

## **Group Child Protection and Safeguarding Policy**

**Policy Owner:** Group Health and Safety Director and Group Safeguarding Director

**Review:** August 2023

### **Justification**

At ISP, we are committed to safeguarding and promoting the welfare of children and young people, and we expect all our employees and volunteers, as well as any contractors/consultants and staff from partner agencies in our schools, to share this commitment. As such, we expect them to recognize when a student is at risk or is actually being harmed and to do everything in their power to reduce further risk or harm.

Our schools are particularly important in protecting our students; our school colleagues are in the best position to identify concerns early and provide or recommend support to students, as well as help prevent these concerns from escalating.

At ISP, we adhere to the following basic principles of child protection and safeguarding:

- A child's well-being is paramount, and every student has the right to be protected from harm and exploitation and to have their well-being safeguarded, regardless of their race, religion, ability, gender, or culture.
- All students need to be safe and feel safe at school.
- We work in partnership with parents/guardians and/or other professionals to ensure the protection of students.
- Our guiding principle is “the best interests of the students.”
- All students have the same and equal rights to protection, but we recognize that we need to do more for some due to their special educational needs, disability, gender, religion, or sexual orientation.

### **Policy Goals and Objectives**

We will:

- Provide a safe and happy environment for students to develop and learn.
- Describe the systems and processes we all adopt to ensure that students remain safe at school.
- Raise awareness among all employees about child safeguarding issues and define their roles and responsibilities in reporting possible cases of abuse.
- Identify students who are suffering or may suffer harm.
- Ensure effective communication among all staff members on child protection/safeguarding issues.
- Define effective procedures to be followed by employees/volunteers or third parties who encounter problems related to child protection/safeguarding.
- Be clear with all parties, including students and their parents/guardians, about our approach to child safeguarding and protection through clear and well-communicated policies.

### Policy Scope

The Child Protection and Safeguarding Policy is endorsed by our Executive Committee and adopted by all levels of the group and the school. The policy will also apply to any partner agency that has unsupervised access to children and young people and to any contractors working at any ISP school location.

### Definition

#### *Safeguarding*

Safeguarding and promoting the well-being of children refers to the processes of protecting students from harm, preventing the compromise of their health and development, ensuring that we seek to improve the overall health and well-being of all students in our care, and enabling each student to have the best chances in life and enter adulthood successfully.

#### *Child Protection*

Child protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer harm as a result of abuse or neglect.

Note:

If preventive work around safeguarding issues is not adequate or sufficiently comprehensive, students identified as being of concern may come to be identified as being at risk of significant harm. While other factors beyond the school's control may also influence this situation, the aim of the policy is to ensure that the ISP takes all possible measures to prevent this from happening.

### Principles

This policy sets out our principles and expectations, as well as the procedures and processes to be adopted by all our schools and our group as a whole. The policy also describes the measures to be taken to fulfill our commitment to safeguard students, both at the school, regional, and group levels.

Given our international context, we recognize and accept our responsibility to safeguard all students in accordance with the United Nations Convention on the Rights of the Child (1989). We recognize our obligation to protect our students from harm and, in particular, the obligation that falls on us and our regions and schools in accordance with the following articles of the UN convention:

- Article 3: which establishes that the best interests of children should be the primary concern in making decisions about them.
- Article 13: which states that children have the right to obtain and share information, provided that it is not harmful to them or other children.
- Article 14: which states that children have the right to think and believe whatever they want and to practice their religion.
- Article 19: which establishes that children have the right to be protected from physical and mental injury and abuse.
- Article 34: which establishes that governments must protect children from sexual exploitation and abuse.
- Article 35: which establishes that governments must take all measures to ensure that children are not abducted, sold, or trafficked.
- Article 36: which states that children must be protected from any activity that takes advantage of them or that could harm their well-being and development.
- Article 37: which establishes that no one may punish children in a cruel or harmful manner.

All UN member states signed the 1989 convention (except for the United States of America) and all UN articles can be found at the following link: [http://www.unicef.org/crc/files/Rights\\_overview.pdf](http://www.unicef.org/crc/files/Rights_overview.pdf)

## **Responsibilities**

### *Executive Committee (ExCo) and Senior Management Team (SMT)*

Our ExCo and SMT recognize their ultimate responsibility to ensure that the group and all regions and schools understand and follow the guidance provided by this and all other safeguarding-related documents.

### *School Principals/Directors and Senior Leadership Teams in Schools*

The Principals/School Directors and Senior Leadership Team of each school shall:

- Ensure that the policy is implemented throughout the school and followed by all staff and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and any Deputy Designated Safeguarding Lead to carry out their duties effectively.
- Ensure that the school culture allows concerns to be raised and dealt with sensitively.
- Ensure that the school site is safe.
- Ensure that there are clear roles, responsibilities, and strategies to provide and maintain an effective electronic safety filtering and monitoring system (the Smoothwall filtering and monitoring system will be implemented in ISP schools).
- Customize this policy for your specific school.
- Ensure that local mapping of legislation, guidelines, and support agencies is carried out and added to the customized version of this school policy.
- Hire employees who will have unsupervised contact with children only if safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by staff in relation to safeguarding and protecting children. This training record should be made available for inspection during any audit and should reflect the renewal deadlines identified in this policy.

