



BRITISH VIETNAMESE INTERNATIONAL SCHOOL  
HO CHI MINH CITY  
A NORD ANGLIA EDUCATION SCHOOL

# Safeguarding & Child Protection Policy

## Description:

Core safeguarding and child protection policy for BVIS.

## Version History

Version Number	Summary of Amendments Made	Start Date	Date ratified by SLT	Review Date
1		Ongoing	30/5/23	May 25
2		20/04/25	27/16/25	June 27

# Safeguarding and Child Protection Policy

## Preamble

BVIS has adopted as its child protection policy the *Nord Anglia Education Policy on Safeguarding, Child Protection and Promoting the Welfare of Children in Our Care* (reviewed 2024) with the omission of a small amount of material which is not applicable in Vietnam. This policy is reproduced on the following pages. The policy contains material for the the school, all staff and specific posts. It should be read in conjunction with the local BVIS information which is contained in a series of appendixes at the end of this document:

1. Examples of forms of abuse and areas of concern
2. BVIS Body Map Form
3. BVIS Child Protection Team
4. BVIS Linked Policies and Guidance Map
5. BVIS Child Protection Training Schedule
6. Flowchart for dealing with Child Protection Referrals.
7. Information Sharing and Record Keeping within School.
8. Extracts from relevant Vietnamese Law
9. Local Contacts
10. Positive Handling policy

There are also a number of other linked NAE and BVIS policy and guidance documents which are relevant to safeguarding and child protection. These are listed in appendix 3 and, along with the BVIS staff expectations policy, should be consulted for detailed information on the topics they cover. All BVIS staff are contractually required to follow these policies and guidance at all times.

## Section 1 - Introduction and Context

### 1.1 Our commitment and guiding principles

BVIS's unique Education philosophy is underpinned by our belief and commitment that all our students will be supported to realise their full potential by learning and thriving in the safest possible environment. Our students are empowered to make decisions for themselves and are supported in this by learning through specific elements of the curriculum, aimed at enabling students to be able to keep themselves safe (e.g. through personal, social and health education, Wellness programmes or similar).

The school recognises that having appropriate safeguarding and child protection procedures does not mean that any risk to our students is eliminated. Rather, we expect that all staff, including volunteers in our schools and any contractors or partner agency staff used by schools, recognise where a student is at risk of, or is actually being harmed and do all they can to reduce further risk or further harm.

We recognise that our staff are particularly important in protecting our students; they are in the best position to identify concerns early and provide or identify help for students as well as helping to prevent these concerns from escalating. Consequently, BVIS accepts and adheres to these basic principles:

- A child's welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'.
- All students have the same equal rights to protection, but we recognise that we need to do more for some students because of their special educational needs, disability, gender, religion and/or sexual orientation.

## 1.2 Aims and objectives

BVIS aims to:

- Provide a world class, safe and happy environment to enable students to thrive and learn.
- Outline the systems and processes we all take to ensure that students remain safe at school.
- Raise awareness to all staff of safeguarding/child protection issues and define their roles and responsibilities in reporting possible cases of abuse.
- Identify students who are suffering, or likely to suffer harm.
- Ensure effective communication between all staff on child protection/safeguarding issues.
- Set effective procedures for staff/volunteers or third-party individuals who encounter any issues in relation to child protection/safeguarding to follow.
- Be clear with all parties, including students and their parents/carers, regarding our approach to safeguarding and child protection, through the provision of clear policies.

## 1.3 Accountability and Ownership

The Child protection Statement alongside the safeguarding policy and procedures will be endorsed and adopted at the highest levels, both in our schools and in the organisation. As much as possible they will be adopted by EXCO (Executive Committee) and signed off by the principal. In as much as it is possible within regional regulatory variations these procedures will also be applied to any partner agency with unsupervised access to children and young people through their work with the school, as well as any contracted organisation working on the school site.

## 1.4 Definitions

### Safeguarding

Safeguarding and promoting the welfare of children refers to the processes of protecting students from harm, preventing the impairment of their health and development, ensuring that we seek to improve the general health and well-being of all students in our care and enabling every student to have the optimum life chances and enter adulthood successfully.

## Child Protection

Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect.

### Note:

If our school's preventative work around safeguarding issues is not appropriate or extensive enough, students identified as being a concern may move to being identified as at risk of significant harm. Although other factors outside of the schools' control may also influence this, the purpose of the policy is to ensure that Nord Anglia Education takes whatever measures are possible to avoid this from happening.

### Staff

For this policy, the term "staff" refers to adults who have unsupervised access to students

### Contractor

An individual who is directly engaged by a Nord Anglia Education entity to provide a service, e.g. Music teacher, gardener or maintenance engineer

### Partner Organisations/3<sup>rd</sup> Party Agency/Vendor

An external provider is supplying services to Nord Anglia Education under a commercial agreement. School bus services or catering services.

## Section 2 - Rationale

### 2.1 Rationale

Our aim at BVIS is to provide the safest possible learning environment for all our students.

This policy sets out the principles and expectations, as well as the procedures and processes, which must be followed by the school staff. The policy also describes the steps that are taken in meeting our commitment to safeguarding students, at both school and organisational level.

Given our international context, BVIS recognises and accepts its responsibility to safeguard all students under the UN Convention on the Rights of the Child (1989). BVIS recognises the obligation to protect our students from harm and in particular following Articles of the UN convention:

Article 3: which states that the best interests of children must be the primary concern in decision making about them.

Article 13: which states that children have the right to get and share information as long as it is not damaging to them or another child.

Article 14: which states that children have the right to think and believe what they want and to practise their religion.

Article 19: which states children have the right to be protected from hurt and mistreatment, physically and mentally.

Article 34: which states that Governments should protect children from sexual exploitation and abuse.

Article 35: which states that Governments should take all measures to ensure that children are not abducted, sold or trafficked.

Article 36: which states that children should be protected from any activity that takes advantage of them or could harm their welfare and development.

Article 37: which states that no one is allowed to punish children in a cruel or harmful way.

All member states of the UN have signed up to the 1989 convention, with the exception of the United States of America.

All the UN articles can be found at the following link: <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

In addition to the school's commitment to the UN convention on the rights of the child, BVIS has used the UK schools' statutory guidance 'Keeping Children Safe in Education' (September 2023) and the International Child protection standards to benchmark against. This policy and procedures are also underpinned by the UK multi-agency guidance "Working together" (Feb 2019) where relevant.

## 2.2 Related Documents

This overarching safeguarding/child protection policy manual should be read in conjunction with other NAE safeguarding related policies including: the NAE recruitment policy, background checking policy, whistleblowing policy, code of conduct for all employees, NAE guidance for safe working practice, the NAE social media policy and the allegations policy.

