



CHARTERHOUSE
LAGOS

Safeguarding Policy (C1.1)

This policy was written by John Todd, Director of Education and is subject to annual review and final approval by the Charterhouse Lagos Board.

January 2023

Table of Contents

1. Introduction and Purpose	3
1.1 Safeguarding Definitions	3
1.2 Guiding Philosophy:	5
1.3 Key Competencies	5
2. Cultural and Legal Context	6
2.1 Legal Framework	6
2.2 What is Child Abuse	6
2.3 Our Commitment to Safeguarding	7
2.4 Safeguarding Policy Review	7
2.5 Safeguarding Roles in the school	8
3 Managing Concerns About Children	9
3.1 Early Recognition and Intervention	10
3.2 Reporting or Recording Concerns About a Child	10
3.3 Allegations Against an Adult	11
4 Recording, Storing and Transferring Child Protection Records	13
4.1 Confidentiality	13
4.2 When we need to tell someone (breaking confidentiality)	13
4.3 Transferring Safeguarding Files	13
5 Safeguarding Training Strategy	15
6 Safer recruitment	16
6.1 Volunteers and visitors	16
6.2 Contractors	16
7 Use of Reasonable Force	17
8 Speaking out - Safeguarding Whistleblowing Guidance	18
8.1 Self-reporting	18
9 Digital Safety	19

10 Homestays	20
11 Reflect, Review and Evaluate for Impact	21
11.1 Audit process	21
11.2 Regular review of Safeguarding action plans	21
11.3 Documentation Review	21
11.4 Safeguarding is a fixed item on all meeting agendas	21

Safeguarding Policy Links	22
Appendices	23

1. Introduction and Purpose

Keeping our students safe is the responsibility of every adult who works at or visits Charterhouse Lagos.

The purpose of this policy is to:

1. Protect children who attend Charterhouse Lagos
2. Provide all adults (staff and volunteers) with the overarching principles that guide our approach to safeguarding and child protection.

Charterhouse Lagos acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities and requirements, government guidance, and internationally recognised best practice.

Charterhouse Lagos recognises that:

1. The welfare of the child is paramount as enshrined by the Child's Rights Law, 2007
2. All children, regardless of age, disability, gender, religious beliefs, ethnicity, disability or socioeconomic background have a right to equal protection for all types of abuse
3. Some children are additionally vulnerable because of the impact of previous experiences, dependency, communication needs or other issues
4. Working in partnership with children, young people, their parents, carers and other relevant agencies is essential in promoting children's welfare.

1.1 Safeguarding Definitions

We define safeguarding as proactively protecting our children in every aspect of their *emotional, intellectual, physical* and *moral development* and *welfare*. Keeping our students safe is central to everything that we do



We aim to comply with State and National legal or other requirements for safeguarding as well as following international best practice. We also aim to meet all standards required for international accreditation.

We recognise the following definitions provided by Lagos State:

Child – any person under 18 years as provided by the Child's Rights Law 2007 Laws of Lagos State of Nigeria

Child protection – Child protection is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect

Child Protection Unit, Ministry of Youth & Social Development– the department responsible for safeguarding the development of the child through the prevention of all forms of abuse against

children, coordinating response and investigation of suspected abuse and neglect and for providing care and protection to children found to be in need.

Designated person for child protection – the manager/supervisor or designated person responsible for providing advice and support to staff where they have a concern about an individual child or who want advice about child protection policy.

Disclosure – information given to a staff member by a child, parent or caregiver or a third party in relation to abuse or neglect.

Physical abuse includes acts of violence such as punching (hitting with a fist), kicking, whipping, beating with an object, choking, smothering, trying to drown, burning intentionally, or using or threatening to use a gun, knife or other weapon, regardless of whether or not it resulted in obvious physical or mental injury. It is not focused on acts of discipline, although many of those perpetrating the violence may be doing so in the name of “discipline”.

Safeguarding- Safeguarding is a term which is broader than ‘child protection’ and relates to the action taken to promote the welfare of children and protect them from harm. Safeguarding is: protecting children from maltreatment; preventing impairment of children’s health and development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes.

Significant Harm - Some children are in need of help and intervention because they are suffering, or likely to suffer, significant harm. This is the threshold that justifies compulsory intervention in family life in the best interests and promotion of the welfare of a child. Significant harm can be considered as the severity of maltreatment, the degree, extent, duration and frequency of abuse and neglect; the extent of premeditation, presence or degree of threat, coercion, sadism and bizarre or unusual elements

Social Worker- Social care qualified professionals with case responsibility including receiving and responding to child concerns/referrals.

Specialised Police Unit in the Nigeria Police (presently referred to as Juvenile Welfare Centre)– the agency responsible for responding to situations where a child is in immediate danger and for working with Child Protection Unit and investigating cases of abuse or neglect where an offence may have occurred.

Sexual abuse includes any act that involves forcing or enticing a child to take part in sexual activities, whether or not they are aware of what is happening. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant. Sexual abuse can be, but is not limited to:

- **Contact abuse:** touching breasts, genital/anal fondling, masturbation, oral sex, penetrative or non-penetrative contact with the anus or genitals, encouraging the child to perform such acts on the perpetrator or another, involvement of the child in activities for the purposes of pornography or prostitution.
- **Non-contact abuse:** exhibitionism, exposure to pornographic or sexual imagery, inappropriate photography or depictions of sexual or suggestive behaviours or comments.

Emotional abuse – any act or omission that results in adverse or impaired psychological, social, intellectual and emotional functioning or development. This can include:

- Patterns of isolation, degradation, constant criticism or negative comparison to others. Isolating, corrupting, exploiting or terrorising a child can also be emotional abuse.
- Exposure to family or intimate partner violence.

Neglect –Neglect is the most common form of abuse and it has the potential of seriously impairing the child’s health or development. Forms of Neglect include:

- Physical- Looking rough and uncared for, dirty, without appropriate clothing, underweight), not providing the necessities of life like a warm place, food and clothing.
- Emotional- Not providing comfort, attention and love
- Neglectful supervision- Leaving children without someone safe looking after them, no safe home to return to).
- Medical Neglect- Failure to present child for timely immunization, persistent nappy rash or skin disorders or not taking care of health needs.

- Educational or Vocational Neglect- Allowing chronic truancy, failure to enrol in school or vocational training centres or inattention to education needs).

1.2 Guiding Philosophy:

- Everyone is responsible for keeping our students safe
- All adults working at the school are trained
- The need of every individual student are supported and we recognise that some students are more vulnerable than others
- Safeguarding is proactively delivered through the school curriculum
- We always use Safer Recruitment
- Safe reporting is a key aspect of our school culture

1.3 Key Competencies

- Place students at the centre of everything that you do
- Understand the possible signs and indicators for abuse and neglect
- Know how to appropriately communicate with and respond to students
- Always focus on safeguarding needs and respect the need for confidentiality
- Understand what may make some children more vulnerable
- Understand the Safeguarding Policy, supporting policies and Code of Conduct
- Know how to share information safely, and who to share it with
- Be culturally sensitive



2. Cultural and Legal Context

2.1 Legal Framework

Our Safeguarding programme is centred in the laws of the Federal Republic of Nigeria and Lagos State and draws on best practice in safeguarding from around the world.

- African Charter on the Rights and Welfare of the Child, 1999
- Child's Rights Act, 2003
- Lagos State Child's Rights Law, 2007
- Prevention Against Domestic Violence Law, 2007
- Criminal Law of Lagos State 2011
- The Family Court of Lagos State (Civil Procedure) Rules 2012
- EO/BRF/005OF2014, Lagos State Sex Offenders Monitoring Programme And Mandated Reporting, 2014

- In every action concerning a child, whether undertaken by an individual, public or private body, institutions or service, court of law, or administrative or legislative authority, the best interest of the child shall be the primary consideration (Child Right's Act, 2003, section 1)
- Rights of a Child (Child Right's Act, 2003, section 2) *include*:
 - Right to survival and development
 - Freedom of association and peaceful assembly
 - Freedom of thought, conscience and religion
 - Right to private and family life
 - Right to freedom from discrimination
 - Right to dignity of the child
 - Right to leisure, recreation and cultural activities
 - Right to health and health services
 - Right to parental care, protection and maintenance
 - Responsibilities of a child and parent, etc. to provide guidance with respect to child's responsibilities
- "child" means, a person under the age of eighteen years (Child Right's Act, 2003, section 277)
- United Nations Convention on the Rights of the Child (<https://www.unicef.org/child-rights-convention>)

Thirty years ago, world leaders made a historic commitment to the world's children by adopting the United Nations [Convention on the Rights of the Child](#) – an international agreement on childhood. The Federal Republic of Nigeria signed the treaty. It has become the most widely ratified human rights treaty in history and has helped transform children's lives around the world.

2.2 What is Child Abuse

Abuse is any form of intentional harm by an adult or another child.

All our staff need to understand the possible signs and indicators for abuse and neglect as a key competency. There are four commonly understood potential areas of abuse. Recognizing any potential sign of abuse does not automatically mean a child has been abused but definitely should alert adults to the possibility.

Detailed information on the four main types of abuse (physical, sexual, emotional, neglect), can be found at Appendix A, along with indicators for children who may be at a higher risk than others.

2.3 Our Commitment to Safeguarding

At Charterhouse Lagos, we have a commitment to upholding the principles of safeguarding as outlined by this policy.

To make sure students are safe in our school, we will:

- Protect and value children, listen to them and protect them
- Create an environment to encourage children to develop a positive self image
- Encourage children to develop a sense of independence and autonomy in a way that is appropriate to their age and stage of development
- Provide a safe and secure environment for all children
- Share information about safeguarding and child protection and good practice with children, parents, staff and volunteers
- Share concerns with relevant agencies and involve parents and children as appropriate
- Write detailed procedures for protecting students
- Enforce safeguarding procedures for all adults working in or visiting our school
- Train all adults working in our school
- Prevent the employment of unsuitable individuals through our Safer Recruitment process
- Deliver a safeguarding curriculum to ensure that students can recognise and speak out about unacceptable behaviour from adults or peers
- Support the needs of the individual child and recognise that some children are more vulnerable
- Develop and maintain a mapping tool that identifies external sources of support
- Encourage a culture of safe reporting of all members of the school community
- Establish clear lines of communication to report concerns

All staff are required to read and sign the Safeguarding Policy and Staff Code of Conduct of Charterhouse Lagos before being allowed to work with children. Failure to comply with the policy will be addressed without delay and may ultimately result in dismissal from the school.

2.4 Safeguarding Policy Review

Key roles and responsibilities are outlined in Appendix B.

The Safeguarding Review Committee is made up of representatives from each area of the school, including the Designated Safeguarding Lead, the Child Protection Officer(s) (CPOs) and the Lead Trainer. The chair of this committee reports directly to the Head. The role of the Safeguarding Review Committee is to:

- Monitor safeguarding practices within the school
- Develop an action plan encompassing operational practices and strategic development relating to the annual audit.
- Oversee professional learning and development with regards to safeguarding
- Review the Safeguarding Policy and Code of Conduct, plus associated documents and materials, on an annual basis taking into account:
 - o Any changes in legislation and / or government guidance
 - o Any other significant changes or events

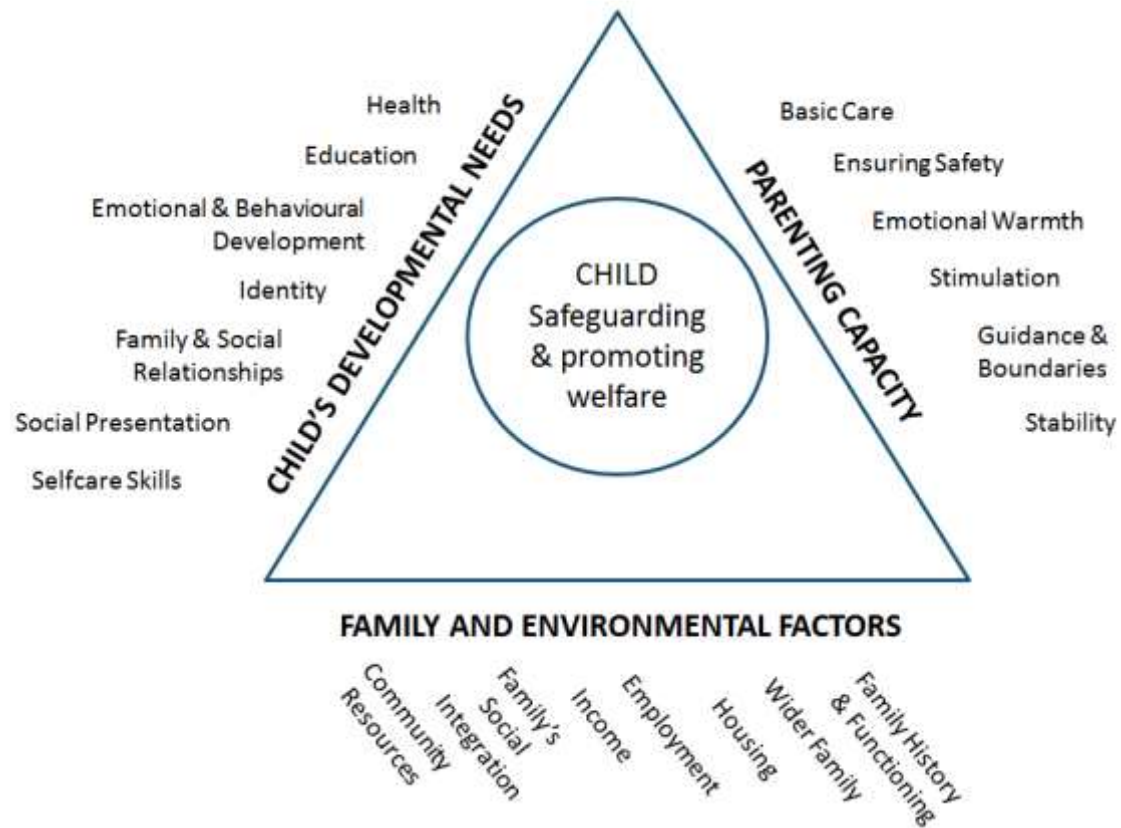
2.5 Safeguarding Roles in the school

Within our school, we have the following specific safeguarding roles:

Role	Person
Executive Chairman	Gordon Zhao
Director of Education / Head	John Todd
Designated Safeguarding Lead	
Deputy Designated Safeguarding Lead	
Child Protection Officer	
Deputy Child Protection Officer	
Support Staff Child Protection Officer	
Safeguarding Lead Trainer	
E-Safety Lead	

3 Managing Concerns About Children

In our school, we take a systematic approach to managing concerns, as set out in the following model:



From UK HM Government, "Working together to safeguard children (March 2015)"

Concerns are defined in two categories:

- Child Protection Concerns – where the child is at significant or immediate risk of harm
- Safeguarding Concerns – where the child is potentially vulnerable, but not at significant or immediate risk of harm

Child protection is only an aspect of safeguarding. Safeguarding is what we do for all children, child protection refers to those children at risk of significant harm, or who have been significantly harmed.

Upon receipt of a Child Protection Concern, the Child Protection Officer informs the Head. The Designated Safeguarding Lead is informed or consulted as appropriate.

When a Safeguarding Concern arises, the Child Protection Officer consults with the Designated Safeguarding Lead to ensure that the appropriate strategy is agreed and implemented. The Head will be informed.

In the absence of the Head, or where the issue is related to the Head, concerns will be taken directly to the Executive Chairman.

3.1 Early Recognition and Intervention

The school will ensure that any internal, group, local, national or international sources of support are identified through the school mapping tool. Contacts may be used to support children and their families when early signs of any challenges to a child's safety or wellbeing are evident. Support agencies are listed in the Referral Directory.

The mapping tool is the responsibility of the DSL and should be developed through the Safeguarding Review Committee.

Regular reviews of the tool will help to ensure that it is kept current and reflects any changes in personnel in contact organisations.

3.2 Reporting or Recording Concerns About a Child

You must immediately raise your concern with the Child Protection Officer (CPO) or Deputy CPO (DCPO).

The CPO will decide if the concern is a welfare rather than a child protection issue. He / she may consult with the Designated Safeguarding Lead (DSL) and Head in order to make the decision.

Child Protection Issues: a Record of Concern (RoC) is completed by the reporting adult. This should be handwritten in pen and signed. The reporting adult should be thanked and asked to report any further concerns.

Welfare Issues: After discussion, a decision is made not to complete an RoC. The concern is noted. The reporting adult should be thanked and asked to report any further concerns.

If an RoC is completed:

- A file is opened on the child.
- The RoC (Appendix C) and a tracking record (Appendix D) are placed in the file.
- A decision is made as to the next steps by the CPO / DSL who may have consulted with other adults connected with the child in order to make a decision.

Next steps should be one or more of:

No further investigation: The RoC is filed. The CPO / DSL regularly (at least monthly) checks the welfare of the child and adds any comments, and a record of checks on the tracking record.

Working with the child / teacher / parents: the CPO / DSL or teacher supports / works with the teacher or parent, and regularly checks on the welfare of the child, and adds any comments, and a record of checks on the tracking record.

Child Support Team meeting: a team is created around the child. The team is made up of a small group of adults considered able to support the issue.

At the end of a Child Support Team meeting, information will be gathered and recorded. One of the following actions will be taken:

Continued support to child and family:

- Support from the teacher / CPO / DCPO to the child and family
- Support from the School Counsellor to the child and family
- Family meeting

External referral for support:

- Multi-agency support
- Outside referral for support or counselling
- Support and / or advice from other specialists

Urgent Action:

Taken if the child is **in immediate or significant risk of harm**

- Further investigation with external support
- Report to local authorities as appropriate
- Contact employer

Serious physical or sexual abuse will be reported and managed at the highest level led by the Head / Director of Education and Executive Chairman who will be informed by the Head of any case involving a Child Support Team meeting or any other case he / she deems serious.

3.3 Allegations Against an Adult

You must immediately raise your concern with the Head.

The Head will make one of the following decisions. They may consult with the Executive Chairman.

Following a discussion, a decision is made not to complete a Managing Allegations RoC. The concern is noted. The reporting adult or child is thanked and asked to report any further concerns.

Following a discussion, a decision is made to complete a Managing Allegations RoC. An adult records the concern in pen and signs. The reporting adult or child is thanked and asked to report any further concerns.

When an RoC is completed:

- A file is opened on the child.
- The RoC and a tracking record are placed inside.
- A decision is made as to the next steps by the CPO / DSL who may have consulted with other adults connected with the child in order to make a decision.

Next steps should be one or more of:

No further investigation: The RoC is filed. The CPO / DSL regularly (at least monthly) checks the welfare of the child and adds any comments, and a record of checks on the tracking record.

Working with the child / teacher / parents: the CPO / DSL or teacher supports / works with the teacher or parent, and regularly checks on the welfare of the child, and adds any comments, and a record of checks on the tracking record.

Child Support Team meeting: a team is created around the child. The team is made up of a small group of adults considered able to support the issue.

At the end of a Child Support Team meeting, information will be gathered and recorded. One of the following actions will be taken:

Continued support to child and family:

- Support from the teacher / CPO / DCPO to the child and family
- Support from the School Counsellor to the child and family
- Family meeting

External referral for support:

- Multi-agency support
- Outside referral for support or counselling
- Support and / or advice from other specialists

Urgent Action:

Taken if the child is **in immediate or significant risk of harm**

- Further investigation with external support
- Report to local authorities as appropriate
- Contact employer

The Head will keep the Executive Chairman informed of the progress of any case he / she deems serious. The Head or Executive Chairman will keep the partner school involved as appropriate.

Further details are included at Appendix H

4 Recording, Storing and Transferring Child Protection Records

All file documentation relating to concerns about a student will be kept indefinitely and stored separately in a fireproof safe by the Head or CPO.

All file documentation relating to concerns about an adult will be kept indefinitely and stored separately in a fireproof safe by the Head.

Recording will be made on the Record of Concern.

Records of Concerns are expected to be handwritten and signed by the reporting individual.

Records of Concern are not emailed or stored on any electronic devices.

4.1 Confidentiality

The school and all members of its staff will ensure that all data relating to children is confidentially managed in accordance with school, state or federal guidance, laws or regulations.

Any individual reporting child protection or safeguarding concerns will adhere to the lines of communication, ensuring confidentiality. The CPO will support the process outlined in this document, and the school will give detailed information about lines of communication in the induction process and at the beginning of every academic year.

Any member of staff who has access to confidential information about a child and / or the child's family must take all reasonable steps to maintain confidentiality. The Head and CPO will agree the appropriate next steps regarding this information.

Regardless of the duty of confidentiality, any member of staff who has reason to believe that a child is at immediate or significant risk of harm, has a duty to forward this information without delay to the CPO.

Volunteers and visitors are not authorised to take any action; their roles are strictly limited to reporting if they are concerned or have witnessed any concerning behaviour while in the school.

4.2 When we need to tell someone (breaking confidentiality)

Breaking a student or adult's confidentiality is not something we do unless we have to.

We should consider doing this when:

- We believe a life is in danger
- A student is being hurt by someone in a position of trust
- A student discloses they are seriously hurting a peer
- A student or adult discloses about another student who is being hurt

4.3 Transferring Safeguarding Files

When a child with an active safeguarding file moves to another school, we have a clear moral duty to inform, or attempt to inform that school that there is an issue about which they should be aware. Colleges or schools must check the legal requirements in the region in which they are operating. Where the legal position is not clear, schools should make a phone call rather than transfer documentation. If there are any child protection issues you **must** make the call and record the fact

that the call was made in the student file, the date and time of the call, who the call was made to, their position in the school and the nature of the communication.

If there is a significant issue to report, there is a duty to call and make the issue known to an appropriate person which should be the Head or the DSL; it would not be appropriate to leave information with a secretary or more junior member of staff.

Our first duty is to protect the child and if in doubt it is better to make the call and raise a concern than to worry later that you did nothing. Further advice may be sought from the Head.

5 Safeguarding Training Strategy

The school is committed to giving appropriate training to all adults involved in working with children. This should be in the trainee's first language.

The school has a Safeguarding Training Team consisting of:

- Lead Safeguarding Trainer(s) (preferably one fluent in English, and one fluent in the local language) and an appropriate number of Safeguarding Trainers.
- The Professional Learning Directors and the Head should support the Safeguarding Training Programme.

Please see Appendix B for the role of the Safeguarding Trainer that will be added to each job description so that this role forms part of the professional review process.

- All training materials will be kept in a designated central location.
- Training materials may also available online (eg www.educare.co.uk)
- Training schedules will be posted online.
- Training is evaluated at the end of each academic year to inform future development.

6 Safer recruitment

To ensure that children are protected while at the school, we will carefully select, screen, train and supervise our staff. Our approach focusses on four steps of:

- Deter
- Reject
- Prevent
- Detect

Details of the Safer Recruitment Policy followed can be found in the Recruitment Policy.

6.1 Volunteers and visitors

We recognise that some people who may be unsuitable for working with children may use volunteering as an opportunity to gain access to children. The Head will ensure that a risk assessment is undertaken on regular volunteers (including gap students and interns) and will determine whether or not to proceed with criminal record and identity checks. All regular volunteers will also receive the relevant level of safeguarding training, sign the Safeguarding Code of Conduct at Appendix E; this will be recorded on the single central record (SCR).

Parents or other volunteers who help on an occasional basis must work under the direct supervision of a member of staff, and may at no time have unsupervised contact with children. They must also sign the Code of Conduct (Appendix E).

The school shall maintain a Safeguarding Guide for all visitors (Appendix G). All visitors who come on campus will be asked to read the Safeguarding statement before being issued a visitor's pass.

6.2 Contractors

The school will ensure that all the companies they work with provide evidence of police checks and that any contractors are supervised on site and given appropriate training. Sample contract wording is attached at Appendix I

7 Use of Reasonable Force

On a rare occasion, a staff member may have to make a physical interventions to a child that is not expected. Members of staff should only do this:

- where action is necessary in self-defence or because there is an imminent risk of injury
- where there is a developing risk of injury, or significant damage to property

Examples of such situations are:

- *A child attacks a member of staff, or another child*
- *Children are fighting*
- *A child is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials, substances or objects*
- *A child is or appears to be under the influence of alcohol or illegal substances*
- *A child absconds from school (this will only apply if a child would be at serious risk if not kept in school)*

Physical intervention can take a number of forms. It might involve staff:

- Physically interposing between children
- Blocking a child's path
- Leading a child by the arm
- Shepherding a child away by placing a hand in the centre of the back or (in extreme circumstances) using more restrictive holds, including holding, pushing and pulling

Specific adults should be trained to restrain any child who may require physical intervention as part of an individual care plan.

Due regard should be given to the school's Safe Touch policy. This policy should also address safe touch in areas such as PE, music, dance, drama, outdoor education, etc where adults may need to touch children as a normal aprt of their duties to help with posture or positioning. In such cases, specific briefings should be given by the appropriate Head of Department and a record kept of this. Wherever possible, children should be notified that touch is going to happen.

8 Speaking out - Safeguarding Whistleblowing Guidance

A staff member may recognise that something is wrong but may not feel able to speak out because of:

- Loyalty to colleagues
- Concerns or fear about harassment or victimisation
- Concerns about the school's reputation or "face"
- A belief that someone else will raise the concern
- Fear of being wrong

We encourage all adults to ensure that children are their priority and should not be unnecessarily at risk. This is known as 'whistleblowing'.

Reasons for whistleblowing:

- Every individual has a responsibility to raise concerns about unacceptable practice or behaviour in relation to the safety and welfare of our children.
- To prevent a problem from becoming more serious.
- To protect or reduce risks to other children in the school.
- To help build a safer community

How to raise a concern:

- Concerns should be expressed as soon as possible. The earlier a concern is expressed the sooner action can be taken.
- The concern should express exactly what practice is causing concern and why.
- The person raising a concern should approach the Head immediately and in his / her absence, the Executive Chairman.
- If a concern is expressed about the Head, it should be referred to the Executive Chairman.

The next steps:

- The staff member specified in any whistle blowing procedure should be given information about the nature and progress of any enquiries.
- The employer has a responsibility to protect the staff member from any harassment or victimisation including, where appropriate, keeping the whistle blowing staff member's identity confidential.
- No action will be taken against the whistle blower if the concern proves to be unfounded and was raised in good faith.

8.1 Self-reporting

Occasionally a member of staff may have a personal difficulty that they know is impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so that professional and personal support can be offered. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children in the school.

It is recognised that whistle blowing can be difficult and stressful. Advice and support will be made available to the member of staff concerned.

9 Digital Safety

E-safety is an integral part of the curriculum. The use of ICT equipment and systems are well monitored and appropriate actions are taken where issues are identified. We are committed to ensuring that our school is a safe digital learning community through the curriculum, professional development, auditing of systems, working with parents and developing detailed e-policies.

Staff, children, parents, visitors and volunteers are expected to engage in the safe and responsible use of social media. However, any member of staff who has or is alerted to any child protection concerns related to the use of the internet or social media should follow the lines of communication set out in this policy.

The school acknowledges that parents like to take photos and videos of their children in performances, sports events and other presentations. This is a normal part of family life, and we will not discourage parents from celebrating their children's successes.

If parents indicate to the school that they would not like their child's photograph or video to appear in the school's materials, brochures, websites, advertisements or press releases, we will ensure that the parents' wishes are fulfilled. The school cannot, however, be held accountable for any photos or videos taken by parents or members of the public at school functions and shared thereafter via social media or other means.

Staff are expected to take photos of children for educational purposes on school devices and in the event of taking photos on personal devices, these images must be transferred as soon as possible to a school device and then immediately deleted from the personal device.

The school has a lead member of staff and an E-Safety policy and due regard should be had to the practices contained within the policy.

10 Homestays

The school does not offer or support homestays for our students.

11 Reflect, Review and Evaluate for Impact

Our approach to safeguarding is strengthened by ongoing reflection and review of all that we do. We ensure that all policies and programmes are evaluated for impact. Where possible, we draw on external support to assess the quality of our programmes.

11.1 Audit process

The Schools will be internally and externally audited on a two-year cycle. The action plan resulting from the audit will be agreed and signed by the following:

- Auditors (internal or external)
- Head
- Designated Safeguarding Lead

The Safeguarding Review Committee, chaired by the Designated Safeguarding Lead, will review the action plan at three meetings per year. The Designated Safeguarding Lead will discuss the action plan with the Head at their termly Safeguarding meetings, and Head will report progress at each meeting of the School Board.

11.2 Regular review of Safeguarding action plans

The Safeguarding Action Plans will be reviewed:

- At termly meetings of the Safeguarding Review Committee
- Audit visits
- Meetings between the Designated Safeguarding Lead and the Head
- School Board meetings

11.3 Documentation Review

It is important to review documentation regularly and to ensure that it is available and effective.

- Child protection files should be discussed monthly (by the Head and CPOs) and reviewed. Meetings must be recorded on tracking sheets.
- Internal School policies and other documentation should be regularly reviewed and the date recorded
- The Safeguarding Review Committee will formally review the Safeguarding Policy on an annual basis. Any changes in the policy must be formally agreed by the School Board.

11.4 Safeguarding is a fixed item on all meeting agendas

- Safeguarding (and health and safety) is a fixed agenda item on every meeting in the school including Board Meetings
- This item may be used for updates, specific discussions or knowledge check activities.

Safeguarding Policy Links

- *Management of Safeguarding Concerns and Allegations about the Conduct of Staff*
- Safe Touch
- Use of Reasonable Force
- Safer Recruitment
- Anti-bullying
- Health and Safety
- Behaviour Management
- Fire Safety
- Lockdown and other emergency procedures
- First Aid (medical procedures)
- Educational Visits (to include risk assessments)
- Supervision of Students
- Procedures for maintaining admissions and attendance registers
- E-safety
- CCTV Surveillance

Appendices

- A. Indicators of abuse and neglect
- B. Key roles and responsibilities
- C. Confidential Record of Concern (RoC)
- D. Record of concern Tracking document
- E. Safeguarding Code of Conduct
- F. Volunteer Safeguarding statement
- G. Visitor Safeguarding statement
- H. Managing allegations reporting about an adult
- I. Head's checklist
- J. Sample Contractor Contract wording
- K. Safeguarding Compliance Review protocol
- L. Referral Directory