

BRITANNICA INTERNATIONAL SCHOOL, SHANGHAI

Child Protection and Safeguarding Policy

Updated September 2024

Monitoring and Review

This policy is to be reviewed annually, though any deficiencies or weaknesses in health and safety arrangements will be remedied without delay.

This policy will be reviewed by the Principal.

This policy will be approved by the Board/ Orbital Education.

Date when policy was last approved: August 2024

Date when next review is due: August 2025

For Head Office advice contact:

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Principal	Paul Farrell	pfarrell@educator.orbital.education
Designated Safeguarding Lead (DSL)	Anthony O'Brien	aobrien@educator.orbital.education
Deputy DSL	Cristina Ortiz Zurita	cortizzurita@educator.orbital.education
Regional Head of Schools (RHoS)	Michael Clack	Michael@orbital.education
Chief Executive Officer (CEO)	David Pottinger	David@orbital.education

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2018), and the Governance Handbook. At all times it will adhere to national requirements/ regulations – set out by the People's Republic of China

- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our board members and Principal should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it is proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they are being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

All early years providers add:

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

Victim 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)** 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's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.

- Are at risk due to either their own or a family member's mental health needs.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and board members in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for 'model society and global citizenship' and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.
 - What constitutes sexual harassment and sexual violence and why they are always unacceptable.

5.1 All staff

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

All other staff are expected to read annex A of KCSIE.

Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues).

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g., sites they need to visit or who they will be interacting with online)

All staff will be aware of:

- 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, the online safety policy.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local children's social care and for assessments that may follow a referral, including the role they might be expected to play.
- 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

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.
- What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Anthony O'Brien, Vice Principal and Head of Secondary The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

DSL contact: aobrien@educator.orbital.education

When the DSL is absent, the deputies – Cristina Ortiz Zurita cortizzurita@educator.orbital.education or John Benson jbenison@educator.orbital.education – will act as cover.

If the DSL and deputies are not available, Principal will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the Regional Head of Schools (RHoS)/ CEO and if necessary to the relevant body (local authority children's social care, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.

The DSL will also:

- Keep the Principal informed of any issues.
- Liaise with the RHoS, local authority case managers and designated officers for child protection concerns as appropriate.

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and deputies are set out in their job description.

5.3 The School Board

The School Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a senior board level RHoS to monitor the effectiveness of this policy in conjunction with the full School Board. This is always a different person from the DSL.

The Regional Head of Schools will:

- On behalf of the School Board, ensure 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.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
 - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure.
 - That this policy reflects that child with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
 - Make sure there are arrangements for the body to consult with the school about safeguarding arrangements, where appropriate.
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The RHoS/ CEO will function as the ‘case manager’ in the event that an allegation of abuse is made against the Principal, where appropriate (see appendix 3).

All Board members will be aware of the key aspects and responsibilities referenced in Keeping Children Safe in Education.

Section 15 of this policy has information on how Board members are supported to fulfil their role.

5.4 The Principal

The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of school systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL and RHoS on this.
- Ensuring the relevant staffing ratios are met, where applicable

Early years providers add:

- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

6. Confidentiality

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

- If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.
 - The DSL will have to balance the victim’s wishes against their duty to protect the victim and other children.
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the relevant authority.
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 14, if the alleged perpetrator is under 14, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims’ identities.
- The government’s information sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputies)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

Staff, volunteers and board members must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL).”

7.1 If a child is suffering or likely to suffer harm, or in immediate danger.

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

7.2 If a child makes a disclosure to you.

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a student is at risk of FGM.

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.”

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting,’ ‘circumcision’ or ‘initiation.’

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been conducted on her; or

- Observes physical signs which appear to show that an act of FGM has been conducted on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out [if relevant, insert or discovers that a student **aged 18 or over** appears to have been a victim of FGM] should speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team or the RHoS.

7.5 If you have concerns about extremism.

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to.

7.6 If you have a concern about mental health.

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

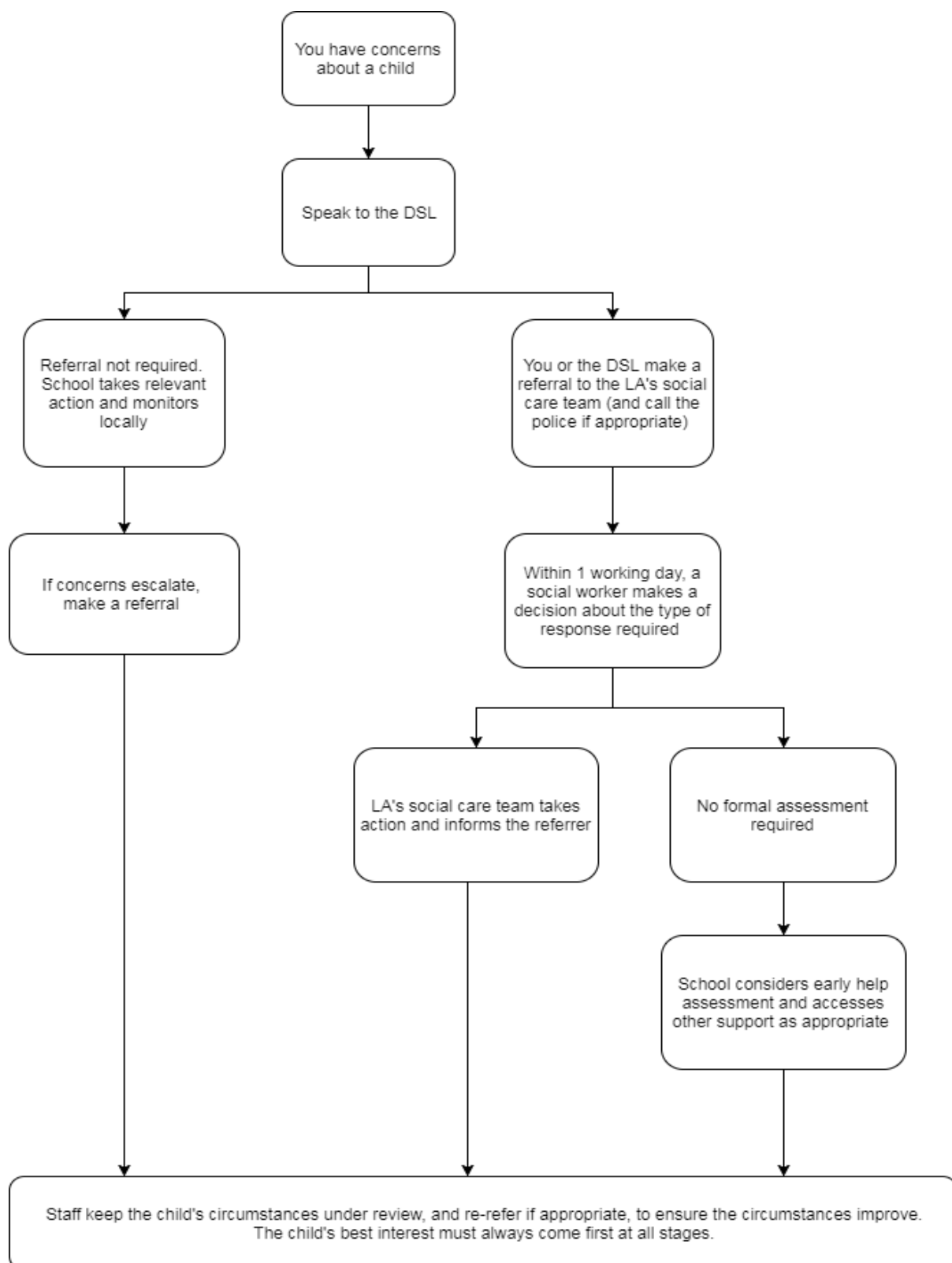


Figure 1: procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the RHoS Micheal Clack, michael@orbital.education

The Principal/RHoS will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Principal, report it directly to the RHoS).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the Principal, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other students.

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter,” “just having a laugh” or “part of growing up,” as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse.

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

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the RHoS and if necessary, the local social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any

disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate students about appropriate behaviour and consent.
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here.”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report.
 - A member of staff may overhear a conversation.
 - A child’s behaviour might indicate that something is wrong.
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
 - That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.

- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The Principal will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the RHoS and police and/or local authority children’s social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.9 Sharing of nudes and semi-nudes (‘sexting’)

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders. Amend or add to this as applicable to reflect your own approach.

Your responsibilities when responding to an incident.

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s).
- Whether to refer to the RHoS.

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

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts and any student in the images or videos is under 14.
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal, RHoS and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the students involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Principal in consultation with the RHoS.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

7.10 Reporting systems for our students

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for students to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students.
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- All students can report concerns to the DSL, DDSL's or Principal
- Students will be made aware of reporting systems in assemblies, in class and parents also made aware during introductory meetings with teachers

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (**including filtering and monitoring systems**) in place to ensure the online safety of students, staff, volunteers and board members.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The four key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as 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, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate students about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings/ information sessions. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when students are not present.
 - Staff will not take pictures or recordings of students on their personal phones or cameras.
- Make all students, parents/carers, staff and volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the police before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Students with special educational needs, disabilities or health issues

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

We offer extra pastoral support for these students. This includes:

Any abuse involving students with SEND will require close liaison with the DSL (or deputy).

11. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers.

We have appointed an appropriately trained teacher, Anthony O'Brien, DSL to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

12. Complaints and concerns about school safeguarding policies

12.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

12.2 Whistleblowing

- Details outlined within whistleblowing policy

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL after consultation with the Principal and RHoS will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.

To allow the new school to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Records are stored electronically on isams 'wellbeing manager';

Records are shared with other schools in line with local policy

15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment.
 - Have a clear understanding of the needs of all students.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and Deputies

The DSL and Deputies will undertake child protection and safeguarding training annually.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

15.3 Board members

All Board members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

As the RHoS/ CEO, may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

At least one person (*ideally all staff involved in conducting interviews and HR staff*) conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

15.5 Staff who have contact with students and families.

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16. Monitoring arrangements

This policy will be reviewed **annually** by the Principal and RHoS. At every review, it will be approved by the full School Board.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- 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.
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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.
- 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 (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

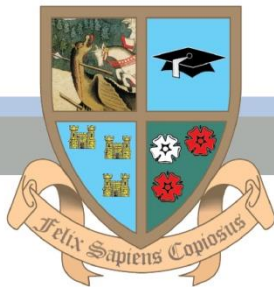
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

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 caregivers)

- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.



BRITANNICA INTERNATIONAL SCHOOL, SHANGHAI

儿童保护和安全保障政策

更新于 2024 年 9 月

审查与评估

这一政策将每年审查一次，但有关于健康与安全中的任何缺陷或不足都将立即得到纠正。

该政策将由校长审查，由董事会/Orbital 教育集团批准。

政策最后批准日期：2024 年 8 月

下一次审查截止日期：2025 年 8 月

总部咨询请联系：

Michael w Clack michael@orbital.education

内容

重要联系人

1. 目标
2. 立法和法律指导
3. 定义
4. 平等声明
5. 角色和职责
6. 保密
7. 意识到虐待并采取行动
8. 网络安全与移动设备的使用
9. 通知父母或看护人
10. 有特殊教育需要、残疾或健康问题的学生
11. 受照顾的和曾经受照顾的孩童
12. 对学校保障政策的投诉和关注
13. 记录
14. 培训
15. 监察安排
16. 其他相关政策链接

附录 1: 虐待类型

重要联系人

职能/组织	姓名	联系方式
校长	Paul Farrell	pfarrell@educator.orbital.education
指定安全保障负责人 (DSL)	Anthony O'Brien	aobrien@educator.orbital.education
指定安全保障负责人 (DDSL)	Cristina Ortiz Zurita	cortizzurita@educator.orbital.education
区域总校长(RHoS)	Michael Clack	Michael@orbital.education
首席执行官(CEO)	David Pottinger	David@orbital.education

1. 目的

学校的目的是确保：

- 及时采取适当的措施来保障和促进儿童的福利。
- 所有员工都清楚认知他们在儿童保护方面的法定责任。
- 对员工进行识别和报告安全问题的培训。

2. 法例及法定指引

该政策基于教育部（DfE）的法定指南《确保儿童教育安全》（2024 年）和《共同保护儿童》（2018 年）以及《治理手册》。在任何时候，它都将遵守中华人民共和国制定的国家要求/法规。

- 《1998 年人权法案》，其中解释说：受到骚扰、暴力和/或虐待，包括性侵犯，可能违反《欧洲人权公约》（ECHR）下适用于个人的任何或所有权利。
- 《2010 年平等法》规定，在受保护的特定特征（包括残疾、性别、性取向、性别重置和种族）方面歧视他人是非法的。这意味着我们的董事会成员和校长应该仔细考虑如何在这些特征方面支持我们的学生。该法案允许我们学校采取积极行动来处理影响学生的特殊不利因素（我们需证明这是适当的）。这包括为残疾学生做出合理的调整，例如，包括采取积极行动支持那些有证据表明自己在不适当地遭受性暴力或性骚扰的女孩。
- 公共部门平等义务（PSED），其中解释说，我们必须适当考虑消除非法歧视，骚扰和受害。PSED 帮助我们专注于所关心的主要问题以及如何提高学生的成绩。有些学生可能更容易受到性暴力，仇视同性恋、双性恋或跨性别者的欺凌，或者种族歧视等的伤害。

所有提供早教教育者都补充道：

- 该政策还符合早期基础阶段法定框架中有关儿童保障和福利的要求。

3. 定义

安全保障和促进儿童福利是指：

- 保护儿童免受虐待
- 防止损害儿童的身心健康或发展
- 确保儿童在安全和有效照料的环境中成长。
- 采取行动，使所有儿童都能获得最好的结果。

儿童保护是这一定义的一部分，是指为防止儿童遭受或可能遭受重大伤害而开展的活动。

虐待是虐待儿童的一种形式，可能涉及造成伤害或未能采取行动防止伤害。附录 1 解释了不同类型的虐待。

忽视是虐待的一种形式，是持续未能满足儿童的基本身体和/或心理需求，可能导致儿童健康或发展受到严重损害。附录 1 更详细地定义了忽视。

分享裸体和半裸（也被称为性短信或青少年制作的性图像）是指儿童分享裸体或半裸的图像、视频或直播。

儿童包括 18 岁以下的所有人。

受害者是被广泛理解和公认的术语，但我们明白，并非所有遭受虐待的人都认为自己是受害者，或者希望被这样描述。在处理此类事件时，我们要准备好使用孩子觉得最舒服的任何术语。

涉嫌犯罪者(们)和犯罪者(们)是被广泛使用和公认的术语。然而，我们会认真思考我们所使用的术语（特别是在孩子面前），因为在某些情况下，虐待行为也可能对犯罪者有害。我们将根据具体情况决定使用哪些合适的术语。

4. 平等声明

有些儿童在网上和线下受到虐待的风险更高，有些儿童在承认或披露受虐待方面可能存在额外的障碍。我们致力于反对歧视做法，并认可儿童的多样化环境。我们确保所有儿童都得到同样的保护，不管他们可能面临的任何障碍。

我们对下列儿童给予特别照顾：

- 有特殊教育需要和/或残疾（SEND）或健康状况（见第 10 节）
- 看护人很年轻。
- 可能因种族、民族、宗教、性别认同或性取向而受到歧视
- 将英语作为一门附加语言。
- 已知生活情况困难 - 例如，住在临时住所或存在药物滥用或家庭暴力等问题。
- 面临女性生殖器切割、性剥削、强迫婚姻或激进化的风险。
- 由于自身或家庭成员的心理健康而处于危险之中。

5. 角色和职责

保护儿童是**每个人**的责任。这一政策适用于学校的所有员工、志愿者和董事会成员，并要符合 3 人为一组的保护程序。我们的政策和程序也适用于课后和校外活动。

学校在预防教育中起着至关重要的作用。这是在全校为学生准备“模范社会和全球公民”以及对性别歧视、厌女症/厌男症、同性恋恐惧症、双性恋恐惧症、跨性别恐惧症和性暴力/骚扰零容忍的文化背景下进行的。这将有我们的以下支持：

- 行为政策
- 心理辅导支持
- 已规划的人际关系、性和健康教育方案（RSHE），该方案具有包容性，并将定期实施，解决以下问题：
 - 健康的，相互尊重的人际关系
 - 边界与许可
 - 刻板印象、偏见和平等
 - 身体自信和自尊心
 - 如何识别虐待关系（包括胁迫和控制行为）

- 性同意、性剥削、性虐待、引诱、胁迫、骚扰、强奸、家庭虐待、所谓基于荣誉的暴力（如强迫结婚和女性生殖器切割）的概念和相关法律，以及如何获得支持。
- 什么是性骚扰和性暴力，为什么这些行为是不被接受的。

5.1 全体员工

直接与儿童打交道的员工应至少阅读《确保儿童教育安全》（KCSIE）的第一部分。

所有其他员工都应阅读 KCSIE 的附件 A。

直接与儿童打交道的员工也应阅读《儿童权利公约》附件 B（关于具体的保护问题）。

所有员工将：

- 阅读并理解教育部的法定保障指南《保持儿童教育安全》的第 1 部分和附件 B，并至少每年审查该指南。
- 在每学年开始时签署一份声明，表明他们已经阅读了指导。
- 在与父母和看护人沟通时，强调线上安全的重要性。这包括让父母和看护人了解我们要求孩子在网上做什么（例如，他们需要访问的网站或他们将在网上与谁互动）。

所有员工都要注意：

- 我们支持保障的系统，包括本儿童保护和保障政策，员工行为准则，任命安全保障负责人（DSL）和副负责人（DDSL）的角色和身份，行为政策，线上安全政策。
- 早期帮助评估过程（有时称为共同评估框架）及其在其中的作用，包括识别新出现的问题，与 DSL 联络，并与其他专业人员共享信息，以支持早期识别和评估。
- 转介到当地儿童社会关怀机构的过程，以及转介后可能进行的评估，包括他们可能期望发挥的作用。
- 如果他们发现了一个保护问题，或者孩子告诉他们他们被虐待或忽视，该怎么做，以及如何在与相关专业人员联络的同时保持适当的保密水平
- 不同类型的虐待和忽视的迹象，以及具体的保护问题，例如儿童对儿童的虐待、儿童性剥削（CSE）、儿童犯罪剥削（CCE）、面临严重暴力犯罪风险或参与严重暴力犯罪的指标、女性生殖器切割、激进化和严重暴力等。
- 让受害者放心的关键点是，他们正在被认真对待，他们将得到支持和保护。
- 儿童在家内外、在学校和在网路上都有受到伤害的风险。
- 女同性恋、男同性恋、双性恋或跨性别（LGBTQ+）的孩子（或被认为是）可能成为其他孩子的目标。
- 如何识别需要帮助或保护的儿童

本政策第 15 节和附录 4 更详细地概述了如何支持员工做到这一点。

5.2 指定安全保障负责人（以下简称“DSL”）

DSL 是高级领导团队的成员，我们的 DSL 是副校长兼中学部主任的 Anthony O'Brien。他主要负责学校的儿童保护和更广泛的保护工作。这包括在线安全，了解我们在学校的设备和学校网络上的过滤和监控过程，以确保学生的在线安全。

在学期期间，DSL 将在上课日提供给员工讨论任何有关安全问题的机会。

DSL 联系方式：aobrien@educator.orbital.education

当 DSL 缺席时，副负责人（DDSL）Cristina Ortiz Zurita cortizzurita@educator.orbital.education 或 John Benson jbenison@educator.orbital.education 将顶替其工作。

如果 DSL 和 DDSL 都不在，校长将顶替其工作（例如，在非工作时间/学期外活动期间）。

DSL 将获得时间、资金、培训、资源和支持，以便：

- 就儿童福利和儿童保护事宜向其他员工提供建议和支持。
- 参与战略讨论和机构间会议，并/或支持其他员工这样做。
- 帮助评估儿童。
- 酌情将疑似案件转介给区域总校长（RHoS）/首席执行官（CEO），必要时转介给相关机构（当地政府儿童社会关怀和/或警察），并支持直接转介此类案件的员工。
- 充分理解有害的性行为。
- 充分理解学校的过滤和监控系统以及流程。

DSL 还将：

- 随时通知校长任何问题。
- 在适当的情况下，就儿童保护问题与区域总校长，地方当局负责人和指定政府人员保持联系。
- 确保了解当地有哪些专家的支持可以帮助所有涉及性暴力和性骚扰的儿童（包括受害者和被指控的犯罪者），并对如何获得这些支持充满信心。
- 请注意，在警察调查或搜查的情况下，儿童必须有一个“合适的成年人”来支持和帮助他们。

安全保障负责人和副负责人的全部职责已在其工作描述中列明。

5.3 学校董事会

学校董事会将：

- 促进全校采取保护措施，确保安全保障和儿童保护处于流程和政策制定所有相关方面的最前沿，并为其提供支持。
- 在每次审查时评估和批准该政策，确保其符合法律规定，并要求校长对其执行情况负责。
- 了解 1998 年《人权法》、2010 年《平等法》（包括公共部门平等义务）以及我们学校当地多机构保障安排规定的义务。
- 任命一名高级董事会级别的区域总校长，与整个学校董事会一起监督该政策的有效性。这须是除已担任 DSL 以外的人担任该职责。

区域总校长 (RHoS) 将:

- 代表学校董事会, 确保所有员工接受安全保障和儿童保护培训, 包括在线安全培训, 并定期更新此类培训, 使其符合安全保障小组的建议。
- 确保学校有适当的网络过滤和监控系统, 并审查其有效性。这包括:
 - 确保领导团队和员工了解现行规定, 并了解他们在网络过滤和监控方面的期望、角色和责任, 作为安全培训的一部分。
 - 审查 DfE 的过滤和监控标准, 并与 IT 人员和服务供应商讨论需要采取哪些措施来支持学校达到这些标准。
- 确保:
 - DSL 具有适当的地位和权力来开展工作, 包括额外的时间、资金、培训、资源和支持。
 - 网络安全是全校保护方法和相关政策中一个持续存在且相互关联的主题。
 - DSL 拥有安全保障的主要权力, 包括在线安全和了解现有的网络过滤和监控系统以及流程。
 - 学校有程序来管理任何关于员工 (包括供应人员、志愿者和承包商) 的安全保障问题 (无论多么小) 或不符合伤害阈值 (低级别问题) 的指控。本政策的附录 3 涵盖了此程序。
 - 这项政策反映了患有 SEND 或某些医疗或身体健康状况的儿童可能面临其他障碍, 无法识别任何虐待或忽视。
- 如果第三方机构提供服务或活动 (无论参加这些服务/活动的儿童是否是学校名册上的儿童):
 - 寻求确保第三方机构有适当的安全保障和儿童保护政策/程序, 并在必要时进行检查。
 - 在适当的情况下, 确保有安排让该机构就安全保障安排与学校进行协商。
 - 确保安全保障要求是使用校区的设施条件, 若该机构不遵守, 任何使用校区设施的协议都将被终止。

在适当的情况下, 如果对校长提出虐待指控, RHoS / CEO 将担任“案件负责人” (见附录 3)。

所有董事会成员都将了解《保护儿童教育安全》中提到的关键部分和责任。

本政策第 15 节介绍了如何支持董事会成员履行职责。

5.4 校长

校长负责执行本政策, 包括:

- 确保员工 (包括临时员工) 和志愿者:
 - 作为入职培训的一部分, 了解支持安全保障的学校系统, 包括这项政策。
 - 了解并遵守本政策中包含的程序, 特别是有关涉嫌虐待和忽视案件的转介程序。
- 在学生入学时以及通过学校网站向家长/看护人传达此政策。
- 确保 DSL 有适当的时间、资金、培训和资源, 如果 DSL 不在, 将有人顶替其工作。
- 在适当的情况下, 在其他员工或志愿者被指控虐待的情况下担任“案件负责人” (见附录 3)。

- 就所有低级别问题做出决定，尽管员工可能希望与 DSL 和 RHoS 合作。

早教教育者补充道：

- 确保为幼儿早教阶段的每个孩子分配一名关键人员。
- 监督现场设备、手机和摄像头的安全使用。

6. 保密

- 及时共享信息对于有效保护至关重要。
- 绝不能让对共享信息的恐惧阻碍促进儿童福利和保护儿童安全的需求。
- 《2018 年数据保护法》(DPA) 和英国《通用数据保护条例》不会阻止或限制为保护儿童安全而共享信息。
- 如果员工需要共享“特殊类别个人数据”，《2018 年数据保护法》将“保护有风险的儿童和个人”作为一项处理条件，允许从业人员在以下情况下未经同意共享信息：无法获得同意；不能合理地期望从业者获得同意；或者，如果获得同意会使孩子面临风险。
- 员工永远不应该向孩子承诺他们不会告诉任何人有关虐待的报告，因为这可能不符合孩子的最佳利益。
- 如果受害者要求学校不要告诉任何人有关性暴力或性骚扰：
 - 这没有明确的答案，因为即使受害者不同意共享信息，如果英国 GDPR 有其他适用的法律依据，员工仍然可以合法地共享信息。
 - DSL 必须平衡受害者的意愿并有义务保护受害者和其他儿童。
 - DSL 应考虑：
 - 通常应通知父母或看护人（除非这会使受害者面临更大的风险）。
 - 基本保障原则是：如果儿童面临伤害风险、处于直接危险或已经受到伤害，应将其转介给有关当局。
 - 强奸、插入式侵犯和性侵犯都是犯罪。如果有强奸、插入式侵犯或性侵犯的报告，应将其提交给警方。虽然刑事责任年龄为 14 岁，但如果被指控的犯罪者未满 14 岁，则求助警方的基本原则仍然存在。
- 关于匿名，所有员工将：
 - 在刑事司法系统中处理性暴力或性骚扰指控时，要注意匿名、证人支持和一般刑事程序。
 - 尽其合理所能的保护参与任何性暴力或性骚扰报告的任何儿童的匿名性，例如，仔细考虑哪些员工应该知道该报告，以及对所涉儿童的任何支持。
 - 考虑社交媒体在推动谣言传播和暴露受害者身份方面的潜在影响。
- 政府为保护从业者提供的信息共享建议包括共享信息的 7 条“黄金法则”，并将支持必须做出共享信息决策的员工。
- 如果员工对共享信息有任何疑问，他们应该与 DSL（或 DDSL）交谈

本政策还涉及第 14 节中关于记录保存的保密问题，以及附录 3 中关于对员工虐待的指控。

7. 承认虐待并采取行动

如果发生安全问题，员工、志愿者和董事会成员必须遵守以下程序。

请注意，在本节和后续章节中，您应该将任何对 DSL 的引用理解为“DSL（或 DDSL）”

7.1 如果儿童正在遭受或可能遭受伤害，或处于直接危险之中。

如果您认为儿童正在遭受或可能遭受伤害或处于直接危险之中，请立即转介给儿童社会保护机构和/或警察。任何人都可以转介。

如果您直接进行转介，请尽快告知 DSL（见第 5.2 节）。

7.2 如果儿童向你透露信息。

如果儿童向你透露了安全问题，你应该：

- 倾听并相信他们。给他们时间自由表述，不要问引导性问题。
- 保持冷静，不要表现出震惊或沮丧。
- 告诉孩子，他们告诉你是正确的。不要告诉他们应该早点告诉你。
- 解释接下来会发生什么，以及你必须传递这些信息。不要承诺保守秘密。
- 尽快用孩子自己的话写下该对话。坚持事实，不要凭自己的判断。
- 在报告上签名并注明日期，然后转交给 DSL。或者，如果合适，直接转介给儿童社会保护机构和/或警察（见 7.1），并尽快告诉 DSL 你已经这样做了。除了这些人，除非参与保护过程的相关机构要求，否则不要向任何其他他人披露信息。

请记住，有些孩子可能会：

- 感觉没有准备好或不知道如何告诉别人他们正在被虐待、剥削或忽视。
- 不承认他们的经历是有害的。
- 感到尴尬、羞辱或受到威胁。这可能是由于他们的脆弱性、残疾、性取向和/或语言障碍。

如果你对儿童有顾虑，所有这些都不要阻止你保持“专业好奇心”并与 DSL 交谈。

7.3 如果你发现发生了女性生殖器切割或学生有女性生殖器切割的风险。

《在教育中保护儿童安全》解释说，女性生殖器切割包括“所有涉及部分或全部切除女性外生殖器或对女性生殖器官造成其他伤害的程序”。

女性生殖器切割在英国是非法的，是一种虐待儿童的形式，具有长期、有害的后果。它也被称为“女性生殖器切割”、“割礼”或“启蒙”

本政策附录 4 列出了学生已经遭受女性生殖器切割的可能指标，以及表明学生可能面临风险的因素。

任何教师，如果：

- 一名 18 岁以下的女孩告知她遭受了女性生殖器切割；或
- 观察到似乎表明对 18 岁以下女孩实施了女性生殖器切割行为的体征，他们没有理由相信该行为对女孩的身心健康或与分娩或分娩有关的目的是必要的。

必须立即亲自向警方报告。这是一项强制性的法定义务，教师如不遵守，将面临纪律处分。

除非他们被明确告知不要披露，否则他们还应该与 DSL 讨论此案，并酌情让儿童社会保护机构参与其中。

任何其他员工发现似乎对 **18 岁以下的学生**实施了女性生殖器切割行为，都必须与 DSL 联系并遵循我们当地的保护程序。

上述教师职责不适用于学生面临女性生殖器切割风险或怀疑但不知道是否实施了女性生殖器切割的情况。员工不能对学生进行检查。

任何怀疑学生有女性生殖器切割风险或怀疑女性生殖器切割已经实施的**员工**（如果有相关发现 18 岁或以上的学生似乎是女性生殖器切割的受害者）都应该与 DSL 交谈，并遵循我们当地的保护程序。

7.4 如果你担心孩子（而不是相信孩子正在遭受或可能遭受伤害，或处于直接危险之中）

下图 1 在第 7.7 节之前，说明了如果你对儿童福利有任何担忧，应遵循的程序。

在可能的情况下，首先与 DSL 沟通，以商定行动方案。

如果在特殊情况下不适用与 DSL 沟通，这不应延误采取适当行动，应与高级领导团队或 RHoS 交谈。

7.5 如果你担心极端主义

如果孩子没有遭受或可能遭受伤害，或处于直接危险之中，在可能的情况下，首先与 DSL 交谈，以商定行动方案。

如果在特殊情况下不适用与 DSL 沟通，这不应延误采取适当行动，应与高级领导团队交谈。

如有疑问，DSL 将评估风险水平，并决定转介给哪个机构。

7.6 如果你对心理健康有所担忧。

在某些情况下，儿童有心理健康问题可能表明该儿童已经遭受或面临遭受虐待、忽视或剥削的风险。

员工将对表明儿童可能正在经历心理健康问题或有发展心理健康问题风险的行为迹象保持警惕。

如果你对孩子的心理健康有担忧，并同时是一个安全保障问题，请按照第 7.4 节中的步骤立即采取行动。

如果你只是有对孩子的心理健康担忧，而这并非安全保障问题，请与 DSL 联系，以商定行动方案。

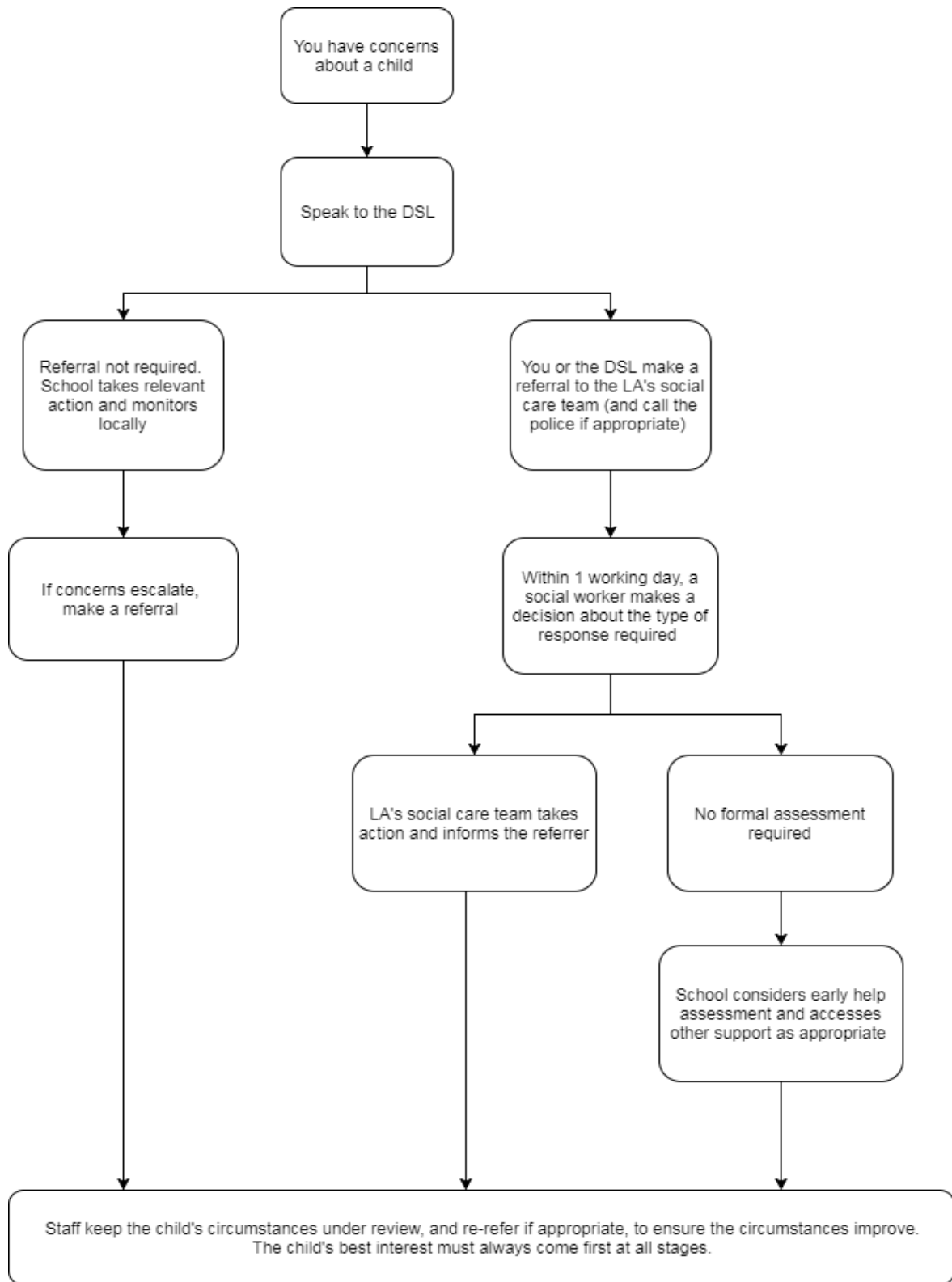


图 1：如果你担心孩子的安全（而不是相信孩子正在遭受或可能遭受伤害，或处于迫在眉睫的危险中）

（注意：如果不适用与 DSL 交谈，这不应延迟你的行动。有关操作，请参阅第 7.4 节。）

7.7 对员工、代课教师、志愿者或承包商的担忧

如果你对员工（包括代课教师、志愿者或承包商）有疑虑，或者有人指控某员工（包含代课教师、志愿人员或承包商）可能对儿童造成伤害，请尽快与校长沟通。如果问题/指控与校长有关，请与 RHoS 区域总校长 Micheal Clack 联系：michael@orbital.education

然后，校长/RHoS 将遵循附录 3 中规定的程序（如适用）。

如果你认为向校长报告有关员工（包括代课教师、志愿者或承包商）的问题或指控存在利益冲突，请直接向 RHoS 报告。

如果你收到与个人或组织使用校区为儿童举办活动的事件有关的指控，请按照我们的学校保护政策和程序，通知校长，就像你处理任何其他保护指控一样。

7.8 对其他学生的虐待指控。

我们需要意识到儿童有能力虐待同龄人。虐待永远不会被容忍，也不能被当作“玩笑”、“打闹”或“成长的一部分”，因为这可能会导致产生不可接受的行为文化以及对学生的不安全的环境。

我们还需要意识到儿童虐待的性别性质。然而，所有虐待儿童的行为都是不可接受的，针对此行为我们都将认真对待。

大多数学生伤害其他学生的案件将根据我们学校的行为政策处理，但这项儿童保护和保障政策将适用于任何引起保障问题的指控。这可能包括所指控的行为：

- 情节严重，可能构成刑事犯罪。
- 可能会使在校学生面临风险。
- 暴力。
- 涉及学生被迫使用毒品或酒精。
- 涉及性剥削、性虐待或性骚扰，如不雅暴露、性侵犯、露肩或性不恰当的照片或视频（包括分享裸体和半裸体）

有关虐待儿童的更多信息，请参阅附录 4。

处理虐待儿童指控的程序。

如果一名学生对另一名学生提出虐待指控：

- 你必须记录指控并告知 DSL，但不要调查。
- DSL 将联系 RHoS，必要时联系当地社会保护组织并遵循其建议，如果指控涉及潜在的刑事犯罪，DSL 还将联系警方。
- DSL 将为所有涉及在内的儿童（包括受害者、被指控的儿童和任何其他受影响的儿童）制定风险评估和支持计划，并在必要时与他们交谈。这将包括将校车视为受害者或被指控的犯罪者的潜在的易受伤害的场所。

如果事件是刑事犯罪，并且刑事诉讼程序出现延误，DSL 将与警方（以及其他必要的机构）密切合作，同时保护儿童和/或对被指控的犯罪者采取任何纪律措施。如果我们对调查有任何疑问，我们会询问警察。

在学校营造一个支持性的环境，最大限度地降低儿童遭受虐待的风险

我们需要意识到，必须采取积极行动，尽量减少儿童对儿童虐待的风险，并创造一个支持性的环境，让受害者对报告事件充满信心。

为了实现这一目标，我们将：

- 质疑同龄人之间任何形式的贬损或性化语言或不当行为：包括要求或发送性图像。
- 对特别影响不同性别的问题保持警惕，例如，对女生的性化或攻击性触摸或抓取，以及对男生的发起或欺侮性暴力。
- 确保我们的课程有助于教育学生进行正确的行为和行为许可。
- 确保学生能够使用我们的报告系统轻松自信地报告虐待行为（如下文第 7.10 节所述）
- 确保员工向受害者保证，他们受到了认真对待。
- 警惕性暴力和/或性骚扰的报告，这些报告可能指向环境或系统性问题，可以通过更新政策、流程和课程来解决，或者可以反映当地应与安全保障小组分享的更广泛的问题。
- 对目睹性暴力，特别是目睹强奸或插入式侵犯的儿童给予支持。我们将尽一切努力确保受害者、被指控的犯罪者和任何证人不会被欺负或骚扰。
- 在接到性暴力和/或性骚扰报告后，要考虑家庭内部伤害以及对该儿童兄弟姐妹的任何必要支持。
- 确保员工经过培训并了解：
 - 如何识别虐待儿童的指标和迹象，并知道如何识别和应对该报告。
 - 即使没有关于学校虐待儿童的报告，也不意味着没有发生—员工应该保持“这里可能会发生”的态度
 - 如果他们对儿童的安全保障有任何担忧，他们应该立即采取行动，而不是等待被告知，受害者可能并不总是会直接报告。例如：
 - 孩子们可能表现出他们希望成年人注意到并做出反应的迹象或行为。
 - 可能是朋友举报。
 - 员工可能会无意中听到谈话。
 - 孩子的行为可能表明出了什么问题。
 - 由于脆弱性、残疾、性别、种族和/或性取向，某些儿童在选择告知他人时可能会面临附加障碍。
 - 学生伤害同龄人可能是孩子自己受到虐待的迹象，这将属于本政策的范围。
 - 他们在预防儿童对儿童进行虐待以及在他们认为儿童可能面临风险的情况下做出回应发挥着重要作用。
 - 如果他们有任何疑问，应与 DSL 联系。
 - 社交媒体可能会在任何事件或所谓事件的影响中发挥作用，包括受害者、涉嫌犯罪者和双方朋友之间的潜在接触。

校长将在对被指控的犯罪者的任何纪律处分中发挥主导作用。我们将在采取一切纪律处分的同时提供支持。

在其他调查进行的同时，可以采取纪律处分，例如通过警方。第三方机构正在调查或已经调查了一起事件的事实（本身）并不妨碍我们学校对发生的事情得出自己的结论并相应地施加惩罚。我们将根据具体情况考虑这些事项，同时考虑是否：

- 采取行动会影响调查和/或随后的起诉——我们将与 RHoS、警方和/或地方当局儿童社会保护机构联络，以确定这一点。
- 在某些情况下，我们对独立调查期间发生的事情达成自己的看法是不公正且不合理的。

7.9 裸体和半裸体的共享（“性短信或图片”）

这是一种基于英国互联网安全委员会为所有员工、DSL 和高级领导提供的指导方法。根据需要可对此内容进行修改或添加，以反映你自己的方法。

你在应对事件时的责任。

如果你意识到涉及双方同意或非双方同意共享裸体或半裸图像/视频（也称为“性短信”或“青少年制作的性图像”）的事件，你必须立即向 DSL 报告。

你不得：

- 自己查看、复制、打印、共享、存储或保存图像，或要求学生共享或下载（如果你已经意外查看了图像，则必须向 DSL 报告）
- 删除图像或要求学生删除图像。
- 要求参与事件的学生披露有关图像的信息（这是 DSL 的责任）。
- 与其他员工、涉及的学生或他们的父母和/或看护人分享有关事件的信息。
- 说或做任何事情来指责或羞辱任何涉案的青少年。

你应该解释你需要报告此事件，并向学生保证他们将得到 DSL 的支持和帮助。

初步审查会议

在事件报告后，DSL 将与合适的学校员工举行初步审查会议，其中可能包括报告事件的员工和处理安全问题的安全保障或领导团队。此会议将审议初步证据，旨在确定：

- 是否对学生有直接风险。
- 是否报告至 RHoS。
- 是否需要转介给警方和/或儿童社会保护机构。
- 是否有必要查看图像以保护青少年（在大多数情况下，不应查看图像或视频）。
- 需要哪些进一步的信息来做出最恰当的回。
- 图像是否已被广泛共享，以及通过哪些服务和/或平台共享（这可能是未知的）。
- 是否应立即采取行动从设备或在线服务中删除或移除图像或视频。
- 任何可能影响风险评估的与涉事学生有关的事实。
- 是否需要联系其他学校、机构或个人。
- 是否联系相关学生的家长或看护人（在大多数情况下，家长/看护人应该参与）。

在以下情况下，DSL 将立即转介给警方和/或儿童社会保护机构：

- 事件涉及一名成年人。
- DSL 有理由相信，一名青少年受到了胁迫、勒索或引诱，或者对他们的同意能力存在担忧（例如，由于特殊教育需求）。
- DSL 对图像或视频的了解表明，内容描述了对青少年发育阶段来说不寻常或暴力的性行为。
- 图像涉及性行为，图像或视频中的任何学生都未满 14 岁。
- DSL 有理由相信，由于共享裸体或半裸体，学生有立即受到伤害的风险（例如，青少年表现出自杀或自残的倾向）。

DSL 的进一步审查

如果在初步审查阶段，决定不转介警察和/或儿童社会保护机构，DSL 将进行进一步审查，以确定事实并评估风险。

他们将对相关学生进行访谈（如果合适的话）。

如果在过程中，有对学生受到伤害或有受到伤害的风险的担忧，将立即转介给警方。

通知家长/看护人

DSL 将在早期阶段通知家长/看护人，并让他们参与这一过程，除非有充分的理由相信让他们参与会使学生面临受伤的风险。

转介警方

如果有必要将事件提交给警方，将通过校长与 RHoS 协商完成。

记录事件

所有共享裸体和半裸体的事件以及应对这些事件的决定都将被记录下来。本政策第 14 条规定的记录保存安排也适用于记录这些事件。

7.10 学生报告系统

在存在安全保障问题的情况下，我们将在决定采取哪些行动和提供哪些服务时考虑孩子的意愿和感受。

我们需要意识到确保学生感到安全和舒适地站出来报告任何问题和/或指控的重要性。

为了实现这一目标，我们将：

- 建立系统，让学生能够自信地报告虐待行为。
- 确保我们的报告系统得到很好的推广，易于理解，便于学生访问。
- 向学生明确表示，他们的担忧将得到认真对待，他们可以安全地表达自己的观点并给予反馈。
- 所有学生都可以向 DSL、DDSL 或校长报告问题。
- 学生将在集会、课堂上了解报告系统，家长也将在与教师的见面会上了解该系统。

8. 网络安全和移动设备的使用

我们需要意识到保护儿童免受潜在有害的和不当的在线资源侵害的重要性，同时了解通讯技术是许多安全保障和儿童福利问题的重要组成部分。

为了解决这个问题，我们的目标是：

- 建立健全的流程（包括网络过滤和监控系统），以确保学生、员工、志愿者和董事会成员的在线安全。
- 保护和教育整个校区安全和负责任地使用通讯设备，包括移动通讯和其他智能设备（我们称之为“手机”）。
- 为整个校区的手机使用制定明确的指导方针。
- 建立明确的机制，在适当的情况下识别、干预和升级任何事件或问题。

四大风险类别

我们的在线安全方法基于解决以下几类风险：

- **内容** — 接触非法、不恰当或有害的内容，如色情、虚假新闻、种族主义、厌女症、自残、自杀、反犹太主义、激进化和极端主义等。
- **交流** — 与其他用户进行有害的在线互动，如同龄人之间的压力、商业广告和成年人冒充儿童或青少年，意图出于性、犯罪、经济或其他目的对他们进行引诱或剥削。
- **行为** — 增加伤害可能性或造成伤害的个人在线行为，如制作、发送和接收露骨图像（例如，自愿和非自愿分享裸体和半裸体和/或色情内容），分享其他露骨图像和在线欺凌；以及
- **商业** — 在线赌博、不当广告、网络钓鱼和/或金融诈骗等风险

为了实现我们的目标并应对上述风险，我们将：

- 将在线安全教育作为我们课程的一部分。例如：
 - 安全使用社交媒体、互联网和通讯技术
 - 保护个人信息隐私
 - 如何识别网上不可接受的行为
 - 如何报告任何网络欺凌事件，确保鼓励学生这样做，包括他们作为证人而不是受害者的情况。
- 作为入职培训的一部分，对员工进行安全互联网使用和在线保护问题的培训，包括网络欺凌，以及关于网络过滤和监控的期望、角色和责任。所有员工都将根据需要接受进修培训，每学年至少一次。
- 通过我们的网站、与家长的直接沟通以及家长会/信息通报会，向家长/看护人宣传网络安全。我们还将与他们分享明确的程序，以便他们知道如何提出对网络安全的担忧
- 确保员工了解在使用手机和相机方面对他们施加的任何限制，例如：
 - 员工可以将个人手机带到学校自用，但将限制在学生不在场的非接触时间内使用。
 - 员工不会用个人手机或相机为学生拍照或录音。
- 让所有学生、家长/看护人、员工和志愿者意识到，他们应该就学校可接受的互联网使用、学校 ICT 系统的使用以及移动和智能技术的使用签署协议。
- 解释如果学生违反了我们的关于可接受使用互联网和手机的政策，我们将采取的制裁措施。

- 确保所有员工、学生和家長/看护人都知道，根据英国教育部关于搜查、筛查和没收的指导，员工有权搜查学生的手机。
- 建立健全的网络过滤和监控系统，以限制儿童接触学校 IT 系统的 4 个关键风险类别（如上所述）。
- 对我们的在线安全方法进行年度审查，并辅以年度风险评估，该评估考虑并反映了我校社区面临的风险。
- 至少每年向所有员工提供包括在线安全在内的定期保障和儿童保护更新，以便继续为他们提供有效保障的相关技能和知识。
- 每年审查儿童保护和保障政策，包括在线安全，并确保定期更新和审查程序和实施情况。

本节总结了我们的在线安全和手机使用方法。有关我校在这些领域的政策的完整详细信息，请参阅我们的在线安全政策。

9. 通知父母或看护人

在适当的情况下，我们将与孩子的父母或看护人讨论有关孩子的任何问题。DSL 通常会在怀疑或披露的情况下这样做。

其他工作人员只有在咨询 DSL 后才能与家长或看护人讨论任何此类问题。

如果我们认为通知父母或看护人会增加孩子的风险，我们将在沟通之前先与警方讨论。

如果有虐待其他儿童的指控，我们通常会通知所有涉案儿童的父母或看护人。我们将仔细考虑我们提供的关于其他涉案儿童的信息，以及何时提供。我们将与警方合作，确保我们的信息共享方法保持一致。

DSL 将与一切相关机构（将根据具体情况决定）一起：

- 与受害者的父母或看护人会面，讨论正在采取哪些措施来保护他们，并了解他们可能需要什么支持以及报告将如何进行。
- 与被指控的犯罪者的父母或看护人会面，讨论能提供的对他们的支持，以及正在采取哪些措施来影响他们，例如：让他们离开与受害者的课堂，以及任何决定背后的原因。

10. 有特殊教育需要、残疾或健康问题的学生

我们认识到，患有 SEND 或某些健康状况的学生可能面临额外的安全保障挑战，被虐待的可能性是同龄人的三倍。在识别这一群体中的虐待和忽视时，可能存在其他障碍，包括：

- 假设可能的虐待指标，如行为、情绪和伤害，与儿童的状况有关，而无需进一步探索。
- 比其他学生更容易受到同伴群体孤立或欺凌（包括基于偏见的欺凌）。
- 有特殊教育需求、残疾或某些健康状况的学生可能会受到欺凌等行为的不适当的影响，而不会表现出任何迹象。
- 管理或报告这些挑战时的沟通障碍和困难。

我们为这些学生提供额外的心理支持。这包括：

任何涉及 SEND 学生的虐待行为都需要与 DSL（或 DDSL）密切联系。

11. 受照顾的和曾经受照顾的儿童

我们将确保员工具备技能、知识和理解，以确保受照顾和曾经受照顾儿童的安全。特别是，我们要确保：

- 合适的员工掌握有关儿童受照顾的法律地位、与亲生父母或负有父母责任的人的联系安排以及看护安排的相关信息。
- DSL 有儿童社会工作者的详细信息。
- 我们任命了一位受过适当培训的教师，Anthony O'Brien，负责领导提高受照顾和曾经受照顾的儿童的教育成就。

作为其职责的一部分，他们将：

- 与 DSL 密切合作，确保对受照顾和曾经受照顾的儿童的任何保护问题都得到快速且有效的回应。

12. 对学校保障政策的投诉和关切

12.1 对员工的投诉

对于可能需要进行儿童保护调查的员工投诉，将按照我们处理虐待员工指控的程序进行处理（见附录 3）。

12.2 举报

- 举报政策中概述的细节

14. 记录保存

我们将按照我们的记录保留时间表保存记录。

所有安全保障问题、讨论、做出的决定以及做出这些决定的原因都必须以书面形式记录。如果你对是否记录某些内容有任何疑问，请与 DSL 讨论。

记录将包括：

- 对关切问题的明确和全面的总结。
- 如何跟进和解决问题的详细信息。
- 记录所采取的任何行动、作出的决定和结果。

关注和转介将保存在每个儿童的单独儿童保护档案中。

任何非机密记录都将易于获取和使用。机密信息和记录将被安全地保存，只有那些有权利或专业需要查看它们的人才能使用。

与个别儿童有关的保护记录将在他们离开学校后继续进行一段合理时间的保存。

如果学校有或曾经有过保护问题的孩子搬到另一所学校，DSL 在与校长和 RHoS 协商后，将确保他们的儿童保护文件尽快、安全地与学生主要文件分开转发。

为了让学生到达的新学校给与支持，文件将在以下时间内转发：

- 年度转学 **5 天内**
- 新学期开始的**前 5 天**

此外，如果问题重大或复杂，和/或涉及社会服务，DSL 将与接收学校的 DSL 沟通，并提供信息，使他们有时间做好任何必要的准备，以确保儿童的安全。

记录以电子方式存储在 isams 的健康管理中；

根据当地政策，记录与其他学校共享。

15. 培训

15.1 全体员工

所有员工将在入职时接受安全保障和儿童保护培训，包括举报程序和在线安全，以确保他们了解学校的安全保障制度及其责任，并能够识别可能存在的虐待或忽视迹象。

该培训将定期更新，并将：

- 整合、协调并考虑作为整个学校保护方法和更广泛的员工培训以及课程规划的一部分。
- 包括在线安全，包括了解员工在网络过滤和监控方面的期望、角色和责任。
- 考虑教师标准，以支持所有教师的期望：
 - 有效管理行为，以确保良好和安全的环境。
 - 清楚地了解所有学生的需求。

工作人员还将根据需要至少每年（例如，通过电子邮件、电子公告和工作人员会议）定期收到安全保障和儿童保护方面的最新信息，包括在线安全方面的信息。

承包商还将接受安全防护培训。

志愿者将接受适当的培训（如适用）。

15.2 安全保障负责人 DSL 和副负责人 DDSL

DSL 和 DDSL 将每年进行儿童保护和保障培训。

此外，他们将定期更新自己的知识与技能，至少每年更新一次（例如，通过电子公告、会见其他 DSL，或花时间阅读和学习安全发展）。

15.3 安全保障负责人

所有董事会成员在入职培训时都会接受有关安全保障和儿童保护（包括在线安全）的培训，并定期更新。这是为了确保他们：

- 具备履行其职能所需的知识和信息，并了解其职责，例如提供战略任务。
- 可以放心，保护政策和程序是有效的，并支持学校提供强有力的全校保护方法。

由于 RHoS/CEO 可能需要在对校长提出虐待指控的情况下担任“案件负责人”，他们将为此接受管理指控的培训。

15.4 招聘 — 面试小组

至少有一名员工（最好是所有参与面试的员工和人力资源人员）在学校的任何职位上进行面试，他们将接受更安全的招聘培训。这将至少涵盖《保护儿童教育安全》的内容，并符合当地的保护程序。

15.4 与学生及其家庭有接触的员工

所有与儿童及其家庭有接触的工作人员都将接受监督，为他们提供支持、指导和培训，促进儿童的利益，并允许对敏感问题进行保密讨论。

16. 监视安排

该政策将由校长和 RHoS 每年审查一次。每次审查时，都将得到学校董事会全体成员的批准。

17. 与其他政策的关联

本政策与以下政策和程序有关联：

- 行为
- 工作人员行为守则
- 投诉
- 健康和安全
- 出席情况
- 网络安全
- 手机使用
- 平等
- 关系和性教育
- 急救
- 课程设置

这些附录是基于教育部的法定指导方针《确保儿童在教育中的安全》。

附录 1：虐待类型

虐待，包括忽视和保护问题很少是一个定义或标签可以涵盖的独立事件。在大多数情况下，会有多个问题重叠。

身体虐待可能涉及殴打、摇晃、摔打、中毒、烧伤或烫伤、溺水、窒息或以其他方式对儿童造成身体伤害。当父母或看护人捏造儿童的症状或故意诱导儿童患病时，也可能造成身体伤害。

情绪虐待是对儿童持续的情绪虐待，对儿童的情绪发展造成严重和不利的的影响。对儿童的各种虐待都涉及一定程度的情感虐待，尽管它可能单独发生。

情绪虐待可能涉及：

- 向孩子传达他们没有价值或不被爱、不足或只有在满足他人需求的情况下才被重视。
- 不给孩子表达观点的机会，故意让他们闭嘴，或者“取笑”他们说的话或他们的沟通方式。
- 对儿童施加年龄或发育不适当的期望。这些可能包括超出儿童发展能力的互动，以及过度保护和限制探索和学习，或阻止儿童参与正常的社交互动。
- 看到或听到他人受到虐待
- 严重欺凌（包括网络欺凌），导致儿童经常感到害怕或处于危险之中，或剥削或堕落儿童。

性虐待涉及强迫或引诱儿童或青少年参与性活动，不一定涉及高度暴力，无论儿童是否知道发生了什么。这包括：

- 身体接触，包括插入式侵犯（例如强奸或口交）或非插入式行为，如手淫、接吻、摩擦和在衣服外触摸。
- 非接触性活动，例如让儿童观看或制作性图像，观看性活动，鼓励儿童以不恰当的方式行事，或为虐待儿童做准备（包括通过互联网）。

性虐待不仅仅是由成年男性实施的。妇女也可能犯下性虐待行为，其他儿童也是如此。

忽视是指持续未能满足儿童的基本生理和/或心理需求，可能导致儿童的健康或发育严重受损。由于母亲滥用药物，怀孕期间可能会出现疏忽。

一旦孩子出生，忽视可能涉及父母或看护人未能：

- 提供足够的食物、衣服和住所（包括被赶出家门或被遗弃）
- 保护儿童免受身心伤害或危险。
- 确保充分的监督（包括使用不适当的护理人员）
- 确保获得适当的医疗护理或治疗。

它也可能包括忽视或不回应孩子的基本情感需求。