## Section 3 – Roles and Responsibilities

### 3.1 Organisational and Individual Responsibilities

#### Nord Anglia Education Senior Management Responsibilities

EXCO, the Chief Executive Officer and the Education Director recognise their ultimate responsibility to ensure that the organisation and all Nord Anglia Education schools understand and follow the guidance provided by this and all other safeguarding related policies.

#### 3.2 Principals/Head Teachers and Senior Management Team in Schools Responsibilities

The Principal/Head teachers and senior management team in the school will:

- Ensure that this policy and procedures are implemented across their school and followed by all staff and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and any deputy Designated Safeguarding Leads to carry out their role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that any mandatory element of the curriculum is delivered according to regulatory requirements.

- Ensure that all staff have seen and read the guidance for safer working practice (amended where necessary for any regional regulatory compliance requirements).
- Ensure that all staff are aware of the NAE policy for dealing with allegations about staff.
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the school site is secure.
- Customise this policy for their particular school.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's customised version of this policy.
- Ensure that the schools policy identifies those in school with responsibility for safeguarding i.e. Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs).
- Ensure that their school has appropriate staff trained to support the wellbeing of students and has accessed ASIST suicide prevention training.
- Ensure that the school has adopted one of the 3 electronic safeguarding software systems approved by NAE, i.e. ISAMs wellbeing manager, CPOMs.
- Only deploy staff who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy.
- Ensure that whichever safeguarding software system is being used in school is set up correctly to use and record the NAE categories and severities. (outlined below)

*Please Note:*

*The central safeguarding team will receive an automated alert via the new central dashboard if a school records either a high or medium level concern. The team will then contact either an SLT member or the DSL to discuss the case further.*

#### **The escalation criteria are as follows:**

- **Low:** An incident that is deemed to be a one-off, may be upsetting for a student (s) but won't have a lasting impact, is not unlawful, and does not involve any outside agencies or parents. Very little risk of negative publicity
- **Medium:** A situation or incident that has been ongoing and is having a detrimental impact on a student/s and/or caused significant disruption within the school. A student (s) may have missed school because of the situation. Parents and possibly external agencies have become involved. Advice may have been sought from the central Safeguarding team and or local legal services or central services.
- **High:** A serious incident, allegation, or situation which is or could escalate to become unlawful, has or will have a significant detrimental impact on a student or students, is or will be talked about or reported in the local community, nationally or internationally or based on local legal expectations, requires local authority involvement. This must include any situation where a child has been seriously hurt or the issue has been life-threatening, including mental health issues such as attempted suicide or suicides. In these situations, escalation should take place securely asap and the reporting form completed asap afterwards.

All High-level incidents will be escalated to Regional Managing Director, Chief Education Officer, Chief Operating Officer and Regional Safeguarding Director.

#### **Categorisation Table A: Category**

<ul style="list-style-type: none"> <li>▪ Bullying</li> <li>▪ Racist behaviour</li> <li>▪ Online issues</li> <li>▪ Trafficking</li> <li>▪ Criminal exploitation</li> <li>▪ Sexual abuse</li> <li>▪ Physical abuse</li> <li>▪ Mental health</li> <li>▪ FGM</li> <li>▪ Missing</li> </ul>	<ul style="list-style-type: none"> <li>▪ Emotional abuse</li> <li>▪ Drug use</li> <li>▪ Sexual assault including verbal</li> <li>▪ Sexual exploitation</li> <li>▪ Neglect</li> <li>▪ Involvement in non-mainstream causes or organisations</li> <li>▪ Attendance below 80%</li> <li>▪ Teacher Low-level concerns</li> <li>▪ Teacher misconduct which is related to children or could impact on children.</li> <li>▪ Other (please describe)</li> </ul>
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**Important, please note:**

**Principals and SLT need to ensure that the email system is never used to report or share any confidential or personal information relating to a student either across school or outside school.**

### 3.3 Responsibilities of the Designated Safeguarding Lead (or Deputy) in a school

The school will identify at least one named person designated as the Safeguarding Lead (DSL), to support the Principal/Head Teachers on each site. This means that school might have more than one Designated Safeguarding Leads or Deputy Designated Safeguarding Lead. This person/people will: receive appropriate safeguarding training to equip them to undertake their role; be given sufficient time in the working day to undertake the role; and be able to prioritise safeguarding when necessary.

The designated staff role is guided by two principles:

- The welfare of the child is always paramount.
- Confidentiality should be respected as far as is reasonably possible.

Being guided by these principles the Designated Safeguarding Lead will:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- Carry out an annual safeguarding evaluation in line with NAE expectations and return the results in a timely fashioned.
- With the Principal and Head Teachers, make sure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Alongside colleagues in other teams across the school ensure that everyone understands their responsibility to safeguard students e.g. ensure that HR only recruit according to safe recruitment best practice or that site managers ensure that the site is safe and secure.
- Have appropriate training in addition to the basic training that all other staff receive.

- Maintain safeguarding records on CPOMS.
- Collate and keep accurate and confidential records of any concerns about children.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All staff have the responsibility to report to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Leads any concern they have about the safety of any child in their care. The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead's responsibility is to make decisions about what to do next and then to take appropriate action.

### 3.4 Responsibilities on all staff (including partner organisations and contractors having regular unsupervised contact with children (where regular is defined as once a week or more))

All staff will:

- Ensure they are familiar with and follow this safeguarding policy and all other safeguarding related policies e.g. Codes of Conduct, guidance for safe working practice.
- Be subject to safe recruitment processes and checks prior to starting at the school/organisation (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed).
- Be aware of and alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL) or Deputy Safeguarding Leads (DDSLs).
- In The British Vietnamese School, Ho Chi Minh City the Designated Safeguarding Lead (Whole school) is Ms Khuyen Tran who can be contacted on 098 5088645, [khuyen.tran@bvisvietnam.com](mailto:khuyen.tran@bvisvietnam.com) The Deputy Designated Safeguarding Lead for the Primary School are Ms Rebecca Robinson [rebecca.robinson@bvisvietnam.com](mailto:rebecca.robinson@bvisvietnam.com) and Mr Darragh Shanahan, [Darragh.shanahan@bvisvietnam.com](mailto:Darragh.shanahan@bvisvietnam.com) and The Deputy Designated Safeguarding Lead for the Secondary School is Ms Thuy Do, [thuy.do@bvisvietnam.com](mailto:thuy.do@bvisvietnam.com) , Mr Chris Cooper, [chris.cooper@bvisvietnam.com](mailto:chris.cooper@bvisvietnam.com), Ms Lyn Stanley [lyn.stanley@bvisvietnam.com](mailto:lyn.stanley@bvisvietnam.com), Mr Jon Every [jon.every@bvisvietnam.com](mailto:jon.every@bvisvietnam.com) and Ms Eliza Hart, [eliza.hart@bvisvietnam.com](mailto:eliza.hart@bvisvietnam.com)
- Record any concerns and report these to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Leads (DDSLs)
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding, safe recruitment and on-line/cyber safety and wellbeing/suicide prevention training as well as any other appropriate training identified by the school's DSL and or SLT (including refresher training as required by Nord Anglia Education).
- All staff and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the NAE code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.



