



Setia EcoHill
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Tenby International School Setia Eco Hill Safeguarding Policy

Policy	Safeguarding Policy			
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Ownership:	Designated Safeguarding Lead & CP	Approved by:	Group Health and Safety Director	

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1. PURPOSE

Tenby International School Setia EcoHill and International Schools Partnership (ISP) expect that all staff and volunteers in our schools and any contractors or partner agency staff used by schools, recognise where a student is at risk of, or is actually being harmed and do all they can to reduce further risk or harm.

We recognise that our schools are particularly important in protecting our students; they are in the best position to identify concerns early and provide or identify help for students as well as helping to prevent these concerns from escalating. ISP adheres to these basic principles:

- A child's welfare is paramount and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'.
- All students have the same equal rights to protection, but we recognise that we need to do more for some because of their special educational needs, disability, gender, religion or sexual orientation.

1. *Aims and Objectives*

Tenby International School Setia Eco Hill and International Schools Partnership (ISP) aim to:

- Provide a safe and happy environment to enable students to thrive and learn.
- Outline the systems and processes we all take to ensure that students remain safe at school.
- Raise awareness to all staff of safeguarding/child protection issues and define their roles and responsibilities in reporting possible cases of abuse.
- Identify students who are suffering, or likely to suffer harm.
- Ensure effective communication between all staff on child protection/safeguarding issues.
- Set effective procedures for staff/volunteers or third-party individuals who encounter any issues in relation to child protection/safeguarding to follow.
- Be clear with all parties, including students and their parents/carers, regarding our approach to safeguarding and child protection, through the provision of clear and well communicated policies.

2. DEFINITIONS

1. Safeguarding

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

2. 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 from harm as a result of abuse or neglect.

3. PRINCIPLES

This Policy sets out the principles and expectations, as well as the procedures and processes adopted by this school. The policy also describes the steps that are taken in meeting our commitment to safeguarding students. Given our international context, Tenby International Schools Setia Eco Hill and International Schools Partnership (ISP) recognise and accept its responsibility to safeguard all students under the UN Convention on the Rights of the Child (1989). Tenby International Schools Setia Eco Hill and International Schools Partnership (ISP) recognise the obligation to protect our students from harm and in particular, the obligation Tenby International Schools Setia Eco Hill and International Schools Partnership (ISP) under the following Articles of the UN convention:

Article 3: which states that the best interests of children must be the primary concern in decision making about them.

Article 13: which states that children have the right to get and share information as long as it is not damaging to them or another child.

Article 14: which states that children have the right to think and believe what they want and to practise their religion.

Article 19: which states children have the right to be protected from hurt and mistreatment, physically and mentally.

Article 34: which states that Governments should protect children from sexual exploitation and abuse.

Article 35: which states that Governments should take all measures to ensure that children are not abducted, sold or trafficked.

Article 36: which states that children should be protected from any activity that takes advantage of them or could harm their welfare and development.

Article 37: which states that no one is allowed to punish children in a cruel or harmful way.

All member states of the UN have signed up to the 1989 convention, with the exception of the United States of America.

All the UN articles can be found at the following link:

http://www.unicef.org/crc/files/Rights_overview.pdf

4. RESPONSIBILITIES

1. Senior Leadership

The Senior Management Team recognise their ultimate responsibility to ensure that the school understands and follows the guidance provided by this and all other safeguarding related documents.

2. Principals and Senior Leadership Teams in Schools

The Principals and Senior Leadership Team in each school will:

- Ensure that the policy is implemented across all schools 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 role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the school site is secure.
- Only deploy staff who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy.

3. Designated Safeguarding Lead (or Deputy) in a school

Every school will identify at least one named person designated as the Safeguarding Lead (DSL), to support the Campus Principal on each site. This person/people will: receive appropriate safeguarding training to equip them to undertake their role; be given sufficient time in the working day to undertake the role; and be able to prioritise safeguarding when necessary.

The designated staff role is guided by two principles:

- The welfare of the child is always paramount.
- Confidentiality should be respected as far as is reasonably possible.

