



## Child Protection and Safeguarding Policy

### Rationale

The purpose of the whole Lancaster School A.C. (henceforth “Lancaster” or “The School”) *Child Protection and Safeguarding Policy* is to provide clear direction to staff and others about expected codes of behaviour in dealing with student protection issues. This policy makes explicit Lancaster School’s commitment to the development of good practice and procedures so that child protection referrals may be handled sensitively, professionally and in ways that support the needs of the students, especially the underage ones. This policy has been developed with reference to both national legislation and current best practice in Mexico and the UK.

This policy will be reviewed on an annual basis in order to identify any deficiencies or weaknesses and, when required, make the necessary remedies in the Policy content or related procedures.

### Policy Statement

At Lancaster we strive to provide a caring, positive, safe and stimulating environment that promotes the intellectual, social, physical and emotional development of each student. We respect, value and celebrate the diversity of all our community and model this in our classrooms, in line with the school’s philosophy, values and the graduate profile.

Each student has the right to be and feel safe and protected from any form of abuse or violence which includes verbal, physical, and economic/property, psych emotional, or sexual. Lancaster School is committed to safeguarding and promoting, within its legal and factice possibilities, the welfare of all its students. All members of the community, and most particularly all staff share this commitment and have a duty to follow this Policy.

This policy applies to all staff and anyone who provides any service or work, paid or not, within the school.



## Terminology used in this policy

**Student/Child** includes any person under or over 18 that is still a Lancaster student.

**Student/Child protection** refers to the internal processes undertaken by the school to protect children who have been identified as suffering, or at a real or probable risk of suffering and/or provoking significant harm.

**Designated Safeguarding Lead (DSL)** - the named member of school leadership designated by the School's Board, with the specific responsibility of coordinating the actions and information required for safeguarding of the students. There will be one DSL per school site (preschool, primary, secondary and CCH).

**Harm** - means any affectation, mistreatment or impairment of the student's property or healthy physical, psychological, emotional, sexual or economic development.

**Parent** includes birth parents and other adults who are in a parenting role, for example step-parents, foster carers, tutors and adoptive parents.

**Safeguarding** refers to the internal processes and actions taken by the Lancaster to prevent students from suffering any harm, ensuring that they are able to develop within the Lancaster in a safe environment by adopting internal measures that allows Lancaster students to have a healthy and wholesome development.

**Staff** refers to all members, collaborators, employees, representatives, administrator, managers, directors, board members, advisors, and teachers of Lancaster, as well as those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

Types of Abuse and Neglect - Lancaster recognises that there are multiple types of abuse and neglect. Lancaster draws its understanding of the terminology from Keeping Children Safe in Education (2022) from the UK government to approach any subject or event related with abuse and neglect.



## **Aims**

### **The aims of this policy are:**

1. To support the full and healthy psycho-emotional, physical and sexual development of students.
2. To provide an internal framework of action that promotes environment in which children feel safe, secure, valued and respected, and feel confident to approach adults that work at the School if they find themselves experiencing difficulties, believing they will be effectively listened to.
3. To educate our students through the School's Student Development and Wellbeing Curriculum so they are aware and understand matters related to protection and safeguarding of themselves and other students.
4. To raise the awareness of all staff of Lancaster about the need to safeguard the integrity of the students, and of their responsibilities in identifying and reporting possible cases of abuse, neglect, or any circumstance which may cause any harm to the students.
5. To ensure that all staff are trained in good practice for recognising and dealing with any issues regarding the integrity and healthy development of the students.
6. To emphasise the need for effective of communication between all members of staff with regards to child protection and safety issues.
7. To maintain a set of effective and structured procedures within Lancaster which will be followed by all members of the school community in cases of suspected or confirmed abuse or neglect against any student, or situations that could represent a potential harm to the students.
8. To comply with all official local and national requirements of protection and safeguarding of the students, and ensure internal procedures and best practice are followed at all times in the school.
9. To provide support and advice for parents in matters relating to student protection and safeguarding.
10. To ensure we practise safe recruitment in checking, as far as possible, the suitability of staff and volunteers to work with students through the implementation of preventive measures for the proper selection of staff.

## **Roles and Responsibilities**



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Clarity of roles and responsibilities of the staff is essential to the effectiveness of child protection and safeguarding for students within the school. Details regarding responsibilities are set out below:

- **School Board** - The School Board has the overall responsibility for the effective implementation of the Student Protection and Safeguarding Policy. The policy should be reviewed annually and the Board may delegate this review to the Academic Committee or any other committee (including an ad hoc committee) deemed qualified to address the revision of the policy. Within the Board, one board member will be given responsibility for ensuring that the policy is regularly communicated within the staff, that staff receive appropriate training at regular intervals, and that all procedures related to this policy are followed with fidelity.
  