### 3.5 All staff who have occasional or supervised contact with children (including staff from partner and contracted organisations) will:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- Provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these staff, (appropriate to the role and contact they will have with children), before they commence their role. Where these staff or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the Principal/Head teacher/ Designated Safeguarding Lead to assess this risk, not individual members of staff or partner organisations themselves.
- Where partners/contractors do not have their own safeguarding or child protection policy, the school will provide a copy of the school's safeguarding policy and ask partners/contractors to read and follow this. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in this policy at all times.
- Be provided with guidance on appropriate safe working practice.

## Section 4 - Training and Support

BVIS will ensure that:

- All staff and volunteers in schools are provided with appropriate general safeguarding training on joining the organisation and then at least every two years. This training will be available through Nord Anglia University (NAU) and other online platforms, as well as face-to-face events.
- Relevant policies are made available in a range of relevant languages.
- Staff and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up to date knowledge.
- All DSLs and deputy DSLs must undertake the NAE higher (level 3) face to face safeguarding training, usually delivered on a regional basis. (Alternative providers for this training must be approved by Head of Safeguarding). This training should be refreshed every two years.
- All staff and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate staff are trained in safe recruitment. This safe recruitment training must be renewed every five years.
- Training for new starters must be completed before any new starter can have unsupervised contact with students.
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counsellors or external agency input. The school will hold information in relation to local, regional or national bodies that may be able to offer direct support in these circumstances.

BVIS recognises our duty of care to our employees and where staff have been involved in reporting and responding to abuse, we recognise that this can be very difficult to deal with in isolation. The school will therefore recommend appropriate external support or counselling for any staff member affected by a

safeguarding issue. The safeguarding team will share a list of organisations (such as hospitals and counsellors) to staff and this list will be reviewed annually.

Please remember unless you are specifically asked to do so, never carry out an investigation about any suspected abuse. This can be highly specialist work and could interfere with a criminal investigation if this were required and appropriate under local laws.

## SECTION 5 – ADDITIONAL AREAS OF FOCUS

### 5.1 Safe Recruitment and Selection

BVIS is steadfast in our commitment to ensuring the safety of all individuals working with students. We have stringent recruitment procedures for all staff working unsupervised with children or young people. These procedures include thoroughly scrutinising applicants through interviews and application forms, verifying their identity and qualifications, obtaining appropriate references, and conducting criminal background checks from all countries where the applicant has lived or worked in the last ten years (7 years for applicants from the USA).

Moreover, at least one member of every interview panel at the organisational and school level, who is interviewing for roles involving unsupervised contact with children, must have undergone safe recruitment training. The school must maintain meticulous records of all the recruitment checks conducted on their staff, including details of DBS checks, criminal records checks from other countries, qualifications, and prohibition order checks.

It is imperative to understand that background checks are obligatory for any adult who regularly has unsupervised contact with students. This includes contractors or third-party vendor staff such as bus drivers, security personnel, caterers, and cleaners.

The school must conduct a background check on contractors who are directly engaged under an agreement with a Nord Anglia Education entity.

For **Partner Organisation/3rd party vendor staff**, a service agreement and letter of confirmation from the company stating that all staff deployed by the vendor to the school have undergone clear background checks and completed safeguarding training, along with reference numbers as confirmation, is required.

If information is disclosed during the criminal records checking process, a rigorous risk assessment will be conducted before the appointment, considering any cautions, convictions, or soft information.

The Principal or Regional HR Director will approve this risk assessment without exception.

### 5.2 Single central record.

It is a mandatory requirement for UK-based schools to keep a single central record (which is a comprehensive record of all recruitment checks). The central record must cover the following:

- All staff/volunteers, including teacher trainees, agency and third-party supply staff who work at the school.
- The single central record must indicate whether the following information has been collected and background checks carried out (and appropriate certificates obtained).

- The record must also show the date on which each check was completed/certificate obtained and who saw them:
- Start date of employment/ Service Agreement Date
- Role

#### **Identity:**

- Name
- Address
- Date of Birth
- Evidence of photo ID, date seen and who checked by. Record what was seen (passport/ driving licence etc). Ideally, schools should also see a birth certificate that matches the photo ID.

#### **Background checks:**

- Evidence of qualification, date seen and who they were checked by. Record “no” if qualifications are not needed for the role. Make sure the original certificate proving the qualification is seen and recorded.
- Prohibition order checks (undertaken by the regional HR team on all teachers who qualified or worked in the UK. (Regional HR would need to provide schools with evidence that these checks have been undertaken)
- Section 128 check (Only applies to UK citizens taking up positions as Principals or senior leaders). This check is undertaken on any individual in a leadership position in one of our schools. Regional HR should undertake these checks on the school’s behalf.
- Background checks must cover ten years (except in the USA), and all countries lived in over the last ten years, including contractors and third parties with regular unsupervised contact with students.
- When a social media/internet search was undertaken on the candidate (except where this conflicts with local regulations)

#### **Right to work:**

- Visa/ Passport, etc – date seen and who checked by

#### **References:**

- There should be a minimum of 2 references. References should be followed up by phone or email to confirm the author, with the date of the follow-up recorded.

## **Section 6 – Procedures, disclosures and reporting**

### **6.1 Procedures to be followed by any staff member or volunteer who is concerned about any student**

If staff suspect that any student in their care may be a victim of abuse or is at risk of abuse or other form of harm, they should not try to investigate and inform the Designated Safeguarding Lead (DSL) or Deputy Safeguarding Leads (DDSLs) about their concerns as soon as possible.

Staff must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm. In many cases a student will not make a direct disclosure, but staff will be concerned because of a physical or emotional indicator. In these circumstances staff should still report on CPOMS and identify which part of the body is affected.

Where any student makes any form of direct disclosure, the guidelines under the heading 'Dealing with Disclosure' below should be followed.

## 6.2 Dealing with Disclosure, Reporting and Further Action

### General Principles:

Note: Be aware that if a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.

The following guidance is based on five key practices for all staff:

#### Receive

Where possible always stop and listen to a child who wishes to speak in confidence. It is important that you make time for the child, even if this is to say "I can't stop now but come and see me in my office at...". Where possible during any disclosure try to listen, allow silences and try not to show shock or disbelief.

#### Reassure

Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.

#### React

React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as... "Is there anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.

#### Record

Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date and place as well on CPOMS.

#### Report

Where a child makes any disclosure, or where you have concerns for any reason, it is very important that the procedures outlined in this policy are followed. A full account of the concern should be submitted on CPOMS as soon as possible and should include, where relevant, a completed body map (which can be found at appendix 2 and on CPOMS).

