



The British School

Safeguarding and Child Protection Policy

**Approved May 2023
For Review May 2024**



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1. Aims of the Policy

- To provide a caring environment in which children and young people feel safe, protected, secure, valued and respected.
- To ensure that rigorous systems of identification, reporting and monitoring are in place to protect all children from harm.
- To instil confidence so that pupils can trust adults and know how to approach staff if they are in difficulty.
- To raise awareness among all staff, both teaching and non-teaching, of the need to safeguard children through identification and prompt reporting of all possible cases of abuse.
- To establish clear and effective channels of communication between staff, and to develop effective working relationships with all other agencies involved in safeguarding children.
- To ensure that all adults have appropriate checks and **relevant safeguarding training** completed before working with children.

2. Roles and responsibilities

The Principal and Vice Principal will:

- Ensure that all policies and procedures adopted by the Governing Body are fully implemented, and followed by the staff.
- Work towards establishing and maintaining a culture in school where all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children. These concerns will be treated sensitively and proactively in line with the school's whistle-blowing policy.
- Ensure that all relevant training for all staff is up-to-date and reviewed annually.

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- Ensure that safeguarding issues are regularly discussed at Governors, SLT and staff meetings.

The Designated Safeguarding Leads (DSL) will:

- Have received the appropriate official training (DFE required standards), which will be undertaken every two years, and obtain access to resources and attend any relevant or refresher training courses.
- Ensure each member of staff has access to and understands the school's Safeguarding Policy and procedures, including new and part time staff, governors and supply staff. The DSL should ensure the school's policies are known and used appropriately.
- Ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role and responsibility the school has in this.
- Be able to keep detailed, accurate, confidential and secure written records of all concerns and referrals.
- Be alert to the specific needs of children in need, those with special educational needs/disability and young carers.
- Encourage a culture of listening to children among all staff.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and, when deciding whether to make a referral, liaise with the appropriate agencies.
- Ensure the school's safeguarding policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly, working with the governing body regarding this.
- When pupils leave the school, ensure that summary child protection information is transferred to the new school and extra information passed on as relevant and appropriate.
- Generate a safeguarding overview for the Principal's report to the Board of Governors.
- When circumstances require, they will make referrals to the appropriate authority e.g. police, international agencies

The Safeguarding Committee will:

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- Take part in the annual review of the school's safeguarding policies and procedures
- Feedback on implementation of the policy
- Support DSLs in ensuring all staff have access to and understand the safeguarding policy and procedures

The Board of Governors will ensure that:

- The school has a safeguarding policy in place and that procedures are in accordance with statutory guidance.
- The safeguarding policy is made available to parents.
- Safer recruitment procedures are used at all times, and all appropriate checks are carried out on staff and volunteers who work with children.
- The Designated Safeguarding Lead (DSL) with responsibility for safeguarding is a member of the senior leadership team.
- All staff have undertaken the appropriate safeguarding training.
- A nominated governor will have responsibility for liaising with the DSL.
- Oversee procedures for dealing with allegations of abuse against staff and volunteers as per the Staff Misconduct and Whistleblowing policies.
- In the case of an allegation against the principal, lead procedures directly.
- Policies and procedures are reviewed annually.
- All members of the governing body will have a current police check or equivalent.

3. Child Protection

We fully recognise our responsibilities for child protection and strive to achieve an environment where children feel secure, supported and valued within and beyond the school gate.

We recognise that some children are the victims of neglect and/or physical, sexual or emotional abuse. Staff at school, by virtue of their day-to-day contact with and knowledge of the children in their care, are well placed to identify such abuse and to offer support to children in need.



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All child protection concerns and referrals will be handled sensitively, professionally and in ways which support the needs of the child.

What is Child Protection?

Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Safeguarding, in addition to child protection, encompasses issues such as pupil health and safety, bullying/cyber-bullying, appropriate medical provision. These areas have specific policies and guidance which should be read in conjunction with this document.

Child Protection Responsibilities

The responsibility for child safeguarding falls on everybody who is employed at TBS. All adults who work at the school are expected to support the Child Protection and Safeguarding Policy and to undergo Safeguarding training with yearly refreshers. All staff have an obligation to report to the DSL if there is suspicion of abuse/neglect of a child or if a child discloses abuse or allegations of abuse.

3.1 Identifying and Responding Overview

There are four key steps to follow to help staff identify and respond appropriately to possible abuse and/or neglect.

