



This policy will be monitored by
Last Reviewed

CPT / Senior Management Team
January 2019 (MS/RI 15-2-19)

Kellett School; The British International School in Hong Kong

Policy for SAFEGUARDING

Aims

1. To establish and maintain an environment where students feel safe and secure and are encouraged to talk, and are listened to.
2. To inform all adults in our community of best practice with regards to safeguarding children in recognition that child protection is a shared responsibility.
3. To ensure that the procedures for dealing with child protection are shared with all staff and that regular training occurs to support best practice.
4. To ensure that students know that there are adults within the school who they can approach if they are worried or in difficulty.
5. To ensure that wherever possible every effort will be made to establish effective working relationships throughout our wider community including those from partner agencies.
6. To identify opportunities and activities within the curriculum which equip students with the skills they need to stay safe from abuse.

Policy Statement

This policy applies to all occasions where students are under the care of Kellett School, both on or off-site and outside of school hours. All adults working with students are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

It is Kellett School's responsibility to protect and safeguard the welfare of children and young people in its care. We work by the principle that **the paramount concern is the welfare of the child.**

Kellett School recognises that children, as individuals, have the right to be treated with dignity and respect, free from emotional or physical danger, abuse and neglect. Safeguarding children is fundamental to the social, emotional, physical and mental development of the child; consequently it is essential to have clear guidelines and procedures in place when dealing with matters involving child protection.

Kellett recognises that some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.



We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

We also recognise that students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- students being more prone to peer group isolation than other students
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Kellett recognises that peer-on-peer abuse may take place, and this policy extends to these cases. Appendix (7) outlines details of how to proceed.

This school is an agent of referral only and not of investigation and will, when appropriate, draw on the services of external agencies, which may include the Child Abuse Investigation Unit (CAIU) and /or Family and Child Protective Services Units (FCPSU) and / or Social Welfare Department outreach team (SWD).

We recognise that for our students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps to prevent abuse.

N.B. The term Voluntary Adult (VA) is used throughout this policy to describe adults who are supervised in supporting a school organised activity involving Kellett Students, but are not directly employed by the Kellett School Association.

The term Outside Providers (OP) is used throughout this policy to encompass all organisations or individuals contracted to provide or enrich education for Kellett School students.



Guidance

Child Protection is the responsibility of all adults.

1. Roles and responsibilities:

- a. Child Protection Officers (CPO) will be appointed at Deputy Head level on each campus.
- b. Deputy Child Protection Officers (dCPO) will be appointed in the position of School Nurse or Wellbeing Officer. This can be amended at the Principal's discretion.

The CPO on each campus is responsible for:

- i. Ensuring that all safeguarding procedures are followed within the school, and to make appropriate, timely referrals to any relevant authority, when required, in accordance with school procedures.
- ii. Informing all staff about child protection responsibilities and procedures through annual training, offering support and advice when required.
- iii. Ensuring that all adults have access to information on best practice when working with students.
- iv. Informing all students about adults in the school that they can approach if they are worried or in difficulty.
- v. Ensuring that students accused of abuse are supported according to this policy.
- vi. Keeping records of all child protection concerns and nagging doubts.
- vii. Making the decision as to whether nagging doubts be escalated to a formal record of concern.
- viii. Securely passing Information between campuses or schools at times of transition.
- ix. Ensuring that the school is represented or a report is submitted to any child protection conference called for a student on their school roll or previously known to them. They will continue to offer support in accordance with the outcomes from the Multidisciplinary Case Conference.

If for any reason the CPO is unavailable, a dCPO has been identified who will act in their absence (Appendix 1).

- c. The Child Protection Team (CPT) is made up of the entire group of CPO and dCPO.

The CPT is responsible for:

- i. Providing support to all members of the Kellett community in regards to Child Protection issues.
- ii. Ensuring that the policy is easily and widely accessible.
- iii. The upkeep and review of this policy.
- iv. Providing an annual summary to the Governing Body in conjunction with the Principal to include any changes to the policy or procedures, training undertaken by all staff and any other relevant issues.
- v. Meeting at least one per term formally, to support one another, review policy, procedures and cases.