Being guided by these principles the Designated Safeguarding Lead will:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the Principal, make sure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Have appropriate training in addition to the basic training that all other staff receive.
- Collate and keep accurate and confidential records of any concerns about children.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.

- Ensure that the entire school community knows who the DSL is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All staff have the responsibility to report to the Designated Safeguarding Lead any concern they have about the safety of any child in their care. The Designated Safeguarding Lead's responsibility is to make decisions about what to do next and then to take appropriate action.

4. All staff (including partner organisations and contractors having unsupervised contact with children)

All staff will:

- Ensure they are familiar with and follow the policy and all other safeguarding related documents e.g., Codes of Conduct, guidance for safe working practice.
- Be subject to safe recruitment processes and checks prior to starting at the school (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed).
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL).
- In Tenby International School Setia EcoHill the Designated Safeguarding Lead is Madeleine Britton and the Deputy DSL is Martin Shelley. They can be contacted on madeleine.britton@tenby.edu.my and martin.shelly@tenby.edu.my
- Follow the procedures outlined in this document when/if concerned about any 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 process of investigation.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by ISP).
- All staff and volunteers need to recognise that if their behaviour inside or outside the workplace breaches Tenby International School Setia EcoHill and International Schools Partnership (ISP) code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

All staff who have occasional or supervised contact with children (including staff from partner and contracted organisations) will:

- 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.

- Provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these staff, (appropriate to the role and contact they will have with children), before they commence their role in any ISP school. Where these staff or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the Principal/ Designated Safeguarding Lead to assess this risk, not individual members of staff or partner organisations themselves.
- Where partners/contractors do not have their own safeguarding or child protection policy, the Tenby International School Setia EcoHill policy will be used and partners/contractors asked to read and follow this. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in this document at all times.
- Be provided with guidance on appropriate safe working practice.

5. TRAINING AND SUPPORT

Tenby International School Setia EcoHill and International Schools Partnership (ISP) will ensure that:

- All staff, volunteers and partner agency's in schools are provided with appropriate general safeguarding training on joining the organisation and then at least every three years. This training will be available through EduCare or in-house training, whichever is appropriate, as well as face-to-face events which Tenby International School Setia EcoHill will secure the budget for each year.
- Relevant documents are made available in a range of relevant languages.
- Staff and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up to date knowledge and that they access appropriate additional and specialist training (approved by the Group H&S Director). This will be refreshed every two years.
- All staff and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate staff are trained in safe recruitment. This safe recruitment training must be renewed every two years.
- Training for new starters must be complete before any new starter can have unsupervised contact with students.
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counsellors or external agency input. All ISP schools will hold information in relation to local, regional or national bodies that may be able to offer direct support in these circumstances.
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Tenby International School Setia EcoHill and International Schools Partnership (ISP) recognise our duty of care to our employees and where staff have been involved in reporting and responding to abuse, we recognise that this can be very difficult to deal with in isolation. ISP will therefore be in a position to offer or broker appropriate external support or counselling for any staff member affected by a safeguarding issue. ISP schools will keep a list of organisations (such as law firms, hospitals and counsellors, which can be made available to staff on request).

6. FORMS OF ABUSE

There are a significant number of ways that students may be exposed to risk and danger. All require a response. Abuse is defined as any form of maltreatment 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 of, or already suffering harm.

The more commonly referred to types of abuse are:

Physical abuse

- a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise causing harm to a child.

Emotional abuse

- the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

This may involve

- Conveying to a child that they are worthless, unloved or valued only in so far as they meet the needs of another person.

Sexual Abuse:

- involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This form of abuse can involve direct contact activities but also non-contact activities over social media or the internet.

Neglect:

- This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development.

While the above are the broad four main areas of potential abuse, abuse itself can take many forms involving one or more of these areas.

School staff need to be aware of what to look for and what actions to take when concerned about any of these issues (or any other concerns).

Female Genital Mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with through the procedures set out in this document where possible.

