



Shrewsbury  
International School  
INDIA

## SAFEGUARDING AND CHILD PROTECTION POLICY

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## 1. Key Contacts

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Headmaster  
Mr Dominic Tomalin  
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Designated Safeguarding Lead (DSL)  
Mr Peter Willett (Deputy Head Pastoral Care and Boarding)  
Phone Number +91 747 075 6412  
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Deputy Designated Safeguarding Lead (DDSL)  
Mr Olly Russell  
Phone Number +91 747 075 6413  
e-mail: oliver.russell@shrewsburyindia.in

Deputy Designated Safeguarding Lead (DDSL)  
Ms Srishti Shah  
Phone Number  
e-mail: Srishti.shah@shrewsburyindia.in

### Other useful phone numbers

- Bhopal police - 100
- National Childline Helpline - 1098 (24x365 emergency phone service for children in need of aid and assistance)
- Helpline - 1091(toll free)
- Child Welfare Society - 1098 (toll free)
- Bhopal Child Welfare Committee - 0755-2661744
- Bhopal District Child protection Officer - 0755-2661745
- Emergency (Medical, Police, Fire) - 100
- NCPDR - 011-23478250/011-23478251

### Other useful emails

- Bhopal Police - police@gmail.com
- Cyber Crime cell (Madhya Pradesh) - cybercellmp@mp.gov.in
- District Child Protection Officer, Bhopal - dcpo.bhopal@mp.gov.in
- Madhya Pradesh State Commission for Protection of Child Rights - mpscpcr@gmail.com
- Childline India - childline@childlineindia.org

## 2. Introduction

The School recognises that it has a duty to ensure that safeguarding permeates all activities and functions. It expects all staff, volunteers, and other third parties to share its commitment to safeguarding and promoting the welfare of children. Adults at Shrewsbury International School take all welfare concerns seriously and encourage children and young people to talk to them about anything that worries them.

### 3. Aims

- To actively promote the wellbeing of pupils.
- To actively promote and safeguard the welfare of children, staff and others who come into contact with the School and to protect them from harm.
- To have clear procedures in place for dealing with and referring to concerns about the welfare of any individual and/or allegations of abuse, neglect and/or exploitation.
- To raise awareness about how to report concerns and how they will be investigated whether they are current or historic in nature.
- To raise staff awareness about the School's safeguarding expectations.
- To ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role.
- To ensure consistent good safeguarding practice throughout the School, to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it.

### 4. Policy Statement and Principles

- The School is committed to safeguarding and promoting the welfare of all children and young people within our care. We recognise that the safety and welfare of children is paramount and that all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, have the right to equal protection from all types of harm or abuse.
- This policy applies to all teaching staff, non-teaching staff, volunteers, contractors, children (not enrolled in the School) and visitors who have direct or indirect contact with children at Shrewsbury School India. The policy will be reviewed annually or sooner if required by changes in legislation or school circumstances.
- All staff members are responsible for the implementation of this policy.
- Any child protection and/or safeguarding concerns must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to one of the Deputy Designated Safeguarding Leads (DDSLs).
- All staff should be alert to identifying children who may benefit from early help using guidance given on identifying early signs of abuse.
- If a suspected crime has been committed, it should be reported to the police and reported through the DSL and/or Headmaster.
- All staff must know who the trained DSL and DDSLs are.
- All safeguarding or child protection concerns must be treated with the utmost confidence, but information must be shared with those who need to know how to safeguard the child or children.
- Where there is a safeguarding concern, the Board of Management, Senior Management Team (SMT), and POCSO committee should always ensure that a child's wishes and feelings are considered, where appropriate, when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and that they can safely express their views.

### 5. The School's Core Safeguarding Principles

- The School's responsibility to safeguard and promote children's welfare is paramount.
- It is everyone's responsibility to safeguard children. Everyone who comes into contact with children and their families has a role in keeping children safe.
- Safer children make more successful learners.

- The DSL and Safeguarding Governor will review the school's safeguarding policy at least annually and submit it for approval by the Board of Management.
- The policy will be submitted to the Advisory Board annually for the purpose of review and ratification.

## 6. Safeguarding Statement

The School fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all its children. The School endeavours to provide a safe and welcoming environment where children are respected and valued. Members of staff should be alert to the signs of abuse and neglect and follow procedures to ensure that children receive effective support, protection and justice. A child's wishes and feelings must be taken into account where appropriate when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and that they can safely express their views.

The procedures contained in this policy apply to all staff, Governors, volunteers and visitors.

## 7. Safeguarding at Shrewsbury International School

### Guiding Principles

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All members of staff have equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm. Members of staff should never assume someone else has taken action.
- Children and staff involved in child protection issues will receive appropriate support.

### The School's Commitments

The School adopts an open and accepting attitude towards children as part of its pastoral care responsibility. We hope that children and parents will feel free to talk about any concerns and see the School as a safe place when there are difficulties. Children's worries and fears will be taken seriously. Children are encouraged to seek help from staff.

The School will therefore:

- Establish and maintain an ethos where children feel secure, are encouraged to talk, and are listened to
- ensure that children know that there are adults in the School whom they can approach if they are worried or are in difficulty
- include within the curriculum activities and opportunities that equip children with the skills needed to stay safe from abuse and which will enable them to develop resilience and realistic attitudes about the responsibilities of adult life
- ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies
- operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with the children.

## Legal Framework

This policy has been developed in accordance with the following legislation and guidance:

## Indian Legislation:

- Protection of Children from Sexual Offences (POCSO) Act 2012: This act provides a robust legal framework to protect children from sexual abuse and exploitation, mandating schools to implement measures to prevent such offenses. Including amendments (2019).
- Juvenile Justice (Care and Protection of Children) Act 2015: This act focuses on the care, protection, and rehabilitation of children in conflict with the law and those in need of care and protection, including those in educational institutions.
- Child and Adolescent Labour (Prohibition and Regulation) Act 1986: This act prohibits the employment of children in hazardous occupations and regulates the working conditions of adolescents, indirectly impacting school attendance and child protection.
- The Information & Technology Act, 2000, (Section 67), is instrumental in punishing obscenity in electronic forms, which includes child pornography and other forms of online child sexual abuse. This legal provision is part of a broader effort to regulate technology-related crimes against children.

## Terminology, Terms and Abbreviations

**Safeguarding** (SG) and promoting the welfare of children – all of the processes involved in protecting children from maltreatment, preventing the impairment of children’s mental and physical health and development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

**POCSO** – Protection of Children from Sexual Offences Act 2012

**DSL** – Designated Safeguarding Lead

**DDSL** Deputy Designated Safeguarding Lead

**Child** - Refers to any persons under the age of 18 years old who is either living or visiting the SISI campus or enrolled in the school. This also include trips off campus. These children will also be referred to at time as child/ren, pupils around the school, in this document we use child.

**Child protection** (CP) – includes all the processes undertaken to protect children who have been identified as suffering or being at risk of suffering harm.

**Physical safety** - Refers to protecting children from harm to their bodies due to location, activity, and feeding.

**Members of staff** – includes all working for or on behalf of the School, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

**Contextual safeguarding** - Contextual safeguarding is an approach to understanding and responding to children’s experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, Schools and online can feature violence and abuse. Parents and carers sometimes have little influence over these contexts, and children’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore, safeguarding practitioners need to engage with individuals who and areas that do have influence over/within extrafamilial contexts, and recognise that assessment of, and intervention with, these contexts is a critical part of safeguarding practices. Contextual safeguarding, therefore, expands the objectives of child

protection systems in recognition that children are vulnerable to abuse in a range of social contexts.

**Parent** – includes birth parents and other adults who are in a parenting role, for example, stepparents, guardians, foster carers and adoptive parents.

## 8. Structure and Organisation (Roles & Responsibilities)

### The Board of Management (BOM):

- Will conduct a review of safeguarding and child protection policies and the effectiveness of their implementation at least annually
- ensure the policy is implemented and applied across the School
- will ensure that the School has a POCSO Committee, Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs), whose roles are explicit in the role holder's job description
- will ensure that the School has a safeguarding policy and safeguarding procedures, including a Staff Code of Conduct (see Appendix 4) and Pupil Code of Conduct (See Appendix 3)
- will ensure that the School's Safeguarding Policy and procedures are made available publicly
- will ensure that the School has procedures for dealing with allegations of abuse made against members of staff, including allegations made against the Headmaster and allegations against other children
- will ensure that the School follows safer recruitment procedures that include statutory checks on staff suitability to work with children
- will ensure that the School develops a training strategy that ensures all staff, including the Headmaster, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated (at least annually)
- will ensure that the School makes all temporary staff and volunteers aware of the School's arrangements for child protection
- will ensure that the School provides a coordinated offer of early help when the additional needs of a child are identified
- will ensure that the School considers how children may be taught about safeguarding, including online, as part of a broad and balanced curriculum
- will consider a whole-school approach to online safety, which will include a clear policy on the use of mobile technology in the School
- will address and rectify without delay any deficiencies or weaknesses in the School's Safeguarding Policy and procedures, which are brought to the attention of the Board of Management.

### The Headmaster:

- Ensures that the Safeguarding Policy and procedures are implemented and followed by all staff
- allocates sufficient time, training, support and resources, including cover arrangements, when necessary, to enable the DSL and DDSLs to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures

- ensures that children are provided with opportunities throughout the curriculum and in PSHE Education to learn about safeguarding, including keeping themselves safe online
- oversees the procedure where an allegation is made against a member of staff or of the Board of Management.

### The Designated Safeguarding Lead (DSL)

- Is the Director of Safeguarding and is responsible for safeguarding and child protection at the School, including online safety
- has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff
- is a member of the Senior Management Team, can delegate activities to appropriately trained deputies, but cannot delegate the ultimate lead responsibility for child protection
- manages referrals from School staff or any others from outside the School
- acts as a source of support and expertise to the School community
- encourages a culture of listening to child and taking account of their wishes and feelings
- is alert to the specific needs of children in need or those with Special Educational Needs
- has a strong knowledge of the school's safeguarding procedures
- has an understanding of locally agreed processes for providing early help and intervention
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on but kept separate from the child's general file
- when children leave the School, ensures the child protection file is copied for any new School as soon as possible but transferred separately from the main child file
- develops effective links with relevant statutory and voluntary agencies
- confirms that all staff have they have read and understood the School's Safeguarding Policy
- ensures that mechanisms are in place to help staff understand and discharge their responsibilities thereunder
- ensures that the Safeguarding Policy is annually reviewed by the Board of Management
- liaises with the Board of Management and the Headmaster as appropriate;
- ensures that a record of staff attendance at child protection training is kept
- makes the Safeguarding Policy available publicly
- in the Headmaster's absence, ensures cases concerning a member of staff are referred appropriately
- submits a termly report to the Headmaster for the Board of Management on how the School's Safeguarding have been carried out
- during term time will be in School during School hours or, if not, will ensure that one of the DDSLs is in School
- outside the School's normal working hours, the DSL and DDSLs will be available by phone.

### The Deputy Designated Safeguarding Leads (DDSLs)

- Are appropriately trained in safeguarding.
- In the absence of the DSL, carry out those functions necessary to ensure the on-going safety and protection of the child.
- Have the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff and in the

event of the long-term absence of the DSL, the DDSLs will assume all the functions as for the DSL above.

## Staff

- All employees with access to children, including teaching, administrative, and support staff.
- All are subject to safeguarding policies and procedures.
- Frontline Compliance: Responsible for identifying and reporting safeguarding concerns.
- Maintain a safe and supportive learning environment.
- Follow school policies and procedures for reporting concerns.
- Attend safeguarding training as required.
- Maintain professional boundaries with Pupils.

## Residential Boarding Staff

All residential staff, principally House Masters/Mistresses, House Administrators and Assistant House Mistresses/Masters, will receive additional training in pastoral care and safeguarding, as it is recognised that they are likely to be on the frontline regarding safeguarding and child protection. House Masters/Mistresses, Assistant House Mistresses/Masters and House Administrators will report all child protection and safeguarding concerns immediately to the DSL.

## School Doctors and Medical Centre Staff

School nurses will liaise closely with the school doctors, the DSL, and other School safeguarding team members. All members of the Medical Centre Staff have an obligation to report any safeguarding concerns to the Headmaster or DSL. Medical Centre staff will be invited to participate in any School INSET concerned with the welfare and protection of children.

## The Safeguarding & Wellbeing Committee

The Safeguarding Committee is chaired by the DSL and meets at least once a week to review and triage cases for further work as necessary. It will comprise the DSL, Deputy Headmaster (Pastoral), the DDSLs, the School Counsellor, and the Senior School Nurse.

The Safeguarding & Wellbeing Committee:

- The committee's responsibility to safeguard and promote children's welfare is paramount, and this is achieved by implementing school policies and practices.
- The School's Safeguarding Policy will be reviewed at least annually by the School and the Board of Management.
- The policy will be submitted to the Advisory Board annually for review and ratification.
- The committee will recommend changes to the policies and procedures where needed.

## The Pastoral Committee

The Pastoral Committee is chaired by the Deputy Head (Pastoral), and comprises additionally of the DSL (where the DSL does not have an additional role listed here, the Deputy Head (Academic), the Housemistress and Housemaster, the chair of the Pastoral Committee, the Head of Additional Learning Support, the Head of PSHEE, the School Doctor, the Senior School Nurse and from the House Administrators. The Pastoral

Committee meets twice a term to develop the school's pastoral strategy and advises the Headmaster on matters of pastoral policy.

## The POCSO Committee

In accordance with the Protection of Children from Sexual Offences (POCSO) Act, 2012, the School, is committed to ensuring a safe and secure environment for all its children. The objectives of the POSCO committee are as follows:

- To ensure compliance with the POCSO Act, 2012.
- To prevent instances of child sexual abuse within the school premises and off-site school activities?
- To address and manage complaints related to sexual offences against children.
- To create awareness among children, staff, and parents about child sexual abuse.
- To provide support to victims of sexual abuse.

The full composition and procedures followed by the POCSO committee are set out in Appendix 1

## 9. Child Protection Procedures and Safeguarding Practices

All members of staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share information and to work together to provide children and young people with the help they need. Members of staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

Staff members should always act in the best interests of a child when concerned about the welfare of the child.

The School will act on identified concerns and provide early help to prevent concerns from escalating. If a child is in immediate danger or is at risk of harm, in consultation with the DSL/DDSL, a referral may be made to the police. The School will ensure it provides as much information as possible as part of the referral process to allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The safeguarding flow chart below provides an outline of steps that will be followed when a concern is raised about a child.

## SAFEGUARDING & INCIDENT FLOWCHART



### Recognising Abuse

To ensure that children are protected from harm, it is important to understand what types of behaviour constitute abuse and neglect. All members of staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

There are four principal categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

## Types of Abuse:

### Physical Abuse

A form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

### Emotional Abuse

The persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) in education, and all staff should be aware of it and of the School's policy and procedures for dealing with it.

### Neglect

The persistent failure to meet a child's basic physical and/or psychological needs is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care givers); or ensure access to appropriate medical care or treatment. This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Peer-On-Peer Abuse

The School has a zero tolerance and whole-School approach to peer-on-peer abuse. Consequently, it seeks to educate all governors, staff, volunteers, parents and children about the issue. Serious incidents may need investigation referring to the Juvenile Act and guidelines.

**All members of staff should:**

- Be aware that children can abuse other children
- be aware that this can happen both inside and outside School and online, sometimes involving children at other Schools
- all peer-on- peer abuse is unacceptable and will be taken seriously
- recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports
- understand that even if there are no reports in their School it does not mean it is not happening, it may just be that it is not being reported
- speak to the DSL (or a DDSL) straight away if they have any concerns regarding potential peer-on-peer abuse
- understand the importance of challenging inappropriate behaviours between peers as such behaviours can actually be abusive in nature
- avoid downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “I didn’t mean it” or “just having a laugh” as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Peer-on-peer abuse may take different forms, such as:

- bullying/ragging/hazing (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern or abuse;
- causing someone to engage in sexual activity such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery/YPSI)
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
- initiation/hazing-type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

All staff should be clear about the School’s policy and procedures for dealing with incidents of peer-on-peer abuse and the important role that they must play in both preventing and responding to it. The Safeguarding form should be used along with the school statement form where needed.

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s) or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or of which they are a part, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgment. As above, they should then discuss their concern with the DSL without delay so that a course of action can be agreed upon.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children are able to freely report instances of peer-on-peer abuse through any of the full range of pastoral support mechanisms in place at the School, including (but not limited to) House Masters/Mistresses, Assistant House Masters/Mistresses, House Administrators, medical staff, counselling staff and senior children. All such reports will be taken seriously, investigated and recorded centrally using the School's pastoral management systems. The School will work to provide appropriate support for all those involved – victims, perpetrators and any other children affected.

#### Sexual violence and sexual harassment between children

The School adopts a zero-tolerance approach to sexual violence and sexual harassment. It recognises that:

- Schools must protect any adult children (i.e. aged 18 and above) and engage with the authorities as required
- members of staff need to choose terminology carefully (for example, the use of 'victim' and 'perpetrator') on a case-by-case basis
- a child abusing another child may have been abused themselves and may also need support
- sexual violence and sexual harassment can be driven by broader societal factors such as everyday sexist stereotypes and everyday sexist language
- sexual violence and sexual harassment can happen both in and out of School, and also online and often occurs in a mixture of environments
- the scale of the problem is considerable and has probably been underestimated
- sexual assault can result in a range of health needs, both mental and physical, including unwanted pregnancy
- children might not find it easy to talk about their abuse verbally so they might not tell staff about abuse; it may be that staff overhear a conversation regarding the abuse or a child's behaviour changes, etc.
- all members of staff, particularly the DSL, need to adopt a contextual safeguarding approach to incidents, which involves considering the context in which incidents or behaviours occur
- assessments of children need to consider broader environmental factors present in a child's life that
- are a threat to their safety or welfare
- information sharing is essential, especially where children involved in allegations of sexual violence or sexual harassment attended two or more different schools or colleges
- in cases where police will not take further action, the School will continue to engage with specialist support for the victim (and perhaps also for the perpetrator), as required

- issues and actions are regularly reviewed to ascertain patterns of behaviour and to look for further ways to improve procedures and practices; and how a School responds to an incident will impact future victims of sexual violence or sexual harassment.

There are four likely routes to consider when managing a report of sexual violence or sexual harassment:

- **Internal Management:** In some cases of perceived sexual harassment, the School may manage the incident internally. However, this can only happen after the case has been considered by the POCSO committee. In cases where the POCSO committee cannot agree, the School will seek external expert or legal advice.
- **Early help:** This is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation.
- **Referrals to outside agencies:** In cases where there has been harm or there is an immediate risk.
- **Reporting to police:** In cases where rape, assault by penetration or sexual assault is reported, the School will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other children in the School. The POCSO committee will work closely with the police to ensure that the School's actions do not jeopardise the police investigation. If a child is convicted or cautioned, the School will carry out a risk assessment and consider suitable action.

In all cases, due processes will be followed, including record keeping, and any evidence gathered or statements will be kept.

**Note:** It is important for the School to ensure that the victim and perpetrator(s) remain protected, especially from bullying and harassment. Whatever the outcome of an incident, the School will continue to support both the victim and perpetrator, as appropriate. Records will be kept of concerns, discussions and decisions made, and the reasons for those decisions.

If a report is determined to be unsubstantiated, unfounded, false, or malicious, the POCSO committee should consider whether the child who made the allegation needs help or may have been abused by someone else. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it.

#### Youth-Produced Sexual Imagery (SEXTING)

This refers to the consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery). Any incident involving youth-produced sexual imagery should immediately be reported to the POCSO committee.

#### Child Criminal Exploitation & Extortion

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance in power to coerce, control, manipulate or deceive a child into any form of criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the

harm they have experienced. The victim may have been criminally exploited even if the activity appears consensual.

Extortion is strictly prohibited in our school community. Extortion occurs when a child, staff member, or any individual uses threats, intimidation, or coercion to obtain money, favours, services, or any other benefit from another person. This includes but is not limited to blackmail, forcing others to hand over possessions, or pressuring someone to act against their will under threat of harm or exposure of sensitive information.

Any extortion incidents will be taken seriously and may result in disciplinary action, including suspension, expulsion, or legal consequences as appropriate. Children and staff are encouraged to report any suspected extortion cases to a trusted teacher, counsellor, or school administrator immediately.

CCE does not always involve physical contact; it can also occur through technology.

Children can become trapped by this type of exploitation because perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss School or education or do not take part in education.

#### Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE may involve physical contact such as assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It can also occur solely through the use of technology. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways of grooming a child in preparation for abuse via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example, through others sharing videos or images of them on social media. Some children may not realise they are being exploited; for example, they believe they are in a genuine romantic relationship. A significant number of children who are victims of exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators:

- Children who appear with unexplained gifts, money or new possessions.
- Children who have associations with outside groups and/or are isolated from their peer networks.

- Children who associate with other young people involved in exploitation.
- Children who have older girlfriends or boyfriends or controlling individuals.
- Children who suffer from sexually transmitted infections or become pregnant, display evidence of physical or sexual abuse or behave in an excessively sexualised manner for their age.
- Children who suffer from changes in emotional well-being or display signs of self-harm.
- Children who misuse drugs or alcohol.
- Children who frequent areas known for sex work.
- Children who display increasing secretiveness or concern about the use of the internet.
- Children who receive excessive texts/phone calls.
- Children who go missing for periods or regularly arrive late.
- Children who regularly miss education or do not take part in education.
- Unexplained long leave from education.

CSE can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the DSL.

#### Child Abduction

All staff should also be sensitive to the risks of child abduction. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. It can be committed by parents or other family members, by people known but not related to the victim, and by strangers. All staff must be aware of the school's procedure for handover care from the school to appropriate adults. Where there is doubt that this procedure has not been followed, staff members must keep the child or children under their supervision, or that of another staff member, until the matter is resolved. All incidents of this nature must be reported to the DSL or DDSLs.

#### Serious Violence

Staff should be aware of the indicators that may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or excluded from School, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Staff should share their concerns immediately with the DSL if they suspect such involvement.

#### Bullying

The School's Anti-Bullying Policy should be read alongside this document. Bullying is one form of peer-on-peer abuse. While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing.

and has even been a factor in the suicide of some young people. Staff members should be aware of the harm caused by bullying and must use the School's counter-bullying procedures when necessary. In some situations, a child's behaviour may warrant a response under child protection rather than or as well as counter-bullying procedures. All incidences of bullying, including cyber-bullying and prejudice-based and discriminatory bullying, should be reported.

## 10. Radicalisation

Radicalisation is the process by which an individual comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine contemporary ideas and expressions of freedom of choice. This process typically involves a significant shift in a person's worldview and can ultimately lead to support for or engagement in violent extremism.

### Signs of Radicalisation

#### Behavioural Changes

- Increasing isolation from family and friends.
- Associating with new groups or individuals known for extreme views.
- Significant changes in appearance or dress related to ideology.
- Loss of interest in previous activities and hobbies.
- Secretive behaviour about online activities or new relationships.

#### Attitudinal Changes

- Expressing increasingly polarised views.
- Using dehumanising language about groups perceived as 'enemies'.
- Expressing support for violent actions to achieve ideological goals.
- Intolerance of different perspectives or belief systems.
- Unwillingness to engage with alternative viewpoints.

#### Concerning Communication

- Sharing or accessing extremist content online.
- Using language characteristic of extremist groups.
- Expressing admiration for extremist figures or organisations.
- Making comments justifying violence for a cause.
- Discussing travel plans to conflict zones without clear explanation.

It is important to note that these indicators should be considered together rather than in isolation, as many could also have innocent explanations. Concerns should be addressed sensitively, through appropriate safeguarding channels, rather than making assumptions about an individual's beliefs or intentions.

### Actions for Teachers

If a teacher suspects radicalisation in a student, they should:

- Record concerns objectively - Document specific behaviours, statements or incidents that have raised concerns, using the student's exact words where possible.
- Avoid confrontation - Do not challenge the student's views directly in a way that might cause them to withdraw or become defensive.
- Report immediately - Share concerns with the Designated Safeguarding Lead (DSL) without delay, following the School's safeguarding reporting procedures.

- Maintain confidentiality - Discuss concerns only with appropriate safeguarding staff, not with other colleagues, students or parents.
- Continue engagement - Maintain a supportive relationship with the student while professionals assess the situation.
- Follow guidance - Adhere to advice from the DSL, who may involve external agencies such as Prevent coordinators or local authorities.
- Participate in further action - Assist with any intervention strategies recommended by safeguarding professionals.
- Monitor ongoing behaviour - Continue to observe and document any further concerning behaviours or positive changes.
- Seek support - Access training and guidance to increase understanding of radicalisation processes and appropriate responses.

Teachers should remember that early intervention is key, and that their role is to refer concerns through proper channels, not to investigate or address radicalisation alone.

## 11. Female Genital Mutilation (FGM)

Female Genital Mutilation comprises procedures involving partial or total removal of external female genitalia or other injury to female genital organs for non-medical reasons. In the event that the school suspects or finds a case of FGM. The Child Welfare Society (tel. 1098) will be contacted for advice on how to proceed. See Appendix 7 for further signs and symptoms.

## 12. General Indicators of Abuse

It is the responsibility of all members of staff to report any and all niggling worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a child has been abused. A child who is being abused or neglected may exhibit some or many of the following signs:

- Have bruises, bleeding, burns, fractures or other injuries.
- Show signs of pain or discomfort.
- Keep arms and legs covered, even in warm weather.
- Are concerned about changing for PE or swimming.
- Look unkempt and uncared for
- Change their eating habits.
- Have difficulty in making or sustaining friendships.
- Appear or are fearful.
- Are reckless with regard to their own or others' safety.
- They self-harm.
- Show other signs of deterioration in mental health.
- show signs of not wanting to go home.
- Display a change in behaviour – from quiet to aggressive or happy-go-lucky to withdrawn.
- Challenge authority.
- Become uninterested in their School work.
- Be constantly tired or preoccupied.
- Are wary of physical contact.
- Are involved in, or particularly knowledgeable about, drugs or alcohol.
- Display sexual knowledge or behaviour beyond that normally expected for their age.
- Be showing signs of being drawn into anti-social or criminal behaviour.

## Additional factors to consider

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is, therefore, essential that staff members report their concerns. Staff do not need 'absolute proof' that a child is at risk but should act on any hunches or worries in the knowledge that they will be supported in their safeguarding role. Reports made in good faith will always be dealt with following the School's Whistleblowing Policy, regardless of outcome.

All members of staff should be aware of safeguarding issues. In particular, they should know that behaviours linked to drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth-produced sexual imagery) put children in danger.

## 13. Community Safety Incidents in the Vicinity of the School

Other community safety incidents near the School can raise concerns among children and parents, such as people loitering nearby or unknown adults engaging children in conversation. Incidents of this type should immediately be reported to the School's security team and the DSL (or DDSLs).

As part of the PSD program, children are advised on how to keep themselves safe.

## 14. SEND

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. The barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges.

Well-judged pastoral support and attention for these children are essential, along with ensuring appropriate communication support is in place. The DSL liaises closely and directly with the Head of Additional Learning Support regarding all children with SEND at the School.

## 15. Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. When children have suffered abuse and/or neglect or other traumatic experiences, staff should be aware that this can have a lasting impact on their mental health, behaviour and education.

Only appropriately trained professionals should attempt to diagnose mental health conditions. Other staff are, however, well placed to observe the children day to day and to identify those whose behaviour suggests that they may be experiencing or be at risk of developing a mental health problem. Any member of staff who has a concern about the mental health of a child that might also be a safeguarding concern should speak to the DSL or a DDSL straight away.

## 16. When there are concerns about a child's welfare

### Confidentiality and Sharing Information

Staff should never promise confidentiality, as it is very likely that the victim will seek advice and guidance from others to provide support.

All staff will understand that child protection issues warrant high confidentiality, not only to respect any child or staff involved but also to ensure that no information is released into the public domain.

Staff members should only discuss concerns with the Headmaster or Deputy Headmaster (Pastoral).

### Notifying Parents

Where possible, parents should be informed about any safeguarding concerns unless informing them would place a child in danger. The authority to notify parents should be approved by the DSL / DDSLs. In the event of a concern of a sexual nature, the POCSO committee will discuss all concerns with parents promptly and ensure clarity of reporting and record-keeping.

### If a child makes a disclosure

It takes courage for a child to disclose that they have been or is being abused or harmed. They may feel ashamed, particularly if the abuse is sexual. The abuser may have made threats about what will happen if they tell. The child may have lost trust in adults, or he may believe, or have been told, that the abuse is their fault.

During such conversations with the child, members of staff will:

- Allow the child to speak freely
- remain calm and avoid overreaction
- offer reassurance and general words of comfort (rather than physical touch)
- not be afraid of pauses or silences
- not ask investigative or leading questions
- explain at an appropriate time that, to help, the information must be passed on to relevant people in positions of responsibility
- not reprimand the child for failing to disclose earlier
- establish the next steps (agree to go to see his House Master/Mistress or the DSL) but let the child know that someone will come to see them before the end of the day
- report verbally to the DSL, even if the child has promised to do it by himself
- write up the conversation as soon as possible as a record of concern
- seek support if distressed.

### Allegations Against Children

A child against whom an allegation of a child protection nature has been made may be suspended from the School during the investigation. The School's policy on behaviour, discipline and sanctions will apply.

The School will take and follow advice from external agencies on the investigation of such allegations. It will take appropriate action to ensure the safety and welfare of all children involved, including the child or children accused of abuse.

If the police or other authorities need to interview a child regarding allegations of abuse, the School will ensure that, subject to advice from external agencies, parents are informed as soon as possible and that the child is supported during the interview by an appropriate adult.

## Missing Child

The School will follow its robust registration and attendance procedures to ensure the child's safety and carry out its duty of care. The School recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore, staff members will respond promptly to absences and follow the School's Missing child procedures as appropriate. The DSL, through the House Masters/Mistresses, will monitor any unauthorised absence at the start or end of any leave period and will be particularly cautious if a child goes missing on repeated occasions. The School holds more than one emergency contact number for its child whenever possible.

## Helping children to keep themselves safe

Children are taught to understand and manage risk through numerous programmes, for example, counter-bullying workshops, the PSD programme for all year groups, training in Peer Mentoring, lectures and seminars and through all aspects of their life at the School.

Children are encouraged to consider risks they may encounter and to devise ways to overcome them. These discussions are empowering and enabling. They aim to promote sensible behaviour rather than fear or anxiety.

Children are also regularly reminded about e-safety and counter-bullying procedures. The School continually promotes an ethos of care and respect for others.

Children are encouraged to speak to a member of staff in confidence about any worries they may have. The School conducts an annual survey, which helps to inform pastoral strategy and sheds light upon areas of concern or specific trends in behaviour.

## 17. E-Safety

The use of technology is an integral part of everyday life but, as such, has also become a significant component of many safeguarding issues. In child sexual exploitation, radicalisation and sexual predation, for instance, technology often provides the platform that facilitates harm. Therefore, an effective approach to online safety empowers the School to protect and educate children in the responsible use of technology and establish mechanisms to identify, intervene in and escalate an incident where appropriate. All staff will be trained in the importance of online safety and how to teach children and young people about safeguarding and online safety. The breadth of issues classified within online safety is considerable, but it can be categorised into three risk areas.

- **Content:** being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users, for example, peer-to-peer pressure, commercial advertising, and adults posing as children or

young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nude and semi-nude photographs and/or pornography), sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The School's e-safety policy is incorporated in the child ICT Acceptable Use Policy. This policy explains how the School tries to keep children safe. Cyberbullying and sexting by children via texts and emails will be treated as seriously as any other bullying behaviour and will be managed through our counter-bullying procedures. The School also has a clear policy on using mobile and smart technology.

## 18. Support for those involved in a child protection issue

The School's procedures will be managed with common sense and sound judgement.

Cases may not meet the criteria for a police investigation or a disciplinary procedure. In such situations, the School will resolve the matter quickly. Where more appropriate, the School may use the Complaints Procedure instead. The School has a duty of care towards its employees as an employer. The School effectively supports anyone facing an allegation and includes staff members with a named contact if they are suspended. Social contact with colleagues and friends will not be prevented unless evidence suggests that it is likely to be prejudicial to the gathering and presentation of evidence.

If appropriate, the parent (s)/guardian(s) of a child involved will be informed about the allegation as soon as possible if they do not already know about it. They will also be kept informed about the progress of the case and told the outcome if there is no criminal prosecution.

## 19. Staff Related Safeguarding

### Staff Training

All members of staff at the School will receive appropriate training in safeguarding and child protection, which is regularly updated. In addition, all members of staff will receive safeguarding and child protection updates at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

In order that the School community is aware of and compliant with local protocols, all members of staff shall have a thorough understanding of the Anti-Bullying Policy, the Child Safeguarding & Protection Policy of the School, POCSO (Protection of Children from Sexual Offence) Act and the JJ (Juvenile Justice) Act.

The School will ensure that training sessions are carried out on a regular basis so that all staff members are aware of what protocols to follow in the event of an incident.

All new members of staff and members of the Board of Management will receive an introduction to the School's Safeguarding Policy. They will receive contact details for the DSL and DDSLs. They will be instructed on reporting and recording arrangements.

The DSL and DDSs will receive advanced-level safeguarding and child protection training updated at least every two years, in addition to annual updates.

Members of the senior leadership team, Human resources and other relevant managers with responsibility for staff recruitment receive regular safe recruitment training.

Temporary staff and volunteers will have regular child protection and safeguarding training. All staff supplied by other bodies will be made aware of the School's Child Safeguarding.

## Safer Recruitment

The School endeavours to ensure that it does its utmost to employ 'safe' staff by following international standards. The School's Safer Recruitment Policy is adhered to in all recruitment activities.

## Allegations or Concerns Relating to Staff

Allegations and concerns will be dealt with in accordance with recommended safeguarding procedures and practice. When an allegation is made against a member of staff or a concern expressed about their conduct relating to children, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A member of staff who is concerned about the conduct of a colleague towards a child is placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all members of staff must remember that the welfare of the child is paramount. Members of staff have a responsibility to raise their concerns with the DSL (or the Headmaster directly). If the concern is about the Headmaster then it must be referred to the Chair of the Board of Management.

No member of staff will suffer a detriment for raising a genuine concern. The School's Whistleblowing Policy enables staff members to raise concerns or allegations in confidence and for a sensitive enquiry to occur.

Staff members who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not the default option, and alternatives to suspension will always be considered. In some cases, a staff member may be suspended where this is deemed the best way to ensure that children are protected.

The School takes a whole-school approach to safeguarding. The School seeks to ensure that there is an open and transparent culture in which all concerns about any adults working in any capacity (employed or voluntary) on behalf of the School are dealt with promptly and appropriately. Creating a culture in which all concerns about adults are shared responsibly with the right person, recorded and dealt with appropriately is critical. This should enable the School to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of the School are clear about professional boundaries and the ethos and values of the School. It should also protect those working in or on behalf of the School from potential false allegations or misunderstandings.

The full procedure for addressing allegations against staff members is provided at Appendix 6.

## Low-Level Concerns

A **low-level concern** is any behaviour by a staff member or adult working with children that is inconsistent with the school's code of conduct but does **not meet the threshold for a formal safeguarding allegation**. It may involve **inappropriate, overly familiar, or boundary-blurring behaviour** that causes a sense of unease, even if it seems minor. Reporting low-level concerns helps maintain a **safe, transparent culture** and allows early intervention before more serious issues arise.

WHAT IS A LOW-LEVEL CONCERN? The term 'low-level concern' does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the staff code of conduct (see Appendix 4), including inappropriate conduct outside of work.

Examples of low-level concerns could include, but are not limited to:

- being over-friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area; or
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a broad spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Shrewsbury International School aims to:

- Ensure that its staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, both in themselves and in others
- empower staff to share any low-level safeguarding concerns
- address unprofessional behaviour and support the individual to correct it at an early stage
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised
- help identify any weakness in the School's safeguarding systems.

## Sharing Low-Level Concerns

Low-level concerns about a staff member (or person employed by a contractor or agency) must be reported to the DSL.

The School seeks to create an environment in which staff are encouraged and feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, or in which their behaviour might have fallen below expected professional standards.

Reports about low-level concerns relating to supply staff and contractors should be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

## Recording Low-Level Concerns

The DSL must share all low-level concerns with the Headmaster. All low-level concerns must be recorded, with details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the

individual wishes to remain anonymous, then that should be respected as far as is reasonably possible. The School must keep these records confidential.

Records should be reviewed periodically to identify potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern of such behaviour is determined, the School will decide on a course of action through its disciplinary procedures or, where the pattern suggests that incidents collectively meet the 'harms' threshold, an escalation to an appropriate external agency.

Consideration will also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur. Where appropriate, policies could be revised or extra training delivered to minimise the risk of recurrence. The School will retain information on low-level concerns until the individual leaves employment.

#### Low-Level Concerns and References

Only substantiated safeguarding allegations will be included in staff references.

Low-level concerns will not be included unless they relate to issues usually included in a reference, such as misconduct or poor performance. Therefore, low-level concerns relating exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

#### Allegations made against the Headmaster and members of the advisory board

If the allegation is against the Headmaster, the Chair of the advisory board must be informed. If the Chair is not available, then the DSL should be informed.

## 20. School Environment and Safety

### Site Security

Shrewsbury International School has a campus with a perimeter fence. It employs a security team to control site access and ensure safe oversight of children leaving the campus. The School's Security Department oversees the site and can be contacted in the event of an emergency or concerns. All visitors are expected to observe the procedures laid down in the School's Safeguarding Policy and Health & Safety Management Policy to ensure that children in the School are kept safe.

### Visiting speakers

All visiting speakers will be treated as visitors and issued a lanyard on arrival on the campus. They will need to be escorted at all times.

### Road Safety

Staff will regularly remind children about the importance of road safety on campus and being aware of any vehicles that also use the roads around campus. On arrival security staff will remind drivers of the requirement to give way to pedestrians.

### Third-Party Use and Off-Site Arrangements

The School's facilities may, from time to time, be used by third-party users (TPUs). Under these arrangements, The School will ensure, as far as it is able, that TPUs have appropriate child protection and safer recruitment procedures in place. TPUs are also made aware of the areas of the School's grounds that are out of bounds. TPUs will be required to provide the School with a copy of their child protection policies before approval is given for their use of

the School's facilities, and all TPUs providing activities that involve children will be required to sign a declaration to confirm that:

- The TPU has a safeguarding policy in place
- safer recruitment procedures are followed for the TPU's staff and volunteers
- all staff and volunteers are appropriately trained in child protection and safeguarding procedures.

The Headmaster or the DSL must be informed as soon as practicable of any child protection allegation or incident that occurs on the School's premises during use by that organisation.

### Procedure for dealing with concerns or allegations of abuse by an individual of a third-party user (TPU) using the school's facilities

If an allegation of abuse is made about an adult in a TPU, the organisation's Safeguarding Officer/Employee must notify the Headmaster or the DSL on the same day as the incident occurred or the disclosure was made, or as soon as possible thereafter. The School expects the TPU to follow its own Safeguarding Policy. The Headmaster will require confirmation that appropriate action has been taken before further use of the School's facilities will be allowed.

### External organisations that have responsibility for children on another site

When our children attend off-site activities, including day and residential visits and work-related activities, the School will check that effective safeguarding and child protection arrangements are in place.

## 21. Children Staying with Host Families

The School may sometimes arrange for children to stay with a host family during, for example, a foreign exchange trip or sports tour. In such circumstances, the School follows guidance to ensure that hosting arrangements are as safe as possible. We will work with partners to best ensure that safeguarding is as effective as reasonably possible.

## 22. Photography and Images

Most people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Nonetheless, we must ensure that we have safeguards in place.

To protect our children, we will:

- Demonstrate respect, care and caution when including photographs of School publications
- encourage children to tell a member of staff if they are worried about any photographs that are taken of them
- prevent the possibility of linking a child's name to an image; no image will carry a caption naming a child who can be clearly identified.
- first names may sometimes be used to celebrate child achievement and participation.
- visitors to campus must not take photographs of students for their social media or distribution.

## Appendices

### Appendix 1: POCSO Committee Procedure

#### Introduction

Following the Protection of Children from Sexual Offences (POCSO) Act, 2012, Shrewsbury International School, India, is committed to ensuring a safe and secure environment for all its children. This policy outlines the establishment, composition, and functioning of the POCSO Committee at our institution.

#### Objectives

- To ensure compliance with the POCSO Act, 2012.
- To prevent instances of child sexual abuse within the school premises and off-site school activities?
- To address and manage complaints related to sexual offences against children.
- To create awareness among children, staff, and parents about child sexual abuse.
- To provide support to victims of sexual abuse.

#### Suggested Committee Composition

The POCSO Committee at Shrewsbury International School shall consist of the following suggested members could include:

Chairperson: Headmaster

Member Secretary: Deputy Head Pastoral

Suggested Members:

- Two female teaching staff members (one from junior and one from senior school)
- One male teaching staff member
- School Counsellor/Psychologist - Srishti Shah
- School Doctor/Nurse
- One non-teaching staff representative – Bursars office
- Two parent representatives (one male, one female) Staff members, is that appropriate?
- Legal advisor (external consultant when required) - Dr Saraswat
- One child representative from senior classes (16 years or older)?

A committee will be constituted when, as a minimum, the following are in place, the Chair plus four members One of whom must be DSL or DDSL.

Note: The actual committee composition may be modified based on availability of personnel and specific school requirements, while ensuring compliance with POCSO Act guidelines.

#### Appointment and Tenure

Committee members shall be appointed by the School. The tenure of the committee shall be a maximum of two academic years. 50% of the members shall be replaced every year to ensure continuity

## Roles and Responsibilities

### **Prevention:**

- Conduct regular awareness sessions for children, staff, and parents
- Display POCSO guidelines and committee contact information prominently across campus
- Ensure implementation of child protection measures in school policies

### **Reporting Mechanism:**

- Establish clear reporting channels (complaint boxes, dedicated email, emergency contact numbers)
- Ensure confidentiality of complaints and complainants
- Create child-friendly reporting procedures

### **Complaint/Incident Handling:**

- Register and document all complaints/incident
- Conduct preliminary inquiry within 24 hours of receiving a complaint/incident
- Report cases to appropriate authorities (police, child welfare committee) within 24 hours as mandated by law
- Provide immediate support to the affected child

### **Support and Rehabilitation:**

- Ensure immediate medical attention if required
- Provide psychological counselling to affected children
- Coordinate with external agencies for additional support
- Facilitate academic adjustments for affected child

## Meeting Schedule

- Regular meetings once every month
- Emergency meetings within 24 hours of any reported incident
- Termly review meetings with the Board of Management

## Documentation and Reporting

- Maintain confidential records of all complaints and proceedings.
- Submit quarterly reports to the School Management Committee.

## Appendix 2: Reporting Form Template

This template is downloadable and can be filled in electronically or by hand.

### Safeguarding Concern / Incident Report Form



#### Remember to:

- allow the student to speak freely;
- remain calm and avoid overreaction;
- offer reassurance and general words of comfort (rather than physical touch);
- not be afraid of pauses or silences;
- not ask investigative or leading questions;
- explain at an appropriate time that, to help, the information must be passed on to relevant people in positions of responsibility;
- not reprimand the student for failing to disclose earlier;
- establish the following steps (agree to go to see his House Master/Mistress or the DSL), but let the student know that someone will come to see them before the end of the day;
- report verbally to the DSL, even if the student has promised to do it by himself;
- write up the conversation as soon as possible as a record of concern, and
- seek support if distressed

#### Safeguarding incident or concern: Reporting Form

This form is designed to report any safeguarding incidents or concerns. It should be completed by the person disclosed to, who witnessed the incident, who was most directly involved or who provided first aid if relevant. Once completed it must be submitted per the school's reporting policy to the DSL or DDSL.

Ref No:

Type of the Incident:

#### Details of child:

Name:	Address/House/Room:
Other names:	
Contact number:	Gender:
Date of birth:	Any further information that may be useful to consider:

Name & role of the person completing this form:

Date of incident:

Date form is completed:

#### Parents/carers details from ISAMS:

Name:	Address:

Contact number:	Email address:
Have parents/carers been notified of the incident?: Yes / No	If yes, please provide details:

Details of reporter:		
Are you reporting your concerns or responding to concerns raised by someone else?	Reporting my concerns	
	Responding to someone else's concerns	
If responding to someone else's concerns, please provide their details below:		
Name:		
Relationship to child, young person or adult at risk:		
Email address:		
Contact number:		

Incident Details:	
Date/ Time:	Group name (if applicable):
Location of incident:	
Description: Describe the incident or concern (continue on a separate sheet if needed). Include relevant information, such as what happened and how it happened. Describe any injuries sustained and behaviour witnessed and if the recorded data is recorded as fact, opinion, hearsay, etc. If you have seen an injury, indicate the location of the injury on the diagram at the bottom of the forms. Do not photograph injuries.	
Details of any previous concerns, incidents or relevant safeguarding records:	

Child, young person or adult at risk account of the incident or concern: (use their own words)		
Witness account of incident or concern: (include further accounts on separate sheets as necessary. Include reference number on each accompanying account)		
Details of any witnesses:		
Name(s): (Consider anonymising where this will not negatively impact the ability to take immediate response actions)	Relationship to child, young person or adult at risk:	Contact details:
Details of any persons involved in the incident or alleged to have caused the incident, injury or presenting risk:		
Name(s): (Consider anonymising where this will not negatively impact the ability to take immediate response actions)	Relationship to child, young person or adult at risk:	Contact details:

PARENTS INFORMED	BY WHO	WHEN? Date / Time
<b>Outcome of incident &amp; immediate actions taken: (circle where relevant)</b>		
Ambulance required? Yes / No	If Yes	Details
Was medical treatment needed? Yes / No	What?	
Medication give Yes / No	What?	When? What?
Name of hospital / medical facility attended, if applicable:	Name?	Address:
First aid treatment provided? Yes / No	Who?	When? What?
Police/fire/rescue services attended? Yes / No	Who?	
Recorded on ISAMS Yes / No	Who?	

Signed By Author/Report:	Name:	Date:

<b>Reporting to the Designated Safeguarding Lead (DSL)</b>		
<i>Section (to be completed by DSL)</i>		
PARENTS INFORMED	BY WHO	WHEN? Date / Time
Date & time DSL notified of incident/concern:		
Date & time this form passed on to DSL (if different from above):		
Is a POSCO committee meeting required? Yes/No If yes, complete meeting details.	Who: Head / DLS / DDSL / Nurse / Bursar / HSM / Report Author When: Location:	
DSL comments: (actions taken / impact on rest of programme / external agency involvement / initial lessons learned / follow-up actions required):		

<b>External agency referral:</b>		
Social services notified? Y/N	Police notified? Y/N	Other referrals made? Y/N
Name of contact person:	Name of contact person:	Name of contact person:
Date & time of referral:	Date & time of referral:	Date & time of referral:
Agreed action or advice given:	Agreed action or advice given:	Agreed action or advice given:
Contact number/email:	Contact number/email:	Contact number/email:

Signed By DSL:	Name:	Date:
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**For Office Use Only:**

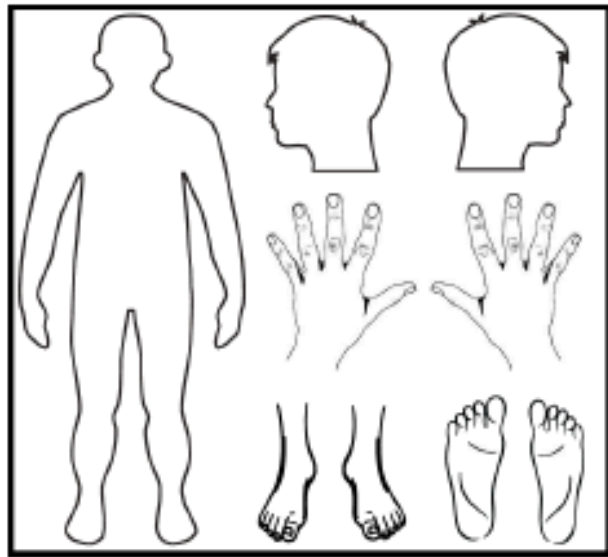
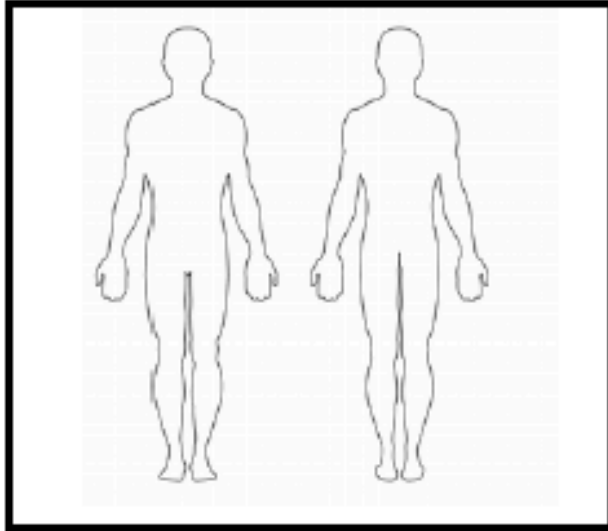
Follow-up action required: Child / Family / Hospital /		
Action:	Due date:	Whom responsible:
Any resulting change of plans or disruption to the programme, if applicable:	Disciplinary procedures enacted:	Were any immediate changes to risk management procedures made?

Indication of Injuries sustained

Front

Back

Notes:



Name of Child: \_\_\_\_\_ Date: \_\_\_\_\_

Name of person writing report: \_\_\_\_\_

## Appendix 3: Pupil Code of Conduct

### Pupil Code of Conduct

#### Introduction

As a student at Shrewsbury International School India (SISI), you are part of a community dedicated to academic excellence, personal growth, and mutual respect. This Code of Conduct outlines the expectations and responsibilities that come with being a member of our school family. By adhering to these guidelines, you contribute to creating a positive, safe, and enriching environment for all.

#### Behaviour Towards Others

**Respect and Dignity:** Treat all members of our community—fellow students, teachers, staff, and visitors—with respect and dignity regardless of their background, beliefs, or opinions.

**Language and Communication:** Use respectful language at all times. Verbal abuse, bullying, intimidation, or discriminatory language will not be tolerated.

**Personal Boundaries:** Respect personal space and boundaries of others. Romantic relationships between students are strictly prohibited on campus.

**Conflict Resolution:** Address disagreements through peaceful dialogue and seek assistance from teachers or pastoral staff when needed.

**Cultural Sensitivity:** Demonstrate respect for diverse cultural backgrounds and traditions represented in our school community.

#### Behaviour Within Our Environment

**Cleanliness and Order:** Maintain cleanliness in dormitories, classrooms, and common areas. Take responsibility for your personal space and shared facilities.

**Property Respect:** Treat school property and the belongings of others with care. Vandalism or theft will result in serious consequences.

**Sustainability:** Participate in conservation efforts by minimizing waste, conserving energy and water, and participating in campus sustainability initiatives.

**Quiet Hours:** Observe designated quiet hours in dormitories to ensure a conducive environment for rest and study.

**Prohibited Items:** The possession or use of tobacco products, alcohol, vaping devices, or any illegal substances is strictly forbidden on campus.

#### Behaviour Towards Learning

**Academic Integrity:** Maintain the highest standards of honesty in your academic work. Plagiarism, cheating, or falsification of work will not be tolerated.

**Classroom Etiquette:** Arrive punctually to classes with necessary materials. Participate actively and constructively in discussions and activities.

**Study Habits:** Develop disciplined study habits, complete assignments on time, and seek help when needed.

**Intellectual Curiosity:** Approach learning with enthusiasm and an open mind. Challenge yourself to explore new ideas and perspectives.

**Co-curricular Engagement:** Participate meaningfully in sports, arts, cultural activities, and community service as integral parts of your holistic education.

## Technology and Communication

**Device Declaration:** All students must declare any and all devices that contain SIM cards or have cellular connectivity capabilities. Each student is permitted to possess only one mobile phone while at school.

**ICT Policy Compliance:** Adhere strictly to the school's Information and Communication Technology policy. Inappropriate use of technology, including accessing unauthorized content or cyberbullying, will result in severe consequences.

**Mobile Phone Usage:** Mobile phones may only be used during designated times and in designated areas. Inappropriate use, including during study hours or after lights-out, is prohibited.

**Social Media Responsibility:** Exercise responsibility in your online presence. Posts that harm the reputation of the school or any member of the school community are prohibited.

**Digital Citizenship:** Practice good digital citizenship by respecting others' privacy, intellectual property, and fostering positive online interactions.

**Undeclared Devices:** Possession of undeclared SIM-enabled devices or multiple mobile phones is considered a serious violation of school policy and will result in confiscation and disciplinary action.

## Consequences for Violations

Violations of this Code of Conduct will be addressed through appropriate disciplinary measures, which may include:

- Verbal or written warnings.
- Loss of privileges.
- Detention.
- Community service.
- Parent/guardian notification and conferences.
- Probation.
- Suspension.
- Expulsion in severe or repeated cases.

The school administration reserves the right to determine appropriate consequences based on the nature and severity of the violation.

## Commitment to Excellence

By signing this Code of Conduct, you commit to upholding these standards and contributing positively to our SISI community. Your adherence to these principles will help you develop into a person of character and prepare you for success in future endeavours.

Pupil Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Parent/Guardian Signature: \_\_\_\_\_ Date: \_\_\_\_\_

School Representative: \_\_\_\_\_ Date: \_\_\_\_\_

## Appendix 4: Staff Code of Conduct

The full code of conduct for staff must be read by all members of staff. Below are the key aspects that relate to safeguarding and must be adhered to.

### General Expectations of Staff

#### Professional Conduct

All staff must maintain the highest standards of professional behaviour. This includes:

- Acting with integrity, fairness, and respect in all interactions with students, colleagues, and parents.
- Upholding confidentiality, especially regarding sensitive information about students and families.
- Complying with all school policies and regulations, in particular those related to health and safety, child protection, and student welfare.
- Avoiding conflicts of interest and engaging in behaviour that reflects the values of the school.
- All staff must also be aware of and adhere to this **Code of Conduct**, and regularly review and check their understanding of the school's policies and procedures.

#### Interactions with Pupils

Staff are expected to maintain professional, respectful, and supportive relationships with students:

- **Respect:** All students should be treated equally, with dignity and respect, regardless of their background, culture, or personal circumstances.
- **Boundaries:** Staff must maintain professional boundaries in all interactions with students. Any behaviour that could be perceived as abusive or inappropriate (e.g., physical, verbal, emotional, or sexual) will result in disciplinary action.
- **Positive Role Models:** Staff should serve as positive role models, demonstrating and advocating the virtues that constitute the Salopian Way: Kindness, Wisdom, Integrity, Spirit, Self Mastery and Courage.
- **Discipline and Guidance:** Staff should follow the school's discipline policies to manage student behaviour effectively and fairly, promoting a positive learning environment and in accordance with the Pupil Behaviour Policy.

#### Interactions with Colleagues

- **Collaboration:** Staff are expected to foster a collaborative and supportive working environment. Open communication and mutual respect are key to creating a positive and productive atmosphere.
- **Conflict Resolution:** Disagreements should be handled professionally, and staff should use appropriate channels to resolve conflicts. The school encourages teamwork and respect among colleagues.
- **Professional Development:** Staff are expected to contribute to and engage in ongoing professional development to improve their own skills and knowledge, thereby enhancing the learning experience for students.

#### Interactions with Parents

- **Communication:** Staff should communicate with parents in a professional, respectful, and transparent manner.

- The pupil's Housemaster or Housemistress is the key point of contact for parents. Where communications are received by other members of staff the communication should be shared with the Housemaster or Housemistress in the first instance as quickly as possible.
- **Partnership:** The school and its staff work in partnership with parents to support students' well-being and development. Respect for the role of parents in a child's education is crucial.
- **Confidentiality:** Sensitive matters regarding students should be shared with parents in a confidential and appropriate manner, with due regard to the child's privacy and in accordance with the school's policies.

## Expectations for Teachers in Teaching Practice

### Pupil Welfare

Teachers are responsible for fostering a positive and supportive classroom environment. This includes:

- Addressing students' emotional and academic needs.
- Encouraging students' social and moral development.
- Supporting students in their extra-curricular activities and personal growth.
- Reporting any concerns related to a student's well-being, behaviour, or safety promptly.

## Child Protection and Safeguarding

### Obligations to Report Concerns

All staff have a responsibility to protect students from harm, and they must:

- Report any concerns or suspicions about a student's safety or well-being to the Designated Safeguarding Lead (DSL) or senior leadership immediately.
- Any concerns of abuse, neglect, or exploitation must be taken seriously and reported in accordance with the school's child protection policy.
- Teachers and staff must be vigilant for signs of abuse, whether physical, emotional, or sexual, and take appropriate action by reporting concerns to the relevant authorities if necessary.

### Safeguarding Training

- All staff will receive regular training on safeguarding and child protection, ensuring they are equipped to recognise the signs of abuse and know how to respond appropriately.
- Staff should remain conversant with the school's child protection policies and procedures.

### Health and Safety Reporting

- All staff must report any health or safety concerns, including hazards, injuries, or unsafe conditions, to the relevant authorities within the school.
- Teachers are responsible for ensuring the safety of students during school activities, including excursions, sports events, and classroom sessions.
- Staff must follow established health and safety protocols to minimise risks and ensure the well-being of all students.

## Disciplinary Actions for Breaches of Conduct

Breaches of this Code of Conduct, whether related to professional conduct, safeguarding, health and safety, or any other aspect of school life, will be taken seriously. Consequences for violations may include:

- **Verbal or Written Warnings:** For minor breaches of conduct.
- **Suspension or Termination:** For more serious violations, particularly those related to child protection or significant breaches of professional conduct.
- **Involvement of Authorities:** In cases of misconduct that may involve illegal activities, appropriate legal authorities will be notified.

## Appendix 5: Information for Parents

Shrewsbury International School aims to safeguard and promote the welfare of the children in its care and protect them from serious harm.

Staff and volunteers are vetted for their suitability to work with children prior to appointment. They receive training in safeguarding and child protection. They will report any concerns in accordance with our procedures.

The School has a Safeguarding Policy, which is regularly reviewed and is available to parents. It is important for parents to be aware that:

- Staff and volunteers in the School have a duty to report concerns about a child, whether this means the child may be in need of additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of harm. There are four categories of abuse: physical, sexual, emotional, neglect.
- If you think your child may have been abused in School (or during expeditions or co-curricular activities), you should contact our Designated Safeguarding Lead. If the allegation of abuse involves a member of staff, you should contact the Headmaster directly, or if the Headmaster himself is involved, the Chair of the Board of Management should be contacted.
- If members of the School's staff need to express concerns about a child, it is understood that this can cause distress for the child parents. It is important that all parties – parents and members of the School's staff – try to discuss these matters as calmly and sensibly as possible, and at as early a stage as is realistically possible.
- School Prefects are given basic training in safeguarding at the start of the academic year. There is also a programme of Peer Mentoring.

## Appendix 6: Concerns or Allegations Relating to Staff

This section lays out the process for dealing with concerns or allegations relating to staff (including the Headmaster), volunteers and others (including Governors) who are in contact with children in the School. References to staff in this policy include all staff employed at Shrewsbury International School, part-time staff, contractors, volunteers and peripatetic staff.

### Reporting Concerns

It is essential that any concern or allegations of abuse is dealt with quickly, and in a fair and consistent way that provides effective protection of child(ren) and at the same time appropriately supports the individual against whom the allegation has been made.

All staff and volunteers must know how to recognise signs of potential and actual abuse and know what to do if they have concerns or hear an expression of such concerns or allegations against colleagues.

On having a concern or having cause to make an allegation against a member of staff or volunteer, or on hearing an allegation or concern about abuse directly from a child, staff should immediately note the facts of which they are aware. Staff must limit any questioning to the minimum necessary for clarification. Leading questions should be avoided, and inappropriate guarantees of confidentiality should not be given; the child should be told the matter will be referred in confidence to the appropriate people in positions of responsibility.

Where a child makes a disclosure, the member of staff to whom the disclosure is made must record in writing what the child said as close to verbatim as their immediate recollection allows. The notes must not include any judgments, conjectures, or interpretive remarks

All allegations and concerns about members of staff must be reported - it may be a criminal offense not to do so and/or may be viewed a gross misconduct.

It is vital that expressions of concern that do not necessarily amount to 'allegations' are reported. Low-level concerns should initially be reported to the DSL; more serious allegations must be reported directly to the Headmaster. It may be that the concern expressed has been raised by another party. If there are repeated reports of such concerns and/or questionable conduct, a pattern of unacceptable behaviour may be identified.

All allegations against the DSL, including low-level concerns must be reported directly to the Headmaster, or their deputed deputy if the Headmaster is not available.

All allegations against the Headmaster must be reported immediately to the Chair of the Board of Management (without informing the headmaster).

If the DSL and the Headmaster are the subject of an allegation, this must be reported directly to the Chair of the Board of Management.

Staff, parents, and members of the Board of Management are reminded that they **MUST NOT**:

- Investigate the matter themselves
- make assumptions or offer alternative explanations for behaviours
- promise confidentiality to the alleged victim(s).

## Checklist of immediate reporting actions

- Write a dated and timed note of what has been disclosed or noticed, said or done.
- Report the information immediately to the appropriate person:
  - For allegations and concerns about staff and volunteers other than the DSL and Headmaster – report the allegation or concern to the DSL, the Headmaster or in the Headmaster’s absence to one the Deputy Headmasters.
  - For allegations and concerns about the DSL – report the allegation or concern directly to the Headmaster or in the Headmaster’s absence to one the Deputy Headmasters.
  - For allegations and concerns about the Headmaster – report the allegation of concern to the Chair of the Board of Management or in their absence to the Governor with responsibility for Safeguarding.
- Pass on the written record.
- The Chair of the Board of Management must be advised that an allegation or concern has been raised within the same working day.
- The Chair of the Board of Management must report the fact that an allegation or concern has been raised to the Chair of the Advisory Board within 24 hours of the Chair of the Board of Management being advised that an allegation or concern has been raised.

## Procedure for dealing with concerns or allegations being made against members of staff or volunteers (other than the Headmaster and the DSL)

- Whoever receives notification of the concern or allegation (the DSL or Headmaster):
  - MUST record the date and time at which the written record of the concern or allegation was passed to them. If there is no written record, they should write a dated and timed note of what has been disclosed or noticed, said or done.
  - MAY ask to clarify details or circumstances of the allegation, but this must not amount to an investigation
- Where the DSL has been notified, the DSL must brief the Headmaster (or his deputed Deputy) on the concern raised or allegation made as quickly as possible - certainly with the same working day.
- The Headmaster on receiving such information must:
  - Appoint a case manager, usually the DSL, and with the case manager, discuss and agree the immediate referral response(s) in terms of the provisions of the Indian POCSO and JJ Acts.
  - Assess and decide whether the subject of the concern or allegation should be suspended (usually without prejudice), pending the completion of an investigation).If suspension is required to arrange a meeting with the individual concerned to advise them verbally and in writing that they are being suspended and why. The headmaster must ensure that one of the following also attends the meeting – the Head of HR, the individual’s Line Manager, or the DSL.
  - Inform the Chair of the Board of Management within 24 hours.
- The Chair of the Board of Management must inform the Chair of the Advisory Board that an allegation or a concern has been made within 24 hours of being briefed on the matter themselves.

## Procedure for dealing with concerns or allegations being made against DSL

- All concerns about or allegations about the DSL must be reported directly to the Headmaster

- The Headmaster
  - MUST record the date and time at which the written record of the concern or allegation was passed to them. If there is no written record, they should write a dated and timed note of what has been disclosed or noticed, said or done.
  - MAY ask to clarify details or circumstances of the allegation, but this must not amount to an investigation
  - Inform the Chair of the Board of Management within 24 hours.
  - With the Chair of the Board Management:
    - discuss and agree the immediate referral response(s) in terms of the provisions of the POCSO and JJ Acts.
    - assess and decide whether the DSL should be suspended (usually without prejudice) pending the completion of an investigation.
    - If suspension is required arrange a meeting with the DSL to advise them verbally and in writing that they are being suspended and why. The headmaster must ensure that the Head of HR attends the meeting.
  - Discuss and agree the appointment of the most appropriate case manager – usually the member of the Board of Management with responsibility for safeguarding or the Headmaster.
- The Chair of the Board of Management must inform the Chair of the Advisory Board that an allegation or a concern has been made within 24 hours of being briefed on the matter themselves.

## Procedure for dealing with concerns or allegations being made against the Headmaster

- All concerns about or allegations about the Headmaster must be reported directly to the Chair of the Board of Management.
- The Chair of the Board of Management on receiving such information must:
  - Appoint a case manager, usually the member of the Board of Management with responsibility for Safeguarding.
  - Discuss and agree the immediate referral response(s) in terms of the provisions of the Indian POCSO and JJ Acts with the case manager.
  - assess and decide whether the Headmaster should be suspended (usually without prejudice pending the completion of an investigation).
  - If suspension is required, the Chair of the Board of Management is to arrange a meeting with the headmaster to advise them verbally and in writing that they are being suspended and why. The Chair of the Board of Management must ensure that the Head of HR or another member of the Board of Management attends the meeting.
  - Inform the Chair of the Advisory Board within 24 hours.

## How allegations will be managed

Decisions about course of action will be taken on a case-by-case basis, bearing in mind the paramount importance of the safety of any child(ren) involved but also remembering that the member of staff against whom an allegation has been made has the right to remain anonymous and to expect any allegations to be investigated as expeditiously as possible. Any course of action would be subject to a risk assessment.

An allegation or concern will need to be investigated in the manner that is most appropriate to the allegation of concern raised, taking into consideration Indian law and the school's policies. Typically, investigation will follow one of three routes:

- it may be the subject of a police investigation and possible action through the courts;
- or it may be the subject of an internal school disciplinary investigation.

- or it may be a matter for the School to be dealt with through non-disciplinary procedures.

If a police investigation concludes with the police deciding to take no action, the School will still need to consider what further investigation is necessary. If there is a case to answer, a disciplinary hearing will be called, which could lead to dismissal.

## Cases Subject to Police Investigation

Where a criminal investigation has taken place and either (i) a trial has resulted, (ii) the investigation has been closed without charge or (iii) a decision has been taken not to prosecute a case after charge, the case manager should consider what further action is required as regards the member of staff concerned.

## Disciplinary Investigation

Where a disciplinary investigation is required, the investigation should be conducted in accordance with the School's Discipline Policy. Whenever possible the person will be given a full opportunity to answer the allegation and make representations about it. The process of investigating the allegation, and reaching a judgment about whether it is substantiated, will continue even if the person does not co-operate. Suspension is never a default option, and the School will consider all other options before suspending a member of staff. The School would only suspend someone if there were no reasonable alternative. If the concerned member of staff is living away from the immediate possibility of contact with children, he or she could remain within their School accommodation but under carefully managed conditions and guidelines. If the suspension concerned a member of staff normally resident in a boarding House, accommodation must be found for them elsewhere.

## Supporting those involved

The School's procedures will be managed with common sense and sound judgement throughout.

Cases may not meet the criteria requiring either a police investigation or a disciplinary procedure. In such situations, the School will resolve the matter as quickly as possible. Where more appropriate, the School may use the Complaints Procedure instead. As an employer, the School has a duty of care towards its employees. The School will provide effective support for anyone facing an allegation and provide staff members with a named contact if they are suspended. Social contact with colleagues and friends will not be prevented, unless there is evidence to suggest that it is likely to be prejudicial to the gathering and presentation of evidence.

When it is appropriate to do so, parent(s)/guardian(s) of a child involved will be told about the allegation as soon as possible, if they do not already know of it. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution.

## Action upon conclusion of a case

The School will inform the appropriate authorities about any person who has been removed from working (paid or unpaid) in regulated activity, or would or might have been so removed had he/she not resigned or left of his/her own accord, and it believes the person may have harmed, attempted to harm, incited another to harm or put a child at risk of harm or if there is reason to believe the person may have committed a safeguarding related offence. 'Removal from working' for these purposes will include dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an

agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation or voluntary withdrawal from any of the above.

Appropriate referrals will be made where a teacher has been dismissed (or would have been dismissed had they not resigned) and a prohibition for teaching and or school management order may follow. The reasons such an order would be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

In situations where, on conclusion of the case, it is decided that a person who has been suspended can return to work, the School will consider how best to facilitate this. The School appreciates that most people would benefit from some help and support when returning to work after a very stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide support in the short term may be appropriate. The School will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the School.

In the event that an allegation is shown to have been deliberately invented or malicious, the Headmaster will consider whether any disciplinary action is appropriate against the child(ren) and or adult(s) who made it. This may include sanctions up to expulsion or dismissal from the School.

## Abuse of trust

All members of staff should be aware that it is an offence for a person over 18 to have a sexual relationship with a child under 18 where the person over 18 is in a position of trust (e.g. Teacher), even if the relationship is consensual.

## Records

A central record of all allegations and concerns (and connected documents) against members of staff will be kept securely by the Headmaster (or a Nominated Safeguarding Governor if it involves the Headmaster), separate from normal staff and child records. The DSL and DDSs will always be kept informed of safeguarding and child protection matters, and will have access to all records. The only exception to this requirement for permanent recording is where allegations have been found to be malicious. In such cases, all records will be removed from staff personnel files. The record will be retained at least until the member of staff involved has reached normal retirement age, or for a period of ten years from the date of the allegation if that is longer. An allegation which was proven to be false, unsubstantiated or malicious will not be included in references for staff. Every effort will be made to maintain confidentiality and to guard against publicity while an allegation is being investigated or considered. Apart from keeping the child(s), parent(s)/guardian(s) and the person about whom the allegation has been made (in cases when this would not place the child at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries or manage related disciplinary processes.

## Transfer of records

Where there have been concerns about a member of staff and he or she leaves the School to work elsewhere, the Headmaster (or the DSL if it involves the Headmaster) will consider the question of passing the concerns to the new employer or authority. The DSL will pass allegations or concerns affecting a child on to his next School, if applicable.

## Appendix 7: Policy on Female Genital Mutilation (FGM)

### Purpose

This policy aims to safeguard children from harm. female genital mutilation (FGM) is a form of child physical abuse and violence against women and girls. Our school recognises its legal duty to protect students at risk and respond appropriately to concerns. The School will consult with external agencies if they need advice on suspected FGM cases found in the School.

### Definition

Female Genital Mutilation comprises procedures involving partial or total removal of external female genitalia or other injury to female genital organs for non-medical reasons. FGM is illegal in many countries, including the United Kingdom, the United States, and across the European Union.

### Signs and Symptoms

#### Physical Indicators

- Difficulty walking, sitting, or standing.
- Frequent urinary tract infections or problems.
- Prolonged absence from school, especially after a holiday to countries known to practise FGM.
- Spending longer than normal in the bathroom or toilet.
- Reluctance to undergo normal medical examinations.
- Complaining about pain between the legs or genital area.

#### Behavioural Indicators

- Withdrawal or depression when returning from extended leave.
- Confiding in a professional about a "special procedure" or "ceremony".
- Expressing anxiety about upcoming holidays or special occasions.
- Requesting help from a teacher or another adult.
- Change in behaviour after a period of absence.
- Reluctance to participate in physical education classes.

#### Response Protocol

1. Any concern must be immediately reported to the designated safeguarding lead.
2. All suspicions and discussions will be recorded confidentially.
3. The matter will be referred to appropriate child protection agencies.
4. Support will be arranged for the affected student.

### Prevention and Awareness

We commit to:

- Age-appropriate education for students about bodily autonomy and rights.
- Engagement with parents and the broader community.
- Providing resources and support for affected families if requested.

This policy should be read in conjunction with our broader safeguarding policies and procedures.