- d. The Principal is responsible for:
- i. Working alongside the CPT in cases requiring referral to an outside agency.
 - ii. Working with the CPT to provide an additional level of support to all members of the Kellett community in regards to Child Protection issues where necessary.
 - iii. Ensuring that advanced child protection training is provided for the CPT at least every 2 years and that a newly appointed CPO or dCPO receives training within their first year of employment.
 - iv. Acting upon allegations involving members of staff.
- e. The Senior Management Team (SMT) is responsible for ensuring that the school follows safe recruitment processes, and giving final approval to amendments to safeguarding policy as recommended by the CPT.
- f. The Governing Body is responsible for:
- i. Acting upon the annual summary provided by the CPT if required.
 - ii. Acting upon concerns regarding the Principal's role in Child Protection referral cases.
 - iii. Acting upon allegations involving the Principal.
- g. The Head of Admissions is responsible for:
- i. Directing all new admissions to the safeguarding policy.
 - ii. Requesting information from feeder schools regarding any specific child protection concerns.
- h. Visit Leaders are responsible for:
- i. Ensuring that all accompanying VAs have signed a safeguarding register to confirm that they have read and understood the policy.
 - ii. Checking that relevant OPs have an appropriate safeguarding policy in place.
- i. The ECA and EVC Coordinator are responsible for ensuring that all OPs have signed a safeguarding register to confirm that they have read and understood the policy.
- j. The Coordinator of GC within each campus holds responsibility for ensuring age appropriate opportunities and activities exist within the curriculum to equip students with the skills they need to stay safe from abuse.
- k. The HR Manager is responsible for ensuring that all existing staff sign a declaration of criminal convictions annually and that all staff have signed a safeguarding register to confirm that they have read and understood the policy.
- l. The Work Experience Coordinator is responsible for ensuring that all work experience providers acknowledge that they have read and understood the policy.



2. Procedures

- a. A procedural flowchart can be found in Appendix 3.
- b. Training and support
 - I. The Principal and all other staff who work in the CPT will undertake advanced child protection training at least every 2 years to equip them to carry out their responsibilities for safeguarding children effectively.
 - II. Newly appointed members of the CPT will undertake advanced Child Protection training within the first year of taking up this role.
 - III. All staff will be given a briefing by the Child Protection Team every year and undertake Basic Child Protection training every two years
 - IV. Where there are concerns about child protection, support will be available from the CPT or Principal.
 - V. Advice and guidance on best practice when working with students can be found within Appendix 6
- c. Confidentiality
 - I. All disclosures received or observations made by an adult must be kept confidential and passed on directly to the CPT, at the earliest possible opportunity.
 - II. Relevant individuals will be informed of any information in respect to specific cases regarding child protection on a need to know basis. All information shared in this way must be held confidentially.
- d. Records and monitoring
 - I. All nagging doubts and formal records of case should be hand-written, dated, signed and passed directly to a member of the CPT. They will be recorded on or attached to the Confidential Child Protection Report Form (Appendix 2). These forms will be kept in a confidential place, separate from other files and in a locked safe or similar.
 - II. Escalated cases will be formally monitored within the CPT in accordance with the Procedural Flowchart (Appendix 1).
 - III. If a student transfers from the school, any formal records of concern will be copied for the new establishment (if known), marked confidential and securely forwarded, separate from other files, for the attention of the receiving school's Child Protection Officer. At the discretion of the CPT, nagging doubts may be verbally communicated.
 - IV. All formal records will be held at the school.
- e. Allegations against staff members
 - I. The Principal should in the first instance act upon any allegation made against a member of staff.
 - II. The Chair of Governors should in the first instance act upon an allegation made against the Principal.



f. Whistleblowing

- I. All staff, OPs and VAs have a duty to notify the Principal about child protection concerns regarding the attitude or actions of any adult working with Kellett students.
- II. All staff, OPs and VAs have a duty to notify the Principal if they are concerned about the effectiveness of the practices supported within this policy.

g. Safe recruitment

- I. Existing staff sign a declaration of criminal convictions annually.
- II. Offers of employment are subject to three references and criminal records checks where available.