1. Be alert
2. Question behaviours
3. Ask for help
4. Refer

More information on identifying signs of abuse can be found below in section 3.2.

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It may not always be appropriate to go through all four stages sequentially, if a child is in immediate danger or is at risk of harm, the DSL must alert parents without delay or the relevant authorities if we believe the parents to be the cause of harm. It is therefore important that staff share any concerns in a timely manner to ensure children are safe. Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When worried about the welfare of a child, staff members should always act in the interests of the child and report any concerns as per our procedures as set out below.

You have a concern about a child / young person's wellbeing, based on:

1. Something the child/young person/parent has told you
2. Something you have noticed about the child's behaviour, health, or appearance
3. Something another professional said or did

Even if you think your concern is minor, the DSL may have more information that, together with what you know, represents a more serious worry about a child. It is never your decision alone how to respond to concerns – but it is always your responsibility to share concerns, no matter how small.

1. Decide whether you need to find out more by asking the child / young person, or their parent to clarify your concerns, being careful to use open questions: beginning with words like: 'how', 'where', 'when', 'who' or 'can you tell me more about that?'
2. Let the child/young person/parent know what you plan to do next if you have heard a disclosure of abuse or you are talking with them about your concerns. Do not promise to keep what they tell you secret....for example, 'I am worried about your bruise and I need to tell XX so that they can help us think about how to keep you safe'. For more specific guidance on how to handle disclosure conversations, see below in section 3.4.
3. Inform the DSL immediately. If the DSL is not available, speak to the Principal or Vice Principal.
4. Make a written record as soon as possible after the event on [My Concern](#), noting:

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Name of child, Date, time and place, Who else was present, What was said / What happened / What you noticed ... speech, behaviour, mood, drawings, games or appearance, If child or parent spoke, record their words rather than your interpretation, Analysis of what you observed and why it is a cause for concern.

If you suspect a child is at risk of harm

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Use [My Concern](#) to record these early concerns. If the child does begin to reveal that they are being harmed you should follow the advice in the section 'Handling a Disclosure'.

If, following your conversation, you remain concerned, you should discuss your concerns with the DSL.

3.2 Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty, though if in doubt staff should always report any concerns. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

Remember, it is your responsibility to *report* your concerns. It is *not your responsibility to investigate* or decide whether a child has been harmed or abused.

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A child who is being harmed, abused and/or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.
- Other distinct categories of abuse can be found [here](#) including radicalisation, FGM, domestic violence and peer on peer abuse.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns – you do not need 'absolute proof' that the child is at risk.

The impact of child abuse should not be underestimated and we would seek to ensure our students are supported in recovering from abuse. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their

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reach, and the rest of their childhood and their adulthood may be characterised by other safeguarding concerns such as anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties which may become child protection issues in and of themselves.

3.3 Students at risk of immediate harm including suicide and self harm

1. Immediately following a disclosure that a student is potentially at imminent risk, the member of staff must inform the DSL Jess Barneclutt - 9810650086, Sally Moulds - 9818280760 or the Principal - 9851035147/ Vice Principal - 9851237609. At this stage, the disclosure should not be shared with any other member of staff.
2. If this disclosure happens in school and it is clear the student may have already been harmed, the member of staff should take the student to a school nurse immediately and contact a DSL, either by phone or in person.
3. If the disclosure happens outside of normal school hours, for example by email, upon reading the email and before responding to the student, you must immediately contact the DSL, or the Principal/ Vice Principal by phone and share any information you have received.
4. Once informed, the DSL will make a decision on whether immediate action needs to be taken to remove/ minimise the risk and secure the child.
5. As soon as is appropriate following this decision, an immediate safeguarding meeting/conversation will be held between the safeguarding officer, the relevant Head of Key Stage or the Principal/ Vice Principal to determine and assign actions. This may include the member of staff to whom the initial disclosure was made.
6. The counsellor or the safeguarding officer will speak to the student if possible, to ascertain the level and immediacy of the risk. If neither the counsellor or DSL are available, another member of staff trained in suicide prevention will speak with the student.
7. Unless there are exceptional circumstances, or an increase to the risk, parents will be contacted on the same day. If the student is in school, parents will be invited in for a meeting to discuss the concerns before the student is allowed to go home. If the disclosure happens outside of school hours, parents will be contacted by phone and alerted to the disclosure so they can ensure their child is supervised and protected from potential harm.
8. The following day or when the student returns to school, the member of staff who had the initial conversation will have a follow up conversation with the student.
9. If the parents were contacted via phone outside of school hours, they will be invited in for a meeting. Following the meeting, a phone call will be made to parents within a few days of the initial meeting to determine if further support is required at home.

