



Haileybury Bhaluka

## Safeguarding & Child Protection Policy

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Owner:	Headmaster
LT committee responsible:	LT
Intended audience:	All
Location:	Staff Portal, Governor Portal and website

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## **SAFEGUARDING AT HAILEYBURY BHALUKA BHALUKA**

### **1. What is safeguarding?<sup>1</sup>**

1.1 Safeguarding is the action that is taken to promote the welfare of all children including everyone under the age of 18 and protect them from harm whether that is within or outside the home, 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 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.
- 2.2 Our aspiration is that all our pupils should be able to develop their skills and abilities to the full and that their achievements and successes should be recognised and valued appropriately. Pupils must be able to develop and achieve in a secure and positive environment, free from fear or abuse.
- 2.3 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.

### **3. Key safeguarding personnel**

3.1 At Haileybury Bhaluka the Child Protection Team is led by the Nominated Safeguarding Lead (DSL) for Child Protection:

Dr Sabrina Tahsin (School Doctor)

A team assists the DSL with all safeguarding and child protection matters:

- Capt. Mushfiqur Rahman (Housemaster) & Ms Rokeya Kashia Chowdhury (Housemistress)

Lead responsibility for child protection and safeguarding at Haileybury Bhaluka lies with the DSL

3.2 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 '[Keeping Children Safe in Education](#)' (KCSIE, 2025) July 2025, (KCSIE, September 2024) and '[Working Together to Safeguard Children](#)' (December 2023).

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<sup>1</sup> <https://www.nspcc.org.uk/preventing-abuse/safeguarding/>

- 3.3 The nominated Governor Safeguarding and Child Protection at Haileybury Bhaluka is:
- TBA (Bangladesh based)
- 3.4 To strengthen further Haileybury Bhaluka's commitment to pupil safeguarding and wellbeing a Governors' Education and Safeguarding Committee meets termly. The nominated Governor for Safeguarding & Child Protection is the Deputy Chair of this committee. Meetings of this Committee are attended by the DSL, the Headmaster and the Chief Operating Officer. The Committee receives and reviews reports related to pupil welfare and safeguarding at every meeting. The Terms of Reference of this Committee are available from the Chief Operating Officer.
- 3.5 Haileybury Bhaluka also has a nominated team of Pastoral staff which includes the DSL, the Health and Wellbeing Centre Clinical Nurse, School Doctor, and the House teams. Members of the Pastoral Team work closely together and meet regularly to share information and to discuss the provision of pastoral care within Haileybury Bhaluka.
- 3.6 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. In order to fulfil this role effectively Haileybury Bhaluka adopts a whole school approach, which is pupil-centred focusing on the best interest of the child at all times.

#### **4. Contact details**

- 4.1 Contact details for Haileybury Bhaluka's Child Protection Team:

**DSL:** Dr Sabrina Tahsin

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

**Headmaster** Mr Simon O'Grady

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

Contact details for the nominated Governor Safeguarding and Child Protection at Haileybury Bhaluka, can be obtained from the Chief Operating Officer, Mr Masum Uddin: [masum.uddin@haileybury.com.bd](mailto:masum.uddin@haileybury.com.bd)

#### **5. External and inter-agency work**

- 5.1 Inter-agencies do not exist in Bangladesh to support and advise on safeguarding and child protection matters.
- 5.2 The School follows the procedures laid down by COBIS and its lead partner The Safeguarding Alliance. Haileybury Bhaluka has been proactive in encouraging the adoption of international standards in all education contexts and, to this end, has set up B-SAFE: the Bangladesh Safeguarding Alliance for Educators: <https://www.bsafed.org/>

## **SAFEGUARDING MEASURES**

### **6. Safeguarding training for staff**

- 6.1 Every member of Haileybury Bhaluka staff (including temporary staff, volunteers, Governors) is given appropriate safeguarding and child protection training. This training is provided by the DSL or a trained line manager. Safeguarding and child protection training is delivered to all new starters as part of the induction process. All teaching staff complete online training in Child Protection for International Schools (source: TES).
- 6.2 Governors receive training appropriate to their role, to equip them for ensuring that the School's safeguarding policies and procedures are effective. This includes ensuring that the School complies with its duties under the Human Rights Act and the Equality Act 2010 (UK), consistent with the Children Act 2013 (Bangladesh).
- 6.3 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.
- 6.4 Refresher training is provided for all staff at least every three years with additional safeguarding and child protection updates provided at least annually. All new staff are given induction training and all new teachers are required to take the TES online course.
- 6.5 This Safeguarding and Child Protection Policy provides the foundations of the child protection training delivered to all staff at Haileybury Bhaluka. In addition to this, 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; Staff Code of Conduct; and the Visitors and Site Security Policy. These are all available on the Frog Staff Frog 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 coaching, and in electronic communication with pupils.
- 6.6 All staff are provided with a 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.
- 6.7 The Continuing Professional Development (CPD) Programme provides teaching staff with additional related training from both internal and external agencies. All key pastoral staff have been trained in Youth Mental Health First Aid and other staff members are also due to receive training.
- 6.8 All staff are made aware in their application process, induction and training that the School follows the international safeguarding and children protection standards and practices:
  - [Keeping Children Safe in Education \(KCSIE, September 2024\)](#)
  - [Working Together to Safeguard Children \(December 2023\)](#)

6.9 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 Bhaluka:

- The Children Act (2013), Bangladesh
- Working Together to Safeguard Children (December 2023), UK
- Every Child Matters; Dealing with Allegations of Abuse against Teachers and other Staff – Guidance for Local Authorities
- Prevent Duty Guidance: for England and Wales (2023)
- 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 May 2024
- What To Do if You Are Worried That a Child is Being Abused - Advice for Practitioners (March 2015)
- Sharing nudes and semi-nudes: how to respond to an incident (March 2024)

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

- 7.1 As made clear in this and other policies, such as our Countering Bullying Policy and our Rewards, Behaviour and Sanctions Policy, Haileybury Bhaluka 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.
- 7.2 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, sex education, diversity and inclusion, gender issues, hazing, sexting, and initiation). At the start of each academic year all pupils are introduced to the Child Protection Team, Health & Wellness Centre School Nurse, 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 Medical Centre.
- 7.3 The School will continue to consult with parents regarding Relationships and Sex Education (RSE). The DSL will ensure that any visiting speakers and all staff teaching RSE are fully equipped to handle any disclosures.
- 7.4 All pupils and parents are issued with a Pupil and Parent Handbook that contains helpful information about safeguarding, such as online safety and child protection concerns. The Handbook is covered within tutorial sessions and frequently referred to in House meetings. These concepts are reinforced within the Houses and more broadly in the School, where pupils interact with one another across year groups and between Houses, so that mutual respect is developed and appreciated.
- 7.5 Staff speak with pupils both formally and informally about pupil relationships and why unacceptable behaviour between pupils will not be ignored by the School or considered as "banter" or "part of growing up". Child on child abuse, whether gendered or not, is unacceptable and is taken very seriously. HMs also have meetings with pupils in their Houses to remind them of the importance of online safety.

## **Online safety**

- 7.6 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, Headmaster, the IT Manager and the Housemaster. 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 Frog Staff Portal.
- 7.7 The School has a Staff Code of Conduct and ICT Acceptable Use Policy which cover online safety; 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.
- 7.8 The IT Department has in place a robust filtering and monitoring system that 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. All staff are made aware, through their induction and update training and the ICT Acceptable Use Policy, of the filtering and monitoring 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.
- 7.9 The Governors' Education and Safeguarding Committee reviews the School's ICT Acceptable Use Policy annually, and receives reports from Headmaster.

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

- 8.1 Child protection and safeguarding extends beyond the Haileybury Bhaluka campus. Care is shown for all pupils when off site and Haileybury Bhaluka only works with appropriately vetted organisations and institutions. When a pupil is off site but in the care of Haileybury Bhaluka each situation will be risk assessed in line with COBIS guidelines. Examples of this might be community service, Duke of Edinburgh expeditions and sports tours.
- 8.2 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 Bhaluka staff.

## **9. Safer recruitment**

- 9.1 All staff employed or engaged by the School in regulated activity, undergo pre-appointment vetting checks consistent with the requirements set out in Part Three of 'Keeping Children Safe in Education (KCSIE, 2024)' and 'Working Together to Safeguard Children' (2018). The checks carried out by the School are described in more detail in the Safer Recruitment Policy.
- 9.2 At least one of the persons interviewing candidates will have completed safer recruitment training, to support direct questions on child protection and safeguarding.
- 9.3 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 School's Safer Recruitment Policy, which can be found on the Staff Frog Portal.
- 9.4 Haileybury Bhaluka's Visitors and Site Security Policy provides for the control of contractors to ensure that any contractors working in close proximity to Haileybury Bhaluka pupils provide sufficient evidence that their staff have undergone appropriate safeguarding checks.



- 9.5 All staff are expected to be familiar with and adhere to the Staff Code of Conduct (available on the Staff Frog 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.
- 9.6 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.

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

- 10.1 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 and Site Security Policy.
- 10.2 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 e.g. Duke of Edinburgh activities provider.

## **11. Reasonable force**

- 11.1 In line with KCSIE (2024) 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.

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

- 12.1 This policy will be reviewed annually in full by the Governors' Education and Safeguarding Committee, and by Council. Any amendments during the year will be reviewed by the Education and Safeguarding Committee at its termly meetings. This Committee will also review the implementation of the School's policies and procedures relating to safeguarding and child protection.
- 12.2 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.

## **DEALING WITH CONCERNS AND MAKING REFERRALS**

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

#### Logging and reporting concerns

- 13.1 An important part of safeguarding and child protection includes identifying and being aware of the signs and types of behaviour that 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.
- 13.2 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.
- 13.3 One way in which staff at Haileybury Bhaluka can refer concerns is through [MY CONCERN](#), the online child protection reporting 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 a concern. 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.
- 13.4 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.

#### More serious concerns

- 13.5 As above, all staff can refer any concern to the DSL, to any member of the Child Protection Team, or via MY CONCERN. If a referral is made by anyone other than a member of the Child Protection Team, the Team should be informed as soon as possible that a referral has been made.
- 13.6 In addition, where there is a serious concern, the pupil will be placed on the School’s “at risk” register, which is monitored systematically by the DSL.
- 13.7 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 UK 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.
- 13.8 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 (for example, COBIS or the TSA) in an early help assessment or with an individual referral.

- 13.9 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 nominated Governor for Child Protection and Safeguarding, to act upon legal or regulatory duties.

A child at risk of immediate harm

- 13.10 If a child is in **immediate danger** or is at risk of immediate harm a referral should be made to children's social care and/or the police **immediately**. **Anybody** can make a referral using the contact details below. If a referral is not made by the Child Protection Team the Team should be informed, as soon as possible, that a referral has been made.
- 13.11 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.

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

- 13.12 In the event of any disclosure of child on child abuse (including, but not limited to upskirting, 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 Staff Frog Portal.
- 13.13 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](#)) and the DSL works closely with the Assistant Head (Pupil Progress and Behaviour) to ensure an appropriate response.
- 13.14 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. 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 Staff Frog Portal.
- 13.15 Where the Headmaster or Child Protection Team believe that a pupil may be in need of additional support from one or more agencies, the School Doctor will be consulted.
- 13.16 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 Anti 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.
- 13.17 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.

Dealing with allegations of abuse against staff or other adults

- 13.18 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 nominated Governor within one working day of any allegation of abuse made against any member of Haileybury Bhaluka staff. Contact details to make a referral are as follows:

If the Headmaster is absent or cannot be contacted, any allegation against a member of Haileybury Bhaluka staff should be passed to the Chair of Governors, TBA, who will keep the Headmaster informed. The Chair of Governors can be contacted by phone or by email, via the Chief Operating Officer Mr Masum Uddin: [masum.uddin@haileybury.com.bd](mailto:masum.uddin@haileybury.com.bd)

In the unlikely event that the Chair of Governors cannot be contacted, any allegation against a member of Haileybury Bhaluka staff should be passed to the nominated Governor for Child Protection, TBA, whose contact details can be obtained via the Chief Operating Officer: [masum.uddin@haileybury.com.bd](mailto:masum.uddin@haileybury.com.bd)

- 13.19 Should an allegation be made against the Headmaster, that allegation should be reported to the Chair of Governors, TBA (see contact details above). **The Headmaster must not be informed if an allegation is made against him.**
- 13.20 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: <https://www.gov.uk/whistleblowing>. The National Society for the Prevention of Cruelty to Children (NSPCC) whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally.
- 13.21 Where allegations are made concerning a member of staff, DfE KCSIE (Part 4) guidelines will be followed. When dealing with such an allegation, the School will act promptly and avoid unnecessary delays.
- 13.22 The Headmaster and Chair of Governors will avoid making any judgement or decision and will not investigate any allegation without prior consultation with TSA UK.
- 13.23 Whether or not an allegation against a member of staff is substantiated, the School will work with TSA UK to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.
- 13.24 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.
- 13.25 Haileybury Bhaluka will report to the Disclosure and Barring Services (DBS) any person (whether employed, a contractor, a volunteer or student) 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.
- 13.26 Haileybury Bhaluka will refer to the Teaching Regulation Agency (TRA) 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".
- 13.27 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.

- 13.28 Any decisions about when to inform a member of staff about an allegation made against them will be made in consultation TSA UK.
- 13.29 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 reported to the nominated Governor.

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

- 14.1 Any staff member to whom an allegation of abuse is made should:
- a. Find a quiet place and make time to listen.
  - b. Stay calm; overreacting may frighten the child and compound feelings of guilt.
  - c. 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.
  - d. Take what the child says seriously and listen carefully to what you are being told.
  - e. 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".)
  - f. Stop asking any more questions as soon as the child has disclosed that he or she believes that something abusive has happened to him or her, or to someone else.
  - g. 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.
  - h. Check out your understanding of what has happened if you are not clear.
  - i. Use the child's own words. If you are reluctant to repeat these words, the child may stop talking to you.
  - j. Reassure the child they were right to tell you and you are glad he/she has done so.
  - k. Avoid criticising the alleged perpetrator.
  - l. 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).
  - m. 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.
  - n. 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.
  - o. 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.

#### 14.2 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.

#### 14.3 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 and in consultation with TSA UK.
- A child will not be sent home if to do so would endanger their safety or wellbeing.
- Reporting to the Disclosure and Barring Service (DBS), and where appropriate the Teaching Regulation Agency (TRA) within one month of his or her leaving the School, of any person whose services are no longer used because he/she 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.

### 15. Information sharing

- 15.1 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 2024 Part 2.
- 15.2 The School will process personal information fairly and lawfully and keep the information it holds safe and secure, and the guidance outlined in [Information sharing. Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (July 2018).
- 15.3 Ultimately, the safety of the child, and other children, is of paramount importance, and the sharing of child protection files can take precedence over international data protection or GDPR rules, as stated in KCSIE 2024, Part 2, paragraph 119:

*"The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to*

*stand in the way of the need to safeguard and promote the welfare and protect the safety of children.”*

## **16. Dealing with low-level concerns about staff**

- 16.1 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.
- 16.2 Where a concern is deemed a “low-level” concern, the concern 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.
- 16.3 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' Education and Safeguarding Committee termly.
- 16.4 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.
- 16.5 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.
- 16.6 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, this will be checked through the MY CONCERN. 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.

## **17. Dealing with any historical / non-recent abuse allegations**

- 17.1 Historical / non-recent abuse allegations (of a sexual or any other nature) are taken extremely seriously at Haileybury Bhaluka. If any concern is brought to your attention regarding an allegation of historical / non-recent abuse involving current Haileybury Bhaluka staff, the matter



must be passed to the Chair of Governors, via the Chief Operating Officer  
[masum.uddin@haileybury.com.bd](mailto:masum.uddin@haileybury.com.bd)

17.2 The School will refer the matter to the police.

## **TYPES AND INDICATORS OF ABUSE AND SPECIAL CONSIDERATIONS**

### **18. Definitions of abuse**

18.1 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation 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 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 UK 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.
- **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.

18.2 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.

18.3 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.

## 19. Indicators of abuse

19.1 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.

#### 19.2 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;
- making a disclosure;
- social isolation – withdrawn, a ‘loner’;
- frozen watchfulness (particularly pre-school);
- developmental delay;
- depression;
- desperate attention-seeking behaviour.

#### 19.3 Indicators of sexual abuse:

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

- 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;
- pregnancy, urinary tract infections (UTI), sexually transmitted disease (STD) are all cause for immediate concern in young children, or in adolescents if his/her partner cannot be identified;
- 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.

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

- 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.

19.5 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.

#### 19.6 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.

## **20. Signs of parental child abuse**

- 20.1 Should the School feel that a parent's behaviour is endangering a child, the School will put the safety of the child first, above the wishes of the parent. The wellbeing and safety of pupils is paramount.
- 20.2 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.

## **21. Affluent neglect**

- 21.1 Staff should be mindful of aspects of "affluent neglect" where children from wealthier families may experience neglect, in particular emotional neglect. Affluent neglect can take the form of emotional neglect when, for example, parents work long hours, leaving children unsupervised for significant periods of time, or in the care of paid nannies / au pairs. This can lead to an emotional disconnect. Emotional neglect can be more difficult to detect when pupils are boarding and parents are "absent".
- 21.2 Children from affluent families may be more vulnerable to engaging in harmful sexual activity when unsupervised, or having access to financial means to engage in illicit activities such as drug use. Pupils may also experience significant pressure to perform at school given the financial cost and familial expectations.
- 21.3 Affluent parents might also be vulnerable to issues of alcohol or substance abuse, or mental illness, which increases the vulnerability of children in their care.
- 21.4 Staff should be aware that affluence is not a barrier to abuse, and be alert to any potential signs and symptoms, and aware of possible unconscious bias when considering if a pupil might be suffering abuse.

## **22. Mental health**

- 22.1 All staff should be aware that mental health problems can, in some cases, be an indicator of abuse.
- 22.2 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.

## **23. Preventing radicalisation**

- 23.1 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 the UK's system of liberal parliamentary democracy and democratic rights, or (3) intentionally create a permissive for others to achieve the results in 1 and 2.
- 23.2 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 23.3 Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 23.4 Protecting children from the risk of radicalisation should be seen as part of the School's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.
- 23.5 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability, which are often combined with specific influences such as family, friends or certain online communities, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.
- 23.6 As with managing other safeguarding risks, staff should be alert to changes in a child's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.
- 23.7 All Haileybury Bhaluka teaching and pastoral staff are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.
- 23.8 All Haileybury Bhaluka staff undertake Prevent awareness training to equip them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- 23.9 Through Information Computer Technology (ICT) classes, presentations on online safety, internet filtering, firewalls and automatic internet alerts, Haileybury Bhaluka ensures that children are safe from terrorist and extremist material when accessing the internet through the school network. The Director of IT ensures that the internet sites pupils access through the school network are constantly monitored and liaises regularly with the DSL. Any occasion where a pupil accesses a site/searches for information on a topic of concern (for example extremist organisations), a check will be run to see what other sites are being accessed and where necessary the matter will be brought to the attention of the Child Protection Team.
- 23.10 Any pupil for whom a concern is raised and brought to the attention of the School relating to their potential susceptibility to be targeted or influenced to participate in radicalism or extremism, will be referred to the Child Protection Team. Any pupil for whom this applies will be

placed on the School's 'pupils at risk register' and followed up as described above. Each case will be dealt with on an individual basis with consideration given to the most appropriate referral, which could include Channel or Children's Social Care as well as engagement with parents/family/guardians. .

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

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

24.2 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.

24.3 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.

24.4 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.

## **25. Child sexual exploitation (CSE) and child criminal exploitation (CCE)**

- 25.1 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.
- 25.2 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.
- 25.3 The abuse can be perpetrated by individuals or groups, males or females, and children or adults.
- 25.4 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.
- 25.5 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.
- 25.6 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 18 into sexual activity, including online e.g. through sharing videos or images on social media.
- 25.7 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.
- 25.8 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).
- 25.9 Child criminal exploitation (CCE), including involvement in county lines 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.



25.10 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.

25.11 Indicators of CCE include children who:

- appear with unexplained gifts or new possessions;
- exhibit a change in friendships or relationships, associate with older individuals or groups or with other young people involved in exploitation;
- suffer from changes in emotional wellbeing or show a significant decline in performance;
- appear with signs of assault or unexplained injuries
- misuse drugs and alcohol or practice self-harm;
- go missing for periods of time or regularly come home late;
- regularly miss school or education or do not take part in education.

## **26. 'Honour-based' abuse (including female genital mutilation and forced marriage)**

26.1 So-called 'honour-based' abuse (HBA) (including female genital mutilation and forced marriage) encompasses crimes that have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, practices such as breast ironing and non-violent forms of abuse. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

26.2 If in any doubt staff should speak to a member of the Child Protection Team and follow the same procedures as detailed in the section below on FGM. All staff must be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

26.3 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. The School takes into account this dynamic and additional risk factors when deciding what form of safeguarding action to take.

26.4 Female genital mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Further information can be found in the Government's ["Multi-agency statutory guidance on female genital mutilation" \(July 2020\)](#).

26.5 Any member of Haileybury Bhaluka staff who believes a pupil may be at risk from FGM or to whom a pupil discloses information related to FGM must make clear to the pupil that this information cannot be kept confidential. In a case where a pupil is discovered to have undergone an act of FGM the police must be informed immediately. Unless the teacher has good reason not to, they should still refer their concerns to a member of the Child Protection Team, who will involve Children's Social Care services as appropriate. In line with KCSIE 2024, Haileybury Bhaluka recognises that our teachers have a legal duty to report concerns regarding FGM.

26.6 Additional information on FGM Mandatory Reporting Duty in the UK can be found at Appendix 2 at the end of this policy as a point of further reference.

- 26.7 Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.
- 26.8 Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.
- 26.9 Any member of staff who is concerned about the welfare of a child in connection with a forced marriage should seek advice from a member of the Child Protection Team.

## **27. Upskirting**

- 27.1 '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. It is a criminal offence. Anyone of any gender can be a victim.

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

- 28.1 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.
- 28.2 The School's Countering Bullying Policy, its Rewards, Behaviour and Sanctions Policy and its 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.

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

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

## **30. Advocacy for pupils**

- 30.1 Pupils at Haileybury Bhaluka will always have adult support such as an 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.

## **31. Children who need a social worker (child in need and child protection plans)**

- 31.1 Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of

adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

- 31.2 The DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
- 31.3 Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

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

- 32.1 In line with Annex B of KSCIE (2024), 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; using the UK Ministry of Justice's online child arrangements information tool.
- 32.2 Support will be led by the Child Protection Team in conjunction with the relevant HM.

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

- 33.1 Haileybury Bhaluka 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, through the internal resources of the School and its counselling services.
- 33.2 Support will be led by the Child Protection Team in conjunction with the HM.

## **34. Homelessness**

- 34.1 Homelessness and/or the risk of becoming homeless pose a risk to a child's welfare and wellbeing.
- 34.2 Where a pupil is at risk of homelessness the DSL and/or a member of her team will liaise with the local housing authority. Where this is also the risk of the child being at harm, a referral to children's services will be made.

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

- 35.1 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. Haileybury Bhaluka follows the procedures and guidance provided on self-harm and suicidal behaviour published by the Hertfordshire Safeguarding Children Partnership documentation from time to time.
- 35.2 The School co-operates with appropriate external agencies in any child protection investigation. In September 2013 self-harm was defined on the Hertfordshire Safeguarding Children Partnership website 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).

- 35.3 Any member of Haileybury Bhaluka 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 Staff Frog 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.
- 35.4 The Child Protection Team will seek specialist help by liaising immediately with the Health and Wellbeing Centre and school counselling team. The School Doctor can assess the pupil's needs and level of risk. 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.
- 35.5 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.

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

- 36.1 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.
- 36.2 Full details of the procedure to be followed in cases of unexplained absences during the school day can be found in Haileybury Bhaluka's Registration and Missing Pupil Policy (available on the Policies page of the [Staff Frog 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.
- 36.3 Pupil non-attendance at school will be followed up by the Headmaster/Housemaster/Housemistress in the first instance. Any pupil who repeatedly misses school will be brought to the attention of the Child Protection

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

**Chair of Governors:**

**Signed:**

**Date:** **8 August 2025**

## **Appendix 1**

### **Nominated Safeguarding Lead for Child Protection (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 Bhaluka's Senior Leadership Team (SLT), 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 deputy DSLs (Child Protection Team), ensuring that they receive regular and appropriate training (to the same standard and level as the DSL.)

Whilst the DSL can delegate activities and individual pupil cases to the deputies, 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, for example FGM.

#### **Work with others**

- liaise with the Headmaster to inform him of issues.
- 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 the IT Manager regarding online safety in the School and the ICT Acceptable Use Policy;
- receive and review all bullying referrals to the Assistant Head (Pupil Progress and Behaviour) within MY CONCERN to consider escalation to child protection; review the Countering Bullying Policy; and
- act as the Online Safety Coordinator and work with the Online Safety Committee 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.

The DSL (and deputies) must undertake Prevent Awareness training.

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 Bhaluka's Safeguarding and 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 Bhaluka 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 Bhaluka staff are appropriately trained to use and understand MY CONCERN; and
- 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 Bhaluka's child protection policies are known, understood and used appropriately;
- Provide anonymised fortnightly updates on any Child Protection issues to Full LT;
- Ensure Haileybury Bhaluka'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.
- Link with TES to make sure all staff are aware of training opportunities and the latest local policies on safeguarding;
- Attend and provide a written report to the Safeguarding and Wellbeing Committee on pupil and staff wellbeing and discipline at each of its three annual meetings;
- Report to the Charities Commission any allegation of potential abuse.

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

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

### **Child protection file**

- The DSL will ensure that where children leave Haileybury Bhaluka 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 Headmaster, Housemaster/Housemistress, 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 Nominated Safeguarding Lead (DSL) for Child Protection:

A team assists Ms Tahsin with all safeguarding and child protection matters:

- Dr Sabrina Tahsin (School Doctor)
- Capt. Mushfiqur Rahman (Housemaster) & and Ms Rokeya Kashia Chowdhury (Housemistress)

Last Reviewed: August 2025



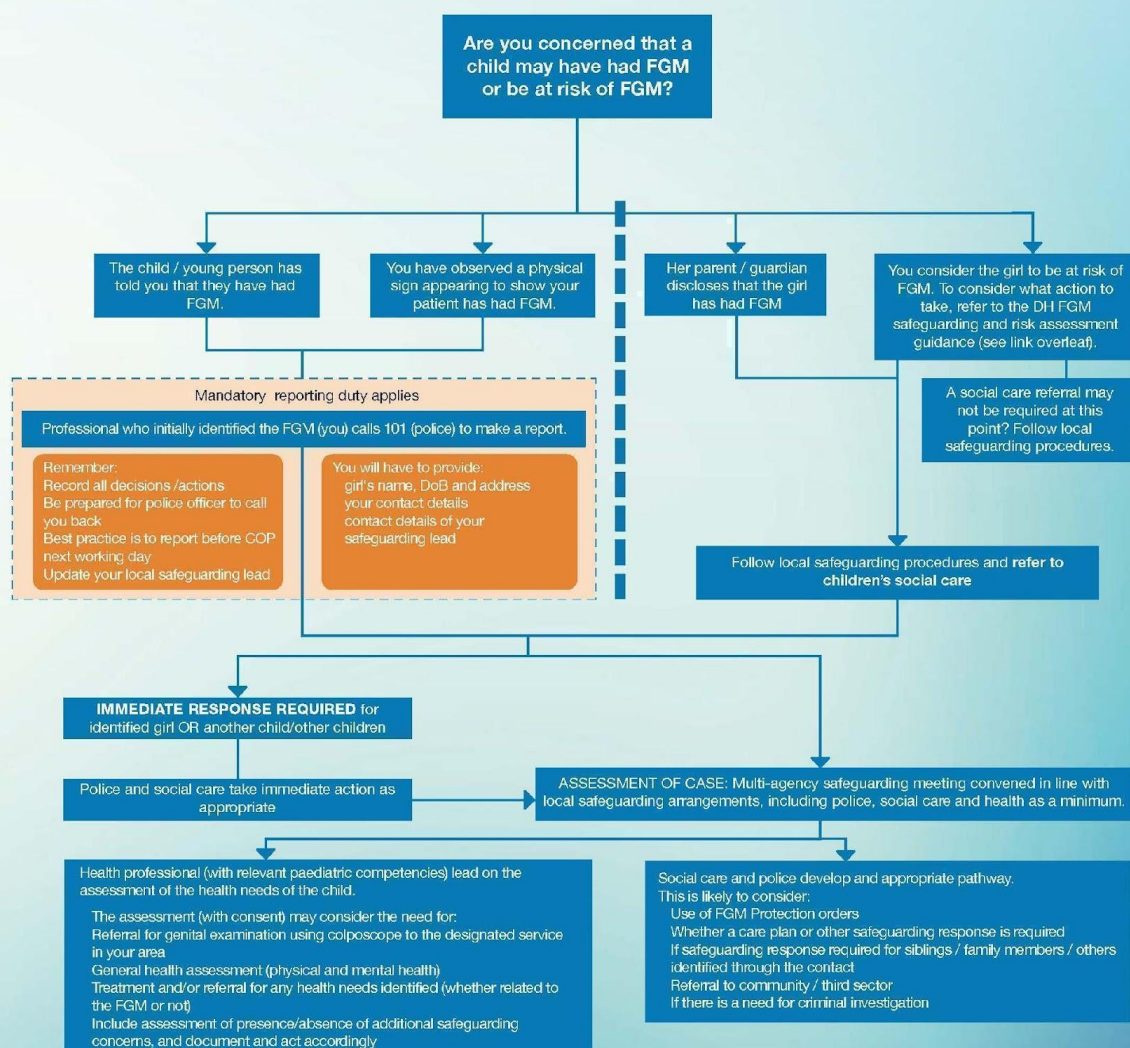


Department  
of Health

**NHS**  
**England**

## Female Genital Mutilation (FGM)

### Mandatory reporting duty



If a girl appears to have been recently cut or you believe she is at imminent risk, act immediately – this may include phoning 999.

**REMEMBER:** Mandatory reporting is only one part of safeguarding against FGM and other abuse. **Always ask your local safeguarding lead if in doubt.**

## 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](http://www.gov.uk/dh/fgm)

FGM eLearning:

[www.e-lfh.org.uk/programmes/female-genital-mutilation](http://www.e-lfh.org.uk/programmes/female-genital-mutilation)

Videos: [www.nhs.uk/fgmguidelines](http://www.nhs.uk/fgmguidelines)

FGM Multi Agency Practice Guidelines: [www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation](http://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation)

- [www.workingtogetheronline.co.uk](http://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.



## Appendix 3

### Keeping children safe in education (KCSIE) 2025: summary of changes

Publication date July 2025



The Department for Education (DfE) has published an information only version of the updates to the statutory safeguarding and child protection guidance for schools in England, Keeping children safe in education (KCSIE). The final version will be published in September 2025.<sup>1</sup> This version will replace previous editions of the guidance.

The guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18.

Our briefing sets out changes to the guidance.

Updates for KCSIE 2025

These include:

- the DfE's Working together to improve school attendance is now statutory guidance
- changes to the list of content risks under online safety, adding in disinformation, misinformation and conspiracy theories
- more information on the DfE guidance on generative artificial intelligence (AI)
- additional information on, and clarity around, alternative provision guidance
- clarity on Virtual School Heads and their non-statutory responsibilities around children in kinship care.

## Acronyms

CAF	Common Assessment Framework – replaced by Families First from September 2017
CAMHS	Child and Adolescent Mental Health Services
CPD	Continuing Professional Development
CPSLO	Child Protection School's Liaison Officer
MY CONCERN	Child Protection Online Monitoring System
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service
DfE	Department for Education
DSL	Nominated Safeguarding Lead for Child Protection
FGM	Female Genital Mutilation
HBA	Honour Based Abuse
HMs	Housemasters/Housemistresses
HR	Human Resources
HSCP	Hertfordshire Safeguarding Children Partnership
ICT	Information and Communications Technology
ISI	Independent Schools Inspectorate
KCSIE	Keeping Children Safe in Education
MASH	Multi-Agency Safeguarding Hub (which has replaced TAS, Targeted Advice Services)
NSPCC	National Society for the Prevention of Cruelty to Children
SEND	Special Educational Needs and Disabilities
STD	Sexually transmitted disease
TRA	Teaching Regulation Agency
TSA	The Safeguarding Alliance
UTI	Urinary tract infections