- **Head Teacher** - The Head Teacher is responsible for the effective implementation of this Policy, as well as other associated policies and procedures across the school. This responsibility includes:
  - Allocating sufficient time, training, support and resources, including cover arrangements when necessary, to enable each DSL to carry out his/her role effectively, including the assessment of students and attendance at strategy discussions and other meetings.
  - Ensuring the existence of adequate internal mechanisms that allow that all staff feel able to raise concerns about any potentially poor or unsafe practice that could represent abuse or neglect against the students or that may pose a risk of harm; and that such concerns are handled sensitively and in accordance with the whistleblowing procedures established by the school.
  - Ensuring that students are provided with opportunities throughout the curriculum to learn about their own safeguarding and protection, including the topic of cybersecurity.
  - Where necessary, ensuring appropriate advice is obtained from School's legal representatives or of any other nature that is pertinent.
  - In the event that a criminal complaint or legal action has been filed against a staff member, the School's collaboration with the



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competent authorities is formally and legally required; Lancaster shall cooperate with them.

- Ensuring that anyone who has been objectively known to have harmed a student or who may pose a real and objective risk to a student is referred to the appropriate authorities.
  - Creating, with the DSLs, an annual report to the Board regarding the implementation, development and improvement of student protection and safeguarding systems within school.
- **Designated Safeguarding Leads (DSL)** - There will be a minimum of one DSL per school site. The DSL are required to:
    - Co-ordinate the student protection and safeguarding procedures on their site.
    - Understand the internal processes and actions developed by The School to provide early help and intervention in events that may pose a risk to student protection and safeguarding.
    - Be the first point of contact for parents, students, staff, volunteers and external agencies in all internal matters related to child protection and safeguarding.
    - Ensure that the parents or guardians are informed of any incidents that may pose a risk to the student protection and safeguarding, when there is sufficient and objective information. If possible, this should be communicated in person. The Head Teacher should be informed immediately.
    - Maintain a continuous staff development programme regarding student protection and safeguarding for all employees. This will include ensuring that all volunteers and temporary staff are informed of the current policies and internal procedures related to child protection and safeguarding.
    - Ensure that as part of the school's induction program all newly employed staff receive initial training regarding school policy and procedures related to the student protection and safeguarding.
    - Lead regular meetings on site related to student protection and safeguarding concerns and termly meetings to remind all staff about the constant commitment of the School to ensure the protection and safeguarding of students
    - Monitor the keeping, confidentiality and storage of records in relation to the harm or risks to student protection and safeguarding which should be kept in the secure, locked space,



## La Escuela de Lancaster

- or any other suitable means that guarantees such confidentiality.
- Keep written records of concerns about a student that affect their protection and safeguarding.
  - Keep the Head Teacher informed of all cases, actions and outcomes related to any harm or risk to the protection and safeguarding of the students, and consult in all cases.
  - Participate continuously in adequate training in the field of protection and safeguarding of students.
  - Ensure continuous and appropriate training for all other staff in the field of protection and safeguarding of students.
- **Human Resources Coordinator (HRC)** - As the person with overall responsibility for all human resources matters, the HRC is responsible for ensuring that:
    - Adequate and pertinent reviews of background and selection procedures of potential staff members are conducted, in order to avoid risks for the protection and safeguarding of students and other members of the Lancaster School community, as well as keeping staff and / or of human resources files for active personnel complete and up-to-date of the already hired members of staff; said update must be made, at least, annually, or when particular circumstances require adjustments to be made.

### Duty of Staff

Each and every member of staff has a duty, within their possibilities, to:

1. Protect students from any kind of actual or potential abuse, neglect, harm or violence.
2. Know, understand and comply with all procedures, policies, codes, guidelines and any type of obligation established by Lancaster in terms of protection and safeguarding of students.
3. Keep a written record of any complaint, conversation or event that is related to a possible student protection or safeguarding issue.
4. Report as soon as they become aware of any matter that could constitute a risk or could compromise the protection and safeguarding of the students, to one of the DSL in their establishment. If it is not possible to report it to an DSL, notify the Director General immediately.



## Types of Abuse

There is not always a clear boundary for members of Lancaster staff to determine if certain incidents should be regarded as abusive or harassing (bullying) against students. Therefore, in addition to the descriptions established by the Mexican legislation regarding the probable illicit acts against the integrity and the healthy physical, sexual and psycho-emotional development of the students, in the School the following behaviours will be considered as abuse:

- Physical abuse e.g. beating, harm, injuries or punching.
- Emotional abuse e.g. to reject, deny affection, ridicule, offend, denigrate, slander, insult, mock, humiliate, blackmail, extort, threaten, discriminate
- Sexual abuse e.g.
  - sexual assault
  - force, induce or incite a student to view material, information, images and / or sounds of a pornographic, erotic, lewd and / or sexual nature.
  - behaviour displayed by any means (including the Internet and social networks) to approach the students in order to obtain any contact or conduct of a pornographic, erotic, lewd and / or sexual nature or content on the part of the students or through them.
  - sexting (defined as when someone sends or receives a sexually explicit text, image, video, photograph, file or document of a pornographic, erotic, lewd and / or sexual nature or content)
- Neglect is a form of abuse in which the student is not provided with the appropriate care they need from their parents or persons responsible for ensuring their integrity, property and / or healthy physical, sexual, economic, and psycho-emotional development.

Generally, abuse is considered when an adult displays a behaviour or omission that generates or can generate violence (physical, sexual, patrimonial, economic or psycho-emotional) towards a student. However, abuse among the students themselves also exists and, as far as possible, it must be prevented and attended to by the School in a timely manner. For further guidance regarding this subject, please refer to the Peer Abuse Situation Handling section of this Policy.



For more information about the School's Bullying Prevention Policy and procedures, please refer to the School's Socialisation Policy. This includes a working definition of bullying and procedures for reducing and dealing with issues of suspected bullying.

## Signs of Possible or Presumed Abuse Against Students

Possible signs may include:

- Student discloses they have been abused or asks a question, shows a conduct or makes a comment which may infer they are a victim of a probable abuse.
- There is no reasonable explanation for an injury or there is a pattern of injuries in the student.
- There is a sudden or unusual change in the student's behaviour e.g. a usually outgoing student becomes withdrawn or they become unusually challenging.
- The student's regular academic development is delayed.
- The student loses or gains weight rapidly.
- The student is reluctant to go home or is openly rejected by their parents.
- The student is neglected or does not receive the necessary care and attention from their parents, for example, has a poor personal hygiene, often arrives late to school, is not picked up at the end of the school day, shows anxiety, etc.
- The student always wants to avoid a particular teacher's classes and is reluctant to discuss reasons.
- The student displays behaviours of explicit sexual nature or lascivious, erotic and/or sexual content that are not appropriate for their age.
- The student is constantly acting out in a violent or aggressive manner.
- The student is withdrawn and shows signs of helplessness and depression.

## Procedures for dealing with possible safeguarding and child protection issues

1. Any report, be that verbal or written, pertaining to any matter relating to student protection and safeguarding must be reported immediately to a Designated Safeguarding Lead who will decide on how to proceed with the incident. A copy of such a report must be kept,



## La Escuela de Lancaster

ideally using the appropriate formats established by the Lancaster School.

2. Any member of staff hearing a complaint about abuse, neglect, or harm against a student must listen carefully and keep an open mind while avoiding judgement and jumping to conclusions.
3. Any member of the school's staff that receives any information related to student protection and safeguarding, unless necessary, must not ask any leading questions (that is, questions that suggest a particular answer) to the student or the person who is reporting a probable incident related to the student protection and safeguarding. Instead, they must try to ask open questions that allow the person who is filing the complaint to explain what happened (i.e. Can you explain to me what happened?)
4. Staff should reassure the student or the person who is filing the complaint and when necessary, explain to them the need to report the information to the DSL, the Head Teacher, and / or the competent authority. The easiest way to do this is to say the following: " I am concerned for your well-being, therefore I need to pass on this information. I will be discreet and professional as to who I share this information with. Is there anything I can do now to help you feel safer? " They should explain fully that they need to pass on the information to the Designated Safeguarding Lead, the Head Teacher, and / or the competent authority who will ensure the correct action is taken.
5. Staff must keep a record of the conversation including the time, date and place as well as what was said and done by whom and who was present. The record should be signed by the person making it and, whenever possible, include the full names of everybody involved. Any written statement or drawing done by the student or anyone who is involved should be included. The record must be kept confidential, secure and handed to the Designated Safeguarding Lead or Head Teacher.
6. Where Staff observe signs which give cause for concern over the physical, psychological or emotional integrity of any student, they should make this known to the Designated Safeguarding Lead without delay.
7. Both the Designated Safeguarding Lead and the member of staff who received the complaint should log in writing any other information they receive or know related to this complaint, which must be kept strictly confidential and registered in the formats established by the School.
8. Other staff should be informed of concerns on a need to know basis only and any additional information should be recorded on the form.



9. All facts and possible evidence (for example notes, text messages, interviews, emails, video) must be safeguarded and preserved as they could be required if a criminal case arises from the concerns or disclosure.

### Possible Actions

The Designated Safeguarding Lead will decide on the course of action to take over the received complaint or report, always having the best interest of the child and protection of the integrity of the students as their main objective.

The DSL will ensure that students are aware and understand their right to establish limits and obtain the support they need from a responsible adult and even from the corresponding authorities.

It may be necessary to advise the parent to obtain professional help e.g. a therapist, psychologist or psychiatrist, depending on the circumstances. They will also be invited to seek the support or guidance of the Head Teacher, should they want it.

The wishes of the student will be taken into consideration as far as possible except in serious situations where because of legal reasons it may be necessary to override those wishes.

When necessary, provide psychological and emotional support through the appropriate support service in school.

Where necessary, the Head Teacher may decide there is the possibility that a criminal offence has occurred. In such cases contact with the police or other authorities will be made to file a proper complaint.

### Professional Confidentiality

Confidentiality related to the all information about possible harm or risks to the protection and safeguarding of the students, needs to be followed and fully understood by every member of the Lancaster school's staff and the purpose, in this respect, is for the benefit and interest of the child.

As part of the induction procedures, emphasis will be placed on all staff and Board members regarding the obligation to ensure and maintain



## La Escuela de Lancaster

confidentiality in matters related to probable abuse, neglect, damage and / or violence against students.

On no account will a student be guaranteed total confidentiality of the information that he or she could manifest related to probable abuses, negligence, damages and / or violence against them or other students or staff members, as there will be cases in which Lancaster, in attention to the applicable legislation or the best interests of the minor, must inform the facts to the corresponding authorities and / or parents of student.

Information should only be shared with the DSL who will in turn decide if information needs to be disseminated to other personnel.

Any breach of the confidentiality indications indicated here will lead to internal disciplinary action and/or legal action.

Internal allegations against staff

The following procedures should be applied in all cases of internal allegations against staff:

- Any knowledge or suspicion of any unlawful, illegal, irregular, undue and / or contrary behaviour to any type of, guidelines, code, policy, internal obligation on the part of a staff member, should be reported to the Head Teacher immediately. In the absence of the Head Teacher, a verbal or written report will be made to the Chairman of the Board.
- The Head Teacher, along with the DSL, will conduct the internal investigations regarding any such allegations, and make a judgment on what action will be taken to attend said complaints.
- In the absence of specific child protection and welfare agencies in Mexico, when necessary the school will take all reasonable steps to protect the welfare and promote the wellbeing of students. This will include possible referral to competent authorities when objective, well-funded, and enough information is provided about a criminal act that may have been committed by a member of staff or other adult against students. Where an overseas member of staff has behaved in a way that suggests an objective unsuitability to work with children, the school should make all attempts to ensure the appropriate national authority is consulted e.g. in the UK Disclosure and Barring Service for UK nationals.



## La Escuela de Lancaster

- On receipt of an allegation or complaint, a member of staff may be temporarily and immediately suspended while an investigation takes place. This decision can be taken by the Head Teacher only. Such a suspension should be considered as authorised leave of absence and be at full pay.
- If the allegation is made against the Designated Safeguarding Lead, the Head Teacher must be informed immediately or the Chair of the Board in her/his absence. If it is against the Head Teacher, the Chair of the Board must be informed immediately, without informing the Head Teacher.
- If the complaint is made against any member of the Board, the Head Teacher must be informed immediately, who will consult with the Commission of Honour and Vigilance.

The safety and welfare of the students is of paramount concern to The School and so is the need for a full and fair investigation to ensure, within what is feasible, that no false or ill-intentioned allegations proceed to further action.

### Allegations against students

These will be dealt with under the section of this policy entitled 'Dealing with Peer to Peer Abuse' which can be found at the end of this document.

### Dealing with Peer to Peer Abuse

#### Definition

Not every conflict between students supposes a situation of abuse, therefore, the professional judgment of who analyses each case must be taken into consideration. In addition to the behaviours described as "abuse" in this Policy, a

Student's behaviour is considered likely to be abuse if:

- There is a disadvantage among the students involved (whether emotional, age, size, abilities, development, among others); or
- The perpetrator has repeatedly tried to harm one or more other children

#### Keys to prevention

As a school there are a number of ways in which we can minimise the risk of incidents against other students by:



## La Escuela de Lancaster

- Providing a developmentally appropriate Personal, Social and Physical Education (PSPE) program which includes support to help develop student understanding of acceptable behaviour and how to keep themselves safe
- Including, as part of the PSPE program, the development of students' knowledge, skills and understanding, to ensure personal safety and self-protection when using the internet and social networks.
- Having systems in place that allow any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Where necessary, giving students information and training that will allow them, as far as possible, to develop the confidence and skills to feel empowered and safe in those cases where students have been identified as being at risk.
- Developing effective internal guidelines and systems of support and prevention where students are identified as being a potential risk to their peers.

Internal allegations against other students which could imply student safeguarding issues

It is possible that allegations could be made against other students by a student in Lancaster school, which are of a safeguarding nature. Safeguarding issues raised in this way may include, amongst others: physical abuse, emotional abuse, teenage relationship abuse and sexual exploitation, bullying, cyberbullying and sexting. The allegation should be considered as a safeguarding allegation against a student if some of the following are present:

- It is made against an older student by a younger student
- the student who makes the allegation is in a condition of vulnerability or disadvantage in relation to the student against whom the allegation was made,
- It is of a serious nature, possibly including a criminal offence as outlined in Mexican Law
- It raises objective and real risk factors for other students in the school
- It indicates that other students may have been affected by this student against whom the allegation was made
- It indicates that young people outside of the school may be affected by the actions of student against whom the allegation was made



Examples of abuse between students could include:

- *Physical Abuse* - hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a child has engaged in such behaviour before considering the actions or sanctions to be undertaken.
- *Bullying* - the School defines bullying in its Socialisation Policy as, “ a person is bullied when he or she is exposed, repeatedly over time, to negative actions on the part of one or more other persons, and he or she has difficulty defending himself or herself.”
- *Psychological and Emotional Abuse* - blackmail or extortion, humiliation, discrimination, mockery, threats and intimidation.
- *Sexual Abuse* - conduct or aggression of a sexual, lascivious or erotic nature that is illegal, unlawful or that may cause harm to students. Sexual behaviours that harm can be varied, from an inappropriate sexual language, inappropriate role plays, touching of sexual nature, sexual assault, exposure of genitals, sexual touching, and sexual aggression with violence, involuntary exposure to pornography or participation in sexting.
- *Teenage Relational Abuse* - any conduct that represents any physical, sexual, and/or psychological and emotional abuse perpetrated by a student against a current or former partner. This pattern of violent or coercive behaviour can be present in a heterosexual or same gender relationship.
- *Gender based abuse* - this is defined as any acts of physical, psychological and emotional or sexual harm or suffering to women or members of the LGBT+ community.
- *Sexual Exploitation* - this can include encouraging other young people to engage in inappropriate or illegal sexual behaviour or grooming or recruiting members of the peer group into being sexually exploited by other young people or adults. It can also include photographing or videoing other children performing sexual acts, and/or disseminating such acts through any means, even if the person disseminating the pictures and/or videos did not actually participate in the recording of the acts presented in those media.



## La Escuela de Lancaster

This list of possible behaviours of peer to peer abuse is not comprehensive and is only used here as an illustration.

### Procedures for Dealing with Internal Allegations of Probable Abuse between Students

When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a real and objective protection or safeguarding concern for the students. If there is felt to be a safeguarding concern the member of staff that receives the internal allegation has a duty to inform the Designated Safeguarding Lead at the earliest possible opportunity.

A factual record should be made of the internal allegation.

The Designated Safeguarding Lead will, when alerted, immediately inform the Head Teacher and together they will initiate and lead any investigation in line with the procedures as set out in the School's Child Protection and Safeguarding Policy and other related internal guidelines and obligations. The Head Teacher should be informed both about the investigation and the conclusions of that investigation.

If, after careful investigation and reflection, there is sufficient information to conclude that a potential criminal offence may have taken place, the Head Teacher should inform the Chair of the Board and report the information with the appropriate authorities. The school also has the responsibility to inform the family of the students concerned about the related findings on possible behaviours that may put at risk the integrity of the students, always respecting the obligations that in the matter of confidentiality the applicable national legislation imposes in charge of the School.

### Safety Measures

The School has the Health and Safety Policy and internal Procedures to monitor the health and safety of all staff, students, parents and users of The School.

The performance and conduct of all staff is monitored by the Senior Leadership Team.

The school requires that the necessary security checks are in place before any person is employed to work in the school.



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Staff must never place themselves intentionally or negligently in a position where their behaviour or actions place students or themselves at risk of harm or of allegations of harm to a student, e.g. engaging inappropriate electronic communication with a student.

Any area of improvement present in the procedures and internal guidelines designed to protect and safeguard students will be resolved without delay.

The Child Protection and Safeguarding Policy will be reviewed annually by the Board and the Senior Leadership Team.