FGM is potentially damaging to children both emotionally and in terms of health issues and is in breach of a number of articles under the UN convention on the rights of the child. It is illegal in 26 countries across Africa and the Middle East, as well as in 33 other countries including the United States of America and the UK.

We recognise that this is cultural practice in this country and therefore not seen as abusive. However, we cannot condone the practice but we need to be aware of the sensitivities surrounding it and always act in the student's best interests.

Forced marriages (FM)

A forced marriage (FM) is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

In 2013, the first United Nations Human Rights Council also adopted a resolution against child and forced marriages. This resolution recognises child, early, and forced marriage as involving violations of human rights which "prevents individuals from living their lives free from all forms of violence and has adverse consequences on the enjoyment of human rights, such as the right to education."

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

Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously.

The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving, or having relationship problems with family or friends. The feelings that these issues bring up can include: low self-esteem, low confidence, loneliness, sadness, anger, numbness and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

There are some common themes that may help staff identify concerns including:

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

If staff suspect that a student is self-harming this must be referred to the Designated Safeguarding Lead who will consider the next steps. It is likely that this will require discussion with the student involved and their parents/carers to agree a course of action or referral to an organisation that may be able to support the student.

Child Sexual Exploitation (CSE)

The sexual exploitation of children and young people under 18 can involve exploitative relationships where young people receive something in return for performing sexual acts. Exploitation of any student can occur on a face-to-face level or through the use of technology, such as mobile phones or computers. In these situations, a student could be encouraged to send or post indecent images of themselves.

In all cases the person exploiting students does so by misusing the power they have over them. This power may come through virtue of age, physical strength and/or economic resources. Violence, intimidation and coercion are common in exploitative relationships.

Sexting

Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages. Sexting may also be referred to by students as trading nudes, dirties or pic for pic. There are many reasons why a student may want to send a naked or semi-naked picture, video or message to someone else:

- Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.
- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent.

Students often do not realise that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting.

Fabricated or Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms. This may include fabrication of past medical history;
- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens

of bodily fluids. This may also include falsification of letters and documents;

- Induction of illness by a variety of means.

The following checklist can be used by any professional dealing with a possible case of FII:

- Focusing on safeguarding and promoting the welfare of the child at all times
- Complete a chronology, listing what is evidence-based.
- cross reference the chronologies for different children in the family as illness behaviour can switch between different children in the family
- Listing inconsistencies and gathering more information from family members and other professionals to clarify inconsistencies
- Look for emerging patterns
- Evaluate alternatives

Warning Signs of FII maybe:

1. Reported symptoms and signs found on examination are not explained by any medical condition from which the child may be suffering.
2. Physical examination and results of medical investigations do not explain reported symptoms and signs.
3. There is an inexplicably poor response to prescribed medication and other treatment.
4. New symptoms are reported on resolution of previous ones.
5. Reported symptoms and found signs are not seen to begin in the absence of the carer.
6. The child's normal, daily life activities are being curtailed beyond that which might be expected for any medical disorder from which the child is known to suffer.
7. Over time the child is repeatedly presented with a range of signs and symptoms.
8. History of unexplained illnesses or deaths or multiple surgery in parents or siblings of the family.
9. Once the perpetrator's access to the child is restricted, signs and symptoms fade and eventually disappear (similar to category 5, above).
10. Exaggerated catastrophes or fabricated bereavements and other extended family problems are reported.
11. Incongruity between the seriousness of the story and the actions of the parents.
12. Erroneous or misleading information provided by parent.

Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Victims of modern slavery may be;

- forced to work – through coercion, or mental or physical threat;
- owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as 'property';
- physically constrained or have restrictions placed on their freedom of movement

Children do not have to prove that they have been coerced or persuaded in order to be a victim of modern slavery, i.e. a child's consent to being trafficked is irrelevant and it is not necessary to prove coercion or any other inducement for there to be an offence. This includes their engagement in criminal activity.