Content of Appendices

Appendix 1: The Child Protection Team

Appendix 2: Confidential Child Protection Report Form

Appendix 3: Procedural Flow Chart

Appendix 4: Signs or symptoms which may indicate abuse

Appendix 5: Advice When Dealing with Safeguarding Disclosures

Appendix 6: Working with Students at Kellett

Appendix 7: Peer-on-peer abuse, including sexting



Appendix 1: The Child Protection Team

PFL Prep School

Child Protection Officer: Nicholas Miller
Deputy Child Protection Officer: Luke Bromwich

KLB Prep School

Child Protection Officer: Ailsa White
Deputy Child Protection Officer: Justin McLaughlin

KLB Senior School

Child Protection Officer: Matthew Seddon
Deputy Child Protection Officer: Sue Parsons

All colleagues named above, when working together, form the Child Protection Team



Appendix 2: Confidential Child Protection Report Form

This form is used to record any child protection concerns or nagging doubts. It should be completed by hand and passed directly to a member of the Child Protection Team once complete.

While nagging doubts may be attached to it, or recorded on it by a Child Protection Officer on behalf of any reporting party, formal concern should be recorded directly by the person passing the record forward.

Name of person completing report	
Position in relation to the student	

Student or students involved		Sibling	
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Class/Tutor Group		Time and location of incident	
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Details of your concern

Record as precisely as possible, using the students own words when relevant.

Signed	Date
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For the use of the receiving Child Protection Officer only

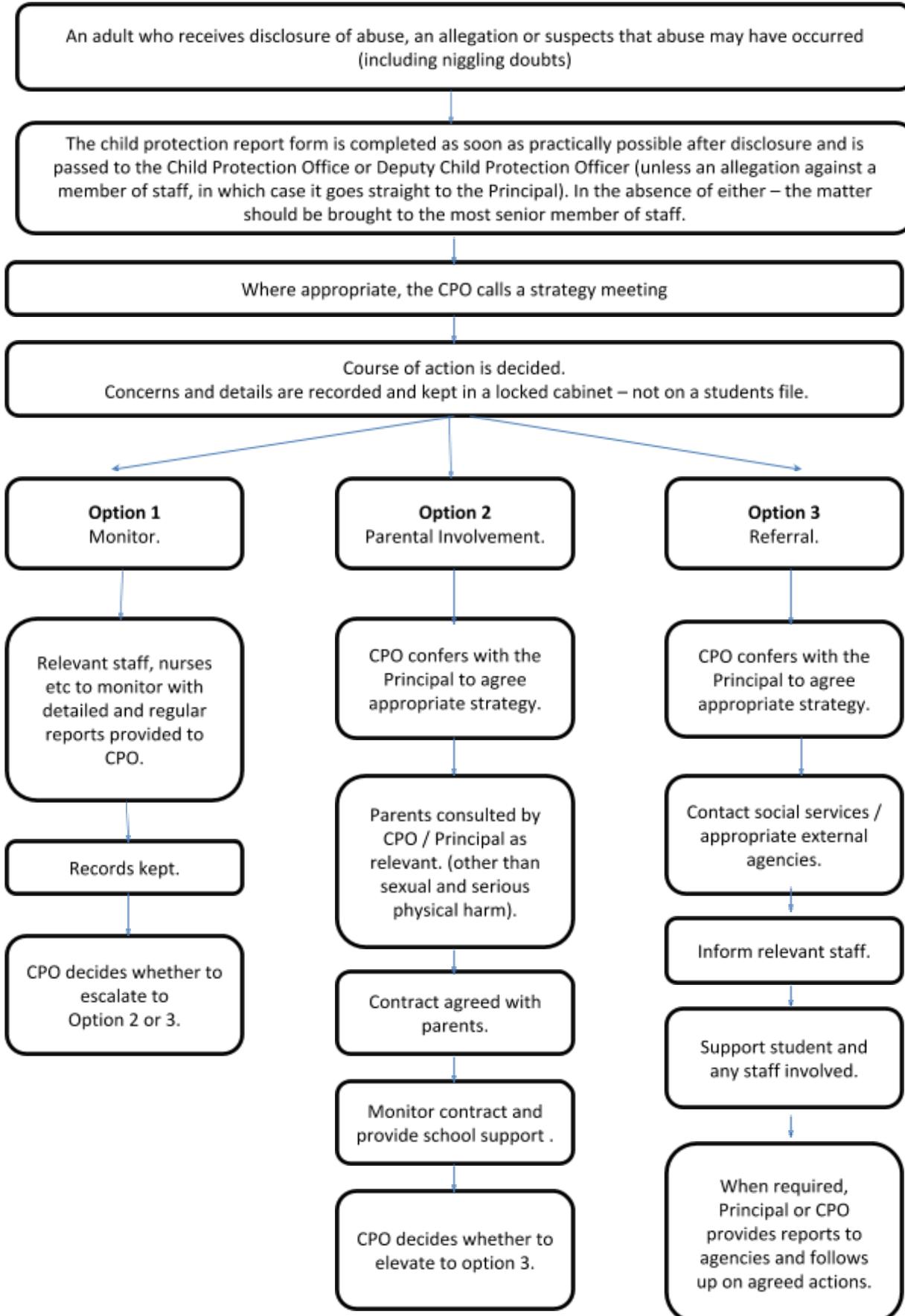
Time and date received: Signed:

