- 3.11 The following legislation and guidance have also been used to inform this Safeguarding and Child Protection Policy, all related procedures, and any child protection training undertaken at Haileybury:
- Local inter-agency guidance in Bhaluka
  - [Working Together to Safeguard Children \(July 2018\)](#)
  - The Child Protection and Safeguarding Handbook for Schools, 2<sup>nd</sup> edition (June 2013)
  - Every Child Matters; Dealing with Allegations of Abuse against Teachers and other Staff – Guidance for Local Authorities
  - The use of social media for online radicalisation (July 2015)
  - Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
  - What to do if you are worried that a child is being abused - Advice for practitioners (March 2015)

#### **4. Educating pupils about safeguarding and child protection**

- 4.1 As made clear in this and other policies, such as our Countering Bullying Policy and our Rewards, Behaviour and Sanctions Policy, Haileybury is committed to being a welcoming and friendly community where unkindness and bullying have no place. Embedded within the culture of the School is an understanding of the importance for pupils to respect one another and be helpful, tolerant and supportive.
- 4.2 All pupils are educated about safeguarding, online safety, radicalisation and child protection issues through the School's Wellbeing and Tutorial programme (also covering topics including relationships, diversity and inclusion, gender issues, hazing, sexting, and initiation). At the start of each academic year all pupils are introduced by video to the Child Protection Team, School Counsellors, and informed of the various roles they serve within the context of safeguarding, as well as being made aware of how to contact these individuals. A number of emergency contacts are available to all pupils at all times, including the Child Protection Team and Health Centre.



- 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.

## **7. Online safety**

- 7.1 The DSL takes lead responsibility for online safety and also has the role of Online Safety Coordinator. There is an Online Safety Group consisting of the DSL, the Headmaster and the IT manager. This group meets half termly and takes responsibility for issues regarding online safety, filtering and the monitoring of online safety and usage. Its functions are set out in its terms of reference available on the School Portal.
- 7.2 The School has a Staff Code of Conduct and ICT Acceptable Use Policy which cover online safety, and all staff and residents must complete a form at the start of each academic year to confirm that they have read and understood these policies. Pupils are also asked to confirm each year that they have read the ICT Acceptable Use Policy.
- 7.3 The IT Department has in place a robust filtering and monitoring system which is reviewed and tested regularly by the IT Manager in conjunction with external organisations where relevant to ensure effectiveness. The IT Manager regularly reports on such matters to the School's IT Committee, and the Governors' Safeguarding & Wellbeing Committee. All staff are made aware, through training and the ICT Acceptable Use Policy, of the filtering systems in place, and understand how to escalate concerns arising from filtering alerts. The School regularly communicates with parents and carers to reinforce online safety and to share helpful information.
- 7.4 The Governors' Safeguarding and Wellbeing Committee regularly reviews the School's ICT Acceptable Use Policy and receives reports from the DSL and IT Manager.

## **8. Dealing with concerns about a child**

### **8.1 Logging and reporting concerns**

- 8.1.1 An important part of safeguarding and child protection includes identifying and being aware of the signs and types of behaviour which may indicate that there are more serious issues affecting a pupil. Further information regarding definitions and indicators of abuse are found later in this document. Even seemingly small concerns could be an indicator of something more serious, and staff are trained to exercise "professional curiosity". It is also important for staff to remember that children may not feel ready or know how to tell someone that they are being abused.
- 8.1.2 All staff could have the opportunity to observe possible signs of abuse, changes in behaviour or a failure to thrive. Staff must report to the DSL or another member of the Child Protection Team at the earliest opportunity anything which gives them cause for concern regarding a child's welfare, no matter how seemingly insignificant. All staff are regularly encouraged and reminded of their duty to report issues, because whilst one symptom alone may not give grave cause for concern, if a number of symptoms are noticed by different members of staff, the broader picture may be more serious. No single person can have a full picture of a child's needs and circumstances, and staff must remember their role and responsibility in the early identification of signs and symptoms of potential abuse, neglect and radicalisation.
- 8.1.3 One way in which staff at Haileybury Bhaluka can refer concerns is through TES My Concer, the system in place at Haileybury Bhaluka. Any member of staff can access MY CONCERN and report a concern about a child. Reported concerns are

only accessible by the Child Protection Team and specified pastoral staff, but all staff are able to use My Concern to log. If a concern is reported to the Child Protection Team via other means (e.g. verbally or by email), they will log the concern on My Concern so that it is captured there.

- 8.1.4 All communication regarding concerns about a child (as opposed to a child being in immediate danger – see below) should be directed to the Child Protection Team. The DSL monitors all concerns via My Concern and reports regularly to the Headmaster on all matters of concern. Monthly meetings take place to review cases, themes or trends.

## 8.2 **More serious concerns**

- 8.2.1 Where there is a serious concern, the pupil will be placed on the School's "at risk" register which is monitored constantly by the DSL.
- 8.2.2 Information related to a child protection or safeguarding concern will be disseminated to the appropriate staff and local agencies on a 'need-to-know' basis, keeping the welfare and safety of the pupil in question at the centre of any decision made. All staff are made aware of their duty to process personal information fairly and lawfully, in line with Bangladesh data protection legislation but that this must not be a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.
- 8.2.3 The Child Protection Team will provide additional support and guidance for staff in any situation where they may be required to support other agencies and professionals in an early help assessment or with an individual referral.
- 8.2.4 Where the Headmaster or Child Protection Team are concerned that a pupil has suffered abuse or is likely to suffer significant harm, a report will be made immediately to Governors.

## 8.3 **A child at risk of immediate harm**

- 8.3.1 If a child is in **immediate danger** or is at risk of immediate harm a referral should be made to the appropriate bodies **immediately. These will be highlighted through the safeguarding routes flow charts displayed in every classroom and boarding house.**
- 8.3.2 In certain circumstances, the School will be required to play a part in multi-agency safeguarding arrangements. Locally, safeguarding partners will make arrangements to work together with appropriate parties, such as schools, to safeguard and promote the welfare of a child, including identifying and responding to their needs. The School recognises that it has a shared and equal duty to work with these partners to safeguard and promote the welfare of children at Haileybury.
- 8.3.3 All concerns, discussions and decisions made, actions taken and outcomes should be recorded on My Concern, which provides a secure record keeping system for each individual child. The member of staff having any safeguarding discussion is responsible for recording it accurately and immediately on MY CONCERN.

## 8.4 **Dealing with allegations of abuse against other pupils (child on child abuse)**

- 8.4.1 In the event of any disclosure of child on child abuse (including, but not limited to sexting, hazing, bullying (including online bullying) and gender based violence, assaults or harassment), all children involved, whether perceived as perpetrator or victim, will be

treated as being 'at risk' and the matter will be dealt with in line with the processes set out in this policy and the School's Countering Bullying and Rewards, Behaviour and Sanctions Policies, all of which are available on the School Portal.

- 8.4.2 Where child on child abuse involves the consensual or non-consensual sharing of nude and semi-nude images and/or videos, the School follows the advice of UKCIS ([Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)) in relation to school based management of any incidents whilst adhering to local law to ensure an appropriate response.
- 8.4.3 Any member of staff should pass their concerns regarding child-on-child abuse immediately to the Child Protection Team, either in person or by using MY CONCERN. Advice to staff on the management of child-on-child abuse will be provided by the Child Protection Team, and the Deputy Head Pastoral. Any member of staff who has concerns regarding inappropriate digital images should not seek to view these on a pupil's device but should pass their concerns to the Child Protection Team following the guidelines in the School's Searching and Confiscation Policy available on the School Portal.
- 8.4.4 Where the Headmaster or Child Protection Team believe that a pupil may be in need of additional support from one or more agencies, local procedures will be followed to ensure immediate (within 24-hour) assessment.
- 8.4.5 Any pupil who has been the victim of abuse whether child on child or otherwise will be provided with additional support as outlined in the School's Countering Bullying and Rewards, Behaviour and Sanctions Policies. Victims will be taken seriously, kept safe and never made to feel as though they are creating a problem by reporting abuse.
- 8.4.6 Where an allegation or report of abuse is determined to be unsubstantiated, unfounded, false or malicious, the School will consider the needs of the child (this may be a cry for help), and, where appropriate, any disciplinary action in line with the Rewards, Behaviour and Sanctions Policy.

## 8.5 Dealing with allegations of abuse against staff or other adults

- 8.5.1 Any allegations of abuse against a member of staff (which includes teachers, support staff supply, temporary or volunteer staff, and which includes any member of the Child Protection Team) or any other adult should be reported immediately to the Headmaster. **A staff member must not be informed that an allegation has been made against them.** The Headmaster will inform the designated Safeguarding Governor with immediate effect.

If the Headmaster is absent or cannot be contacted, any allegation against a member of Haileybury Bhaluka staff will be passed to the Designated Safeguarding Governor – Details TBD.

- 8.5.2 Should an allegation be made against the Headmaster, it should be reported to the Chair of Governors, (see contact details above). **The Headmaster must not be informed if an allegation is made against him.**
- 8.5.3 Any member of staff making an allegation against the Headmaster, a member of the Child Protection Team or another member of staff should follow the School's Whistleblowing Policy found on the School website. Additional guidelines on whistleblowing issued by the government can be found at: ?



- 8.5.4 Where allegations are made concerning a member of staff, DfE KCSIE (Part 4) guidelines will be followed in partnership with local guidelines. to ensure best practice is contextual. When dealing with such an allegation, the School will act promptly and avoid unnecessary delays.
- 8.5.5 Whether or not an allegation against a member of staff is substantiated, the School will determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.
- 8.5.6 If a situation arose where a member of Haileybury Bhaluka staff had a child protection allegation made against them and who, in the view of the Headmaster (or in his absence the Chair of Governors), lives in accommodation where continued occupation would be inappropriate, alternative accommodation off-site will be provided until such a time as the matter is resolved.
- 8.5.7 Haileybury Bhaluka will report to the appropriate bodies, any teacher whose services are no longer used, or who leaves the School, because they were considered unsuitable to work with children. This information will be reported within one month of the date at which the person left the School.
- 8.5.8 Haileybury Bhaluka will refer to the appropriate bodies, any instance where a member of teaching staff has been dismissed or has resigned and a prohibition order may be appropriate. Reasons for dismissal could include "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence".
- 8.5.9 In any situation where a member of staff has had an allegation of abuse made against them, Haileybury Bhaluka will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions will apply up to the point where the accused member of staff is charged with an offence.
- 8.5.10 If you feel that concerns you have raised related to a safeguarding or child protection issue have not been dealt with appropriately and constitute a potential failure of our Safeguarding and Child Protection Policy, these should be referred to the Chair of Governors.

## 9. Definitions of abuse

- 9.1 Whilst a list of definitions of abuse is provided below, abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one single definition or label. In most cases multiple issues will overlap with one another.
- **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. A child 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). A child may be abused by an adult or adults or another child or children. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
  - **Physical abuse:** 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:** the persistent emotional maltreatment of a child such as to cause 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 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. This may also include bullying or harassment due to gender (including misogyny and misandry), race, disability, sexual orientation, gender reassignment, religion or belief, or any of the protected characteristics as defined in the Equality Act 2010. These inappropriate expectations 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 cyberbullying), 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 in isolation.

- **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.
- **Domestic abuse:** involves any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can include, but is not limited to: psychological, physical, sexual, financial, or emotional abuse. All children can witness and be adversely affected by domestic abuse through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. Exposure to domestic abuse and/or violence 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. If an incident of domestic abuse occurs and the police are called, [Operation Encompass](#) will ensure that the DSL is informed before the child arrives at school the next day. Signs, symptoms and effects of domestic abuse can be found via the [NSPCC site](#).
- **Neglect:** 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. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Gangs and violence:** encouraging others to engage in, encourage or assist in gang-related violence, and gang-related drug dealing.
- **Modern slavery:** subjecting a person to modern slavery.

9.2 Staff must also be mindful that certain behaviours such as drug taking, alcohol abuse, truanting and sexting put children in danger and such behaviour should be reported to the Child Protection Team. Safeguarding issues can also manifest themselves via child-on-child abuse. This may include but is not limited to: bullying (including cyber bullying), gender-based violence / sexual assaults and sexting.

9.3 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of 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 different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## 10. Indicators of abuse

### 10.1 Indicators of physical abuse:

- bruises and abrasions – especially about the face, head, genitals or other parts of the body where such markings would not be expected to occur given the age of the child. Some types of bruising are particularly characteristic of non-accidental injury especially when the child's explanation does not match the nature of injury or when it appears frequently;
- slap marks – these may be visible on cheeks or buttocks;
- twin bruises on either side of the mouth or cheeks – can be caused by pinching or grabbing, sometimes to force a child to eat or to stop a child from talking;
- bruising on either side of the ear – this is often caused by grabbing a child who is attempting to run away. It is very painful to be held by the ear, as well as humiliating and this is a common injury;
- grip marks on arms or trunk – found on babies who are handled roughly or held down in a violent way. Gripping bruises on the arm or trunk can be associated with shaking a child. Shaking can cause one of the most serious injuries to a child, a brain haemorrhage. X-rays and other tests are required to fully diagnose the effects of shaking. Grip marks can also be indicative of sexual abuse;
- black eyes – most commonly caused by an object such as a fist coming into contact with the eye socket. A heavy bang on the nose can cause bruising to spread around the eye but a doctor will be able to tell if this has occurred;
- damage to the mouth – e.g., bruised/cut lips or torn skin where the upper lip joins the mouth;
- bite marks;
- fractures;
- poisoning and other drug misuse – e.g., overuse of sedatives;
- burns and/or scalds – a round red burn on tender, non-protruding parts like the mouth, inside arms and on the genitals will almost certainly have been deliberately inflicted. Any burns that appear to be cigarette burns should be cause for concern. Some types of scalds known as 'dipping scalds' are always cause for concern. An experienced person will notice skin splashes caused when a child accidentally knocks over a cup of tea. In contrast a child who has been deliberately 'dipped' in a hot bath will not have splash marks;
- bruising to the breasts, buttocks, lower abdomen, thighs and genital/rectal areas. Bruises may be confined to grip marks where a child has been held so that sexual abuse can take place;
- discomfort or pain particularly in the genital areas;
- the drawing of pornographic or sexually explicit images.

### 10.2 Indicators of emotional abuse:

- self-harm (including changing in eating<sup>2</sup> patterns and habits);
- over-reaction to mistakes;
- inappropriate emotional responses;
- chronic running away;
- abnormal or indiscriminate attachment;
- drug/solvent abuse;
- low self-esteem;
- compulsive stealing;
- extremes of passivity or aggression;
- makes a disclosure;
- social isolation – withdrawn, a ‘loner’;
- frozen watchfulness particularly pre-school;
- developmental delay;
- depression;
- desperate attention-seeking behaviour.

#### 10.3 Indicators of sexual abuse:

- a detailed sexual knowledge inappropriate to the age of the child;
- behaviour that is excessively affectionate or sexual towards other children or adults;
- lack of trust in adults (particularly any marked fear of men);
- attempts to inform by making a disclosure about sexual abuse often begins by the initial sharing of limited information with one adult. It is also very characteristic of such children that they have an excessive preoccupation with secrecy and try to bind the adults to secrecy or confidentiality;
- a fear of medical examinations;
- a fear of being alone – this applies to friends, families, neighbours, baby-sitters, etc.;
- a sudden loss of appetite, compulsive eating<sup>3</sup>, anorexia nervosa or bulimia nervosa;
- excessive masturbation is especially worrying when it takes place in public;
- promiscuity;
- unusually explicit or detailed sex play in younger children;
- sexual approaches or assaults on other children or adults;
- bruising to the breasts, buttocks, lower abdomen, thighs and genital/rectal areas. Bruises may be confined to grip marks where a child has been held so that sexual abuse can take place;
- discomfort or pain particularly in the genital areas;
- the drawing of pornographic or sexually explicit images.

#### 10.4 Some potential warning signs of grooming as a precursor to sexual abuse include:

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<sup>2</sup> Please also see the School’s Eating Disorders and Disordered Eating Policy.

- a pupil receiving special attention or preferential treatment;
- excessive time spent alone with a pupil outside of 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, toys, cards, letters to a pupil;
- using texts, telephone calls, emails or social networking sites to inappropriately communicate with a pupil;
- overly affectionate behaviour with a pupil;
- flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a pupil;
- other pupils are suspicious and make jokes or references.

#### 10.5 Indicators of neglect:

- underweight – a child may be frequently hungry or preoccupied with food or in the habit of stealing food or with the intention of procuring food. There is particular cause for concern where a persistently underweight child gains weight when away from home, for example, when in hospital or on a school trip. Some children lose weight or fail to gain weight during school holidays when school lunches are not available and this is a cause for concern;
- inadequately dressed – a distinction needs to be made between situations where children are inadequately dressed, dirty or smelly because they come from homes where neatness and cleanliness are unimportant and those where the lack of care is preventing the child from thriving;
- Persistent stomach-aches, feeling unwell, and apparent anorexia can be associated with physical neglect.

#### 10.6 Mental health problems as an indicator of abuse:

- All staff should also 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 School Doctor, should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 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 children's experiences can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by reporting via MY CONCERN or speaking to the DSL.

When a child is suffering from any one or more of the previous four 'categories of abuse', they will nearly always suffer from or display signs of stress and distress. An abused child is likely to show signs of stress and distress as listed below:

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

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

## **11. Children with special educational needs and disabilities**

11.1 Children with Special Educational Needs and Disabilities (SEND) are particularly vulnerable and as such can face additional safeguarding challenges, including increased vulnerability to child-on-child abuse. Staff are aware and mindful that additional barriers can exist when recognising abuse and neglect in children with SEND. Such barriers can include:

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

11.2 The School's Countering Bullying Policy; Rewards, Behaviour and Sanctions Policy; and Equal Opportunities for Pupils Policy provide additional information on the strategies adopted to ensure that children with SEND are appropriately supported in all areas. Where reasonable force is used (see below), staff are reminded that this must be minimised, particularly with SEND pupils.

## **12. Looked after children and previously looked after children**

12.1 Looked after children are also vulnerable, and staff are reminded that previously looked after children remain vulnerable.

## **13. Reasonable force**

13.1 In line with KCSIE (2022) the child protection and safeguarding training given at induction, and through regular and statutory updates, covers what is meant by the "use of reasonable force" and when it may be necessary. This must also be reviewed in line with local guidance.

## **14. Parental signs of child abuse**

14.1 Particular forms of parental behaviour that could raise or reinforce concerns are:

- implausible explanations of injuries;

- unwillingness to seek appropriate medical treatment for injuries;
- injured child kept away from school until injuries have healed without adequate reason;
- a high level of expressed hostility to the child;
- grossly unrealistic assumptions about child development;
- general dislike of child-like behaviour;
- inappropriate labelling of child's behaviour as bad or naughty;
- leaving children unsupervised when they are too young to be left unattended.

## **15. Some potential indicators that a pupil may be at risk of radicalisation**

15.1 The characteristics set out below do not necessarily indicate that a person is either committed to terrorism or may become a terrorist.

15.2 Engagement with a group, cause or ideology:

Engagement factors are sometimes referred to as “psychological hooks”. They include needs, susceptibilities, motivations and contextual influences and together map the individual pathway into terrorism. 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 transitional time of life;
- being influenced or controlled by a group;
- relevant mental health issues.

15.3 Intent to cause harm:

Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- over-identification with a group or ideology;
- ‘them and us’ mentality;
- dehumanisation of the ‘enemy’;
- attitudes that seek to justify offending;

- harmful means to an end;
- harmful objectives.

#### 15.4 Capability to cause harm:

Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Factors can include:

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

### 16. Listening and talking to a child who tells you they are being abused

#### 16.1 Any staff member to whom an allegation of abuse is made should:

- Find a quiet place and make time to listen.
- Stay calm; overreacting may frighten the child and compound feelings of guilt.
- Not promise confidentiality. Issues relating to child protection must be passed on. Reassure the child that you will only tell those people who need to know.
- Take what the child says seriously and listen carefully to what you are being told.
- Limit any questioning to the minimum necessary to seek clarification, strictly avoiding 'leading' the child by making suggestions or asking questions that introduce ideas about what may have happened. (Do not ask questions like "Did they do 'x' to you?" using instead a minimum number of questions such as, "Tell me what has happened".)
- Stop asking any more questions as soon as the child has disclosed that he believes that something abusive has happened to him, or to someone else.
- Reassure the child they are not to blame - it is all too easy for the victim of abuse to be blamed and to feel guilty.
- Check out your understanding of what has happened if you are not clear.
- Use the child's own words. If you are reluctant to repeat these words, the child may stop talking to you.
- Reassure the child they were right to tell you and you are glad he has done so.
- Avoid criticising the alleged perpetrator.
- Inform the child that the staff member will now make sure that the appropriate people are brought in to follow up the problems (these will include a member of the Child Protection Team and may also include external agencies).
- Ask the child what steps they would like taken to protect them now that they have made an allegation, and assure them that the School will try to follow their wishes.
- Record statements and observations as soon as possible of what they have been told and how the child behaved. Include in this written record any non-verbal signs and indications e.g. the child was visibly distressed/shaking.
- Follow the guidelines above and inform the relevant person immediately, this would usually be a member of the Child Protection Team unless the child protection issue involves an



allegation against a member of staff in which case the Headmaster should be informed or, if the allegation is against the Headmaster, the Chair of Governors should be informed.

- p. Record the disclosure on [MY CONCERN](#) and/or hand your record of the disclosure promptly to a member of the Child Protection Team, the Headmaster or the Chair of Governors, as appropriate. This could be used in any subsequent legal proceedings.
- q. Check your guidelines.
- r. Seek support for yourself as you may need it. Listening to children's accounts of abuse can be very distressing. You may not be able to help the child if you are not well supported. You can discuss this with any member of the Child Protection Team.

## 16.2 Record keeping:

When a child has made a disclosure, staff should:

- a. Record the disclosure using [MY CONCERN](#), and alert the appropriate members of the Child Protection Team through this system.
- b. Include a diagram showing the position of any bruising or other injury.
- c. Use the words of the child in these notes.
- d. Record statements and observations rather than interpretations or assumptions.
- e. Record the date, time and place of the conversation.
- f. If unable to access or use MY CONCERN, make brief notes as soon as possible after the conversation. Hand the notes promptly to a member of the Child Protection Team. Copies should not be retained by the member of staff who received the allegation.
- g. Do not discuss the details of the disclosure with anyone outside the Child Protection Team.

## 16.3 What will happen next?

The Child Protection Team is responsible for the next steps. Exactly what these are will depend on what other information the School has, but they are likely to involve some of the following:

- Close monitoring by the School.
- Liaison with parents where appropriate
- A child will not be sent home if to do so would endanger their safety or wellbeing.
- Where appropriate, reporting to appropriate bodies within one month of his leaving the School, of any person whose services are no longer used because he is considered unsuitable to work with children.
- Once a concern has been passed to the Child Protection Team this will be logged on MY CONCERN and all subsequent correspondence related to the matter will be added to MY CONCERN.

## 17. Dealing with low-level concerns about staff

17.1 The School encourages the reporting of all concerns, no matter how trivial they may seem. It is important that all pupils and staff feel able to raise concerns, so as to ensure a culture of openness and transparency in which the School's values, ethos and expectations of behaviour are upheld.

17.2 With a low-level concern, it should nevertheless be reported to the DSL. A low-level concern can be raised with any member of LT, but they will always refer it to the DSL in the first instance. The

concern will be recorded by the DSL who will refer the concern to the Headmaster. The Headmaster will decide on whether or not further action is required, and if so, the most appropriate action or response; the Headmaster may ask the DSL to investigate the concern and the School's Staff Disciplinary Procedure may be followed where applicable.

- 17.3 The DSL will keep a log of all concerns and any decisions or action taken. The number and trends of low-level concerns will be reported to the Governors' Safeguarding and Wellbeing Committee termly. Low-level concerns which are raised about supply staff or contractors will be notified to their employers. The DSL will consult with local agencies at the Headmaster's request, including if there is any uncertainty as to whether a low-level concern about a member of staff meets the harm threshold.
- 17.4 Examples of low-level concerns might include a suspicion or a "nagging doubt" that a person has acted inappropriately or inconsistently with the Staff Code of Conduct, or could include behaviour carried out accidentally or inadvertently. Examples of such behaviour could include, but are not limited to:
- being over friendly with children;
  - having favourites;
  - taking photographs of children on their mobile phone;
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
  - using inappropriate sexualised, intimidating or offensive language.
- 17.5 Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- 17.6 Records of low-level concerns will be reviewed by the DSL so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold. The DSL will also consider whether there are wider cultural issues within the School that enabled the behaviour to occur and, where appropriate, policies will be revised or extra training delivered to minimise the risk of the behaviour happening again.

## **18. Safer recruitment**

- 18.1 All staff employed or engaged by the School in regulated activity, undergo pre-appointment DBS and other vetting checks in accordance with the requirements set out in Part Three of 'Keeping Children Safe in Education (KCSIE, 2023)' and 'Working Together to Safeguard Children' (2018). The checks carried out by the School are described in more detail in the School's Safer Recruitment Policy.
- 18.2 At least one of the persons interviewing candidates will have completed the NSPCC safer recruitment training.
- 18.3 On appointment, all staff employed by the School undergo safeguarding and child protection training to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or provoke allegations of harm to a pupil. Further details regarding recruitment and selection of staff can be found in the Safer Recruitment Policy which is found on the School Portal.

- 18.4 Haileybury's Visitors, Contractors, and Site Security Policy provides for the control of contractors to ensure that any contractors working in close proximity to Haileybury pupils provide sufficient evidence that their staff have undergone appropriate safeguarding checks.
- 18.5 All staff are expected to be familiar with and adhere to the Staff Code of Conduct (available on the School Portal) which includes staff-pupil relationships. It is made clear to all staff when they join Haileybury Bhaluka, during the staff induction process and during subsequent training, that at all times their relationship with pupils must be appropriate and professional. It is also made clear that this requirement extends beyond the school campus and encompasses online communication.
- 18.6 Haileybury Bhaluka has a culture of safety, of raising concerns, of valuing staff and of reflective practice. A clear procedure exists within the School for reporting and handling concerns, including those regarding poor or unsafe practice and potential failures in the School's safeguarding regime. This includes provision for mediation and dispute resolution where necessary. This information is contained in the School's Whistleblowing Policy, which can be found on the School Portal.

## **19. Policy on pupils who self-harm**

- 19.1 Self-harm is a serious action for any young person to undertake and the School recognises that young people who self-harm are at risk.
- 19.2 The School co-operates with appropriate external agencies in any child protection investigation. Self-harm may be defined as including "*a wide range of things that people do to themselves in a deliberate and usually hidden way. In the vast majority of cases self-harm remains a secretive behaviour that can go on for a long time without being discovered*". Self-harm can involve:
- cutting, often to the arms razor blades, broken glass or knives;
  - burning using cigarettes or caustic agents;
  - punching and bruising;
  - inserting or swallowing objects;
  - head banging;
  - pulling out hair or eyelashes;
  - restrictive or binge eating<sup>3</sup>;
  - overdosing of tablets or medicines;
  - inhaling or sniffing harmful substances (Mental Health Foundation 2006).
- 19.3 Any member of Haileybury staff to whom a pupil discloses information related to self-harming must follow the School's Self-Harm Policy and Procedures which is on the School Portal. They should make clear to the pupil that this information cannot be kept confidential. The member of staff should immediately refer this information to a member of the Child Protection Team.
- 19.4 The Child Protection Team will seek specialist help by liaising immediately with the Health Centre and school counselling team. The School Doctor can assess the pupil's needs and level of risk and where necessary refer the case to additional external agencies in Bangladesh. Where the child is deemed to be at immediate risk a member of the Child Protection Team and/or School Doctor (or any member of staff) may call an ambulance or make a direct referral to a hospital accident and emergency unit.

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<sup>3</sup> Please also see the School's Eating Disorders and Disordered Eating Policy.

19.5 In all cases of self-harming, active consideration must be given to informing the parents of the child affected. Unless there is a compelling reason not to do so, the parents should be informed and then kept closely in touch with developments.

## **20. Child sexual exploitation (CSE), child criminal exploitation (CCE)**

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

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

20.3 The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

20.4 The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

20.5 Victims can be exploited even when an activity appears consensual and it should be noted that exploitation, as well as being physical, can be facilitated and/or take place online.

20.6 All Haileybury Bhaluka staff need to be aware of what the term “child sexual exploitation” means. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 14 into sexual activity, including online e.g., through sharing videos or images on social media. This is more complex in a Bangladeshi context as the legal age of consent is 14 but the marriage ages are 18 (girls) and 21 (boys).

20.7 Any member of Haileybury Bhaluka staff who believes a pupil may be at risk from CSE or to whom a pupil discloses information related to CSE must make clear to the pupil that this information cannot be kept confidential. The member of staff should immediately refer this information to a member of the Child Protection Team.

20.8 It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person’s immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

20.9 Child criminal exploitation (CCE), including involvement in criminal activity/trafficking for drug transportation, is another form of harm that may impact negatively on a child’s development and outcomes. Children may be vulnerable to criminal exploitation in circumstances where there is a power imbalance, force or enticement is used and/or they are consensual.

20.10 Staff should be aware that the experience of girls being criminally exploited can be very different from boys, and that indicators of CCE may be different in girls and boys.

20.11 Indicators of CCE include children who:

- appear with unexplained gifts or new possessions;
- associate with other young people involved in exploitation;
- suffer from changes in emotional wellbeing;

- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late;
- regularly miss school or education or do not take part in education.

## **21. Mental health**

- 21.1 All staff should be aware that mental health problems can, in some cases, be an indicator of abuse.
- 21.2 Where staff are concerned about a pupil's mental health, or a pupil makes a disclosure about their mental health, this is a safeguarding concern and should be referred to the Child Protection Team. Where necessary, the School Doctors and/or School Counsellors may be asked to assess a case and identify further support, including working with external agencies.

## **22. Policy on pupils missing from education**

- 22.1 Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.
- 22.2 Full details of the procedure to be followed in cases of unexplained absences during the school day can be found in Haileybury's Registration and Missing Pupil Policy (available on the Policies page of the [School Portal](#)). The School will hold more than one emergency number for each pupil where this is reasonably possible to assist in these situations. A child going missing from an educational setting is a potential indicator of abuse, neglect or radicalisation. All cases where a pupil is found to have left school grounds without appropriate permission will be referred to the Child Protection Team. The Child Protection Team will consider each case individually to identify any risk of abuse and neglect, including sexual abuse, exploitation or radicalisation.
- 22.3 Pupil non-attendance at school will be followed up by the Housemaster in the first instance. Any pupil who repeatedly misses school will be brought to the attention of the Child Protection Team so that matters are investigated and appropriate actions taken.
- 22.4 Haileybury Bhaluka maintains an Admissions Register in line with ISI guidance. The name of a pupil is included in the register from the beginning of the first day on which the School has agreed, or has been notified, that the pupil will attend the School.
- 22.5 When a pupil leaves, the report will include the name of the destination school notified by a parent and the first date of attendance, where it is reasonably practicable for the School to ascertain this information.
- 22.6 The parents or guardians of any pupil who wishes to return to school late or leave school early at the beginning and end of each term and half term must write to either the Headmaster or the Deputy Headmaster. Parents who fail to request permission may be written to by the Deputy Headmaster. No reasonable request will be denied as the purpose is to ensure continuity of education, avoid a pupil missing key events and opportunities.

## **23. Children and the court system**

- 23.1 In line with Annex B of KSCIE (2022) and local guidelines, due care is shown for pupils who may have to appear in court or whose family are in court. Both situations can be extremely stressful for children. Where children are required to give evidence in court the appropriate support and

guidance is sought, according to their age. Where a family is in court following separation, and where conflict may become entrenched in a family, appropriate support is sought from the dispute resolution service.

23.2 Support will be led by the Child Protection Team in conjunction with the relevant HM.

#### **24. Children with family members in prison**

24.1 Haileybury recognises the increased risk of poor outcomes, including poor mental health, on children with a parent or family member in prison. Appropriate support is offered to help mitigate the negative consequences for those pupils.

24.2 Support will be led by the School Counsellor in conjunction with the relevant House Teams.

#### **25. Safeguarding of pupils off site**

25.1 Child protection and safeguarding extends beyond the Haileybury campus. Care is shown for all pupils when off site and Haileybury only works with appropriately vetted organisations and institutions. When a pupil is off site but in the care of Haileybury each situation will be risk assessed. Examples of this might be community service, activities, language exchanges and sports tours.

25.2 In addition, when a pupil is off site, every effort is made to ensure that they are never left alone under the sole supervision of any adult who is not a member of Haileybury staff.

#### **26. Hiring school premises and third-party activities**

26.1 Where an organisation or individual hires or rents school facilities or premises (for example community groups, sports associations, and service providers to run community or extra-curricular activities) the School will ensure that appropriate arrangements are in place to keep children safe. Further information on the control of third parties on School premises is set out in the Visitors, Contractors and Site Security Policy.

26.2 Where services or activities are provided on behalf of the School by an external party the School will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). The School will ensure that safeguarding requirements are included in any agreement entered into with such a third party and that failure to comply with these would lead to termination of the agreement.

#### **27. Reviewing the safeguarding and child protection policy**

27.1 This policy will be reviewed annually in full by the Governors' Education Sub Committee. Any amendments during the year will be reviewed by the ESC at its termly meetings. This Committee will also review the implementation of the School's policies and procedures relating to safeguarding and child protection.

27.2 This policy will also be reviewed after any serious safeguarding incident and where necessary modifications will be applied and deficiencies or weaknesses remedied without delay. All staff are encouraged to contribute to and offer suggestions regarding this policy in order that it is as context specific as possible and so that the highest level of safeguarding can be achieved.

## **28. Information sharing**

- 28.1 In order to safeguard the pupils in our care it is our responsibility to seek child protection files from previous schools and to ensure that we transfer child protection files to new schools or colleges, sharing, holding and using this information in line with KCSIE 2022 Part 2 and local guidelines.
- 28.2 The School will process personal information fairly and lawfully and keep the information it holds safe and secure, as it is obliged to under the data protection laws in Bangladesh and the guidance outlined in [Information sharing. Advice for practitioners providing safeguarding services to children, young people, parents and carers](#)
- 28.3 Ultimately, the safety of the child, and other children, is of paramount importance, and the sharing of child protection files can take precedence over Data Protection rules in Bangladesh.

**Headmaster: Simon O'Grady**

**Date: 04.09.2024**

## **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. As a member of Haileybury's Leadership Team (LT), the DSL has the appropriate status and authority to carry out the duties of the post. Time, funding, training, resources and support are given to the DSL to enable them to provide advice and support staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings and/or to support other staff to do so and to contribute to the assessment of children.

The DSL is responsible for managing the Child Protection Team, ensuring that they receive regular and appropriate training (to the same standard and level as the DSL.), and chairs the School Safeguarding Committee (see Appendix 2).

Whilst the DSL can delegate activities and individual pupil cases to the deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL. This lead responsibility must not be delegated.

#### **Manage referrals**

The DSL is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to the local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a member of staff is dismissed or leaves due to risk/harm to a child to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA) as required; and
- Refer cases where a crime may have been committed to the Police as required/

#### **Work with others**

- Liaise with the Headmaster to inform him of issues especially ongoing enquiries and any police investigations;
- Liaise with any "case manager" at the local authority for child protection concerns;
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- Act as a source of support, advice and expertise for staff;
- Liaise with the School Doctor and School Counsellor to ensure all pupils receive appropriate support and that early intervention is accessed when necessary;
- Liaise with and manage the Independent Listener and ensure pupils are aware of their sessions and how to access their services;
- Check the discipline files held by the Proctor to ensure that pupils on the SEND register aren't disproportionately represented and that their needs are being accounted for;



- Liaise with the Director of IT and the Deputy Headmaster regarding online safety in the school, the ICT Acceptable Use Policy, and the Cyber Bullying policy;
- Receive and review all bullying referrals to the Proctor within MY CONCERN to consider escalation to child protection; review the Counter Bullying Policy;
- Work with the Online Safety Coordinator and the Head of Wellbeing to encourage online safety and to foster a culture that seeks to counter any forms of bullying in the school.

### **Undertake training and oversee training**

The DSL (and deputies) must undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

In addition to the formal training set out above, the DSL must refresh their knowledge and skills (e.g. via e-bulletins, meeting other DSLs, reading and digesting safeguarding developments) at regular intervals, as required, but at least annually, in order to understand and keep up with any developments relevant to their role so that they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands Haileybury's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals using MY CONCERN;
- Understand and support all Haileybury staff with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures Haileybury Bhaluka puts in place to protect them;
- Ensure all Haileybury staff are appropriately trained to use and understand MY CONCERN;
- Provide Level 1/Annual Refresher Child Protection training sessions for teaching and support staff as needed during the school year and full training/updates in September.

### **Raise awareness**

The DSL must:

- Ensure Haileybury's child protection policies are known, understood and used appropriately;
- Provide anonymised fortnightly updates on any Child Protection issues to Full LT;
- Ensure Haileybury's Safeguarding and Child Protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Safeguarding and Wellbeing sub-committee of Governors to ensure this;

- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Haileybury Bhaluka in this.
- Attend and provide a written report to the Education Sub Committee on pupil and staff wellbeing and discipline at each of its four annual meetings;

### **Pupils leaving/joining Haileybury Bhaluka**

- The DSL will ensure that all relevant material regarding pupils joining/leaving Haileybury Bhaluka is transferred to the next education provider in line with their requirements.
- The DSL will work with the Registry and the School Office to ensure that the Admissions Register is accurate.

### **Child protection file**

- The DSL will ensure that where children leave Haileybury their child protection file is transferred to the new school as soon as possible. The child protection file will be transferred separately and securely with confirmation of receipt being obtained.
- The DSL will ensure that letters are sent to previous schools in September and the collated responses filed so that any Child Protection concern is transferred with the pupil and accessible to the Child Protection Team.

### **Availability**

- The DSL will produce a rota, available to all LT and Housemaster, showing which member of the Child Protection Team will be available during school hours for staff to discuss any safeguarding concerns. The DSL or deputies are expected to be available in person although in exceptional circumstances availability via 'phone is acceptable.
- The DSL will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities, to be agreed with the Headmaster.

### **The Child Protection Team**

At Haileybury Bhaluka, the Child Protection Team is led by the Designated Safeguarding Lead (DSL) for Safeguarding & Child Protection, Housemaster and supported by the school doctor, and the school counsellor. The Child Protection Team is part of the School Safeguarding Committee.

Last Reviewed:            September 2024

## **Appendix 2**

### **School Safeguarding Committee**

#### **Terms of Reference**

##### **1. Introduction**

The Safeguarding Committee ensures the safety, protection, and welfare of all students and staff within the school. The committee works to develop, implement, monitor, and review policies and procedures to align with local, national, and international standards.

##### **2. Purpose**

To provide leadership and oversight on all matters related to safeguarding and child protection within the school. It ensures that effective measures are in place to prevent and address any safeguarding concerns.

##### **3. Key Objectives**

- Develop and review safeguarding policies and procedures.
- Ensure all staff and students are aware of and comply with safeguarding protocols.
- Promote a culture of safety and respect within the school.
- Monitor and report on safeguarding issues and incidents.
- Provide training and support to staff on safeguarding issues.

##### **4. Membership**

The Committee shall consist of the DSL (Chair), Headmaster, Housemaster. As senior management evolves, new members will be appointed to the Committee. It will invite key stakeholders on a planned basis.

##### **5. Roles and Responsibilities**

- Chair: To set and chair meetings, ensure the agenda is followed, and actions are taken.
- DSL: Central to safeguarding issues, to handle disclosures, report to the Headmaster.
- Headmaster: To provide leadership so that safeguarding is a priority within the school.

- Members: To contribute to and participate in meetings, review policies and procedures.

## **6. Meetings**

- Frequency: The committee will meet monthly.
- Quorum: Each meeting must have the DSL and Headmaster in attendance.
- Agenda: Circulated 5 days in advance of a meeting by the DSL
- Minutes: Recorded and circulated 5 days after a meeting.
- Archive: The DSL will store meeting records on a secure drive.

## **7. Decision-Making**

To make decisions for the further consideration and approval of the Headmaster.

## **8. Reporting**

The Chair will report to LT on a regular basis. An annual safeguarding report will be prepared by the DSL and submitted to the Board of Governors, highlighting key issues, actions taken, and recommendations for improvement. New policies or procedures will be communicated to stakeholders by the DSL or the Headmaster.

## **9. Confidentiality**

All discussions and documentation related to safeguarding issues are to be treated with strict confidentiality. Members must adhere to the school's confidentiality policies and the legal requirements related to data protection.

## **10. Review of Terms of Reference**

Terms of Reference will be reviewed annually to ensure relevance and effectiveness. Any amendments must be approved by the Headmaster and the Board of Governors.

## **11. TORs: Approval and Adoption**

These Terms of Reference are hereby adopted by the School Safeguarding Committee on 4<sup>th</sup> September 2024 and these will remain in effective for one academic year.

SOG/05.09.24

## Acronyms

CAF	Common Assessment Framework – replaced by Families First from September 2017
CAMHS	Child and Adolescent Mental Health Services
CPD	Continuing Professional Development
MY CONCERN	Child Protection Online Management System
CSCI	Commission for Social Care Inspection
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service
DfE	Department for Education
DoB	Date of Birth
DSL	Designated Safeguarding Lead for Child Protection
FGM	Female Genital Mutilation
HBA	Honour Based Abuse
HM	Her Majesty's
HMs	Housemasters
HR	Human Resources
ICT	Information and Communications Technology
ISI	Independent Schools Inspectorate
KCSIE	Keeping Children Safe in Education
NCSC	National Care Standards Commission
NSPCC	National Society for the Prevention of Cruelty to Children
PA	Personal Assistant
RoC	Record of Concern
SENCO	Special Educational Needs Coordinator
SEND	Special Educational Needs and Disabilities
STD	Sexually transmitted disease
TRA	Teaching Regulation Agency
UTI	Urinary tract infections
WTSC	Working Together to Safeguard Children