### *Designated (or Deputy) Safeguarding Lead in a school*

All school will identify a person designated as a Designated Safeguarding Lead (DSL) to support the Headteacher/Principal at each site. This means that schools with split sites may have Deputy Designated Leads at each site for safeguarding purposes, with the DSL having an overview. This person or persons shall: receive appropriate safeguarding training to enable them to carry out their role; have sufficient time in the working day to carry out the role; and be able to prioritize safeguarding when necessary.

The Designated Safeguarding Leader may be the Headteacher, if appropriate, but will be subject to the same training and processes as any other Designated Safeguarding Leader. Schools are

therefore advised to carefully consider before choosing the Headteacher to act as Designated Safeguarding Leader.

The role of DSL is guided by two principles:

- The child's well-being is always paramount.
- Confidentiality must be respected as far as reasonably possible.

Guided by these principles, the Designated Safeguard Leader shall:

- Play a key role in ensuring that the school takes steps to support any student who may be at risk.
- Together with the Principal, ensure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and protecting children.
- Have appropriate training in addition to the basic training that all other staff receive. This includes attending ISP Designated Safeguarding Lead training at least every two years and actively participating in DSL Regional Network meetings to ensure that they remain up to date on safeguarding issues.
- Collect and maintain accurate and confidential records of all concerns relating to children, which should include ensuring that robust action plans are implemented as soon as possible, recorded in writing, and reviewed regularly.
- Take a leadership role in reviewing the filtering and monitoring of online access in schools.
- Have a clear understanding of local expectations regarding safeguarding, who to contact, what agencies exist, and how to contact them.
- Ensure that the entire school community knows who the DSL/DSL Team is in their environment.
- Be familiar with local standards, procedures, and agencies that can offer support on safeguarding issues.
- Be familiar with local standards, procedures, and agencies that can offer support on safeguarding issues. Todos os colaboradores têm a responsabilidade de denunciar ao Líder de Salvaguarda Designado qualquer preocupação que venham a ter sobre a segurança de qualquer criança sob seus cuidados. A responsabilidade do Líder de Salvaguarda Designado é tomar decisões sobre o que fazer em seguida e, então, tomar as medidas adequadas.

*All employees (including employees of partner organizations and service providers who have unsupervised contact with children)*

All employees must:

- Ensure that they are familiar with and follow the policy and all other documents related to safeguarding, e.g., Codes of Conduct, safe working practices guidelines.
- Undergo safer recruitment processes and checks before starting work at the school/organization (in exceptional cases, an action plan/risk assessment may be implemented to ensure that the employee is supervised until all checks are completed; this **must** be authorized by the Group Health and Safety Director before work begins).
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously children's opinions and concerns, knowing what to do if a child tells them they are being abused, exploited, or neglected.
- Know how to manage the requirement to maintain an appropriate level of confidentiality. This means involving only those people who need to be involved, such as the Designated Safeguarding Lead (or a Deputy) and the child welfare service in your area. Employees should never promise a child that they will not tell anyone about a report of any kind of abuse, as this may ultimately not be in the child's best interests.
- Be able to assure victims that they are being taken seriously and that they will be supported and kept safe. Never give the victim the impression that they are creating a problem by reporting the abuse. Nor should the victim be made to feel ashamed for making a report.
- Record all concerns and report them to the Designated Safeguarding Lead (DSL) on the school's concern form or through the MyConcern reporting system.
- Be aware of who the Designated Safeguarding Lead is at the school where you are working and how you can contact them. Schools should include this information in the Appendix at the end of this policy.
- Follow the procedures outlined in this document when/if you are concerned about a child.
- Support students, staff, or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent investigation process.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by ISP).
- All employees and volunteers must recognize that if their behavior inside or outside the workplace violates ISP's code of conduct and/or safe work practice guidelines, it may be considered a disciplinary or even criminal matter.

All employees who have occasional or supervised contact with children (including employees of partner organizations and contractors) must:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns, and to whom they should report them.
- Provide written confirmation to demonstrate that, where appropriate, all staff/contractors from partner agencies have been recruited safely, with the appropriate checks carried out, and that a safeguarding briefing has been given to these employees (appropriate to the role and contact they will have with children) before they start their duties at any ISP school. When these staff or volunteers are constantly supervised, recruitment checks may not need to be as rigorous, but it is up to the Principal / Designated Safeguarding Lead to assess this risk, not individual staff or the partner organizations themselves.
- When partners/contractors do not have their own safeguarding or child protection policy, ISP's application notes will be used, which partners/contractors must read and follow. These requirements will be part of any contract.
- Always follow the guidelines set out in this document.
- Receive guidance on safe and appropriate working practices.