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10. A support programme will be put in place for the student as appropriate and necessary. Feedback, reassurance and support will also be given to the student who made the disclosure, if it was not the student concerned.
11. There will be a debrief meeting with staff involved, even if it is to say no further information can be passed on at this stage. Support will be offered to staff as necessary.

3.4 Handling a disclosure

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault or totally normal behaviour.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child:

- Allow them to speak freely;
- Remain calm and try not to express emotions other than concern – the child may stop talking if they feel they are upsetting you;
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’;
- Do not be afraid of silences – remember how hard this must be for the child;
- Under no circumstances ask leading questions or encourage the child to report on something that maybe hearsay – such as what another family member thinks;
- At an appropriate time tell the child that in order to help them you must pass the information on;
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;

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- Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong;
- Tell the child what will happen next. The child may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day;
- Before ending the conversation reiterate that they have done the right thing in disclosing the information;
- Report verbally to the designated person immediately if you believe the child is at risk of harm;
- If you believe the child is at immediate risk of harm, do not leave them unsupervised. Stay with the child and contact a DSL or a member of SLT or PLT for support;
- If you believe the child has already been harmed, including self harm, take them to a school nurse immediately and contact a DSL at the earliest opportunity either in person or by phone;
- Write up your conversation as soon as possible on the record of concern form and hand it to the designated person;
- Seek support if you feel distressed.

Staff safeguarding training will include strategies for handling and responding to disclosures.

3.5 Potential actions and feedback following a referral

Following a disclosure or a reported concern, the DSL along with the Principal and Vice Principal will decide on the most appropriate course of action in the circumstances. All actions and decisions will be detailed on My Concern and monitored by the DSLs as a record of our response to each case. Information recorded on My Concern will be entered as follows:

- Upon receiving the concern, the DSL will assign a category to the concern.
- The concern may be referred to another member of staff, for example the counsellor, with a 'task' to be completed.

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- Tasks may include follow up conversations to find out more information before support plans can be formed and implemented. The details of the task will be fully recorded, even if it is the DSL following up to find out more information.
- Any additional information should be added to the concern once it is known, including any subsequent tasks then issued to other staff.
- Once the concern has been dealt with and support has been put in place, it should be marked as 'filed'. There should be an indication of whether support is ongoing and updates are required or whether no further action or updates are required.
- When a child is referred to the counsellor or another member of staff for support, they will add dated, bi-weekly updates to the concern.
- A report of all live concerns will be downloaded each week for the Safeguarding Team meeting and reviewed- while in use this will be stored in the secure safeguarding drive and then deleted at the end of the meeting.

Immediate responses could include:

- Speaking with staff for any further information
- Speaking to the child at risk or the child who made the disclosure if extra information is needed
- Calling one or both parents to discuss disclosure
- Referring the child to our school nurses
- A referral to our school counsellor to assess immediate risk
- Asking parents to take the child to hospital for treatment or tests.
- Taking the child to hospital for immediate treatment if necessary and parents cannot be reached.
- Cross referencing the disclosure information with other safeguarding information already on file

Longer term responses could include:

- Forming a 'team around the child' to ensure ongoing monitoring and effective communication of support strategies
- Linking up with any agencies in Nepal if appropriate
- Talking to all staff involved with the child and ask for close monitoring
- Regular check ins with the child and a designated member of staff
- Meetings with parents to discuss and monitor support strategies

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- Support from our in school counsellor
- Referring for external counselling
- If the concern is about the parents, contacting the organisation of the parents and reporting findings to the company's nominated welfare officer
- If the concern is about a BGN child, contacting the designated officer at BGN to raise concerns
- In the case of all serious concerns, informing the Chair of Governors and the Governor with responsibility for Child Protection
- Keeping records of all discussions and conversations (preferably signed or acknowledged by parents)
- Provide extra levels of staffing/vigilance as appropriate
- A support plan to enable the student to return to school safely
- Support for a student who reports a safeguarding concern about another student
- Support for staff after dealing with a difficult disclosure

4. Confidentiality

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the designated person, head teacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with General Data Protection Regulation (GDPR), 2018 principles. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights



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Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Child protection information will be stored separately from the child's Engage records.

Child protection records are normally exempt from the disclosure provisions of GDPR, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the principal.

GDPR principles do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. When information is shared, the reason for doing so as well as the reasons why consent may not have been sought, will be clearly documented within the child protection records.

When a child leaves the school their Child Protection files will be copied with the copies archived and stored securely for 7 years.

The school's policy on confidentiality and information-sharing is available to parents and children on request.

When a child leaves TBS we will pass on relevant safeguarding information to their new school via their DSL using the appropriate confidential channels.

Post Concern Information Sharing

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This section is for the designated safeguarding leads only.

Once a concern has been reported, the safeguarding team will decide who the information needs to be shared with. When considering who safeguarding information needs to be shared with, we take the following into account:

- Is there a clear purpose for sharing the information?
- Is the information confidential?
- Do you have consent from the student or parent to share the information?
- Is it in the best interests of the child/ other children to share the information?
- Do we need to share all of the information?
- Is the information accurate?
- What is the fewest number of people we need to share the information with to fulfil our purpose?
- Will we increase the risk of harm if we do/ don't share the information?



Scenario

Initial concern

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Student A told me that they had been suffering from insomnia for some time. They have been having therapy and were on medication. However, the doctor advised them to stop medication over the exam period because it might affect their performance. As a result of stopping the medication they are having severe migraines and still cannot sleep. They had told another teacher previously that they had been hospitalised due to his insomnia which was entered on My Concern.

Decision

Initially, we will share the full concern with the counsellor as the counsellor will investigate the accuracy of the original concern with the student and clarify the areas of concern.

Following the meeting with the counsellor, the key information is now as follows:

- The student has been struggling with sleep and anxiety and saw a Dr for support- he was not hospitalised
- The Dr referred the student to a counsellor who they are seeing outside of school regularly
- The medication the student was prescribed was a multivitamin so there are no withdrawal issues in stopping the medication suddenly
- The student had spoken to another teacher but had not said they had been hospitalised, only that they were having trouble sleeping
- The student would like some support in school with managing workload and deadlines
- However the student does not want other staff to know they are seeing a counsellor
- We would not share the original full concern outside of the DSL team and the counsellor because:
 - The information in the initial concern recorded by the member of staff is inaccurate and incomplete
 - The student has not consented to the information being shared
 - It is not necessary for HofKS/ mentor to see the full concern to be able to provide support

We will share some information because it is in the best interests of the child for key staff to be aware of parts of this information. The information will be shared as follows:

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Parents: we will share a summary of our concerns regarding the student's mental health and wellbeing and check the accuracy of the information we have received via the counsellor regarding medication and external support.

HofKS/ Mentor: we will share that the student is struggling with academic anxiety which is having an impact on their sleep and their ability to complete work and meet deadlines. This will allow for the student to be supported by their key pastoral staff for example in making a sensible revision or homework timetable or by checking their planner each morning in mentor time.

Teachers of that student: we will share that the student is struggling with academic anxiety and to be understanding around workload and deadlines, set clear targets and let the mentor know if they continue to struggle to keep on top of the work set.

5. Staff Code of Conduct

The Code of Conduct applies to all staff who represent **The British School Kathmandu** and who interact with our children in any capacity. This includes direct/indirect and supervised/unsupervised contact. For the purposes of this policy a child is defined as a person on roll at school or on roll from a visiting school regardless of age.

The Code of Conduct is designed to give clear guidance and rules on the standards of behaviour that all school staff are expected to adhere to, including rigorous safeguarding guidelines, and all staff receive a copy of the Code of Conduct which must be signed and returned to the HR department.

A copy of the code of conduct can be found [here](#).

6. Whistle Blowing

- Often it can be an employee who is the first to realise that there may be something wrong within their school. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to The British

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School (TBS); or they may fear harassment, victimisation or other reprisals. It may be easier to ignore the concern rather than report a suspicion of malpractice.

- TBS is committed to the highest possible standards of service and full accountability for those services. In line with that commitment, employees are encouraged to come forward and voice any concerns they may have about any aspect of school life. It is recognised that certain cases will have to proceed on a confidential basis. This policy makes it clear that employees can do so without fear of reprisals and is intended to encourage and enable them to raise concerns within school rather than overlooking a problem or “blowing the whistle” externally.
- The policy applies to all employees and contractors working for the school on school premises, for example, agency staff, builders, drivers. It also covers suppliers and those providing services under contract with the school.

NB - The TBS policy is in line with the UK PUBLIC INTEREST DISCLOSURE ACT (1998)

This act protects workers who ‘blow the whistle’ about wrongdoing. It makes provision about the kind of disclosures which may be protected; the circumstances in which the disclosures are protected; and the persons who may be protected. The provisions introduced by the act protect most workers from being subjected to a detriment by their employer. Detriment may take a number of forms, such as denial of promotion, facilities or training opportunities which the employer would otherwise have offered. Employees may make a claim for unfair dismissal if they are dismissed for making a protected disclosure.

The link to our full whistle blowing policy can be found [here](#).

7. Allegations against Staff

We will deal with any abuse allegation made against staff quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Details of allegations of abuse against staff can be found in Appendix I

8. Safe recruitment

The Safe Recruitment policy has been developed to embed safer recruitment practices and procedures throughout **The British School Kathmandu** and to support the creation of a safer culture by reinforcing the safeguarding and well-being of children and young people in our care. This policy complies with guidance outlined in ‘*Safeguarding Children and Safer*

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Recruitment in Education-January 2007' and Dealing with allegations of abuse against teachers and other staff – DfE 2012.

The link to our Safe Recruitment Policy can be found [here](#).

9. Health and Safety

The Principal and Vice Principal will ensure that there is a robust, up to date Health and Safety Policy and Procedure to meet the statutory responsibility for the safety of students and staff at the school.

The Principal and Vice Principal will identify and manage health and safety through the use of risk assessments, which are carried out:

- On an annual basis for the school learning spaces and environment in and outdoors.
- For all school trips and educational visits.
- For students travelling between locations during the school day.
- For all work-based learning on work experience placements.
- When a student returns following an exclusion due to risky or violent behaviour.
- When there are any changes to the premises or practices.
- Following a serious accident in relation to staff and/or students.
- When there is a high-level risk associated with contact with parents.
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage.

A link to the full Health and Safety Policy can be found [here](#).

A link to our on site emergency procedures can be found [here](#).

10. Site Supervision inc Visitor Policy

Student safety and security whilst on site is our priority. We have an open site which creates a unique learning environment, but also presents us with security challenges. Parents are welcome on site in line with our safety, safeguarding and security supervision rules which are

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detailed in our full site supervision policy and can be found [here](#). The details of our Visitor Policy can be found [here](#).

11. Intimate Care

The Principal and Vice Principal will ensure that there are clear Intimate Care guidelines for parents & staff on accepted protocols in the provision of intimate care at TBS. They will also ensure adults required to operate in sensitive situations are fully aware of the policy and procedures in order to safeguard both staff and students

Full details of our intimate care policy can be found [here](#).

12. Image Use Policy/Photo Policy

Purpose

Increasingly, technology is making it easier to access and distribute pictures and images in printed materials, on websites and on social media. TBS believes that it has a responsibility to ensure that individual and parental rights are respected, and that vulnerable individuals are protected from risk or exploitation. There needs to be special care taken when obtaining and publishing images of children for issues of child protection. There may be reasons for a child's picture not being used that only a parent or guardian may know. The policy, which can be found [here](#) puts into place a structure whereby images of children taken and stored by TBS are properly safeguarded.

13. E Safety Policy

Our e-safety policy acknowledges that being online is an integral part of children and young people's lives. Social media, online games, websites and apps can be accessed through mobile phones, computers, laptops and tablets – all of which form a part of children and young people's online world.

The internet and online technology provides new opportunities for young people's learning and growth, but it can also expose them to new types of risks.

E-safety forms a fundamental part of our safeguarding and child protection measures.

The main text of our e safety policy can be found [here](#). (Note policy yet to have final approval)



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14. Informal Fostering Arrangements

We recognise informal foster care as a situation where a child is looked after by an adult who is closely related to them but does not have official parental responsibility. Informal arrangements are made between the child's parents (or someone else who has parental responsibility for them) and the relative.

If parents wish to delegate day-to-day decision making to another guardian, then they must inform the school in writing of the arrangement.

15. Trips and Residential

A link to our trips and residential risk assessment can be found [here](#).

16. Anti- Bullying Policy

At TBS we recognise the important role anti-bullying procedures have to play in safeguarding students. The TBS school community is based on an ethos of mutual respect and consideration. The school and the Board of Governors are committed to providing a safe and happy learning environment for all. We do not tolerate bullying, harassment, victimisation or discrimination of any kind and work hard to prevent these or to tackle them if they occur. Bullying is a whole school issue and we take a whole school approach in response. Any member of the community may bully or be a victim of bullying: we regard all incidences of bullying equally seriously and in turn expect all staff, pupils and parents to play their part in preventing and tackling bullying.