Police CAIU Numbers: 2860 7815 or 2860 7814

Social Welfare Department - Child Protective Services

Kwun Tong - 2707 7681 Central, Western & Southern 2835 2733 Out of Hours 2343 2255

Appendix 3: Procedural Flow Chart





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The British International School
in Hong Kong

Police CAIU Numbers: 2860 7815 or 2860 7814

Social Welfare Department - Child Protective Services

Kwun Tong - 2707 7681 Central, Western & Southern 2835 2733 Out of Hours 2343 2255



Appendix 4: Signs or symptoms which may indicate abuse

The presence of any one or a combination of these indicators is not in itself any proof of child abuse, although the presence of these indicators should alert us to the possibility that a child may be at risk.

Signs or symptoms which may indicate *neglect*:

- Hunger
- Tiredness or listlessness
- Child dirty or unkempt
- Consistently poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection demanding or attention seeking behaviour
- Untreated or recurring illnesses/injuries
- Severe rash or skin diseases
- Stealing or scavenging compulsively
- Failure to thrive
- Failure to develop intellectually or socially

Signs or symptoms which may indicate *physical abuse*:

- Inconsistent or unexplained account of how injuries occurred patterns of bruising
- Finger, hand and nail marks, black eyes
- Bite marks
- Round burn marks, burns and scalds
- Lacerations, abrasions, welts
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying

Signs or symptoms which may indicate psychological or *emotional abuse*:

- Over-reaction to mistakes, continual self-deprecation
- Delayed physical/mental/emotional development
- Sudden speech disorders, elective mutism/deafness
- Inappropriate emotional responses - seeking affection
- Disruptive behaviour or conduct problems
- Marked deterioration in academic performance
- Rocking, banging head, regression
- Self-mutilation, drug or solvent abuse



- Social withdrawal
- Suicidal thoughts
- Fear of parents being contacted
- Running away, compulsive stealing
- Appetite disorders – anorexia, bulimia
- Soiling, smearing faeces, enuresis

Signs or symptoms which may indicate *sexual abuse*:

- Sexually explicit play or behaviour or age inappropriate behaviour
- Anal or vaginal discharge, soreness or scratching
- Difficulty walking or sitting
- Pregnancy
- An unusual or unexplained period of absence
- Truancy, lateness, reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate, elective mute
- Thrush or other sexually transmitted infections
- Persistent complaints of stomach disorders or pains
- Eating disorders, e.g. anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant
- Regressive behaviour
- Enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Excessive reaction to being touched
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches, etc., in genital area
- Lack of trust in a familiar or particular adult

Child abuse cases are applicable to children and juveniles under the age of 18 (UK guideline).



Appendix 5: Advice When Dealing with Safeguarding Disclosures

Remember that abused children often have feelings of powerlessness and betrayal.

If a child approaches you with a safeguarding issue please remember to;

1. Stay calm and keep an open mind.
2. Reassure them that they are right to tell, you believe them and their concerns will be taken seriously.
3. Tell them it is not their fault.
4. Listen carefully.
5. Proceed at the child's pace and at a level appropriate to them.
6. Ask only open questions to clarify facts - tell me, explain, describe.
7. Explain that you will share this information with another adult at school.
8. Record what they have said accurately and using their words without your own opinions or comments.
9. Pass to the CPO as soon as possible.

It is important that you do not;

1. Promise confidentiality. You cannot keep secrets if you think they or others are in danger.
2. Interrogate, investigate or ask why.
3. Transmit anger, shock or embarrassment.
4. Interrupt, speculate or accuse anyone.
5. Tell the child to go and talk to someone else.
6. Assume, e.g this child tells lies.
7. Talk to anyone but the CPO/Principal about what the child has said.



Appendix 6: Child Protection guidance for adults working with students

Whenever working with Kellett students, remember that you have a professional, not personal relationship with them. The following guidance offers sensible and practical advice to keep **both** you and the student safe.

Understand the individual

Everyone has individual needs. Please be aware of any specific student needs and ensure that expectations, behaviour and the working environment are adjusted accordingly.

Behaviour

Whilst it is important to reassure students who may be nervous and reliant on your guidance, you should avoid being over-familiar. Use professional and appropriate language at all times and do not engage in 'horseplay' which may cause embarrassment or fear.

Remember that you are responsible for the safety of all students; you should not work with them whilst under the influence of alcohol or other substances.

Do not engage in activities or suggestions of a sexual nature.

Physical Contact

On some occasions, physical contact with students may be appropriate (e.g. when reassuring them or guiding them in carrying out operations) but this should be kept to a minimum. Always discuss this beforehand, explaining what you are doing and why.

Environment

Where possible, avoid working alone in an isolated or closed environment with a student. Try to keep an open door and not position yourself between the student and an exit route. If unavoidable, ensure that others know where you are and why.

Avoid sharing bathroom facilities with students - if separate facilities are not available, spaces should not be used whilst a student is inside.

Travel

Ensure that a third party is aware of the destination and expected arrival time when an adult is travelling alone with a student.

Overnight Accommodation

Ensure that any overnight accommodation places you apart from students and that you offer appropriate personal privacy. If you need to enter student accommodation for any reason, please knock, state clearly why you are entering and keep the time spent in the room to a minimum.

Personal Data

Do not exchange personal contact details (eg. phone number, social networking, email address other than school/work email address) or encourage a student to pass on sensitive information such as that which may be found on their HK ID card or Passport.



Photography

We recognise that taking photographs can play an important role in recording events and celebrating success. Photographs of students should not be used without the written permission of their parents. Ensure that any photographic images of students are not kept on personal devices and are transferred to professional equipment at the earliest possible opportunity.



Appendix 7: Peer-on-peer abuse, including sexting

Allegations of abuse made against other students

Kellett School recognises that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of a student hurting other students will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the CPO, but do not investigate it
- The CPO will contact the social welfare department and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The CPO will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The CPO will contact any additional mental health professionals if necessary

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially by referring to the Wellbeing Team.
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy



Sexting

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for all staff and for CPOs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the CPO immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the CPO
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the CPO's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the CPO.

Initial review meeting

Following a report of an incident, the CPO will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or social welfare department
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents should be involved)

The CPO will make an immediate referral to police and/or social welfare department if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the CPO knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 13 (based on UK law)
- The CPO has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)



If none of the above apply then the CPO, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or social welfare department .

Further review by the CPO

If at the initial review stage a decision has been made not to refer to police and/or social welfare department, the CPO will conduct a further review.

They will hold interviews with the student(s) involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to social welfare department and/or the police immediately.

Informing parents

The CPO will then inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded.