

# SAFEGUARDING AND CHILD PROTECTION POLICY

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Reviewed By	Tom Hoopes
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## Table of Contents

1	Introduction, Philosophy and Aims	3
2	Definitions	4
3	Rationale	5
4	Equality Statement	5
5	Roles and Responsibilities	6
6	Identifying Types of Abuse	9
7	Specific Safeguarding Issues	12
8	Managing Concerns	16
9	Disclosures	17
10	Records	17
11	Confidentiality	18
12	Staff and Volunteers	18
	Appendix 1 – Additional Forms of Abuse	21
	Appendix 2 – Safeguarding Structure at NLCS 2023 - 24	23
	Appendix 3 – Child Protection Process	24
	Appendix 4 – Record of Child Protection Concern	26
	Appendix 5 – Provider Referral List	27
	Appendix 6 – Allegations Against a Member of Staff	30

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## Our Safeguarding Leads



**Ms Gemma**

**Designated Safeguarding Lead**



**Ms Thuy**

**Deputy Designated Safeguarding Lead**

# 1. INTRODUCTION

## 1.1 PHILOSOPHY

Fundamental to our School's ethos, North London Collegiate School (NLCS) HCMC prides itself on providing exceptional pastoral care for every student. We believe that by supporting students in all aspects of their lives and removing any barriers to learning, they will reach their full potential.

We recognise that if a child cannot feel safe, they cannot learn to their full potential and as such, we are fully committed to the safeguarding and welfare of children and young people. We expect all our teaching staff, non-teaching staff and volunteers to share and uphold this commitment.

There can be no issue of greater importance to staff and parents of NLCS HCMC than the safety and care of our students. 'Safeguarding' represents all that we do as a school to protect our students from harm. This Safeguarding Policy includes the School's Child Protection Policy and reference to all other policies and procedures that relate to safeguarding. This policy together with elements of other school policies constitute the School's Safeguarding Framework.

This Policy should be read in conjunction with the following:

- Recruitment, Selection and Disclosure Policy
- Behaviour Policy
- Whistleblowing Policy
- Anti-bullying Policy
- Online Safety Policy
- Staff Code of Conduct
- Visitor's Code of Conduct

## 1.2 AIMS

The School aims to ensure that:

- Children's development is supported in ways that will foster security, confidence and independence.
- Children are provided with a positive, supportive and secure environment where they know that there are adults in School they can approach if they need help.
- Staff have clear guidelines for identifying and reporting safeguarding issues.
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their responsibilities with respect to safeguarding.

Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. If staff are concerned about the welfare of a child, they should always act in the best interests of the child. If staff are unsure about any aspect of safeguarding, they should immediately speak to the DSL without delay and should not assume that a colleague will raise the matter and share information that may keep a child safe.

Staff should be mindful that sharing information at an early stage is essential for effective safeguarding and promoting the welfare of children. Information should be shared to ensure that children and young people are kept safe.

Every complaint or suspicion of abuse from within or outside the School will be taken seriously and in all proper circumstances will be investigated by the School immediately. In cases of serious harm, the police will be informed from the outset.

Additionally, if the school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, we will follow the school's safeguarding policies and procedures, as we would with any safeguarding allegation

The Proprietor ensures the School complies with its legislative duties, has regard to best practice internationally and confirms the School's safeguarding arrangements are in line with the procedures and practice of local agencies.

## **2. DEFINITIONS**

### **Safeguarding**

Safeguarding and promoting the welfare of children refers to the processes of protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and acting to enable all children to have the best outcomes. Children include everyone under the age of 18.

### **Child Protection**

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

### **Abuse**

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Children may be abused by an adult or adults or by another child or children. This abuse may also take place both online or offline.

### **Staff**

Members of staff refer to all those working for, or on behalf of the school. This includes full-time and part-time staff, academic and support staff and temporary or permanent staff in either a paid or voluntary capacity.

Additionally, this definition includes staff of VCVA (Vietnam Contemporary Visual Arts Academy) and Kindermusik and any other Embassy Education partner staff working on the NLCS campus.

### **Victim**

This is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

### **Alleged perpetrator(s) and perpetrator(s)**

These are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

### **3. RATIONALE**

This policy sets out the principles and expectations, as well as the procedures and processes, which have been adopted by North London Collegiate School (NLCS) HCMC. The policy also describes the steps that will be taken in meeting our commitment to safeguarding students, at both a school and organisational level.

NLCS HCMC is committed to the prevention of Child Abuse and to the Safeguarding and protection of children. This commitment means that the interests and welfare of children are our prime consideration when any decision is made about suspected cases of abuse or neglect.

As a school, all our policies adhere to the relevant child protection legislation under Vietnamese Law ([102/2016/QH13](#) and [Decree No 56/2017/ND-CP](#)) which provides a clear statutory framework to support Child Protection within Vietnam.

In addition, NLCS HCMC fully recognises our moral and statutory responsibility to meet international standards for safeguarding and child protection. The procedures outlined in this policy are in line with the United Nations Convention on the Rights of the Child (UNCRC) and draw upon key safeguarding guidance from the United Kingdom and internationally, including the [International Task Force on Child Protection's Final Report and Recommendations](#), [Keeping Children Safe in Education](#), [Working Together to Safeguard Children](#) and [Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings](#).

#### **3.1 LOCAL SAFEGUARDING AGENCIES/ADVICE**

At NLCS, Director of Operations, Pham Lan Huong, will be the contact person for any interactions with the Vietnamese authorities. The Designated Safeguarding Lead will be regularly updated and involved in any decisions and required actions.

Where necessary and appropriate, the Designated Safeguarding Lead, with assistance from the Operations Director, will communicate with the National Helpline for Child Protection. This is an established government agency for the protection of children in Vietnam.

<http://tongdai111.vn/>

Telephone: 111

Please refer to Appendix 4 for details of locally available advice and agencies.

### **4. EQUALITY STATEMENT**

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

We give special consideration to children who are:

- disabled and/or have specific additional needs;
- have special educational needs (whether or not they have an IEP);
- have English or Vietnamese as an additional language;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- a young carer;
- frequently missing/goes missing from care or home;
- who are missing or absent from education for prolonged periods and/or repeat occasions;
- showing early signs of abuse and/or neglect;
- a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- misusing drugs or alcohol themselves;
- showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups; or
- at risk of modern slavery, radicalisation, trafficking or exploitation.

The School will also be alert to the potential need for early help for a child who comes from a split family, looked after children, previously looked after children and care leavers. The DSL will inform the lead teachers about the child's circumstances. The lead teachers will monitor the child and put in place any necessary special arrangements and support.

## **5. ROLES AND RESPONSIBILITIES**

**Safeguarding and child protection is everyone's responsibility.**

This policy is addressed and applies to all staff, volunteers and visitors in the school. Our policy and procedures also apply to enrichment sessions and off-site activities provided by NLCS.

This policy applies wherever staff or volunteers are working with pupils even when physically outside of School grounds, for example at an alternative venue or on an educational visit. The NLCS reporting flowchart can be found in Appendix 2.

It is also endorsed and adopted at the highest levels, both in our schools and in the wider ecosystem. This policy will also be applied to any partner providers or members of the Embassy Education Ecosystem using NLCS facilities, as well as any other contracted organisation temporarily using our school site.

The School plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for modern life, and a culture of zero tolerance towards racism, sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

This will be underpinned by our:

- Behaviour Policy
- Pastoral support system
- Planned programme of PSHE and RSE relationships and health education (RHE), which is inclusive and delivered regularly.

**5.2 THE GENERAL PRINCIPAL (THE MAJORITY OF RESPONSIBILITIES WILL BE UNDERTAKEN BY THE HEAD OF JUNIOR SCHOOL FOR 2023 - 2024 SCHOOL YEAR)**

The General Principal is responsible for formulating and implementing policy and procedures which:

- Prevent unsuitable people from working with children and young people i.e. safe recruitment procedures and single central vetting records.
- Only deploy staff who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Promote safe practices and challenge poor and unsafe practices in the whole school context.
- Identify and support a Designated Safeguarding Lead who is a member of the senior leadership team.
- Identify instances where there are grounds for concern about a child's welfare and initiate appropriate action/intervention to keep them safe.
- Contribute to effective partnership working between all those involved with providing services for children.
- Ensure, in conjunction with the Operations Director, that the school site is secure.
- Ensure that children's safety and welfare are addressed through the curriculum.
- Maintain a record of all training undertaken by staff in relation to Safeguarding and Child Protection.
- Make sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness
- Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Make sure that all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
- Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

### 5.3 DESIGNATED SAFEGUARDING LEAD

The DSL is a member of the Senior Leadership Team. Our DSL is Gemma McCarron (Head of Junior School).

The DSL takes lead responsibility for child protection and wider safeguarding in the school. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Outside of school hours, our DSL can be contacted via email: [gemma.mccarron@nlcshcmc.edu.vn](mailto:gemma.mccarron@nlcshcmc.edu.vn) or by telephone: 0965507350

When the DSL is absent, the deputy – Ms Nguyen Thuy (Operations Manager) will act as cover. If the DSL and deputy are not available, Ms Huong Pham (Director of Operations) will act as cover (for example, during out-of-hours/out-of-term activities).

The School will ensure that the Designated Safeguarding Lead is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, to contribute to the assessment of children and to refer suspected cases, as appropriate, to the relevant body (external agencies, Disclosure and Barring Service, and/or police).

Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's form teacher who will notify the relevant Designated Safeguarding Lead in accordance with these procedures.

The main responsibilities of the Designated Safeguarding Lead are:

- The strategic direction and operational management of Safeguarding within the organisation.
- To ensure that this Policy is known, understood and used appropriately and that all staff know to see the DSL (and, in their absence, the deputy DSL) for Safeguarding issues.
- To be available to all staff for consultation on Child Protection issues.
- To seek advice from relevant authorities and coordinate action where Child Abuse is suspected.
- To report to outside agencies where relevant.
- To undertake training at least every two years in Child Protection.
- To facilitate regular training on Safeguarding for all other staff at the School which, at a minimum standard, meets UK statutory requirements of at least every two years.
- To make sure that online safety training is included in staff safeguarding and child protection training.
- To review the school's policy on Safeguarding (including related policies) with the relevant Leadership Teams and the Safeguarding Committee on an annual basis and present suggested changes.
- To monitor, update and maintain confidential records of students in relation to Child Protection issues.
- To maintain records of sensitive information in a secure and confidential file, and to disseminate information about children as policy dictates.
- To raise staff awareness and confidence in Safeguarding procedures and to ensure new staff are aware of these procedures through induction training.
- To ensure temporary supply and other short-term staff are made aware of the School's Child Protection arrangements via training and documentation summarising the procedure and practice.
- To ensure that the School's PSHE programme teaches pupils about safeguarding, including safer use of the internet and social media.
- To form part of the School's Safeguarding Committee.
- To follow appropriate protocol regarding confidentiality in matters relating to Safeguarding and Child Protection.

#### **5.4 SAFEGUARDING COMMITTEE**

The Safeguarding Committee is comprised of the General Principal, members of the Senior Leadership Team and the Operations Team. They will meet on at least three occasions during each academic year.

The main responsibilities of members of the Safeguarding Committee are:

- To ensure that NLCS HCMC is compliant with both Vietnamese and international safeguarding legislation.



- To help dictate school policy on issues relating to Safeguarding and to ensure that such policies are developed and reviewed.
- To ensure that monitoring and evaluation take place and that any recommendations from external partners (i.e. NLCS International) are understood and actioned.
- To be a point of contact for general issues relating to Safeguarding in school (but not for disclosures.)
- Make sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness
- Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- To ensure that the individual needs of children are met.
- To help raise awareness of Safeguarding at NLCS.

## 5.5 STAFF

All staff (including partner organisations and contractors having unsupervised contact with children) will:

- Contribute to their professional Safeguarding training (either full or refresher) outlining this policy's guidance at least annually.
- Sign a declaration at the beginning of each academic year regarding their suitability for their role and their review of guidance.
- Understand our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputies, the Behaviour Policy and our online safety policy.
- Provide a safe environment for children and young people.
- Identify young people who are suffering or who are at significant risk of harm.
- Know what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Take appropriate action with the aim of making sure that children are kept safe both at home and at school.
- Reinforce the importance of online safety both when teaching and when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

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

- Undergo a Safeguarding briefing/induction in relation to their role, and understand what is required of them if they have concerns and to whom they should report. This is provided in dual language, if necessary – English and Vietnamese.
- Provide, if necessary, written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a Safeguarding briefing has been provided to these staff (appropriate to the role and contact they will have with children) before they commence their role on the School site.
- Where partners/contractors do not have their own Safeguarding or Child Protection Policy, NLCS will provide a copy of their own policy and ask partners/contractors to read and follow. These requirements are part of all contractual arrangements.

- Follow the guidance laid down in this policy at all times.

## 5.6 HUMAN RESOURCES DEPARTMENT IN RELATION TO SAFER RECRUITMENT

The Human Resources Department will:

- Ensure the School has effective policies and procedures in place for the recruitment of all staff and in accordance with international best practice (and monitor the School's compliance with them).
- Ensure that the School operates effective administration of safe recruitment procedures and makes sure all appropriate checks are carried out on all staff prior to the start of their employment at the School.
- Keep and maintain a single central record of recruitment and vetting checks.
- Assess clearance and vetting documentation provided by contractors and agencies working at school.
- Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process

## 6. IDENTIFYING TYPES OF ABUSE

There are four main areas of Child Abuse. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition and, in most cases, multiple issues will overlap with one another. It should be recognised that a drastic change in behaviour can be a symptom of any area of Child Abuse, However these signs may also be a symptom of another problem.

The School defines types of abuse and neglect as follows:

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. (These symptoms could also indicate harm to self, such as cutting and suicide ideation). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Some signs or symptoms that may indicate physical abuse:

- Bruises, burns, sprains, dislocations, bites, cuts
- Improbable excuses given to explain injuries
- Injuries which have not received medical attention
- Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc.
- Repeated urinary infections or unexplained stomach pains
- Refusal to discuss injuries
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of returning home or of parents being contacted
- Showing wariness or distrust of adults
- Self-destructive tendencies
- Being aggressive towards others
- Being very passive and compliant
- Chronic running away

**Emotional abuse** is the persistent emotional ill-treatment of a child so as to cause severe and adverse effects on a child's emotional development. It may involve: conveying to children that they are worthless or unloved; that they are inadequate or valued only insofar as they meet the needs of another person; age or developmentally inappropriate expectations being imposed on children; causing children frequently to feel frightened; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may also occur alone.

Some signs or symptoms that may indicate emotional abuse:

- Physical, mental and emotional development is delayed
- Highly anxious
- Showing delayed speech or sudden speech disorder
- Fear of new situations
- Low self-esteem
- Inappropriate emotional responses to painful situations
- Extremes of passivity or aggression
- Drug or alcohol abuse
- Chronic running away
- Compulsive stealing
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Attention-seeking behaviour
- Persistent tiredness
- Lying

**Sexual abuse** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (i.e. rape or oral sex), or non-penetrative acts (i.e. masturbation, kissing, rubbing, touching outside of clothing). They may include non-contact activities, such as involving children in the production or viewing of pornographic material or encouraging children to behave in sexually inappropriate ways. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Some signs or symptoms that may indicate sexual abuse (please note that frequently there are no signs of this type of abuse):

- Pain or irritation to the genital area
- Vaginal or penile discharge
- Difficulty with urination
- Infection, bleeding
- STDs
- Fear of people or places
- Aggression
- Regressive behaviours, bed wetting or stranger anxiety
- Excessive masturbation
- Acting in a sexually provocative manner
- Stomach pains or discomfort walking or sitting
- Being unusually quiet and withdrawn or unusually aggressive
- Suffering from what seem physical ailments that can't be explained medically

- Showing fear or distrust of a particular adult
- Mentioning receiving special attention from an adult or a new “secret” friendship with an adult or young person
- Refusal to continue with school or usual social activities
- Age-inappropriate sexualised behaviour or language

**Neglect** is the persistent failure to meet a child’s basic physical or physiological needs, likely to result in serious impairment of the child’s health or development.

Some signs or symptoms that may indicate neglect:

- Medical needs unattended
- Lack of supervision
- Consistent hunger
- Inappropriate dress
- Poor hygiene
- Inadequate nutrition
- Fatigue or listlessness
- Self-destructive behaviour
- Extreme loneliness
- Extreme need for affection
- Failure to grow
- Poor personal hygiene
- Frequent lateness or non-attendance at school
- Low self-esteem
- Poor social relationships
- Compulsive stealing
- Drug or alcohol abuse

A list of additional forms of abuse can be found in Appendix 1.

## **7. SPECIFIC SAFEGUARDING ISSUES**

### **7.1 E-SAFETY**

NLCS will adhere to the Online Safety Policy at all times and is committed to keeping children safe online. The school recognises its responsibilities regarding safeguarding children both online and offline. The school recognises that addressing online safety issues should form an integral part of the school’s safeguarding arrangements and online safety training is included in staff safeguarding and child protection training.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

The school will ensure that suitable monitoring and filtering systems are in place on ICT equipment to prevent children from accessing inappropriate material. We use the third-party software provided by Fastvue (<https://www.fastvue.co/fortinet/>) to ensure we adhere to DfE standards. This system will be monitored and reviewed with any inappropriate behaviours or searches being followed up appropriately.

Further information regarding the school’s approach to online safety can be found in the Online Safety Policy.

## **7.2 MOBILE PHONE AND CAMERA IMAGES**

NLCS Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. If staff capture pictures or recordings of pupils on their personal phones or cameras, they will be uploaded, used for the desired purpose and deleted at the first opportunity.

Photographs for School Publications:

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

## **7.3 WHISTLEBLOWING**

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

Malicious whistleblowing, however, will be seen as a potential disciplinary matter (see NLCS Whistleblowing Policy).

## **7.4 ANTI-BULLYING**

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve either face-to-face or the misuse of social media or technology. For more details, please refer to our Anti-bullying Policy.

## **7.5 CHILDREN WITH SPECIAL EDUCATIONAL NEEDS OR DISABILITIES**

Children with a formal diagnosis of SEND as well as those who have issues apparent without a formal diagnosis are at greater risk of abuse or neglect. The barriers to identifying and intervening are also higher. It is therefore important to maintain an open mind about what we see and maintain professional curiosity, for example:

- not accepting that an injury is a result of the needs of the child, but instead, considering what other causes there may be and what the evidence suggests.
- considering a behaviour such as self-harm as possibly being indicative of abuse.
- recognising the potential for fabricated or induced illness.

## **7.6 CHILD ON CHILD ABUSE**

All staff should recognise that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school and online.

Child-on-child abuse is unacceptable and will be taken seriously by the School. It can manifest itself in many ways, this is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Sexual violence and sexual harassment;
- Sexting (also known as youth-produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission; and
- Initiation/hazing type violence and rituals.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. The School recognises that abuse is abuse and it will not be tolerated or passed off as “banter,” “part of growing up” or “just having a laugh” as it 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.

At NLCS, through our Personal, Social, Health and Education (PSHE) and Relationships and Sex Education (RSE) syllabus, we include input to help educate students about leading responsible, healthy and assertive lives and to develop skills and knowledge to equip them with the ability to deal with a range of issues.

## **7.7 PHYSICAL INTERVENTION/RESTRAINT**

The school does not allow any form of corporal punishment or the use of unwarranted physical force. The use of physical intervention should be avoided if possible.

There are circumstances when it is appropriate for Staff to use force to safeguard children. The use of force or physical contact may be reasonable and proportionate in the circumstances to prevent a pupil from doing, or continuing to do any of the following:

- Committing a criminal offence;
- Injuring themselves or others;
- Causing damage to property, including their own; or
- Engaging in any behaviour prejudicial to good order and discipline at the School or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

The use of reasonable force will always depend on the circumstances. The UK government has offered guidance outlined in [Use of Reasonable Force in Schools](#) and this is used to inform our practice.

Whenever practicable and prior to intervening physically, staff should seek to de-escalate potentially harmful situations through verbal communication, use of body language and via a calm but firm response.

Staff should inform the Designated Safeguarding Lead immediately following an incident where force has been used. Staff should provide a written report as soon as possible afterwards which should include written and signed accounts of those involved, including the pupil.

The parents, guardians or carers of the pupil should always be informed about serious incidents involving the use of force.

## **7.8 SAFE RECRUITMENT AND SELECTION**

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training from external providers, renewable every two years.

The School follows international best practice for the safer recruitment and employment of staff who work with children. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

### **Application forms**

All applicants complete a thorough application form through iCims, our cloud-based recruiting portal. The online application form includes a self-declaration of an applicant's criminal record or any information that would make them unsuitable to work with children and includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country
- Any relevant overseas information

Applicants are informed that it is an offence to apply for the role if an applicant is barred from engaging in regulated activities relevant to children and are required to sign a declaration confirming the information they have provided is true.

### **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

### **Seeking references and checking employment history**

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at the interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school-based, we will ask for the reference to be confirmed by the headteacher/principal as accurate with respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed
- In line with the changes to KCSIE (2023) all shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process.

### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the School's Single Central Record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain a recent (no older than 6 months) police check from Vietnam or country of residence if recruiting from abroad.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of Vietnam. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#).
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.

The School will require evidence of appropriate child protection checks and procedures having been applied to any staff employed by another organisation and working with the School's pupils on another site.

## **8. MANAGING CONCERNS**

If staff or volunteers suspect a child has been abused or neglected, the following procedures should be implemented:

- NLCS staff will report concerns immediately to the DSL.



- Using the School's Record of Concern Form (see Appendix 4) they will be required to record observations, communications and impressions which cause concern and pass this written report to the DSL.
- In the event of suspected Sexual Abuse happening, it is a requirement for the School to contact the appropriate Vietnamese authorities. For cases happening within the context of the family, the family should not be alerted to the allegations being made and the report can be made to relevant external agencies. For Sexual Abuse cases happening outside the context of the family, the family should be informed of the incident and any reports made to the relevant authorities. The School should not conduct investigations, in terms of talking to the child at length on the incident.
- In the event of other forms of abuse, the DSL will be committed to acting and arranging consultation. A record of this will be kept using the School's Child Protection Record Form. The case will be considered in the context of the wider assessment framework (see Appendix 3).
- If there are obvious signs of harm, the student will be taken to the School Nurse immediately. If the student requires urgent medical attention, they should be brought to Family Medical Practice D1, the school's designated paediatric hospital.
- Where we suspect the abuse has occurred or is about to occur and the child is unsafe and at imminent risk of further harm, we are committed to reporting the matter to the relevant external authority.
- Where we suspect that the abuse has been perpetrated by someone close to the family or within the family network, the General Principal will contact the family and discuss ways in which the student could be kept safe and their needs managed more appropriately. However, where there is concern that the child will be further harmed should the family be informed, alternative actions may be taken.
- If we suspect that an employed or voluntary worker in the school has abused a child, the matter should be reported to the General Principal. Consideration will be given as to whether that member of staff should face suspension. Please see Appendix 5.
- Above all, the School takes a victim-centred and child-centred approach to dealing with allegations of abuse. The next steps are considered in light of what is in the best interests of the child.

A flow chart of NLCS' Child Protection Processes can be found in Appendix 3.

## **8.2 EMERGENCIES**

First aid is to be administered in any emergency and the student will be taken to the School Nurse immediately. If the student needs urgent medical attention, they should be brought to Family Medical Practice D1, the School's designated paediatric hospital.

## **9. DISCLOSURES**

The following is advice on what to do if a child discloses:

- Remain calm – do not panic or express shock.
- Listen carefully – do not prompt responses.
- Reassure the child – tell them they are doing the right thing and that you are pleased they are confiding in an adult. Praise them for having the courage to talk about it with someone.
- Do not project or assume anything, let the child tell their story; leave your own assumptions out.
- Possible questions to ask in a non-leading manner include:

- What happened to you?
- Who did this to you?
- Where did it happen?
- When did this happen?
- Use age-specific language. Ask for clarification for any meaning or words you do not understand.
- Let the child know they are believed.
- Let the child know that you will do your best to protect and support them.
- Do not promise secrecy to the child. Explain that, in order to help them, you will have to tell certain other parties but it will be as confidential as possible. Assure them that their issue will not be general knowledge within the school community.
- Check that you have a full understanding of what the child has told you before the end of the discussion.
- Make the child comfortable. Ensure that the child is not left in a situation where he/she may be pressured to change their story.
- Report the disclosure to the DSL (or Deputy in their absence). You will be asked to record what the child has said or what you have observed, including dates and times. It is important that this is recorded in as much detail as possible so that the child does not have to repeat the details of abuse unnecessarily.
- In line with Safeguarding guidelines, the school does not take any photographs of a child's injuries but instead records them by use of diagrams.
- Maintain confidentiality. Do not discuss this with any other members of staff, children or people outside of school. It will be considered a breach of school protocol if you do this.

## **10. RECORD KEEPING**

All safeguarding concerns are kept separately and electronically in an encrypted file where the DSL's discussions, decisions made and reasons for those decisions are recorded in writing. See Appendix 4.

Records include:

- a clear and comprehensive summary of the concern details of how the concern was followed up and resolved and
- a note of any action taken, decisions reached and the outcome.

Each Child Protection case file is kept separately in a locked cupboard within the DSL's office. Records may be kept until such time as the individual has reached 25 years of age.

## **11. CONFIDENTIALITY**

Students are actively encouraged to raise personal and general concerns with members of staff and seek advice in confidence.

It is important to note, however, that such discussions, whilst remaining confidential in nature, must consider a full appreciation of duty of care. If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the adult tell the child in an age-appropriate manner that they cannot promise complete confidentiality. This will mean that information may have to be shared with senior members of staff or parents on a need-to-know basis.

Confidentiality cannot be guaranteed to the victim regarding Child Protection issues.

Staff/Volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

All matters relating to Child Protection are confidential and the Designated Safeguarding Lead will disclose any such information on a need-to-know basis only.

### **11.2 COMMUNICATION WITH PARENTS**

NLCS HCMC will ensure that the Safeguarding and Child Protection Policy and other safeguarding policies are available publicly and are displayed on the School's website. The Child Protection and Safeguarding policy is updated annually.

Parents should be informed prior to referral unless it is considered that this action may place the child at increased risk of significant harm by:

- The behavioural response it prompts;
- Leading to an unreasonable delay; or
- Leading to the risk of loss of evidential material.

The School will also consider not informing parents where a member of staff would be placed at risk.

## **12. STAFF AND VOLUNTEERS**

### **12.1 TRAINING**

NLCS HCMC is committed to maintaining and increasing staff awareness of how to prevent, recognise and respond to Child Abuse and neglect. The School ensures that all staff are updated annually on procedures relating to Child Abuse and neglect. As part of their induction, all adults will familiarise themselves with the NLCS HCMC Child Protection and Safeguarding Policy and undergo Safeguarding Awareness Training. Online safety training is also included in staff safeguarding and child protection training.

The School is also committed to updating staff on policy and procedures on an annual basis at the beginning of each academic year so that all staff working with children understand their responsibilities and are familiar with expected practice and any recent changes to legislation.

A further commitment is training senior leaders on a regular basis to ensure that they are up-to-date with Vietnamese and international policy and practice, and good practice in other leading international schools. All those with a Designated Safeguarding responsibility will hold up-to-date Level 3 Safeguarding and Safer Recruitment training, renewed every two years.

All staff should undergo yearly Safeguarding Awareness Training, including:

- teaching staff,
- support staff,
- external partners (on or off-site),
- outsourced staff,
- extra-curricular activity providers and
- volunteers and/or temporary staff.

### **12.2 PROFESSIONAL AND PERSONAL CONDUCT OF STAFF**

Staff must read and abide by the Staff Code of Conduct. This Code of Conduct applies to all adults who come into contact with students at NLCS on behalf of the School, including:

- teaching staff,
- support staff,
- external partners (on or off-site),
- outsourced staff,
- extra-curricular activity providers and
- volunteers and/or temporary staff.

Detailed guidance is given to staff and volunteers through training and the staff code of conduct to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil.

Staff and volunteers should also feel able to raise concerns about poor or unsafe safeguarding practices at the School, potential failures by the School or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.

### **12.3 ALLEGATIONS AGAINST A MEMBER OF STAFF**

Managing accusations of abuse against staff members, including volunteers, is the responsibility of the General Principal and in certain situations the DDSL. If the allegation is against the General Principal, the matter must be taken directly to the Proprietor who will liaise with relevant external agencies. This must happen without informing the General Principal. If the allegation is against the DSL, this must be reported to either the General Principal or DDSL immediately.

Records concerning members of staff will be kept separately and not with other Child Protection records.

The School has procedures for dealing with allegations of abuse against staff (including the General Principal), Proprietor and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 6.

### **12.4 INVESTIGATING ALLEGATIONS AGAINST A MEMBER OF STAFF**

If it is deemed necessary, a full investigation will take place. However, staff are not automatically suspended following an allegation. In instances where an allegation has been made, a judgment will be made by the General Principal as to the next steps.

The outcome of an investigation into a member of staff can take one of four outcomes:

- 1 The allegation could be upheld - this means that there is identifiable evidence to prove the allegation on the balance of probability.
- 2 The allegation could be unsubstantiated - this means that there is insufficient identifiable evidence to prove or disprove the allegation on the balance of probabilities. The term does not imply guilt or innocence.
- 3 The allegation could be unfounded - this means that there is no evidence or proper basis that supports the allegation being made, or there is evidence to prove that the allegation is untrue.

- 4 The allegation could be deemed to be malicious - this means that the allegation was made with deliberate intent to deceive or cause harm.

Full details on the investigation process are outlined in Appendix 6.

#### **12.4 VOLUNTEERS AND VISITORS**

Volunteers and visitors to the school are expected to abide by the school's safeguarding procedures and are asked to read and sign the school's [Visitors Code of Conduct](#).

### **Appendix 1: Additional Forms of Abuse**

#### **Child Criminal Exploitation (CCE)**

Child criminal exploitation is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, in exchange for something the victim needs or wants, and/or the financial advantage or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence (this could be online or through technology).

The School will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The School will also recognise that pupils of **any gender** are at risk of CCE.

#### **Child Sexual Exploitation (CSE)**

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

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

### **Domestic Abuse**

In line with the Domestic Abuse Act 2021, domestic abuse is defined as abusive behaviour of a person towards another person where both are aged 16 or over and are personally connected. Abusive behaviour includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse or another form of abuse.

The School will recognise the detrimental and long-term impact on health, well-being, development and the ability to learn domestic abuse has upon children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

### **Female Genital Mutilation (FGM)**

NLCS HCMC recognises Female Genital Mutilation (FGM) as a form of Child Abuse and a form of violence against women and girls. The School draws upon guidance from the UK's [Department of Health](#) when dealing with issues of Safeguarding in this respect.

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

### **Forced Marriages (FM)**

A Forced Marriage (FM) is a marriage conducted without the valid consent of one or both parties. It can see somebody facing physical pressure (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family) to get married. A Forced Marriage is different to an arranged marriage, where both parties give consent.

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

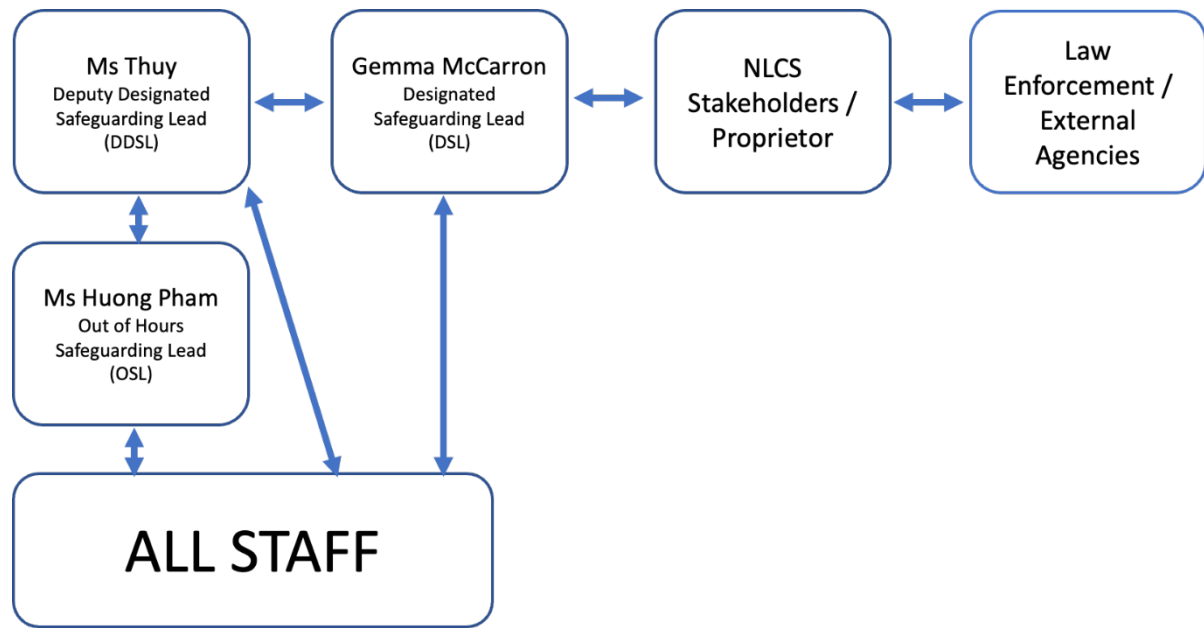
### **Mental health**

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, the remainder of childhood, adolescence and adulthood stand to be affected. It is key that staff are aware of how these children's experiences can impact their mental health, behaviour and education.

Staff at NLCS are well placed to observe children day-to-day and identify students whose behaviour suggests that they may be experiencing some form of mental health problem (or be at risk of developing one).

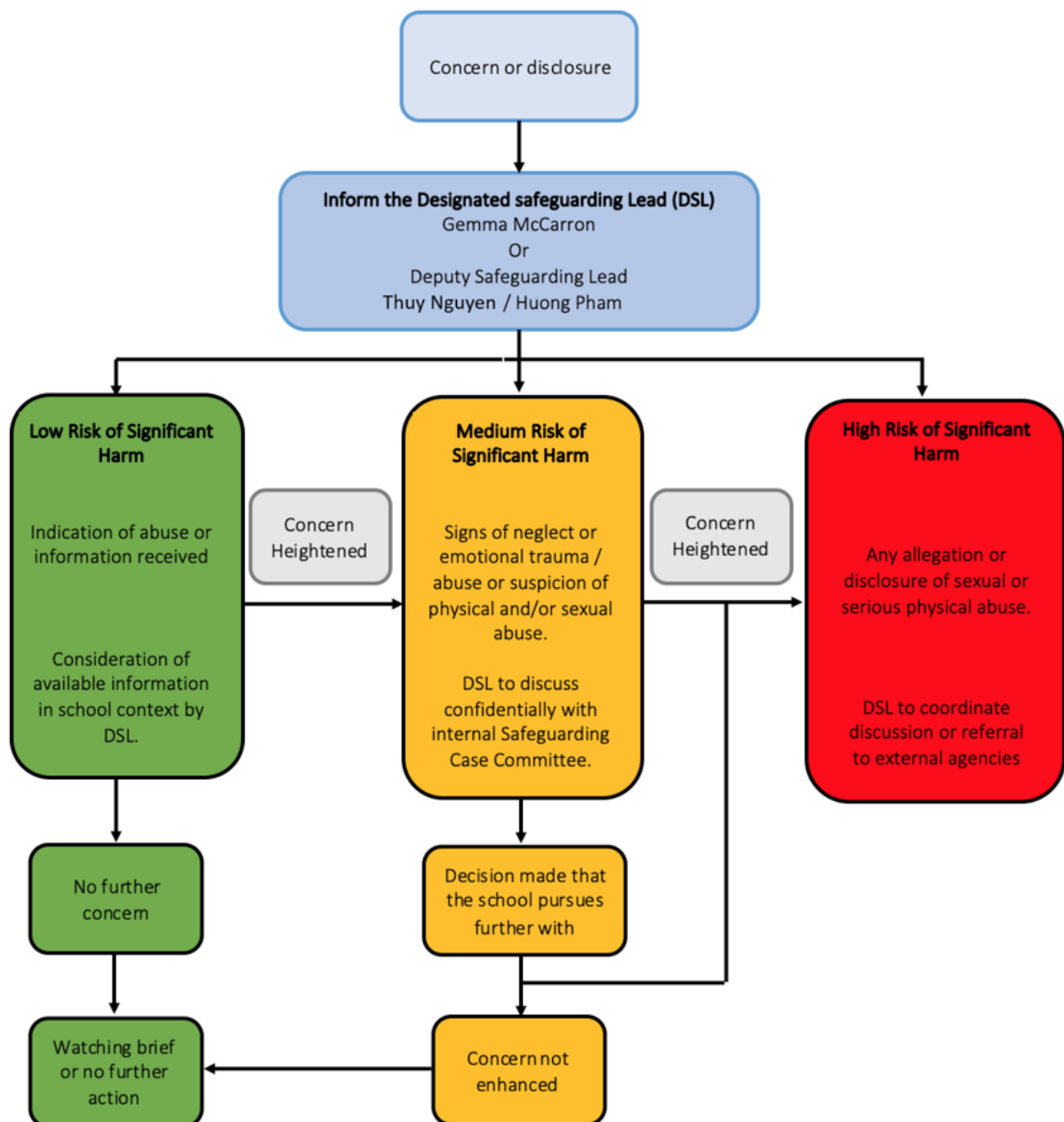
In these instances, unless it places a child at greater risk, early contact should always be made with the child's family. Where possible an agreement should then be reached regarding a child's access to the appropriate external professional body, see Appendix 5.

The above is not an exhaustive list of all the potential forms of abuse which staff may have to deal with on occasions. For more information, please see 'Keeping Children Safe in Education 2023'. This is a UK publication in which the types of abuse discussed are valid and can apply to any country around the world.





## Appendix 3: Child Protection Process

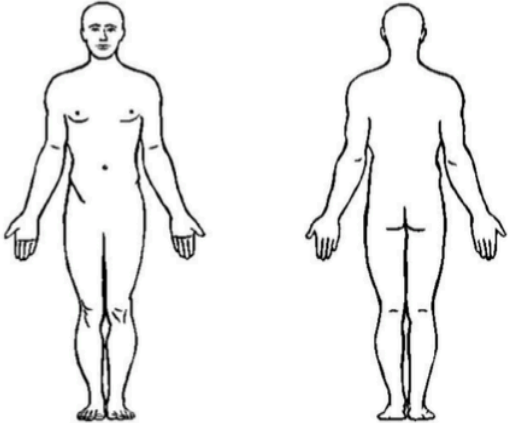


## Appendix 4: Record of Child Protection Concern

### Record of Child Protection Concern

To be completed by the DSL with any other attached notes for reference.

Child's Name		Class:	
Date and Time of the concern:			
Concern Initially reported by:			
Account of the Concern:			

<b>Additional Information:</b>		(Context of concern / disclosure / details of any physical and emotional signs / witness)	
Indication of any markings on body outline:			
<b>Action Resulting:</b>		(What did you do/say following the concern, and what you chose not to do.)	
<b>Action</b>		<b>When</b>	
<b>By whom</b>			
<b>Details to be placed on School 'At Risk Register'</b>		<b>Yes / No</b>	
<b>Your Name:</b>			
<b>Your Signature:</b>		<b>Date:</b>	
<b>Your Position in School:</b>			

## Appendix 5: Provider Referral List – HCMC

Last Updated: Mar 2023

### National Helpline for Child Protection

<http://tongdai111.vn/>

Telephone: 111

### District 2

#### Family Medical Practice

Dr Miguel Seixas

Psychiatry (Portuguese, English)

Assessment, Diagnosis of Major Psychiatric Disorders

Treatment, Medication Management

District 2

<https://fmp.bliss.build/hcmc/en>

+84 28 3744 2000

### International Centre for Cognitive Development

Various therapists/specialists/languages available

Azrael Jeffrey, Ph. D. Psychology

Psychosocial/Educational Assessments

Psychotherapy

Behavioural Therapy

Occupational Therapy

Speech Therapy

[www.iccd.info](http://www.iccd.info)

[azjeffrey1@gmail.com](mailto:azjeffrey1@gmail.com)

Telephone: 0965 729 346

Email: [Azjeffrey@iccd.info](mailto:Azjeffrey@iccd.info) or

[Phuong.pham@iccd.info](mailto:Phuong.pham@iccd.info)

Contact: Dr Azrael Jeffrey (Psychologist) or

Phuong Pham (Counsellor /

Psychotherapist)

### Ethos Educational Therapy & Psychology

Academic Issues

Autism spectrum disorders

Child Development

Telephone: 028 6288 3969

Email: [anita@ethosasia.com](mailto:anita@ethosasia.com) /

[nessa@ethosasia.com](mailto:nessa@ethosasia.com)

Contact: Anita North / Ms Nessa Maguire

### Huong Tran (Victoria), MS Marital & Family Therapy (MFT)

Psychotherapist (Vietnamese, English)

[saigontherapy.com](http://saigontherapy.com)

[info@saigontherapy.com](mailto:info@saigontherapy.com)

+84 961 045 800

### Astrid Matarrita, Postgraduate in Clinical Psychology Costa Rica

Clinical Psychologist (Spanish, English)

Children, teenagers, adults, couples

[saigonpsychology.com](http://saigonpsychology.com)

[astridmatarrita@yahoo.com](mailto:astridmatarrita@yahoo.com)

+84 121 8263 167

### Nicole Marchetto, MA

Applied Behavioural Analysis Specialist (ABA)

Developmental Specialist

ADHD, ASD, Learning Disabilities,

Developmental Delays

Assessment

Treatment

Training

Consultation

[Marchetto.nm@gmail.com](mailto:Marchetto.nm@gmail.com)

### Learning Strategies

Tony Louw, BA

Developmental Specialty/Classroom support

Applied Behavioural Analysis (ABA)

[www.learning-strategies.org](http://www.learning-strategies.org) (various therapists available)

[tony.louw@learning-strategies.org](mailto:tony.louw@learning-strategies.org)

+84 915 729 230

### Tracey Nakhila

I am Therapy

[traceynakhila@gmail.com](mailto:traceynakhila@gmail.com)

+84 868 103 143

[www.iamtherapy.me](http://www.iamtherapy.me)

### Janak Counselling

Mr. Janak Vadgama

Psychologist

Anxiety

Depression

Suicide Prevention

+84 0934549847

[janakcounselling.com](http://janakcounselling.com)

[janak@janakcounselling.com](mailto:janak@janakcounselling.com)

### **Viet Education**

Ms Thang Mai

Counselling services

Abuse / Abuse Survivor Issues

Adjusting to Change / Life Transitions

+84 984 900509

<https://vietedu.org>

[thangxu2000@gmail.com](mailto:thangxu2000@gmail.com)

[thang.mai@vietedu.org](mailto:thang.mai@vietedu.org)

### **Mandala Wellness**

Various Alternative Therapy Practitioners

TP 215A8, Nguyễn Văn Hưởng, Thảo Điền,

Thủ Đức, Thành phố Hồ Chí Minh 70000

090 277 45 84

<https://www.mandala-wellness.com.vn/p-r-a-c-t-i-t-i-o-n-e-r-s>

### **District 7**

#### **Chinh Le Ostrander**

Licensed Master Social Worker

Psychotherapist (English, Vietnamese) limited

Children, Teenagers, Families

Individual Adults & Couples

Play therapy, CBT, Family Systems

Solution-focused, skills building

[chileostr@gmail.com](mailto:chileostr@gmail.com)

+84 083 908 5298

#### **Alter Mind**

Academic Issues

Anxiety

Depression

Play therapy

Parent counselling

Ms Lana Sher

[altermind.life@gmail.com](mailto:altermind.life@gmail.com)

+84 90 6391659

#### **Marie Watson, MS Counselling**

Psychotherapist (Christian)

[watson.marie@gmail.com](mailto:watson.marie@gmail.com)

Hien Nguyen, Post Graduate Clinical Psychology France

(female)

French-Vietnamese Hospital

Clinical Psychologist (Vietnamese, French)

[fvhospital.com](http://fvhospital.com)

[Hien.nguyen.psychologue@gmail.com](mailto:Hien.nguyen.psychologue@gmail.com)

### **Nayoung 이나영**

Korean Therapist

Psychological Testing and Treatment for elementary school students, adolescents, and adults.

Based in District 7 but also covers Districts 1 and 2.

Mobile phone: 093 193 6825

Kakao talk ID: etesian73

이나영 [etesian73@naver.com](mailto:etesian73@naver.com)

### **District 1**

#### **Centre Medical International (CMI)**

Virginie Lambert

Clinical Psychologist (French, English)

Children, teenagers, adults, families, couples (French, English)

[viridesroches@icloud.com](mailto:viridesroches@icloud.com)

Dr Giang Phan

Psychiatrist (French, English)

[www.cmi-vietnam.com](http://www.cmi-vietnam.com)

[psychologue@cmi-vietnam.com](mailto:psychologue@cmi-vietnam.com)

### **District 9**

#### **Naomi Taylor**

Children, adults, couples

Psychotherapy

Hypnotherapy

[www.counsellingwithnaomi.com](http://www.counsellingwithnaomi.com)

[Counsellingwithnaomi@hotmail.co.uk](mailto:Counsellingwithnaomi@hotmail.co.uk)

+84 1635 425 211

#### **Eating Disorder Specialists International**

<https://supportedrecoveryasia.com/eating-disorder-specialists/>

## APPENDIX 6: Allegations Against a Member of Staff

### Allegations of abuse against members of staff, the General Principal, Proprietor/Governor, contractors, volunteers or students who work with children

Any allegation against a member of staff (or any volunteers, contractors or students who work with children) or the General Principal or Proprietor/Governor must be reported straight away, in accordance with the procedures set out below.

The School has procedures for dealing with allegations that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures will be used where the member of staff, volunteer, student, General Principal or Proprietor/Governor has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children.

All such allegations must be dealt with as a priority, without delay.

The School has a culture of safety and of raising concerns, encouraging transparency and accountability. Induction and whole school training in safeguarding include guidance to staff on the raising and handling of concerns and the support available in such cases.

### Reporting allegations against members of staff, the General Principal, Proprietor/Governor, contractors, volunteers, or students who work with children

Where an allegation or complaint is made against any member of staff, the Designated Safeguarding Lead, Proprietor/Governor, contractor or students who work with children, the matter must be reported immediately to the General Principal (or in the General Principal's absence, the Proprietor/Governor). Where appropriate to do so, the General Principal will liaise with the Proprietor/Governor.

If the school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, we will follow the school's safeguarding policies and procedures, as we would with any safeguarding allegation.

Where an allegation is made against the General Principal, the matter must be reported immediately to the Proprietor/Governor without notifying the General Principal first. Staff can access the Proprietor/Governor in his office.

The contact details are also set out on the safeguarding contacts at the start of this policy. Parents can write to the Proprietor/Governor, at the School address, marking their envelope 'Private & Confidential'. The Proprietor/Governor will act immediately.

The General Principal or Proprietor/Governor, as appropriate, will act in accordance with this policy. The discussions will be recorded in writing, and any communication with both the accused person and the parents of the child agreed upon.

If it is not possible to report to the General Principal or Proprietor/Governor in the circumstances set out above, a report should be made immediately to a Designated Safeguarding Lead. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the General Principal or, where appropriate, the Proprietor/Governor, as appropriate.

The person responsible for reporting per the procedures described above is known as the "case manager".

**Disclosure of information:**

The case manager will inform the accused person of the allegation as soon as possible after the General Principal has been consulted. The parents or carers of the child(ren) involved will be informed of the allegation as soon as possible after the General Principal has been consulted, if they do not already know of it. Where the General Principal advises that a strategy discussion is needed, or anyone else that needs to be involved, the case manager should not inform the accused or the parents or carers until these people have been consulted and it has been agreed what information can be disclosed. The parents or carers should be kept informed of the progress of the case, including the outcome of any disciplinary process. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

**Further action:**

The School has a duty of care towards its employees and as such, it will ensure that effective support is provided for anyone facing an allegation. The School will act in accordance with best practice internationally.

**Suspension:**

The School will carefully consider whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- there is cause to suspect a child or other children at the School is or are at risk of significant harm; or
- the allegation is so serious that it may prove grounds for dismissal.

All alternatives to suspension will be considered before a decision to suspend is reached. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School.

The School will give due weight to the views of the General Principal, Proprietor/Governor and best practice internationally when reaching a decision about suspension. A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day.

Appropriate support will be provided for the suspended individual and contact details provided.

**Ceasing to use staff:**

If the School ceases to use the services of a member of staff (including the General Principal), volunteer, contractor or anyone working with children, because he or she is found unsuitable

to work with children, a settlement/ compromise agreement will not be used and a referral to the local child protection agency will be made. A separate referral will also be made as soon as possible to the relevant teaching regulation agencies in cases of serious professional misconduct of teachers. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the General Principal without delay.

**Resignation:**

If a member of staff (including the General Principal), volunteer, contractor or anyone working with children within the school tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy. A referral will be made to the General Principal and/or Proprietor/Governor as soon as possible if the criteria are met, that they have caused harm or pose a risk of harm to a child. A separate referral will also be made as soon as possible to the relevant teaching regulation agencies in cases of serious professional misconduct of teachers.

**Ceasing to use a person's services includes:**

Terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; voluntary withdrawal from contract working, a course of initial teacher training or volunteering.

Where a teacher (including the General Principal) has been dismissed or would have been dismissed had he/she not resigned, in circumstances where the threshold for a police referral has not been met, separate consideration will be given to whether the matter should be referred to the relevant teaching regulation agencies both nationally and internationally. This will include matters where there has been unacceptable professional conduct, conduct which may bring the teaching profession into disrepute, conviction at any time of a relevant offence or where a prohibition order may otherwise be appropriate.

**Unsubstantiated, false or malicious allegations:**

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the General Principal will consider whether to take disciplinary action in accordance with the School's Behaviour Policy.

Where a parent has made a deliberately invented or malicious allegation the General Principal will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other members of the public), the School reserves the right to contact the authorities to determine whether legal action might be appropriate.

Allegations against a teacher who is no longer teaching and/or allegations of historical abuse should be reported to the Designated Safeguarding Lead who will take them forward in accordance with best practice internationally.

**Record keeping:**



Low-level concerns that are expressed either by staff or parents that do not result in an allegation are logged by the General Principal and are stored in a private, encrypted online folder.

Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal pension age or for a period of 10 years from the date of the allegation, if this is longer. Allegations proven to be false, unsubstantiated or malicious, will not be referred to in any employer reference. Allegations found to be malicious will be removed from personnel records.