### *Training and support*

ISP will ensure that:

- All employees, volunteers, and partner agencies in schools receive adequate general training on safeguarding when they join the organization and then undergo annual refresher training. This training will be available through ISP-approved online courses, for example, Safeguarding Fundamentals in the Learning Hub, or internal training (following the ISP format within DSL resources), whichever is appropriate, as well as in-person events for which schools must secure funding each year.
- All staff receive updates on safeguarding and child protection (including online safety) throughout the school year (e.g., via email and e-newsletters) so that they have the relevant skills and knowledge to protect students effectively.
- Relevant documents are made available in a variety of relevant languages.
- Staff and volunteers receive support and have the necessary skills to recognize and take appropriate action in relation to students who are at risk or potentially at risk.
- Those with responsibility as Designated Safeguarding Leaders in schools have adequate and up-to-date knowledge and access to appropriate additional and specialized training (approved by the Group S&S Director). This will be updated every two years.
- All employees and volunteers undergo a comprehensive induction, which includes an overview of what to do and who to contact if they are concerned about a student.
- Appropriate employees are trained in safe recruitment. This safer recruitment training must be updated every five years.
- Training for new starters must be completed before any new starter can have unsupervised contact with students.
- Any student who has suffered or is suffering any kind of harm will receive support. Once agreed with any investigating agency (if involved), students may receive direct support from school counselors or an outside agency. All ISP schools have information about local, regional, or national agencies that can offer direct support in these circumstances.

ISP recognizes our duty to care for our employees, and in cases where employees have been involved in reporting and responding to abuse, we recognize that it can be very difficult to deal with these situations alone. ISP will therefore be in a position to offer or arrange appropriate external support or counseling for any employee affected by a safeguarding issue. ISP schools will maintain a list of organizations (such as law firms, hospitals, and counselors) that can be made available to employees upon request.

*Remember that unless you are specifically asked to do so, never conduct an investigation into any suspected abuse. This can be highly specialized work and may interfere with a criminal investigation, if that is necessary and appropriate under local law.*

### Forms of abuse

There are a significant number of ways in which students can be exposed to risks and dangers. All require a response. Abuse is defined as any form of mistreatment of a child. This can manifest itself as direct harm to a child or by a failure to take action to protect a child who is at risk or already suffering harm.

The most commonly mentioned types of abuse are:

- Physical abuse: a form of abuse that may involve hitting, shaking, throwing, poisoning, burning, scalding, or otherwise causing harm to a child.
- Emotional abuse: persistent mistreatment of a child in a way that causes serious and adverse effects on their emotional development. This may involve conveying to the child that they are worthless, unloved, or valued only to the extent that they meet someone else's needs.
- Sexual abuse: involves forcing or seducing a child to participate in sexual activities, whether or not the child is aware of what is happening. This form of abuse may involve direct contact activities, but also non-contact activities, such as through social media or the Internet.
- neglect: is the persistent failure to meet a child's basic physical or psychological needs, which can result in serious impairment of the child's health or development.

Although the four main areas of potential abuse are those mentioned above, abuse itself can take many forms involving one or more of these areas. Employees of the organization and school need to be aware of what to look for and what actions to take when they are concerned about any of these issues (or any other issues).

### Questões Específicas de Salvaguarda

Há questões específicas de salvaguarda que podem colocar as crianças em risco (listadas abaixo). Todas as áreas serão abordadas nos cursos de treinamento inicial da ISP e devem ser incluídas no treinamento anual de atualização ou durante um programa de treinamento de salvaguarda ministrado ao longo do ano letivo. Isso ajuda a garantir que todos os colaboradores estejam cientes dos sinais e indicadores desses problemas específicos para permitir que o suporte de intervenção precoce seja implementado nas escolas ou que sejam feitos encaminhamentos para agências externas especializadas.

### *Abuse among coworkers*

We recognize that children are capable of abusing their peers. When an allegation is made that a child may have abused another child, it must always be taken seriously and treated as a safeguarding issue. This type of behavior between peers will not be tolerated. It can occur both inside and outside of school and online. Abuse between peers is most likely to include, but is not limited to:

- bullying (including cyberbullying, prejudiced and discriminatory bullying);
- abuse in intimate personal relationships between coworkers;
- physical abuse, which may include hitting, kicking, shaking, biting, pulling hair, or causing physical harm in any other way;
- sexual violence, such as rape, penetration assault, and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment;
- non-consensual sharing of nude and semi-nude images and/or videos (sexting);
- causing someone to engage in sexual activity without consent, such as forcing someone to undress, touch themselves sexually, or engage in sexual activity with others;
- upskirting, which typically involves taking a photo under a person's clothing without their permission, with the intent to view their genitals or buttocks for sexual gratification or to cause humiliation, distress, or alarm to the victim; and
- hazing and initiation rituals; this can include activities involving harassment, abuse, or humiliation used as a way to initiate a person into a group and may also include an online element.

### *Sexual violence and sexual harassment*

This can occur between two children of any age and gender, from elementary school through high school. It can occur through a group of children who sexually assault or harass a single child or a group of children. Sexual violence and sexual harassment exist on a continuum and can overlap; they can occur online and in person (both physically and verbally) and are never acceptable. All employees should maintain an attitude of “it could happen here.”

Any reports of abuse among peers should be taken seriously; it is essential that all victims feel confident that they are being taken seriously and that they will receive support and be kept safe.

All employees should be aware of the importance of:

- challenge inappropriate behaviors;
- make it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up;
- do not tolerate or dismiss sexual violence or sexual harassment as “playful,” “part of growing up,” “just being funny,” or “boys being boys”; and
- challenging physical behaviors (potentially criminal in nature), such as grabbing buttocks, breasts, and genitals, pulling down pants, shaking bras, and lifting skirts. Ignoring or tolerating these behaviors can normalize them.

### *Child Sexual Exploitation (CSE) and Children's Criminal Exploitation (CCE)*

Both CSB and CCE are forms of abuse that occur when an individual or group takes advantage of a power imbalance to coerce, manipulate, or deceive a child into participating in sexual or criminal activities in exchange for something the victim needs or wants, and/or to gain financial advantage or increase the status of the perpetrator or facilitator, and/or through violence or the threat of violence. CSE and CCE can affect both male and female children and may include children who have been transferred (commonly referred to as trafficking) for the purpose of exploitation.

### *Sexting*

Sexting is when someone shares sexual images or videos, nude or semi-nude, of themselves or others, or sends sexually explicit messages.

Sexting may also be referred to by students as exchanging nudes, dirty pictures, or photo for photo.

There are many reasons why a student might want to send a nude or semi-nude photo, video, or message to someone else:

They may find it difficult to say “no” if someone asks them for an explicit image, especially if the person asking is persistent or has groomed the child to gain their trust.

- They may go along with it because they believe that “everyone is doing it.”
- To boost their self-esteem.
- To flirt with other people and test their sexual identity.
- To explore their sexual feelings.
- To get attention and connect with new people on social media.

Students often do not realize that by creating and sending these images, they are potentially committing a criminal offense. Ideally, we would prefer not to deal with these issues as criminal offenses. Education and support may be a more beneficial way to address sexting. Staff members should report any incidents of sexting to the DSL via the school's concerns system..

### **Mental Health**

We are 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 should attempt to diagnose a mental health problem. School staff, however, are well placed to observe children on a daily basis and identify those whose behavior suggests they may be suffering from a mental health problem or are at risk of developing one.

When children experience abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence, and adulthood. It is essential that staff are aware of how these children's experiences can affect their mental health,

behavior, and education.

If a staff member has a concern about a child's mental health that is also a safeguarding concern, immediate action must be taken by recording the concern on the school's concern form and speaking to the Designated Safeguarding Lead or a deputy.

### *Self-harm*

Self-harm can take many physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they have started, it can become compulsive. It is therefore very important that schools detect the problem as early as possible and do everything in their power to help. Self-harm is not usually a suicide attempt or a cry for attention. It is often a way for young people to release overwhelming emotions and a way of coping with them. Therefore, whatever the reason, it must be taken seriously.

It is not always easy to discover the exact reasons why children and young people decide to hurt themselves. In fact, they may not even know exactly why they do it, but there are links between depression and self-harm. Often, a child or young person who self-harms is being bullied, is under a lot of pressure, is suffering emotional abuse, is grieving, or has relationship problems with family or friends. The feelings that these problems bring up can include low self-esteem, low confidence, loneliness, sadness, anger, numbness, and a lack of control over their lives. Sometimes, young people will go to great lengths to hide scars or injuries caused by self-harm and/or explain any signs of self-harm as an accident.

There are some common themes that can help employees identify concerns, including:

- Physical indicators, such as cuts, bruises, burns, bald spots (places where hair has been pulled out).
- Emotional indicators, such as depression, sudden weight loss, alcohol or drug use, unusual eating habits, and isolation or withdrawal.

If a staff member suspects that a student is self-harming, this should be referred to the Designated Safeguarding Lead, who will consider the next steps. This is likely to require a discussion with the student involved and their parents/guardians to agree on a course of action or referral to an organization that can support the student.

### **Radicalization and Extremism**

Children can be vulnerable to extremist ideology and radicalization. There is no single way to identify whether a child is likely to be susceptible to extremist ideology. Antecedent factors combined with specific influences, such as family and friends, can contribute to a child's vulnerability. Similarly, radicalization can occur through many different methods (such as through social media or the internet) and environments (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behavior that may indicate they need help or protection.

ISP values freedom of expression and the expression of beliefs/ideologies as fundamental rights that underpin the values of our society. Both students and teachers have the right to speak freely and express their opinions. However, freedom comes with responsibility, and freedom of expression that aims to manipulate the vulnerable or lead to violence and harm to others goes against the moral principles by which freedom of expression is valued. Freedom of expression is not an absolute privilege; it is subject to laws and policies that govern equality, human rights, and community safety and cohesion. Any freedom of expression that promotes violence against any person or anything else will not be tolerated.

A brief awareness course on extremism can be found at the link:

[http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html)

### *Female Genital Mutilation (FGM)*

FGM is a form of child abuse and violence against women and girls and should therefore be dealt with using the procedures set out in this document, i.e., concerns and signs of FGM should be reported to the DSL.

FGM is potentially harmful to children, both emotionally and in terms of health problems, and it violates several articles of the United Nations Convention on the Rights of the Child. It is illegal in 26 countries in Africa and the Middle East, as well as in 33 other countries, including the United States and the United Kingdom.

We recognize that this is a cultural practice in some countries and is not always viewed as abusive. While we do not condone the practice, we need to be aware of the sensitivities surrounding the issue and always act in the best interests of the student.

### *Forced Marriages (FM)*

A forced marriage (FM) is a marriage that takes place without the valid consent of one or both parties and in which coercion is a factor. Forced marriage is when someone is physically pressured to marry (e.g., threats, physical violence, or sexual violence) or emotionally and psychologically pressured (e.g., if someone is made to feel that they are bringing shame on their family). This is very different from an arranged marriage, where both parties give their consent.

In 2013, the first United Nations Human Rights Council also adopted a resolution against child and forced marriages. This resolution recognizes that child, early, and forced marriage involves human rights violations that “prevent individuals from living their lives free from all forms of violence and have adverse consequences on the enjoyment of human rights, such as the right to education.”

As with FGM and other cultural practices, we need to be aware of cultural sensitivities but always act in the best interests of students. However, school procedures should be followed in the same way as for any other child safeguarding or protection issue.

### **Children who miss school for extended periods and/or on repeated occasions**

All staff should be aware that children who are absent for prolonged periods and/or on repeated occasions may serve as a vital warning sign of a range of safeguarding concerns. These may include abuse and neglect, which in turn may include sexual abuse or exploitation, and may also be a sign of criminal exploitation of children. It may also indicate mental health issues, risk of substance abuse, risk of travel to conflict zones, risk of female genital mutilation, honor-based abuse, or risk of forced marriage. Early intervention is necessary to identify any underlying safeguarding risks and to help prevent the risks of a child going missing in the future.

Staff should be aware of the school attendance policy and procedures for unauthorized absence and children missing from school.

### *Domestic Abuse*

Types of domestic abuse include intimate partner violence, abuse by family members, abuse in relationships with adolescents, and violence and abuse by children/adolescents against parents. Anyone can be a victim of domestic abuse, regardless of gender identity, age, ethnicity, socioeconomic status, sexuality, or background, and domestic abuse can occur inside or outside the home.

Every child can witness and be negatively affected by domestic abuse in the context of their home life, when domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious and lasting emotional and psychological impact on children.

In some cases, the child may blame themselves for the abuse or may have been forced to leave the family home as a result.

Young people may also experience domestic abuse in their own intimate relationships. This form of peer abuse is sometimes referred to as “teen dating abuse.”

### *Modern Slavery*

Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labor. Exploitation can take many forms, including: sexual exploitation, forced labor, slavery, servitude, forced criminality, and organ removal.

### *Manufactured and Induced Diseases*

In fabricated illness, the perpetrator (usually a parent or caregiver) does not directly harm the child, but reports a medical history to doctors that turns out to be fabricated. In induced illness, the perpetrator actively inflicts direct harm on the child. This can range from trivial injuries, such as pricking the child to add blood to their urine, to suffocation. All schools should have a robust attendance policy to help monitor childhood illnesses. When a parent reports that a child has an illness that requires health insurance, the school should work collaboratively with the doctor treating the child.

### **Note:**

*The above list is not exhaustive of all possible forms of abuse that employees may have to deal with on occasion. For further information, please refer to "Keeping Children Safe in Education" 2023. This is a UK publication, but the types of abuse discussed are valid and may apply to any country in the world. **All employees must read and confirm receipt of Part 1 of the document.***

## **Preventive measures and related policies for the protection of children**

### *Electronic security*

The growth of electronic media in everyday life and a variety of constantly developing devices create additional risks for children. The risks and dangers of being online include:

Inappropriate content.

- Ignoring age restrictions and communicating with unknown adults or other children (which makes children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or incurring debts.
- Cyberbullying.

Cyberbullying is an increasingly common form of bullying behavior and is most often related to social media and cell phones.

ISP believes that the best way to protect our students is to provide awareness and understanding of the risks, especially through personal, social, and health education, sex and relationship education, or wellness programs. Each school's curriculum includes appropriate and frequent opportunities to teach children to recognize when they and others are at risk and equips them with the skills, strategies, and language necessary to take appropriate action.

### *Photos from cell phones and cameras*

It is our policy that professionals, teachers, and visitors to our Early Childhood Education environments do not use personal cell phones to take photos of children. In our elementary and secondary schools, if personal equipment is used to take photos of children, these photos must be uploaded to the school system as soon as possible and immediately deleted from personal equipment. These measures must be completed before the employee leaves the school premises at the end of the school day. Permission to take photos or make videos or audio recordings must be requested from the Designated Safeguarding Leader or the school Principal.

At the beginning of school events, parents should be reminded of the restriction on taking photos and videos on school grounds and that they should not capture the image of any child other than their own.

We are aware that the use of digital platforms and social media, in particular, can make children particularly vulnerable to “grooming.” Therefore, all ISP employees must ensure that, when promoting school activities on these platforms, they follow the following measures:

- Always request written consent from a child and their parents or guardians before capturing and using a child's image.
- Always explain the purpose for which the images will be used and the possible risks associated with sharing images of children.
- Make it clear that if a child or their family withdraws consent for an image to be shared, it may not be possible to delete images that have already been shared or published.
- Change the names of children whose images are being used in materials published by the school whenever possible (and use only first names if we need to identify them).
- Never show screenshots of classes or videoconference meetings that show children's faces and full names.
- Only use images of children in appropriate clothing.
- Avoid full-face and full-body photos of children participating in activities such as swimming.
- Never publish personal information about individual children and mask any identifying information.
- Ensure that children, their parents, and guardians understand how images of children will be stored securely and for how long (including how we will control access to the images and associated information).
- Reduce the risk of images being copied and used inappropriately by using the correct settings on digital platforms.

#### *Photographs for school publications and marketing*

- Photographs of students used by staff for marketing purposes are taken only with school cameras/devices.
- Images must be saved on a secure server/database, and printed copies must be used only within the school for display, records, and learning journals. Images to be used for marketing must be agreed upon with parents/guardians prior to use.
- Visitors and parents/guardians should be asked not to use cell phones within the school and/or early childhood education environment, except when permission has been given to capture images of their own children. All parents/guardians must authorize the use of photographs for advertising purposes and sign a liability waiver if they do not want their children's image to be used externally.

Failure by employees to adhere to the above measures to safeguard the children in our care will result in disciplinary action.

#### *Antibullying*

Bullying is a safeguarding issue and, if not addressed, can become a more serious child safeguarding issue. Staff at all levels will take seriously any concerns raised about bullying of any student. Action will always be taken to investigate concerns and prevent incidents or behaviors from recurring. Bullying can occur both in person and through the misuse of social media or technology. Each school should have its own policy and approach to restorative practices, and all our schools will demonstrate a commitment to helping resolve specific issues. ISP has a separate Anti-Bullying Policy Statement which should be consulted and fully referenced in relation to bullying of any student.

#### *Children with special educational needs or disabilities*

All staff should recognize that children with special educational needs and disabilities may present additional safeguarding challenges. Depending on the nature of a child's special need or disability, there may be additional barriers that make it difficult to identify and recognize signs of abuse. For example, it is

easy to assume that a child's mood, behavior, or any injury is related to their disability, rather than the fact that they may be suffering abuse. It should also be recognized that children with disabilities may be disproportionately affected by behaviors such as bullying, but may not show any outward signs. Communication difficulties can make it very difficult for a child to indicate what is happening, and therefore it can be very difficult to overcome this barrier. Staff should be extremely vigilant and report any and all concerns, avoiding making assumptions about the causes of any injuries or behavior. ISP has a separate Special Needs Policy Statement.

#### *Physical intervention/restraint*

There may be occasions when adults in schools, in the course of their school duties, have to physically intervene to restrain students and prevent them from harming themselves. Such intervention should always be reasonable and proportionate to the circumstances and be as minimal as possible to resolve the situation. The UK government has issued guidance on the use of reasonable force, which can be used as guidance on good practice. (Schools may add their own guidance and recommendations for local good practice here, if available).

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>.

The Principal/School Director should request that any adult involved in such an incident report the matter to him or her as soon as possible. The employee should document the incident in full, providing a description and a complete account of the incident. Witnesses to the incident should be identified whenever possible.

When intervention is necessary, a senior staff member should be asked to interview the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept, and the student should be examined for injuries.

Parents/guardians should always be informed when intervention is necessary.

#### *Safer Recruitment and Selection*

We will do everything possible to ensure that all those who work with children in our regions, schools, and throughout our group are suitable. To this end, all employees who will work unsupervised with children or young people will be recruited using safer recruitment procedures. (See ISP's safer recruitment policy and background check policy).

Safer Recruitment involves thoroughly screening candidates through the interview process and application forms, verifying identity, qualifications, and obtaining appropriate references, conducting criminal background checks for all countries where the candidate has lived or worked in the last 10 years, as well as some additional recruitment checks.

At least one member of each interview panel, both at the organizational and school levels, interviewing for a position or positions that may involve unsupervised contact with children, must have completed safe recruitment training. All schools will maintain a central record of all recruitment checks carried out on all employees. This record will include details relating to DBS (Disclosure and Barring Service - for anyone who has lived or worked only in the UK) checks, i.e., date of completion and number, criminal background checks from other countries or certificates of good conduct, qualifications, prohibition order checks, etc.

When information is disclosed as part of the criminal background check process, whether it is information about warnings, convictions, or minor information, any disclosure will lead to the completion of a risk assessment prior to appointment. This risk assessment will be signed by the Chancellor, the Group Health and Safety Director, the Regional HR Manager, and the Regional Director of Schools.

### **Allegations against employees and volunteers**

An allegation can be made against an employee or volunteer at any time. It is important that such allegations are treated seriously and that the appropriate procedures are followed.

An allegation is different from a complaint and can be defined as follows:

- When someone behaves in a way that harms or could harm a child.
- When someone possibly commits a criminal offense against a child.
- When someone behaves toward a child or children in a way that poses a risk to them.

In the event of an allegation made against an employee (or volunteer helper), it will always be investigated by the School Principal/Director, unless a criminal act has been committed, in which case the matter should be referred to the local authorities, where appropriate. In all cases (criminal or otherwise), the School Principal and the Group Safeguarding Director must be informed as soon as possible and always within 48 hours. If the allegation is against the Principal or SLT of the school, the Division CEO, Division CFO, Regional Administrative Director, Group Health and Safety Director, Group Safeguarding Director, and Group Personnel Operations Director must be informed.

No action to investigate the concern should be taken before consulting with the Group Safeguarding Director and agreeing on the best way to address and investigate the concern. If, after these initial consultations, it is judged that further investigation is necessary, the employee may be suspended. Suspension is a neutral act and does not in any way imply that the person is guilty of any offense. It is recognized that this would be distressing for the person concerned, and the school will do everything possible to balance the interests of any individual with the need to keep children safe. The school will seek guidance from the Group Safeguarding Director before taking action and will comply with nationally and locally agreed guidance on these matters. Each school is expected to have researched and mapped local arrangements and guidance for dealing with allegations.

The Group Safeguarding Director will update and keep the Group Health and Safety Director informed of any developments. In cases of allegations against a Principal or member of the school's SLT, the Division CEO is also expected to update the CEO, CFO, and Group Director of Learning and Innovation.

Employees will reduce the possibility of an allegation being made by ensuring they are aware of the expectations contained in the code of conduct for employees and volunteers and the guidance on safe working practices, which includes the school's Intimate Care policies.

### *Complaints*

We recognize that we cannot expect children to raise concerns in an environment where adults do not do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitudes of colleagues. Appropriate concerns raised for the right reasons are considered protected disclosure, and even if they prove to be unfounded, no action will be taken against the whistleblower.

Malicious reporting, however, will be viewed as a possible disciplinary issue. ISP has a separate Whistleblowing Policy that should be consulted and fully referenced in the event of such an incident.

## Procedures

### *Adults concerned about a Student*

Se um colaborador suspeitar que um aluno sob seus cuidados possa ser vítima de abuso ou esteja At risk of abuse or other harm, they should not attempt to investigate and should instead report their concerns to the Designated Safeguarding Leader (DSL) as soon as possible.

Employees should disclose any concerns they have about a student potentially being abused or putting themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to withhold information that could have helped protect a student from actual harm. In many cases, the student will not make a direct disclosure, but employees will be concerned because of a physical or emotional indicator. In these circumstances, employees should still use the concern registration form and body map (if appropriate) to report to the Designated Safeguarding Leader.

When a student makes any kind of direct disclosure, the guidelines under the heading “Dealing with Disclosure” below should be followed.

### *Disclosure, Complaints, and Additional Actions*

If a child asks to speak to someone in confidence about a problem, no one should promise confidentiality if what the child reveals or may reveal is related to abuse suffered by them or another child. Employees should always give this health warning before meeting with the child.

The following guidelines are based on five fundamental practices for all employees:

#### *Receive*

Whenever possible, stop and listen to the child who wants to talk in confidence. We know that children often find the most inconvenient moment to do this, but it is important that you make time for the child, even if it is just to say, “I can't right now, but come see me in my office at .”

Whenever possible, during any disclosure, try to listen, allow for silences, and try not to show shock or disbelief.

#### *Reassure*

Try to remain calm, don't judge, and empathize with the child. Never make a promise you can't keep. Reassure the child as much as you can and tell them what actions you will take. Reassure the child that they are doing the right thing by telling you.

#### *React*

Respond to what the child is saying only to the extent necessary to obtain more information. Do not ask leading questions. Keep questions open-ended, such as, “Is there anything else you want to tell me?” Try not to criticize the alleged perpetrator, as they may be a family member for whom the child still has feelings.

#### *Register*

Take brief notes on what the child said during the conversation, but if this is not possible, take notes as soon as you can and always within 24 hours. Be sure to record exactly what the child says and not your interpretation of what was said. Also record the time, date, and location (see the concern log form).

#### *Report*

When a child makes a disclosure, or when you have concerns for any reason, it is very important that the procedures outlined in this document are followed. A full written/typed account of the concern (preferably using the concern registration form) should be sent to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed body map.

When a child makes a disclosure and alleges abuse, the Designated Safeguarding Leader (or the Head Teacher/Principal, in the absence of the DSL) must be informed as soon as possible. The Designated Safeguarding Leader will gather all available evidence, ensuring that the notes of all witnesses are made available to any investigating body. The Designated Safeguarding Lead will consider and, where necessary, consult on the information available. It is the role of the Designated Safeguarding Lead to make decisions about the next steps to be taken and to decide whether the matter will be pursued within the local legal framework. It is important that a complete record of all information and decisions made is recorded and

stored confidentially.

ISP recognizes the diverse and complex local contexts in which our schools operate. Therefore, the following principles are taken into account when following the structure and procedure for disclosure, reporting, and further action:

As International Schools, we:

- We generally reside in cities and countries that offer little external support.
- We recognize the limitations in the areas of child protection.
- We need to assess the quality and skills of counselors and other support teams in dealing with children who have suffered harm or self-harm in order to determine the limits of their work.
- We need to act in accordance with local legislation, as well as the principles and practices outlined in this policy.

### Local Safeguarding/Guidance Agencies

Each school MUST include local arrangements and contact information for local agencies and bodies that can provide guidance or accept referrals in the Appendix at the end of this policy. Alternatively, schools may produce a separate document describing which agencies, if any, can be contacted or are available for the school to seek guidance or make referrals. The names and contact information of the DSL should also be included.

### Record Keeping and Confidentiality

#### *Record Keeping*

All records of concerns, disclosures, or allegations of child protection must be treated as confidential information and must be kept together, securely, and separate from the child's general school records. The information should be shared with all those who need it, either to enable them to take appropriate action to protect children or to enable them to fulfill their own obligations, but it should not be shared more widely than that.

- Child protection records must be stored in a secure (i.e., locked) filing cabinet or secure electronic system such as MyConcern (its use must be authorized by the Group S&S Director). Safeguarding information must not be recorded in Engage. Files should be accessible through the Designated Safeguarding Lead (or their Deputy) and other senior staff in larger schools to ensure reasonable access. (ISP should enable the S&S system to maintain these records securely.)
- Records of any child disclosures should be clearly dated and filed without future alteration.
- Child protection records should be separate from the general education file, but the child's general school record file should be marked to indicate that a child protection file exists (e.g., red star or similar). All staff who need to consult a child's school file should be aware of the meaning of the symbol and who to consult if they see this symbol.
- A child protection file (electronic or otherwise) should be started for an individual child as soon as the school becomes aware of any concern about that child's protection. This can occur in a number of ways, for example:
  - If an employee raises a concern about a child's welfare, this must be recorded in writing (see guidelines below).
  - If the information is forwarded to the school by a previous school attended by the child.
  - If the school is alerted by another agency about concerns regarding the protection of that child.
- Employees should report any concerns they have about a child's welfare in writing, using the school form. This record should be forwarded as soon as possible to the Designated Safeguarding Lead. Concerns that may seem trivial at first may later become vital information. Therefore, it is important to provide as much detail as possible. A concern raised may not progress beyond a conversation with the Designated Safeguarding Lead, but it may also result in issues being addressed through a legal system. If there is no specific incident causing concern, try to be specific about what is causing you concern.
- If any information is removed from a file for any reason, a dated note should be placed in the file indicating who removed it, why, and when.
- The registration form should include (see Concern Registration Form):

- A record of the child's information: name, date of birth, address, and family information.
- Date and time of the event/concern.
- The nature of the concern raised.
- The action taken and by whom: Name and position of the person who made the record.

In the event of disclosure, remember that the record you make must include:

- As complete an account as possible of what the child said (in their own words).
- An account of the questions asked of the child.
- Time and place of disclosure.
- Who was present at the time of disclosure.
- The child's behavior, where they were taken, and where they returned to at the end of the disclosure.

### *Confidentiality*

Schools should consider all information relating to individual child safeguarding issues as confidential and should treat it accordingly. Information should only be passed on to appropriate persons at the discretion of the Principal/Designated Safeguarding Lead, and this should always be based on a need-to-know basis.

All records relating to child protection should be adequately protected.

### **Auditing, Reporting, and Review**

The elements of safeguarding practice in schools will be audited during visits by the Group Safeguarding Teams; they will also be included in the annual safety audit and will also be reviewed when visited by the Group Health and Safety Department.

This policy will be reviewed regularly and at least every two years by the Group Safeguarding Director, Director of