Children are trafficked for;

- child sexual exploitation
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft

The Modern Slavery Act 2015 was introduced to specifically address slavery and trafficking in the 21st century. Tenby Setia Ecohill has a zero tolerance approach to any form of modern slavery and trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery. If an employee suspects that modern slavery and/or trafficking may be occurring within our school or supply chain in the first instance concerns should immediately be raised with the DSL and Campus Principal.

Note:

The above is not an exhaustive list of all the potential forms of abuse which staff may have to deal with on occasions. For information, please see "Keeping Children Safe in Education". This is a UK publication but the types of abuse discussed are valid and can apply to any country around the world.

Domestic Abuse

Domestic abuse is considered to be 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 encompass, but is not limited to:

- Psychological;
- Physical;
- Sexual;
- Financial;
- Emotional;
- Stalking;
- Harassment.

Controlling behaviour

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

This definition, which is not a legal definition, includes 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

The impact of domestic abuse is usually on every aspect of a child's life, although it will vary according to the child's resilience and the strengths and weaknesses of his / her particular circumstances.

In almost a third of cases, domestic abuse begins or escalates during pregnancy and it is associated with increased rates of miscarriage, premature birth, foetal injury and foetal death. The mother may be prevented from seeking or receiving proper ante-natal or post-natal care. In addition, if the mother is being abused this can affect her attachment to her child, more so if the pregnancy is a result of rape by her partner.

There is a strong evidence based link between domestic abuse and child abuse. Children who witness domestic abuse suffer emotional abuse and exposure to domestic abuse is always abusive to children. Research suggests that 62% of children who are exposed to domestic abuse are also harmed as a result of physical and emotional abuse or neglect. There is also increasing recognition of the damaging psychological impact that witnessing domestic abuse has on children.

Signs of domestic abuse

It can be difficult to tell if domestic abuse is happening and those carrying out the abuse can act very different when other people are around. Children and young people might also feel frightened and confused, keeping the abuse to themselves.

Signs that a child has witnessed domestic abuse can include:

- aggression or bullying
- anti-social behaviour, like vandalism
- anxiety, depression or suicidal thoughts
- attention seeking
- bed-wetting, nightmares or insomnia
- constant or regular sickness, like colds, headaches and mouth ulcers
- drug or alcohol use
- eating disorders
- problems in school or trouble learning
- tantrums
- withdrawal.

Children Missing From Education

In Children Missing Education - Statutory Guidance for Local Authorities (2016), children missing education are defined as those who are not on a school roll or receiving suitable education otherwise than at school. Those who are regularly absent or have missed 10 school days or more without permission may be at risk of becoming 'children missing education'.

There will not always be a safeguarding concern for children and young people who are missing education. Most children and young people are moving schools supported by their parents/carers, schools and local authority admissions services. A smaller number, however, are at risk of dropping out or disengaging from education and, being out of school, they are at risk of exploitation, going missing and significant harm.

Risks

These 'missing' children can be vulnerable; it is essential that all services work together to identify and re-engage these children back into appropriate education provision as quickly as possible. It is important to establish, at the earliest possible stage, the reasons for the child being missing. Possible reasons that should be considered include:

- Failure to start appropriate provision and never enter the system
- Stopped attending, due to illegal exclusion or withdrawal by parent/carers
- Failure to complete a transition between schools
- Children from refugee and asylum -seeking families
- Children from families who are highly mobile
- Children at risk of a forced marriage
- Children experiencing abuse and neglect

Children who remain disengaged from education are potentially exposed to higher degrees of risk such as anti-social behaviour and/or sexual exploitation.

Response

From the first day that a child does not attend school and there is no explanation or authorisation of the absence, the following steps should be taken:

- Record on MyConcern
- A staff member will contact the parents/carers (person with parental responsibility for the child) to seek reassurance that the child is safe at home
- The outcome of the contact should be assessed and if there are any concerns a consultation with the Designated Safeguarding Lead should take place to consider the child's vulnerability.

Children missing from education but not missing from home

The length of time that a child remains out of school could, of itself, be an alerting factor of risk of harm to the child. A judgement as to timeliness is required in respect of the referral to the police. This timeliness should be on a case by case basis. In exceptional circumstances, a leave of absence can be authorised by the Headteacher, at which point a return date is set. In these cases, the time line for enquiries starts from when the child does not attend school on the expected return date, not from the day the authorised leave started.

7. SPECIFIC SAFEGUARDING ISSUES

1. E-safety

The growth in electronic media in everyday life and an ever-developing variety of devices create additional risks for children. Risks and dangers of being online include:

- Inappropriate content.
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or running up debts.
- Cyber Bullying.

Cyber bullying is an increasingly common form of bullying behaviour and is most often related to social networks and mobile phones.

Tenby International School Setia Eco Hill and International Schools Partnership (ISP) believe the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. Each school's curriculum includes appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies and language they need to take appropriate action.

2. Mobile phone and Camera Images

It is our policy that visitors to our Early Years settings should not use personal mobile phones to take images of children. In EYFS, primary and secondary school, if personal equipment is used to capture child images, these images should be uploaded to the schools' system as soon as possible and immediately deleted from personal equipment. Permission to capture images, videos or audio recordings should be sought from the Designated Safeguarding Lead or Principal of the school.

Photographs for School Publications:

- Photographs of students being used by staff for learning or marketing are only taken on school cameras/devices.
- Images should be saved on a secure server/database and printed copies only used within the school for purposes such as displays, records and learning journals. Images to be used for marketing need to be agreed with parents/carers before use.
- Staff personal phones should not be used in classrooms and learning areas when students are present except where required as a response to emergency planning.
- Visitors and parents/carers should be asked not to use mobile devices within the school and/or early years setting, except where permission has been granted to capture images of their own child children. All

parents/carers must give permission for photographs to be used for publicity purposes and to sign a disclaimer if they do not wish their child's image to be used externally.

3. Allegations against staff and volunteers

An allegation can be made against a staff member or volunteer at any point. It is important that any such allegations are treated seriously, and appropriate procedures followed.

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

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal offence against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.

In the event of an allegation being made against a member of the school staff (or a volunteer helper), it will always be investigated by the Principal 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 not) the Principal and Group H&S Director must be informed as soon as possible and certainly within 48 hours. In the case of the allegation being against the Principal, the Regional Managing Director and the Group H&S Director should be informed.

No action to investigate the concern should be taken before consultation with the Group H&S Director, and agreement reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are needed, then the member of staff may be suspended. Suspension is a neutral act, and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the Group H&S Director before acting and will comply with national and locally agreed guidance on these matters. Each school is expected to have researched and mapped the local arrangements and guidance for dealing with allegations.

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the code of conduct for staff and volunteers and the guidance for safe working practice.

4. Whistleblowing

Tenby International School Setia Eco Hill and International Schools Partnership (ISP) recognise that we cannot expect children to raise concerns in an environment where adults fail to do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are considered to be a protected disclosure and, even if proven to be unfounded, no action will be taken against the whistle-blower.

Malicious whistleblowing however, will be seen as a potential disciplinary matter. ISP has a separate Whistleblowing Policy Statement which must be referred to and fully referenced in the event of such an incident.

5. Anti-Bullying

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve either face-to-face or the misuse of social media or technology. Tenby International School Setia EcoHill has a separate Anti-Bullying Policy Statement which must be referred to and fully referenced in relation to the bullying of any student.

6. Children with Special Educational Needs or Disabilities

All staff should recognise that children with Special Educational Needs and Disabilities can mean additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it is easy to assume that a child's mood, behaviour, or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted on by behaviours such as bullying but they may not show any outward signs.

Communication difficulties, in particular, can make it very difficult for a child to indicate what's happening and, therefore, may make it very difficult to overcome any such barrier. Staff should be extra vigilant and report any and all concerns, avoiding making assumptions about the causes of any injury or behaviour.