Our anti bullying policy can be found [here](#).

17. Equality, Diversity and Inclusion

At TBS we recognise that being actively supportive of diversity, equality and inclusion has an important role in safeguarding children. Children in protected groups are more at risk of abuse and as such we aim to ensure that all members of the school community know their rights, and respect the rights of others. We aim to ensure that prejudice or discrimination in all its forms is actively rejected and raise awareness of equality issues for all members of the school community, and through our links with the local community. We establish strategies to ensure equal access to the curriculum and enable each individual to fulfil his/her potential regardless of ability, gender, race, disability, religion or sexual orientation or caste.



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A link to our DEI Policy can be found [here](#)

18. Useful Links

Childline in Nepal can be contacted by dialling 1098.

TBS POLICIES:

[Staff Code of Conduct](#)

[Student code of conduct](#)

[Behaviour guidelines](#)

[Other Types of Abuse](#)

[Safeguarding form](#)

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Appendix I: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will ensure that roles are assigned. This will be a member of SLMT, or the chair of governors where the Principal is the subject of the allegation. The Case Manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children

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- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location

If in doubt, the case manager will seek views from the school's HR Manager as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Case Manager will take the following steps:

- Appoint an independent Investigating Officer. This will usually be a member of the school's Senior Leadership and Management Team
- Where appropriate, the Case Manager will carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the police and/or children's social care services, as appropriate
- The Case Manager will inform the accused in writing that an Investigation Officer has been appointed and the reason for this. At this time they should inform the staff member not to discuss the above matter with other staff (other than any counselling staff) or discuss any aspects with students or parents/carers of the school, including those who may form part of the investigation.

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- The Case Manager will have no further involvement in the investigation until they receive the report from the Investigating Officer or the Investigating Officer has cause to stop the investigation.
- If it is very likely that a crime has been committed, the school will contact the police directly, for example, if the accused individual is deemed to be an immediate risk to children (including both those at TBS and others) or there is evidence of a possible criminal offence. They will follow the police advice while the criminal investigation is live.
- If, once an investigation has begun, the Investigating Officer determines that it is likely that a crime has been committed, they will stop the investigation at that point and refer to the Case Manager. The Case Manager will determine if the school should then cease any involvement and refer the matter directly to the police.
- Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- If a Disciplinary process is required the Case Manager will ensure this is set in motion and hand over to the Disciplinary Officer, if this is a different person. The Disciplinary Policy will be followed from this point.

Investigating Officer role:

- Ensure the staff member is aware that they have been appointed as the Investigating Officer and what the investigation entails.
- Inform the staff member that they may have a colleague with you at the interview. They will not be allowed to contribute to the meeting but would be there only to act as your support.
- Inform the staff member not to discuss the above matter with other staff (other than any counselling staff) or discuss any aspects with students or parents/carers of the school, including those who may form part of the investigation.
- If there is no evidence of a crime having been committed, the investigating officer will gather the facts of the case and evidence. The investigating officer will, if necessary, hold investigatory meetings (in person or over video conferencing). They will conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation
- If they determine that it is likely that a crime has been committed, they will stop the investigation at that point and refer to the Case Manager. The Case Manager will

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determine if the school should then cease any involvement and refer the matter directly to the police.

- The employee will be informed of the outcome of the investigation by the Investigating Officer in writing. The Case Manager will take over from this point.
- If a serious allegation has been made, the Investigating Officer will discuss the allegation in confidence with an external experienced DSL. This is to consider the nature, content and context of the allegation in order to make a recommendation in their report, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve external agencies.
- If the investigating officer determines that the matter should move forward to a formal disciplinary hearing, a Disciplinary Officer will be appointed by the Case Manager. This will be a person independent from the Investigating Officer, normally the Principal or Vice Principal. This could be the same person as the Case Manager as long as they have only been involved in the delegation of tasks and not with the investigation itself.

If immediate suspension is considered necessary, agree and record the rationale for this. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.



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Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted, and the equivalent body in the staff member's home country, of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the UK secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the UK and teacher's home country's Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

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- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will examine whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

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If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the UK Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, safeguarding measures may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

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The case manager will take advice from police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

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- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child in line with our procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

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- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider an external referral

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- Empowering staff to share any low-level concerns as per this policy
- Empowering staff to self-refer

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- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

Kept confidential, held securely and comply with our data protection guidance

- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:



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- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance