

# The International School @ ParkCity Hanoi

## Child Protection & Safeguarding Policy

<b>Applies to:</b>	All staff (including supply & peripatetic), visitors, parents, contractors, board of trustees and guests etc.
<b>ISPH Responsibility:</b>	Head of Learning Support
<b>Version:</b>	1
<b>Groups consulted:</b>	Principal, LT, DSLs, DDSLs
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## 1. Introduction

### 1.1 A Note On Language

At ISPH the terms ‘Safeguarding’ and ‘Child Protection’ are used side by side. ‘Safeguarding’ refers to the actions that are taken to promote the welfare of children and protect them from harm across all facets of ISPH and is inclusive of but not restricted to the following areas:

- Protecting children from abuse and maltreatment.
- Preventing harm to children’s health or development.
- Ensuring children grow up with the provision of safe and effective care.
- Taking action to enable all children and young people to have the best outcomes.

‘Child Protection’ refers to the specific actions to the prevention of, and response to, exploitation, abuse, neglect, harmful practices and violence against children.

### 1.2 Scope & Purpose Of This Policy

The purpose of this policy is to ensure:

- There is a whole school approach to safeguarding which enables ISPH to be a safe place to learn and work.
- All staff understand their safeguarding responsibilities and are confident to carry out their duties.
- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare.
- Children and young people who attend ISPH are protected from harm and appropriate action is taken so that pupils receive the right help at the right time.
- Systems for reporting abuse are well promoted, easily understood and easily accessible.

This scope of this policy applies to all staff (including supply and peripatetic staff), volunteers, Trustees, or anyone working on behalf of ISPH.

## 2. Legal framework

ISPH practices the UK Curriculum and as such this policy is based on the Department for Education’s statutory guidance, [Keeping Children Safe in Education \(2023\)](#), [Working Together to Safeguard Children \(2018\)](#) and [Governance Handbook \(2020\)](#). It is also based on relevant Vietnamese legislation and other policy & guidance that seeks to protect children.

This includes:

- [The Children Law of Vietnam \(2016\)](#)
- [United Nations Conventions on the Rights of the Child \(1991\)](#)
- [The Penal Code \(2015\)](#)
- [The Law on Prevention and Combat against Domestic Violence \(2022\)](#)
- [Promoting the education of looked after children and previously looked after children \(2018\)](#)

## 3. Supporting documents

This policy should be read alongside our organisational policies, procedures, guidance, and other related documents.

- Behaviour (under completion)
- Anti-Bullying & Respect Policy (under completion)
- [Complaints Policy](#)
- [Safer Recruitment Policy](#)
- Suicide Prevention (under completion)

- Counselling (under completion)
- [Wellbeing](#)

#### 4. Policy Statement

##### We believe that:

- Children and young people should never experience abuse of any kind and all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- Everyone working for ISPH has responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

##### We recognise that:

- The welfare of children is paramount in all the work we do and in all the decisions we take.
- We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.
- Safeguarding and promoting the welfare of children is everyone's responsibility.
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare
- Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

Extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse

##### We are committed to:

- A whole school approach to safeguarding, which underpins all aspects of school life
- Safeguarding and promoting the welfare of all Pupils
- Working with '**professional curiosity**' and an attitude that '**it could happen here**'
- Practice that is child-centred, considering, at all times, what is in the best interests of the child
- Having effective procedures in place which ensure pupils receive the right help, at the right time
- Playing a pivotal role in local safeguarding arrangements
- A 'zero-tolerance' approach to harmful sexual behaviours, and child on child abuse
- Ensuring all staff receive appropriate safeguarding and child protection training which is regularly updated.
- Providing suitably trained and experienced, specialist staff, including a Designated Safeguarding Lead, within the

school

- Reviewing policy, procedure, and practice regularly

#### **We will seek to keep children and young people safe by:**

- Valuing, listening to and respecting them
- Involving them in decisions which affect them
- Building children's resilience to radicalisation through a broad and balanced curriculum that promotes fundamental values and enables children to challenge extremist views
- Adopting child protection and safeguarding best practice through our policies, procedures, and code of conduct for staff and volunteers
- Developing and implementing effective online safety and related procedures
- Providing effective management for staff and volunteers through induction, supervision, support, training, and quality assurance measures so that all staff and volunteers know about, and follow, our policies, procedures, and behaviour codes confidently and competently
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording, storing, and using information professionally and securely, in line with data protection legislation and guidance.
- Sharing information about safeguarding and good practice with children and their families through all our communication routes.
- Making sure that children, young people, and their families know where to go for help if they have a concern
- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families, and carers appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying and harassment environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying and harassment that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with Vietnamese law and regulatory guidance
- Building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns

#### **5. Definitions**

To this policy, we will use the following definitions:

**Child** - As in [The Children Law of Vietnam \(2016\)](#), a **child** is a human being below the age of 16 however children at ISPH who are 16 and older are included within this definition and this policy is applicable.

**Safeguarding** - This is the action that is taken to promote the welfare of children and protect them from harm.

This means:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

**Child protection** – This is part of the safeguarding process and refers to the activities undertaken that prevent children suffering, or being likely to suffer, significant harm. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to

respond to concerns about a child.

**Safeguarding Partners** - Safeguarding partners will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

The our Safeguarding partners are:

- La Khe Police.
- Park City ClubHouse.
- The Department of Child Affairs (under the Ministry of Labor, Invalids, and Social Affairs).

**Abuse** – This is a form of maltreatment and may involve inflicting harm or failing to act to prevent harm.

**Neglect** – This is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

## 6. Identifying children and young people who are suffering or likely to suffer significant harm.

Teachers and other adults in school are well placed to observe any physical, emotional, or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents, and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

We recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Therefore, all staff know of the safeguarding issues that can put children at risk as well as the signs of abuse, harm, and neglect.

### **a) Indicators of abuse and neglect**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or children.

#### **i. Physical Abuse**

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

#### **ii. Emotional Abuse**

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

### **iii. Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in a sexually inappropriate way, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **iv. Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve parents/carers failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

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

### **b) Safeguarding issues**

#### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

We recognise that Child Sexual Exploitation (CSE) can happen in person or online. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge

e.g., through others sharing videos or images of them on social media. An abuser will gain a child's trust or control them through violence or blackmail before moving onto sexually abusing them. This can happen in a short period of time. An abuser may groom a young person by giving gifts, drugs, money, status, and affection. This is usually exchanged for the young person performing sexual activities. Key to identifying potential CSE is a change in behaviour, having money or items they cannot or will not explain, alcohol or drug misuse, sexually transmitted infections, being secretive.

CSE can affect any child, who has been coerced into engaging in sexual activities.

The age of consent in Vietnam is 18 and as previously stated, although the definition of a child is someone under the age of 16 this policy still applies to all individuals at our school who are engaged in studying as a student no matter their age.

Some children may not realise they are being exploited e.g.; *they believe they are in a genuine romantic relationship.*

The ICMEC provides: [National Legislation in Vietnam protecting children.](#)

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

We recognise that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

*Note: The age of criminal responsibility is 14 years old in Vietnam.*

## **iii. Modern Slavery:**

ISPH recognises that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour, it can include sexual exploitation and the removal of organs. Trafficking is where children and young people are tricked, forced, or persuaded to be moved or transported and then exploited, forced to work or sold. Children are trafficked for sexual and criminal exploitation, benefit fraud, forced marriage, domestic slavery, forced labour, committing crime like theft.

## **iv. Extremism**

Although the Prevent duty stems from the United Kingdom, ISPH has chosen to include this in its Child Protection & Safeguarding policy due to the different forms extremism can take e.g radicalism, reactionism, chauvinism, fundamentalism, and fanaticism.



It is essential that staff can identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other harms (e.g., drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

### **Radicalisation (prevent strategy)**

"The process by which a person comes to support terrorism and forms of extremism leading to terrorism."

### **Extremism (prevent strategy)**

"Vocal or active opposition to fundamental Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faith and beliefs."

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

Female genital mutilation is a procedure where the female genitals are deliberately cut, injured, or changed, but there's no medical reason for this to be done.

### **vi. Mental Health**

Mental health problems can be an indicator that a child has suffered or is at risk of abuse, neglect, or exploitation. This can have a lasting impact throughout childhood, adolescence and into adulthood.

### **vii. Child-on-child abuse, including Sexual Violence and Harassment and Youth Produced Sexual Imagery (sexting)**

ISPH recognises that children can abuse their peers, that this can manifest itself in many ways and may reflect gender issues.

**Sexual violence and sexual harassment** involving children at the school is a form of child-on-child abuse. Sexual violence involves the criminal sexual offences defined in the Sexual Offences Act 2003. Sexual Harassment is defined as unwanted conduct of a sexual nature and can include online behaviour. Neither is acceptable nor will it be tolerated.

ISPH takes all such reports seriously and they will receive the same high standard of care that any other safeguarding concern receives. A Safeguarding Partner approach will be undertaken when responding to all such complaints; however, the school will always take immediate action to protect children despite the actions of any other agency.

These actions may include an immediate risk assessment in respect of the needs of the child victim and will address any risks identified to any child in respect of an alleged perpetrator of sexual violence or sexual harassment to ensure children are protected from harm. Any risk assessment will be fluid and may change to reflect any developments during the management of the case.

Upskirting (which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm).

As of November 2015, Article 146 & Article 147 make this act illegal (*although not officially named*) and carry a sentence of between 3 months to 7 years depending on severity.



Where there are concerns or allegations of child-on-child abuse, the procedures and guidance for staff if they suspect abuse of this policy will be followed, in the same way as if the matter was in respect of abuse by an adult.

#### **viii. Serious violence**

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

All staff should be aware of the associated risks and understand the measures in place to manage these.

#### **ix. Domestic Abuse**

The Law on Prevention and Combat against Domestic Violence in 2022 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be family members or personally connected for this law to apply (*other laws can be used if not*).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Where police are called to an incident of domestic abuse and there are children in the household who have experienced the domestic incident, the police will provide 'shelter' for these individuals and can impose sanctions.

#### **x. Extra Familial Harm**

**All** staff should be aware that Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. **All** staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. It is important that schools provide as much information as possible so that assessments can consider any harm in contexts outside the home. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse.

Staff should recognise that children with SEN, disabilities and certain health conditions can face additional safeguarding challenges. They must not assume that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration. They must remain alert to the fact that children with SEN, disabilities and certain health conditions can be more prone to peer group isolation and disproportionately

impacted by behaviours such as bullying, without outwardly showing any signs and may have communication barriers and difficulties overcoming these barriers.

It is **not** the responsibility of the school staff to investigate or determine the truth of any disclosure or allegation of abuse or neglect. This includes allegations of peer abuse. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns indicating possible abuse or neglect will be recorded and discussed with the DSL (or in their absence with the person who deputises) prior to any discussion with parents.

#### **xi. The trio of vulnerabilities**

This is made up of three issues: domestic abuse, mental ill-health, and substance misuse. These issues can co exist in families where significant harm to children has occurred. Where this co-occurrence happens, it is an indicator of increased risk of harm to children.

#### **xiii. Cybercrime**

Cybercrime is criminal activity committed using computers and / or the internet. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

#### **c) Children potentially at greater risk of harm**

All children should be protected but some groups of children are potentially at greater risk of harm.

#### **i. Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare issues, this can lead them to be vulnerable to further harm as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. This should inform decisions about safeguarding and promoting welfare, considering the provision of pastoral and / or welfare support, alongside action by statutory services.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

#### **ii. Children who are absent from education**

Children being absent for prolonged periods and/or on repeat occasions can be a warning sign of safeguarding issues including neglect, child sexual exploitation and child criminal exploitation.

#### **iii. Children missing from education**

This can be a vital warning sign to a range of safeguarding issues and the response of the school will support identifying abuse help prevent the risk of the child going missing in the future.

#### **iv. Children requiring mental health support**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The school has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

The Wellbeing lead at ISPH is **Lewis Foster**. They will access training and resources to develop the whole school

approach to mental health and wellbeing.

#### v. Looked after children (LAC) and previously looked after children (PLAC)

ISPH recognises that LAC and PLAC children are [statistically](#) more likely to have Special Educational Needs (SEN) and that the child, and carers, may need additional support such as access to counselling services.

The most common reason for children becoming looked after is because of abuse and/or neglect.

The school will:

- Hold the information in relation to a child's looked after legal status (whether they are looked after under voluntary) (*if applicable*).
- Arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility (*if applicable*).
- The school will hold the name of the child's social worker (*if applicable*).
- The school recognises that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe.
- The Head of Learning support will create a PLAC File for looked after children or previously looked after children in conjunction with relevant parents, carers and teachers.

As part of their role, the Head of Learning Support will:

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

## 7. Roles and responsibilities

Safeguarding and promoting the welfare of children is **everyone's** responsibility.

### a) All School Leaders, Staff and Volunteers should:

- Read at least Part One (or Annex A, if appropriate) and Annex B of KCSIE 2023
- Receive appropriate child protection training, including online safety training, at induction and which is regularly updated, (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Be aware of systems within the school which support safeguarding. These should be explained to them as part of staff induction. This includes: the school's child protection & safeguarding policy; Code of Conduct, the identity and role of the DSL and any deputies.
- Know what to do if a child tells them they are being abused or neglected and know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved. Staff should never promise a child that they will not tell anyone about a report of abuse
- Be aware of the signs of abuse and neglect so that they are able to identify cases of children who may need help or protection.
- Be aware of children who may need support with their mental health.
- Maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.
- **Always** speak with the DSL & record on CPOMs where there are concerns about a child
- Speak to a member of the LT and / or take advice from DDSL's if the DSL is not available
- Have due regard to the duty to prevent people from being drawn into terrorism; report known cases of female genital mutilation and follow procedures when a child goes missing from education
- Be aware of the school emergency procedures regarding lock-down and invacuation.
- Refer concerns to the DSL where there are concerns about another staff member.
- Refer concerns to Andrew Dalton (Director of Education) where there are concerns about the Headteacher or

Principal.

- Raise concerns about poor or unsafe practices and potential failures in the school's safeguarding regime and where necessary have regard to whistleblowing procedures.
- Do not assume a colleague or another professional will act and share information that might be critical in keeping children safe and be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.
- Staff should be vigilant and always raise any concerns with their DSL or deputy.
- Should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. Therefore all staff must have an awareness and understanding of the provisions in place (filtering and monitoring systems), manage them effectively and know how to escalate concerns when identified.

**Concerns should always lead to help for the child at some point.**

#### b) The Designated Safeguarding Lead

The DSL is a Head of Department. Our DSL is:

Name	Role	Contact
Lewis Foster	Head of Learning Support	Lewis Foster

The DSL takes lead responsibility for child protection and wider safeguarding.

They are supported by:

Name	Role	Contact
Paul Antcliffe	Head of Primary	Paul Antcliffe
Stuart Hill	Head of Secondary	Stuart Hill
Kit Pham	School Counsellor	Kit Pham

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (child protection services, local police and Park City community), and support staff who make such referrals directly
- The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- The DSL should take lead responsibility for online safety and understanding the filtering and monitoring systems

and processes in place.

## **8. Training**

To fulfil their safeguarding duty effectively, all board of trustees members, staff and volunteers receive regular, relevant, and comprehensive training, relevant to their role. Training is part of induction but is also aligned and integrated to the wider R&D schedule. Through induction, and the training schedule, all staff and volunteers are provided with opportunities to learn how to recognise and respond to concerns about child abuse.

We have a team of specialist staff, including the Designated Safeguarding Lead (DSL). Staff and volunteers who have these specialist responsibilities linked to safeguarding are given training matched to their role.

Training and guidance on safer recruitment is provided for those responsible for recruiting and selecting staff and volunteers.

### **i) Training Record**

The DSL will keep and manage a training record of all Safeguarding training (and other relevant trainings)

## **9. Safer Recruitment**

Rigorous practices are in place that ensure all staff and volunteers are suitable to work with children and young people. ISPH pays full regard to DfE guidance Keeping Children Safe in Education 2023.

We ensure that all appropriate measures are applied in relation to everyone who works in or on behalf of the school who is likely to be perceived by the children as a safe and trustworthy adult.

It is vital that schools create a culture of safe recruitment and, as part of that, adopt our written recruitment and selection policies and procedures that help deter, reject, or identify people who might abuse children. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining, at least three, professional and character references, checking previous educational and employment history and ensuring that a candidate has the health and physical capacity for the job.

The school will take a planned approach to recruitment and ensure it takes appropriate safeguarding actions at each stage of the process. The selection decision will be appropriately recorded and a copy of relevant documents, including those used to verify the successful candidate's identity, right to work and required qualifications, will be kept on their personal file.

Where staff move from positions that are not providing education into a new position where they are, then they will be treated as a new member of staff and all appropriate checks for the post carried out.

All Safer Recruitment steps detailed in Safer Recruitment Policy.

### **Single Central Record**

ISPH has a single central record detailing a range of checks carried out on all staff (including supply staff, and teacher trainees on salaried routes) who work at the school and, additionally, all members of the proprietor body.

ISPH requirements are such that:

- All staff are required to apply for a Police Clearance Certificate from their home country or the country they have been living/working recently. The certificate must be valid within the last 6 months calculated from the date staff start working in ISPH. The Police clearance certificate is required to be renewed every 2 years if they continue their employment at school.
- A local Vietnamese staff of expat who have been living in Vietnam over the course of 6 months are required to

apply for the Vietnamese Police Clearance Check No. 2 issued by the provincial-level Justice Departments or National Center for Judicial Records. In which the content proves:

- Individuals with or without criminal records, judgments or decisions of the Court during their stay in Vietnam
- Whether an individual is currently banned from holding a position in the enterprise or establishing or managing an enterprise declared bankrupt by the Court.
- A clear Police Clearance Certificate is a requirement from the Vietnamese government in order to grant the work permits and visas to expat workers in Vietnam. If the result of background checks reveals information related to the disclosure of criminal backgrounds, the work permit is not granted.
- Staff are required to send a scanned copy of their professional qualifications to HR to check if they meet the requirements of Vietnamese labour law to work in Vietnam.
- In the unlikely event of a work permit not being obtained or rejected for whatsoever reason and/or entry denied by the Vietnamese authorities, both parties shall be released from all obligations under this offer of Employment and thereafter neither party shall have any claims whatsoever against the other.

### **Safer Working Practice**

*"All staff have a responsibility to be aware of systems within their school which support safeguarding and these should be explained to them as part of staff induction and in regular staff training sessions. This includes the school's child protection policy and staff behaviour policy (sometimes called code of conduct) of which this document will become a part." (Guidance for safer working practice for those working with children and young people in education settings)*

Safer working practice ensures that pupils are safe and that all ISPH staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- work in an open and transparent way
- discuss and/or take advice from school management over any incident which may give rise to concern
- record any incidents or decisions made
- apply the same professional standards regardless of gender or sexuality
- are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them

### **10. Site and premises**

ISPH has put in place appropriate arrangements to ensure the security of the site. These include a variety of different measures and is constantly monitored & reviewed:

- All members of staff, including gardeners, kitchen staff, cleaners & security staff have had the same safeguarding training as the academic staff.
- The gates are kept locked at all times and access is restricted using lanyards.
- There is an 8 foot perimeter fence around the entire perimeter.
- Fingerprint & card scanners have been installed around access points to track staff entrance & exit (*under review*).

### **11. Curriculum**

The curriculum plays an important, preventative role in safeguarding. At ISPH there is an inclusive and effective Community Outreach and Life Skills (COALS) which is underpinned by the school's values, standards, and guidance. Pupils are encouraged, enabled, and inspired to be happy, healthy, safe and confident young people now and, in the future.

An age-appropriate, spiral curriculum split by Key Stage teaches pupils how to keep themselves and others safe. This includes harmful and inappropriate online content, contact, conduct and commerce.



## 12. School procedures to ensure children are safe at school and at home

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

### a) Reporting concerns

#### i. If you are concerned a child is suffering or likely to suffer harm, or in immediate danger

- Act on your concerns immediately.
- Report your concerns to the DSL, or DDSL, if the DSL is unavailable in person.
- Keep detailed records of decisions made - this could be in the form of a decision log - to ensure the response is child-centred and based on ensuring the child is away from harm.

#### ii. If a disclosure is made

Disclosures or information may be received from a child, parents, or other members of the public. If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation on CPOMs as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Such information cannot remain confidential, and you must immediately communicate what you have been told to the DSL and make a contemporaneous (immediate chronological) record. If in doubt about recording requirements staff should discuss with the DSL.

School recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity.

#### iii. If you discover that FGM has taken place, or a child is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

Whilst FGM is not prevalent in Vietnam there are many neighbouring countries which practice FGM legally. ISPH is extremely multi-national and has students from many different nations. There are no specific anti-FGM laws in Vietnam but ISPH adopts the stance that FGM is an illegal practice in line with the United Nations unanimous ban on FGM in 2012. It is a form of child abuse with long-lasting, harmful consequences. It can also be known as 'female genital cutting', 'circumcision' or 'initiation'.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil must immediately report this to the DSL who will then in turn consult local Safeguarding Partners (e.g Police & Child Protection Services) in coordination with the LT team.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Under no circumstances Staff members examine pupils.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL.



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

- Where possible, speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken.
- Speak to a DDSL or a member of the senior leadership team.
- Share details of any actions you take with the DSL as soon as practically possible.

**v. If you have concerns about extremism**

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

- Where possible, speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken.
- Speak to a DDSL or a member of the senior leadership team.
- Share details of any actions you take with the DSL as soon as practically possible.

**vi. If you have a mental health concern**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by speaking with the DSL/DDSL or a member of LT.
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.

**vii. Allegations of abuse made against other pupils**

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

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

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

- You must record the allegation on CPOMs and tell the DSL, but do not investigate it.
- The DSL will form a response team with the DDSLs and other members of leadership where necessary.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact Safeguarding Partners if needed.

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual

images

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

### **viii. Sexting**

#### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

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

#### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

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

The DSL will make an immediate referral to the police and/or child protection services if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 16
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **Further review by the DSL**

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

### **Informing parents**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through relevant channels with the La Khe Police Ward.

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12ii of this policy also apply to recording incidents of sexting.

### **Supporting the Child and Partnership with Parents and Carers**

- ISPH recognises that the child's welfare is paramount, however good child protection practice and outcome relies on a positive, open, and honest working partnership with parents and carers.
- Whilst we may, on occasion, need to make referrals without consultation with parents and carers, we will make every effort to maintain a positive and supportive working relationship with them whilst fulfilling our duties to protect any child.
- We will provide a secure, caring, supportive and protective relationship for the child.
- Children will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why.
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child, parents, and carers. The DSL will determine which members of staff 'need to know' personal information and what they 'need to know' for the purpose of supporting and protecting the children.

### **13. Concerns about a staff member, supply teacher or volunteer**

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the DSL immediately. If the concerns/allegations are about the DSL or Heads of School, speak to the Director of Education - Andrew Dalton.

### **Low-level concerns**

The term low-level concerns covers behaviours that **DO NOT** meet the **harm threshold** but still cause concern. KCSIE definition:

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college 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 harm threshold or is otherwise not serious enough to consider an immediate referral to the DSL

Examples:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, and storing them contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils

It is important to remember that these concerns exist on a large spectrum where two low-level concerns may look very different but are still covered under that same guidance.

These can be reported through the 'Disclosure About a Member of Staff' aspect of Safeguarding, only the DSL can view this.

#### 14. Online Safety and social media

The use of 'Information and Communication Technologies (ICT)' has great benefits for the development of students' learning and the administration and governance of ISPH. With these advantages, however, come risks, including:

- child sexual exploitation
- identity theft including phishing
- spam
- 'cyber' bullying
- viruses

It is the aim of this section of the policy to minimise these risks for:

- students
- staff and others involved with the daily activities of ISPH.

#### Online safety

**Issues relating to online safety can be categorized into 4 areas of risk:**

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk.

This policy is concerned with significantly unsafe use of ICT, not minor infringements. Just as safe use of ICT is commonly known as Online Safety, unsafe use of ICT is an Online Safety incident.

An Online Safety incident:

- uses some form of technology
- causes or could have caused significant offence, harm, or distress

- may or may not be deliberate
- may not have occurred within school or on school equipment.

Examples of Online Safety incidents (not exclusive) include:

- a student or member of staff viewing pornography on a school computing device
- a student bullying someone from another school with text messages
- a student bullying a fellow student using instant messaging services
- a student placing distressing posts about a member of the school community on social networking sites like Facebook
- a student publishing their own address details on the Internet
- a student publishing revealing images of her or himself on a social networking site
- a student sharing a phone video of a member of staff in a lesson with other students
- a member of staff suspecting a student of being groomed through their use of internet chat services
- a student modifying a photo of a member of staff and distributing it leading to offence

### **Staff Responsibilities**

Online Safety Coordinators - Lewis Foster, Kian Yap, Nick Gray & Georgina McFetridge

All members of the school community will be made aware of who holds this post. It is the role of the Online Safety Coordinator to:

- Keep abreast of current issues and guidance through organisations such as CEOP (Child Exploitation and Online Protection) and Childnet
- Provide regular training which explains online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Support staff in handling incidents
- Support the education of students and staff in the safe use of ICT

### **ISPH IT Services**

Maintain services in support of the safe use of ICT. Typically to include;

- internet and email filtering and logging
- management tools to monitor ICT use
- logging of network access
- appropriate level of IT security to guard against malicious use

### **Other staff**

- Know what is safe use of ICT
- Understanding the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Model safe use of ICT within the school community and beyond
- Be alert to unsafe use of ICT, by students & staff within school and beyond
- Manage & report incidents as appropriate
- Educate students where required by the curriculum

### **Student Responsibilities**

- Must adhere to an ICT Acceptable Use Policy
- Must report incidents as they occur through the most appropriate member of staff, e.g., current teacher, form tutor, Online Safety Coordinator, DSL or SLT.

### **Parent Responsibilities**

- Understand the Acceptable Use Policy and encourage their child to use ICT safely

- Accept any sanctions that are applied when a student breaches the policy

### **Education in Safe Use of ICT**

#### **Staff**

- In addition to the Child Protection training, all staff will be trained in the safe use of ICT both for themselves and for students they supervise; the training will be regular and kept up-to-date.
- Certain members of staff will have a higher level of expertise and clearly defined responsibilities.

The training will raise awareness of their individual responsibilities for the safeguarding of children within the context of Online Safety and will cover what to do in the event of misuse of technology by any member of the school community.

#### **Students**

- Each school will provide opportunities through ICT, Assemblies and other curriculum and non-curriculum times as appropriate
- Students will be taught about copyright and respecting other people's information, images, and related topics.
- Students will be made aware of the impact of Cyberbullying and know how to seek help if they are affected by any form of online bullying.
- Students will be taught the dangers of releasing personal information through the use of social networking platforms and instant messaging / chat facilities.
- Students will also be made aware of where to seek advice or help if they experience problems when using the internet and related technologies; i.e., parent/ carer, teacher/ trusted staff member, or an organisation such as Childline or CEOP report abuse button.

### **7. Managing Technology**

The Internet is an open communication medium, available to all, at all times. Anyone can view information, send messages, discuss ideas and publish material which makes it both an invaluable resource for education, business and social interaction, as well as a potential risk to young and vulnerable people. Internal networks are logged to allow any inappropriate use to be identified and followed up.

#### **Infrastructure**

ISPH IT Services will monitor access and use of the school network including internet services, so activity is monitored and recorded. Email and internet activity can be monitored and explored further if required.

ISPH IT Services will use management systems for controlling and monitoring workstations. The school also reserves the right to inspect any computing device authorised for use for school activity.

#### **Managing the Internet**

Access to the Internet will be monitored. A filtering and monitoring system is in place and its effectiveness is regularly reviewed.

Staff will make every effort to preview sites and applications before recommending them to students; it is recognised that internet sites and applications are beyond the control of the ISPH.

All users must observe software copyright at all times. It is illegal to copy or distribute school software or illegal software from other sources.

All users should make all reasonable attempts to observe copyright of materials from electronic resources.

Users must not post personal, sensitive, confidential or classified information or disseminate such information in any way that may compromise its intended audience.

Users must not reveal personal information/images about members of the school community (including names) acquired through school life on any social networking site or blog without seeking the subject's permission.

Information published on the internet prior to the adoption of this policy may remain where not causing an issue, however staff should declare any material in the public domain (to the Designated Safeguarding Lead) which will be inspected for suitability.

If staff are asking students to download apps or sign-up to sites for activities such as blogging, permission must be sought from the relevant Senior Leader in conjunction with ISPH IT Services.

### **Communication**

Students, Parents, Staff and Governors are made aware of the Safeguarding and Child Protection Policy through a variety of means:

- Online Safety will be introduced to the students at the start of each school year
- Online Safety messages will be embedded across the curriculum whenever the Internet and/or related technologies are used including Assemblies and other non-curriculum time
- Online Safety posters will be prominently displayed
- Online Safety updates will be displayed via the following methods;
- school website
- any school learning platform

### **Procedures for Handling and Reporting Incidents**

#### **Student Online Safety incidents**

Many incidents of misbehaviour involving ICT do not lead to actual or potential significant offence, harm or distress. These should be dealt with by our normal discipline procedures. Where the member of staff involved believes the event to be an Online Safety incident, they will follow this procedure:

- Log the incident via CPOMs to the relevant Assistant Head & DSL.
- Staff must not investigate an Online Safety incident and should not ask students to forward inappropriate or illegal content.
- If the incident constituted misbehaviour the member of staff must follow standard school procedures.
- The relevant Assistant Head & DSL investigates and decides whether further action should be taken.
- Further action may include sanctions or education and may involve parents.

In extreme cases, it may be necessary to involve outside agencies such as the Police.

- The DSL will inform staff as appropriate.
- Staff Online Safety incidents

If a member of staff suspects another member of staff has breached this policy, they should report their concerns to the Designated Safeguarding Lead. This will be investigated to see if further action is needed and report to the Heads of School. Any internal disciplinary action taken will conform to the Expectations, Code of Conduct and Disciplinary Policy. If a criminal offence has been committed, the details will be passed on to the appropriate authorities.



## Social Media

This section of the policy is in place to minimise the risks to ISPH through use of social media.

- This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Instagram, WhatsApp and Snapchat and all other social networking sites, internet postings, blogs and chat apps. It applies to use of social media for business purposes as well as personal use that may affect ISPH in any way.
- This policy covers all employees, officers, consultants, contractors, volunteers, casual workers, and agency workers.
- This policy ensures ISPH maintains its duty to safeguard children, the reputation of the ISPH and those who work for it and the wider community.
- This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## Personal use of social media

- Personal use of social media during directed hours is not permitted.
- You must avoid making any social media communications that could damage our business interests or reputation, even indirectly.
- You must not use social media to defame or disparage the Trust, ISPH, our staff, students, parents/carers or any third party; to harass, bully or unlawfully discriminate against students, parents/carers, staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.
- You must not express opinions on our behalf via social media, unless expressly authorised to do so.
- You must not post comments about sensitive business-related topics, such as school performance, or do anything to jeopardise confidential information and intellectual property.
- You must not accept students or their parents/carers as friends or use social media to send any personal messages to them directly or indirectly – personal communication could be considered inappropriate and unprofessional and may put you and/or your colleagues vulnerable to allegations.
- You are strongly advised not to be friends (on or offline) with recent students (the potential for colleagues at the school to be compromised in terms of content and open to accusations makes the risk not worth taking) and colleagues at the school are also strongly advised not to be friends with students at other schools (on or offline) as this is likely to make them vulnerable to allegations and may be open to investigation by the school or police. Where a colleague is considering not following this advice, they are required to discuss the matter, and the implications with the Heads of School or DSL.
- You must not share any personal information with any student (including personal contact details, personal website addresses/social networking site details) and ensure good safeguarding practice.
- You must not post or share photographs of students under any circumstances.
- Any misuse of social media should be reported to the DSL or members of LT.

## Guidelines for responsible personal use of social media

- You should make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal e-mail address.
- You must be conscious at all times of the need to keep your personal and professional lives separate. You should not put yourself in a position where there is a conflict between your work for ISPH and your personal interests.
- Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.
- If you disclose your affiliation with us on your profile or in any social media postings, you must state that your views do not represent those of your employer. You should also ensure that your profile and any content you post are consistent with the professional image you present to the community and colleagues.
- If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting until you have discussed it with your line manager. All communication via social networking sites should be made with the awareness that anything said, shown or received could be made available, intentionally or otherwise, to an audience wider than that originally intended.

- You are strongly advised, in your own interests, to take steps to ensure as far as possible that your on-line personal data is not accessible to anybody who you do not want to access it. For example, you are strongly advised to check the security and privacy settings of any social networking site you subscribe to and set these to maximum and, where relevant, use strong passwords and change them regularly.
- If you see social media content that disparages or reflects poorly on ISPH, you should contact the DSL.

### **Business use of social media**

- There are many legitimate uses of social media within the curriculum and to support student learning – for example, school and faculty-based Twitter accounts. There are also many possibilities for using social media to enhance and develop students' learning.
- There must be a strong pedagogical or business reason for creating official school social media sites. Staff must not create sites unnecessarily or for trivial reasons which could expose the Trust to unwelcome publicity or cause reputational damage. As a guideline, we would expect accounts to be limited to one faculty account. Staff should remember that the greater the number of accounts the greater the risk of those accounts being "hacked".

When using social media for educational purposes, the following practices must be observed:

- Staff should set up a distinct and dedicated social media site or account for educational purposes. This should be entirely separate from any personal social media accounts held by that member of staff, and ideally should be linked to an official school email account.
- The content of any school-sanctioned social media site should be solely professional and should reflect well on the school.
- **Staff must ensure that the school has consent to use, post or publish a photograph or video image of the student.**
- **Staff must ensure that they do not identify a student using their full name. Only first/forenames or initials may be used.**
- Care must be taken that any links to external sites from the account are appropriate and safe.
- Any inappropriate comments on or abuse of school-sanctioned social media should immediately be removed and reported to a member of the LT.
- Staff should not engage with any direct messaging of students through social media where the message is not public.
- Staff should not seek to view/link up with view student accounts. For example, in the case of Twitter, staff should not "follow back" those who follow, share or like School comments/posts.

### **14. Monitoring IT resources**

We reserve the right to monitor, intercept and review, without further notice, staff activities using our IT resources and communications systems, including but not limited to social media postings and activities, to ensure that our rules are being complied with and for legitimate business purposes and you consent to such monitoring by your use of such resources and systems.

### **15. Complaints**

Wherever a complaint indicates that a child's safety or wellbeing is at risk, ISPH staff have a duty to report this immediately to the relevant member of leadership. Any action taken will follow the procedures set out in this policy.

#### **Complaints against staff**

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

#### **Other complaints**

When concerns are raised, they will be dealt with promptly through a fair, transparent process and without prejudice.

## Whistleblowing

ISPH is committed to achieving the highest possible standards of service and ethical standards and this policy will enable you to raise your concerns of serious wrongdoing without fear of reprisal. The Whistleblowing Policy covers concerns about wrongdoing within ISPH.

### 16. Monitoring, Review & Audit

This policy will be monitored continuously whilst also being reviewed & audited **annually** by Lewis Foster, ISPH's Designated Safeguarding Lead.

Continuous monitoring of CPOMs and incident reports will be fed back into staff training, preventative measures and this policy.

An annual audit will form part of the review of this policy and will aim to encompass changes to the school community, best practice and KCSIE. This review will also look at filtering & monitoring procedures.

Every two years an external audit will be conducted by an independent safeguarding advisor with their findings being amalgamated with that year's annual review & audit.

### 17. Appendices

Appendix Correspondance	Document/File Name	Policy Link	Document Review