7. Allegations made by a child about another child (Peer on peer abuse)

Tenby International School Setia EcoHill and International Schools Partnership (ISP) recognise that children are capable of abusing their peers. Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. Peer on peer abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse. Examples can include girls being touched/assaulted inappropriately by boys, or boys themselves being subject to initiation violence. This type of peer on peer behaviour will not be tolerated.

Under no circumstances should an allegation that one child has possibly abused another be treated "as just children being children" or "experimentation".

If the alleged actions are unwanted or involve minors who may not be able to give consent by virtue of their age or any disability, then this is potentially abusive and the school procedures should be followed in the same way as for any other safeguarding or child protection matter.

8. Safeguarding students who are vulnerable to extremism

Tenby International School Setia EcoHill and International Schools Partnership (ISP) value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety

and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

A short awareness course on Extremism can be found at the following link:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

9. *Physical Intervention/restraint*

There may be times when adults in schools, in the course of their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation.

The DSL requires any adult involved in any such incident to report the matter to him/her as soon as possible. The staff member is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified where possible.

Where intervention has been required a senior member of staff should be asked to debrief 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 checked for any injuries.

Parents/carers should always be informed when an intervention has been necessary. Tenby International School Setia EcoHill has a separate Physical Intervention Policy Statement which must be referred to and fully referenced in relation to the physical intervention of any student.

10. *Safe Recruitment and Selection*

Tenby International School Setia EcoHill and International Schools Partnership (ISP) will do all they can to ensure that all those working with children in our schools and across the whole organisation are suitable people. In order to do this, all staff who will work in an unsupervised capacity with children or young people will be recruited using safe recruitment procedures.

Safe Recruitment involves scrutinising applicants through the interview process and application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks.

From August 2018, at least one member of every interview panel at both the organisational and school level, who are interviewing for a post or posts that may have unsupervised contact with children, will have undertaken safe recruitment training. All schools will keep a central record of all the recruitment checks undertaken on all staff. This record will include details relating to the DBS (Disclosure and Barring Service check - for anyone who has lived or worked in the UK only), i.e., date completed and number, other countries criminal records checks or certificates of good conduct, qualifications, prohibition order checks etc.

Where information is disclosed as part of the criminal records checking process, whether this is information about cautions, convictions or soft information, any disclosure will lead to a risk assessment being completed prior to appointment. This risk assessment will be signed off by the Principal, Regional HR Manager and Regional Director for Schools.

8. PROCEDURES

1. Adults concerned about a Student

If staff suspect that any student in their care may be a victim of abuse or is at risk of abuse or other form of harm, they should not try to investigate, and inform the Designated Safeguarding Lead (DSL) about their concerns as soon as possible, via MyConcern.

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

Where any student makes any form of direct disclosure, the guidelines under the heading 'Dealing with Disclosure' below should be followed.

2. Disclosure, Reporting and Further Action

General Principles:

Note: Be aware that if a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.

3. The following guidance is based on five key practices for all staff:

Receive

Where possible always stop and listen to a child who wishes to speak in confidence. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say "I can't stop now but come and see me in my office at...". Where possible during any disclosure try to listen, allow silences and try not to show shock or disbelief.

Reassure

Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.

React

React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as... "is there anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.

Record

Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not

your interpretation of what is said. Record the time, date and place as well (see the record of concern form).

Report

Where a child makes any disclosure, or where 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 using My Concern should be sent to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed body map.

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then consider and where necessary, consult on the information available. It is the role of the Designated Safeguarding Lead to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored on MyConcern.

4. Record Keeping and Confidentiality

1. Record Keeping- My Concern

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept on My Concern. The information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it should not be shared more widely than that.

2. Confidentiality

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

All records relating to child protection should be secured appropriately. Such information will now be stored electronically.

6. AUDITING, REPORTING, REVIEW AND SIGN OFF

Elements of safeguarding practice in schools will be included in the annual safety audit and will also be reviewed when visited by Group Health and Safety.

The policy will be reviewed on a regular basis every year by Group Health and Safety, Regional Managing Directors at group level and by the Designated Safeguarding lead at school level.