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal/Head Teacher in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then consider and where necessary, consult on the information available. It is the role of the Designated Safeguarding Lead to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

As an International Schools organisation, BVIS recognises the diverse and complex local contexts our schools operate in. Therefore, the following principles are taken into account when following the framework and procedure for disclosure, reporting and further action:

As an international school we:

- often reside in cities and countries that offer little external support.
- recognise the limitations in the areas of child protection.
- need to assess the quality and skills of counsellors and other support staff in dealing with children who have suffered harm or self-harm, in order to determine the boundaries of their work.
- need to act in accordance with local legislation as well as the principles and practices outlined in this policy.
- May need to consider the involvement of international embassies in certain circumstances.

#### Local Safeguarding Agencies/Advice

Please see appendix 9 for details of locally available advice. Within School advice should be sought from the Designated Safeguarding Lead or other members of the safeguarding team. See appendix 3 for details.

Schools are reminded that they can seek advice or guidance from the Regional Safeguarding Director Southeast Asia, Middle East & India : Luke Curran [luke.curran@nordanglia.com](mailto:luke.curran@nordanglia.com) Mobile: +84 (0)93 7835813

### 6.3 Record Keeping

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept together securely and separately from all other general school records. The information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it should not be shared more widely than that.

- Child protection records should be stored within the secure electronic system, CPOMS.

- All information should only be accessible through the Designated Safeguarding Lead or Deputy Safeguarding Leads and other senior staff as appropriate.
- All staff should be provided with appropriate training to enable them to use CPOMS and should be supported in making reports until all are familiar with its use.
- A child protection file should be started for an individual child as soon as the school is aware of any child protection concerns about that child. This may arise in a number of ways e.g.:
  - If a member of staff raises a concern about the welfare or well-being of a child – this should be recorded on CPOMS and categorised (and/or escalated where it meets the threshold) according to the criteria set out in section 3 of this document.
  - If information is forwarded to the school by a previous school attended by the child.
  - If the school is alerted by another agency of child protection concerns about that child.
- Members of staff should make a report of any concern they have regarding the welfare or well-being of a child, using the school's system. This record will automatically be passed to the Designated Safeguarding Lead and Deputy Safeguarding Leads. Concerns, which initially seem trivial, may turn out to be vital pieces of information later. So, it is important to give as much detail as possible. A concern raised may not progress further than a conversation with the Designated Safeguarding Lead or Deputy Safeguarding Leads but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from the electronic file for any reason, a dated note should be placed on the file indicating who has taken it, why and when.
- In the case of disclosure, remember the record you make should include:
  - As full an account as possible of what the child said (in their own words).
  - An account of the questions put to the child.
  - Time and place of disclosure.
  - Who was present at the time of the disclosure?
  - The demeanour of the child, where the child was taken and returned to at the end of the disclosure.

## 6.4 Confidentiality

The school should regard all information relating to individual Safeguarding/child protection issues as confidential and should treat it accordingly. Information should be passed on to appropriate persons only at the discretion of the Principal/Head teacher/Designated Safeguarding Lead and this should always be based on the need to know.

All records relating to child protection should be secured appropriately. Such information can be stored electronically but contemporaneous notes should be scanned and kept in original format.

**Never share any confidential or personal student information by email.**

## SECTION 7 – SIGNATURES

### Auditing, Reporting, Review and Sign off

To support the safeguarding and child protection agenda and to enable school to undertake a 'Safeguarding Health Check', school will be provided with a self-evaluation tool to enable an annual review of their safeguarding arrangements. It is expected that the school will undertake and submit this evaluation together with proposed actions for improvement to the Regional Safeguarding Director every year. A random selection of schools will be reviewed in more depth. School may be supported by the Regional Safeguarding Director to both complete the evaluation and plan actions where necessary.

Elements of safeguarding practice in schools will also be included in the safeguarding quality assurance framework and reviews and will continue to be an element of the school's Health and Safety review and NAE's audit process.

Our child protection statement and procedures are owned by the school and are made available to students and parents/carers alike in hard copy where requested, but also through the school's own website and the Nord Anglia Education website. This policy will be translated into key languages as appropriate.

This policy will be reviewed and updated on a regular basis but at least every two years.

Senior staff in school should adopt and sign the updated procedure document after each update. A copy of the revised policy should be made available to all staff, volunteers, parents/carers, and students.

Signed and dated by School  
Principal

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Signed and dated by the school  
Designated Lead for Safeguarding

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## APPENDIX 1

### Examples of Forms of Abuse and Areas of Concern

#### Forms of Abuse

There are a significant number of ways that students may be exposed to risk and danger. All require a response. Abuse is defined as any form of maltreatment of a child. This can manifest itself as direct harm to a child, or by a failure to take action to protect a child who is at risk of, or already suffering harm.

The more commonly referred to types of abuse are:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise causing harm to a child.
- Emotional abuse: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved or valued only in so far as they meet the needs of another person.
- Sexual Abuse: involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This form of abuse can involve direct contact activities but also non-contact activities over social media or the internet.
- Neglect: This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development.

While the above are the broad four main areas of potential abuse, abuse itself can take many forms involving one or more of these areas.

Organisational and school staff need to be aware of what to look for and what actions to take when concerned about any of these issues (or any other concerns).

### Internet Filtering and Monitoring

This needs to be an increased focus on online safety and ensuring that staff in schools understand what filtering and monitoring is, and that it is in place to prevent children accessing inappropriate and harmful content online while pupils are in school. This is a clear safeguarding and welfare concern and not just a matter for the IT team. The DSL should take lead responsibility for understanding the filtering and monitoring systems in place at the school.

### Forced marriages (FM)

A forced marriage is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

In 2013, the first United Nations Human Rights Council also adopted a resolution against children and forced marriages. This resolution recognizes child, early, and forced marriage as involving violations of human rights which "prevents individuals from living their lives free from all forms of violence and has adverse consequences on the enjoyment of human rights, such as the right to education."

As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests. However, the school procedures must be followed in the same way as for any other safeguarding or child protection matter.

### Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously.



The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving, or having relationship problems with family or friends. The feelings that these issues bring up can include low self-esteem, low confidence, loneliness, sadness, anger, numbness, and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

There are some common themes that may help staff identify concerns including:

- Physical indicators such as cuts, bruises, burns, bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal.

If staff suspect that a student is self-harming this must be referred to the Designated Safeguarding Lead or the Deputy Safeguarding Leads who will consider the next steps. It is likely that this will require discussion with the student involved and their parents/carers to agree a course of action or referral to an organisation that may be able to support the student.

## Mental Health/Wellbeing

The COVID pandemic brought a greater emphasis to student wellbeing than ever before. Data tells us that more and more children are reporting significant wellbeing and mental health issues.

The school needs to be able to recognise and act appropriately for students whose wellbeing is suffering especially where this is having a negative impact on any student.

Training and support are available to all schools through the resources in NAU much of which is provided for us by specialist organisations. Further training in suicide prevention will also be available to nominated personnel in all schools.

Additionally, all staff should be aware that 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 in schools are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing some form of mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware for some children their experiences can impact on their mental health, behaviour, and education. Schools may not have the expertise or resources to address any mental health issues and unless it places a child at greater risk early contact should always be made with the child's family and agreement reached about access to the appropriate external professional body reached where possible.

## Affluent Neglect

### What is Affluent Neglect?

Affluent neglect refers to the neglect experienced by children in wealthy families. Often, neglect in wealthier families can be more difficult to spot, as the type of neglect experienced by children and young people in these circumstances is often emotional.

There are a huge number of risks that face children from all walks of life and being a child in an affluent family is often perceived to protect those children from some of these dangers. In reality, children from affluent families aren't as sheltered from neglect as some of us may think.

In wealthy families, it can be the case that parents work long hours, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling lonely, with their emotional needs unfulfilled by their parents.

It has also been suggested that as well as not spending quality time with their children, affluent parents may put a high amount of pressure on their children to succeed academically, which can sometimes lead to psychological and emotional problems for children.

There are several barriers that may prevent children, from more affluent homes, who are experiencing these types of neglect from accessing the support they need. Firstly, their symptoms of neglect may be harder to spot. The nature of emotional neglect can make it much harder to identify than other types of neglect. For example, due to the family having hired help to care for the children they may present as clean, tidy, well-dressed, and properly fed when they are actually experiencing emotional neglect.

Also, staff training often focuses on case studies looking at children from poor or working-class families, so staff in educational settings may not be adequately trained to identify and intervene with cases of neglect among their wealthier families.

It is also often the case when working with poorer families that they are already known to external agencies, so it is easier to know who to look out for. The same cannot be said for wealthy families, as often they are not 'on the radar' of external services (where these exist). Even where external agencies do exist, there may also be increased hostility towards these agencies from more affluent families, making it more difficult to improve outcomes for children in these circumstances.

There is also a case to be made for the role of unconscious bias when working with children from wealthier families. Schools and school staff may miss important pieces of the puzzle when they assume that children from wealthy families are less at risk than those from poorer backgrounds. These children may be coming in with new clothes and fancy designer labels – not signs you would usually associate with a case of parental neglect.

It can be even harder to identify and intervene in neglect cases when a child is attending boarding school, or their parents are living out of the area or even overseas. This adds another layer of complexity and can prove challenging, not only for identifying home issues but also for communicating with parents to improve outcomes for the child.

### What is the potential impact?

The emotional neglect and lack of supervision sometimes faced by children from affluent families are considered to be adverse childhood experiences (ACEs). ACEs can affect brain development and change how a person's body will respond to stress. They have a lasting impact on an individual and the consequences of these adverse experiences can lead to long-term mental and physical health problems, as well as substance misuse and addiction in adulthood.

ACEs are preventable and by ensuring staff in your organisation are trained to spot affluent neglect, and have the appropriate tools to report, record, and manage these concerns, your organisation can be proactive in improving outcomes for this often-overlooked group of young people.

By preventing ACEs from occurring, your organisation will be able to lower the risk for serious and long-term health conditions such as depression and cancer in adulthood. They will also be able to intervene and reduce behaviours like smoking and heavy drinking, improve a child's ability to thrive at school, and ultimately prevent ACEs from being passed from one generation to the next.

Some fundamental steps for ensuring no child (no matter what their background) goes unseen:

- Ensure staff regularly receive up-to-date, good quality, and thorough safeguarding training.
- Encourage staff to identify and question their own unconscious biases.
- Put in place robust and easy-to-use safeguarding reporting systems.
- Create a culture in your organisation that puts safeguarding first.

### Managing Cases of Affluent Neglect

Farrer & Co (UK legal Firm) have created a helpful document to support schools in handling cases of affluent neglect.

You can find it [here](#).

They suggest you create a whole school environment which is "trauma informed"

*A school environment which is trauma informed assumes that an individual is more likely than not to have a history of trauma and that, without interventions and supportive factors in place, the cycle of ACEs, trauma and adversity, is more likely to continue in future generations.*

### Child Sexual Exploitation (CSE)

The sexual exploitation of children and young people under 18 can involve exploitative relationships where young people receive something in return for performing sexual acts. Exploitation of any student can occur on a face-to-face level or through the use of technology, such as mobile phones or computers and game consoles. In these situations, a student could be encouraged to send or post indecent images of themselves.

In all cases the person exploiting students does so by misusing the power they have over them. This power may come through virtue of age, physical strength and/or economic resources. Violence, intimidation, and coercion are common in exploitative relationships.

### Sexting

Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages.

Sexting may also be referred to by students as trading nudes, dirties or pic for pic.

There are many reasons why a student may want to send a naked or semi-naked picture, video, or message to someone else:

- Joining in because they think that ‘everyone is doing it.’
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.
- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent.

Students often do not realise that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting.

#### Note:

The above is not an exhaustive list of all the potential forms of abuse which staff may have to deal with on occasions. For information, please see “Keeping Children Safe in Education” (2023 latest version). This is a UK publication, but the types of abuse discussed are valid and can apply to any country around the world.

## Specific Safeguarding Issues

### E safety

The continued growth in electronic media in everyday life and an ever-developing variety of devices create additional risks for children. Risks and dangers of being online include:

- Inappropriate content.
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or running up debts.
- Cyber Bullying.

Cyber bullying is an increasingly common form of bullying behaviour and is most often related to social networks and mobile phones.

Nord Anglia Education believes the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. The school’s curriculum includes appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies, and language they need to take appropriate action.

## Appropriate use of social media

When used appropriately, social media can be a very powerful and effective method of communication and in order to make best use of the many educational and social benefits of technologies, students need opportunities to use and explore the digital world, using multiple devices from multiple locations.

As with all technologies however, we need to be aware of the potential dangers and boundaries for the use of social media in school. We also need to recognise that the risks associated with the use of social media and all technology, is not with the technology itself but with the user.

To equip students to use these technologies safely, school should consider opportunities to educate students in the safe use of technology. This may be through the curriculum or by external/specialist provision.

School should also make students aware that if they are concerned about anything they encounter, through social media that worries them, should be reported to school staff.

School may adopt their own social media policy in addition to that of NAE, but these procedures should be seen as the guide to safeguarding both staff and students, in this area and the guidance should be followed at all times.

Communicating with both current and former students via personal social networking sites or via other non-school related mechanisms such as personal e-mails and text messages can lead to employees being vulnerable to serious allegations concerning the safeguarding of children and young people. All communication with students via any personal page or elsewhere should be avoided and where there is an exception this must be agreed with a member of the school SLT.

Adults working in this area must therefore ensure that they establish safe and responsible online guidelines and acceptable user policies. The school must therefore have an acceptable user's policy. This policy/ guidance must detail the way in which all technologies may and may not be used and identify the potential sanctions for misuse. Various learning platforms are now widely established and clear agreement by all parties about acceptable and responsible use is essential.

This means for our students, they should:

- Not sign up to social media sites that have an age restriction on them until they reach the appropriate age.
- Not post anything which is offensive to any other student, parent, or staff member, either in their own name or anonymously.
- Not sending friend requests to a member of staff.
- Be provided with guidance and training on the safe use of social media and other technologies.
- Report anything of concern that someone sends them through social media (or other technology).

The school:

- have in place a [Learning Technologies and Device Usage Policy](#)
- have in place [Implementation and use of AI policy](#)
- have a clear policy which specifies acceptable and permissible modes of communication.

- ensure communication between students and adults, by whatever method, takes place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messages, e-mails, digital cameras, video, webcams, websites, and blogs.
- They should not request or respond to any personal information from the child/young person other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should:

- ensure that personal social networking sites are set at private, and students are never listed as approved contacts.
- never use or access social networking sites of students unless requested to do so by a member of SLT.
- not give their personal contact details or any other personal information to students, including mobile telephone number.
- only use equipment e.g. mobile phones, provided by school/service to communicate with children, making sure that parents/line manager have given permission for this form of communication to be used.
- only make contact with children for professional reasons and in accordance with any school or NAE policy.
- recognise that text messaging should only be used as part of an agreed protocol and when other forms of communication are not possible.
- not use web-based or any other communication channels to send personal messages to a child/young person or their families without express permission of your line manager or the Principal/Headteacher.
- avoid any form of on-line, electronic (or otherwise) relationship with former students unless this is as part of planned and agreed engagement with Alumnae. This is especially important with ex-students who are still under 18.
- Adults should ensure that all communications are transparent and open to scrutiny.
- Adults should be professional in their communications with students to avoid any possible misinterpretation of motives or any behaviour which could be misconstrued.
- Above all do nothing that is likely to bring into question your suitability to work for Nord Anglia Education or your suitability to work with children or young people in a Nord Anglia School.
- Internet and e-mail systems should only be used in accordance with the school policy.

## Mobile phone and Camera Images

It is our policy that teachers and staff should not use personal mobile phones to take images of children. Permission to capture child images, videos or audio recordings should be sought from the Designated Safeguarding Lead or Headteacher if personal equipment is used. These images should be uploaded to the schools' system as soon as possible and immediately deleted from personal equipment.

## Photographs of Students:

- Photographs of students being used by staff for learning, marketing or any other purpose should only be taken on school cameras/devices (any exception to this should require agreement with a member of schools SLT).
- Images taken should be saved on the school's server/database and never uploaded to any personal equipment.

- Visitors and parents/carers should be asked not to use mobile devices within the school and/or early years setting, except where permission has been granted to capture images of their own child or children.
- All parents/carers must give permission for photographs (usually through PICS) to be used for any purpose and to sign a disclaimer if they do not wish their child's image to be used.

## Allegations against staff and volunteers

**(Please see the NAE allegations policy for full detail)**

In short, however:

An allegation can be made against a staff member or volunteer at any point. It is important that any such allegations are treated seriously, and appropriate procedures followed.

An allegation is different to a complaint and can be defined as follows:

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal offence against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.
- Where someone has behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In the event of an allegation being made against a member of the school staff (or a volunteer helper), it will always be referred to and investigated by the Principal/DSL unless a criminal act has been committed, in which case the matter should be referred to the local authorities where appropriate. If the Principal deems the allegation to be of a safeguarding nature (criminal or not) the Regional Safeguarding Director must be informed as soon as possible and certainly within 24 hours. HR must also be informed by contacting the Regional HR Director and/or the Chief HR Officer as soon as possible. In the case of the allegation being against the Principal, the Regional HR Director, and the Regional Managing Director, as well as the Regional Safeguarding Director and Chief HR Officer should be informed.

For serious allegations, in addition to the above, the matter must always be reported as soon as possible to the Chief HR Officer, the Chief Operating Officer and the Chief Executive Officer.

No action to investigate the concern should be taken before consultation with the Regional Safeguarding Director, HR colleagues, Regional Managing Director and where necessary Group Legal have been consulted (to verify if Legal Privilege is to be maintained) and agreement reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are needed, then the member of staff may be suspended in certain circumstances. Suspension is a neutral act, and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the Regional HR Director/Regional Safeguarding Director before acting and will comply with national and locally agreed guidance on these matters. Each school is expected to have researched and mapped the local arrangements and guidance for dealing with allegations, and these should be reviewed at this stage.

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the Nord Anglia Education code of conduct for staff and volunteers and the NAE guidance for safe working practice.

### Whistleblowing

Nord Anglia Education and our schools recognise that we cannot expect children to raise concerns in an environment where adults fail to do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are considered to be a protected disclosure and, even if proven to be unfounded, no action will be taken against the whistle-blower.

Malicious whistleblowing, however, will be seen as a potential disciplinary matter. (see Nord Anglia Education's whistleblowing policy).

### Anti-Bullying

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve the misuse of social media or other technology and/or be direct from student to student. Each school must have its own anti-bullying policy and approach to restorative practices and all our schools will demonstrate a commitment to help resolve specific issues.

### Children with Special Educational Needs or Disabilities

All staff should recognise that children with Special Educational Needs and Disabilities can mean additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it is easy to assume that a child's mood, behaviour, or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted on by behaviours such as bullying but they may not show any outward signs. Communication difficulties, in particular, can make it very difficult for a child to indicate what's happening and, therefore, may make it very difficult to overcome any such barrier. Staff should be extra vigilant and report any and all concerns, avoiding making assumptions about the causes of any injury or behaviour.

### Safeguarding students who are vulnerable to extremism

BVIS values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.



A short awareness course on Extremism can be found at the following link:

[http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html)

### Physical Intervention/restraint

There may be times when adults in schools, in the course of their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation. UK government guidance has been issued in relation to the use of reasonable force and can be used as best practice advice. BVIS HCMC has a more detailed policy document on positive handling and safe touch which should be followed. [BVIS Appropriate Touch, Physical Contact and Intimate Care Policy Update Jan 2025.docx](#)

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>.

The Principal/Head teacher should require any adult involved in any such incident to report the matter to him/her as soon as possible. The staff member is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified where possible.

Where intervention has been required a senior member of staff should be asked to debrief the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept, and the student checked for any injuries.

Parents/carers should always be informed when an intervention has been necessary.

### Domestic Abuse

The accepted definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass but is not limited to psychological, physical, sexual, financial, and emotional. Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

### Peer on Peer abuse and Harmful Sexual Behaviour (HSB)

All staff should recognise that children are capable of abusing their peers.

Sexual violence and sexual harassment can occur between students of any age and sex, from primary through to secondary. Incidents can occur in school or outside school and can occur through a group of students sexually assaulting or sexually harassing a single student or group. Sexual violence and sexual

harassment exist on a continuum which may overlap; they can occur online and face to face (both physically and verbally) but are never acceptable in any situation. Staff in school need to understand the different forms sexually harmful behaviours can include not just sexual violence and sexual harassment but also:

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, and
- Sexting and other forms of inappropriate on-line.

Reports regarding sexually harmful behaviours should never be ignored or dismissed. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Students who are victims of sexual violence and/or sexual harassment wherever it happens, will find the experience stressful and distressing and it is possible that this will have a negative impact on their educational attainment which can be exacerbated if the alleged perpetrator(s) attends the same school.

Staff should understand that safeguarding incidents and/or behaviours can be associated with factors outside the school including intimate personal care.

Staff in schools need to be able to identify concerning sexualised behaviour and know when to refer these concerns to the DSL. Schools need to ensure that staff know how allegations of peer-on-peer abuse will be recorded, investigated, and dealt with in the same way as any other safeguarding or bullying concern.

All schools need to have clear processes as to how victims, perpetrators and any other child affected by sexually harmful behaviours will be supported and a clear statement that abuse is abuse and will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

Staff in school need to understand the different forms peer on peer abuse can take, such as:

- sexual violence and sexual harassment.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, and
- sexting.

In assessing and addressing this issue the school advised to undertake the NAE sexually harmful behaviour audit. Available here:

[https://www.nordanglia.university/lms/index.php?r=course/deeplink&course\\_id=1763&generated\\_by=13045&hash=28f3086a52dc9a250e90459409040b154d388a4e](https://www.nordanglia.university/lms/index.php?r=course/deeplink&course_id=1763&generated_by=13045&hash=28f3086a52dc9a250e90459409040b154d388a4e)

School should take a zero-tolerance approach to the issue and include appropriate input through the curriculum to help educate students about a variety of issues related to sexually harmful behaviours including issues such as consent.

School needs to understand that local procedures should always be followed (where they exist) when dealing with a case of sexual assault or harassment between students.

School needs to act in accordance with local legislation as well as the principles and practices outlined in these procedures.

**Never share any confidential or personal student information by email.**

## **APPENDIX 2 – Body Map**



Please use the electronic version of this form available on CPOMS to document and illustrate visible signs of harm and physical injuries and if possible uploaded to the system. Even if the injury to the child has a plausible explanation, a completed body map helps track a history or pattern of repeated injuries.

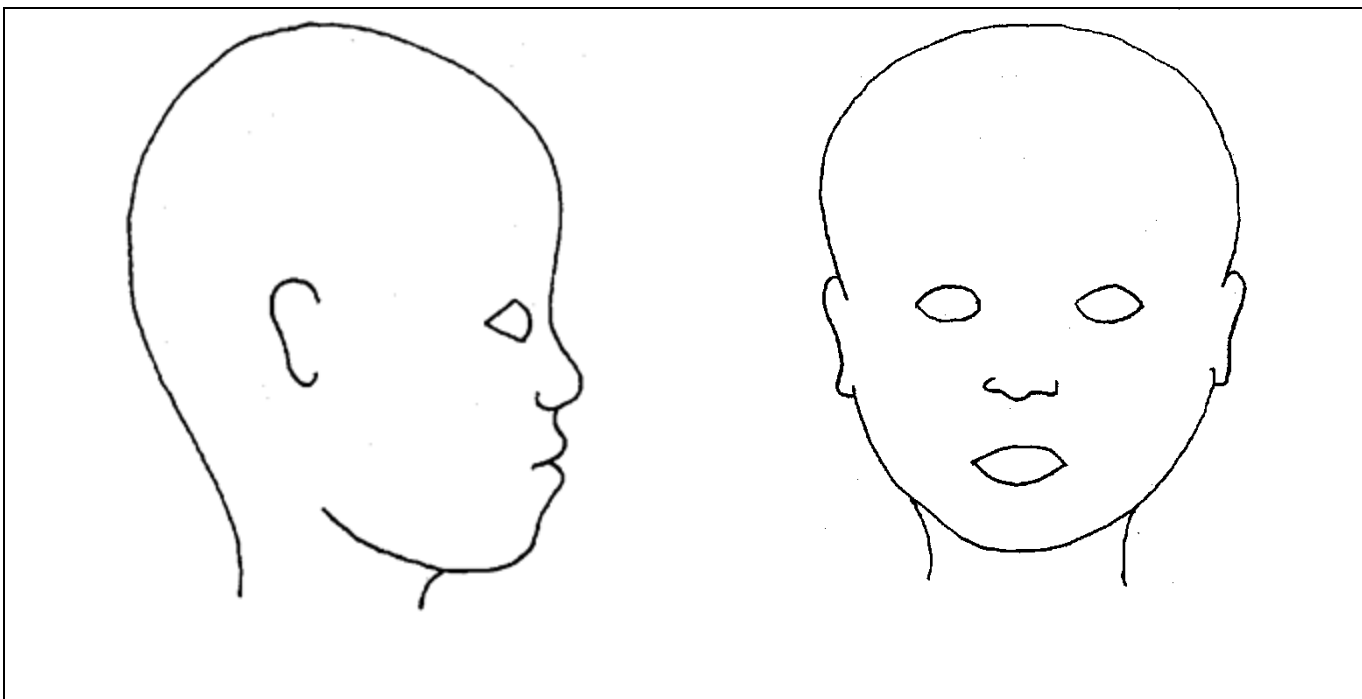
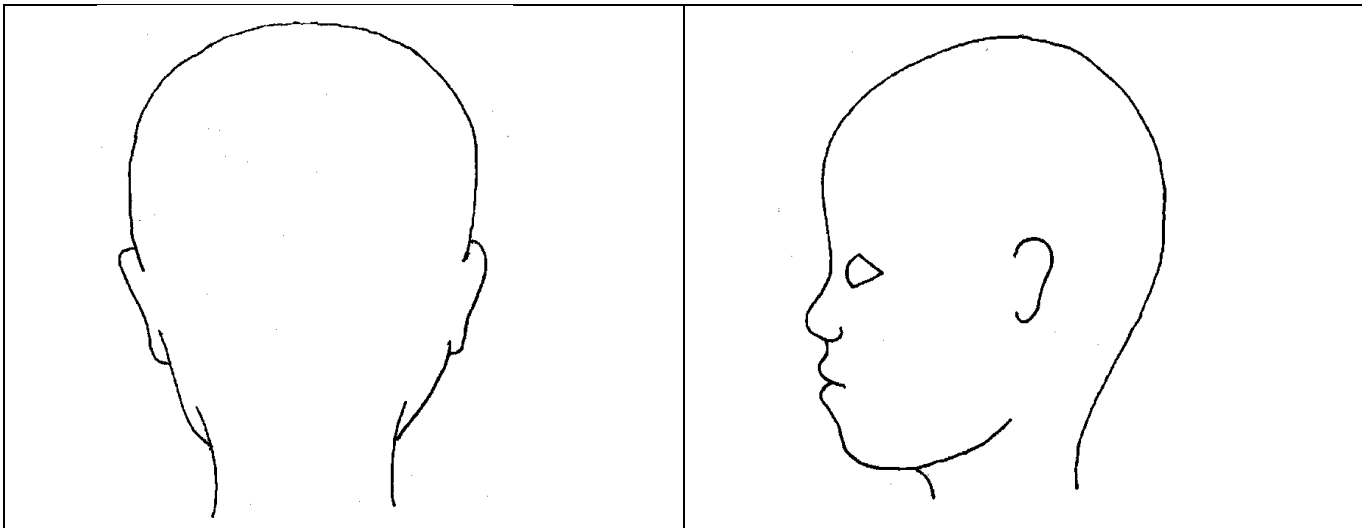
Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment. *At no time should staff seek to record injuries on photographic equipment.* If you notice an injury to a child, try to record as much of the following as possible in respect of all the injuries you can see:

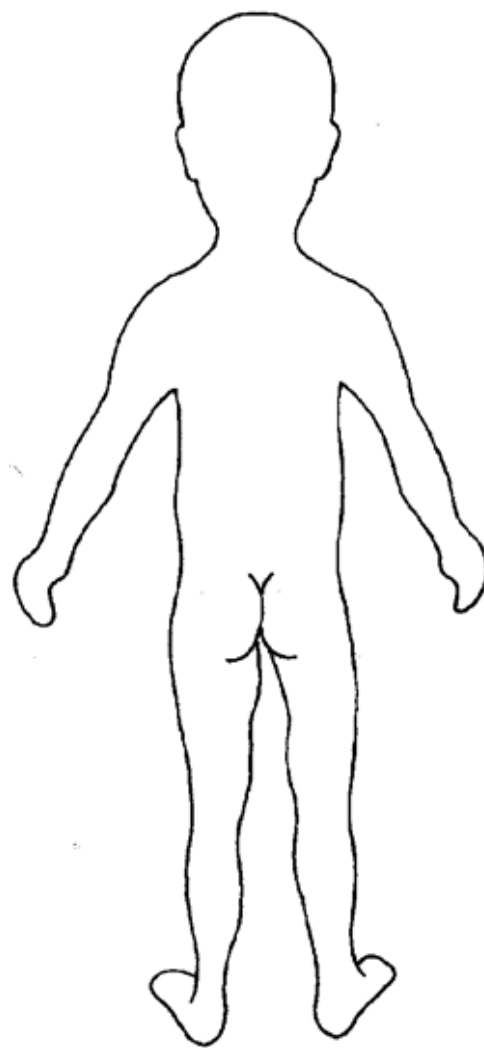
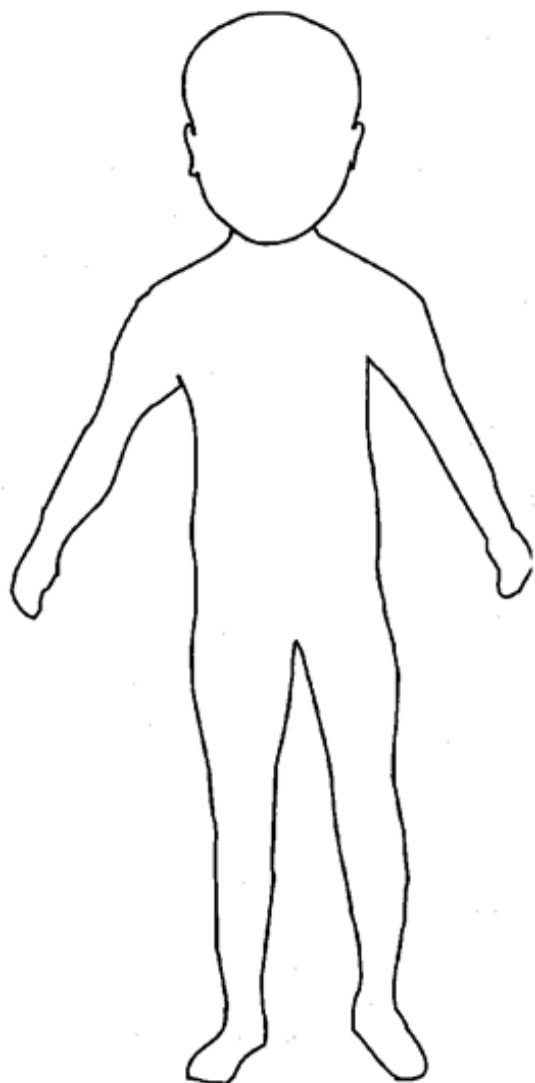
Exact site of injury on the body, e.g. upper outer arm/left cheek.

- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

**Where any child has any form of injury that requires attention please ensure that first aid is given.**

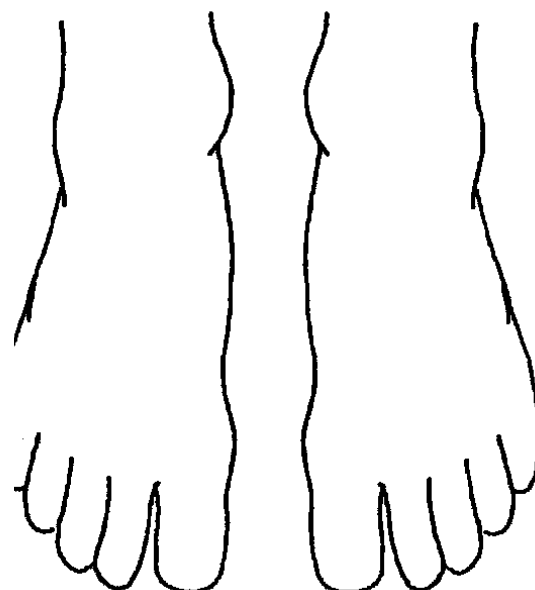
Student name	Form/class	Date Injuries observed





Sole of Feet

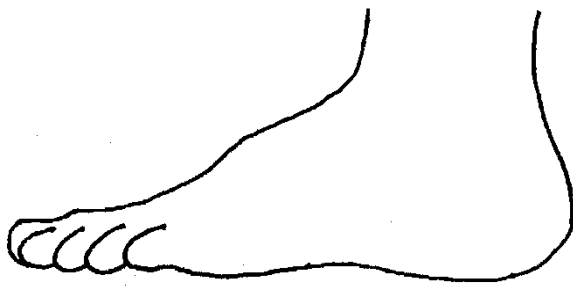
Top of Feet





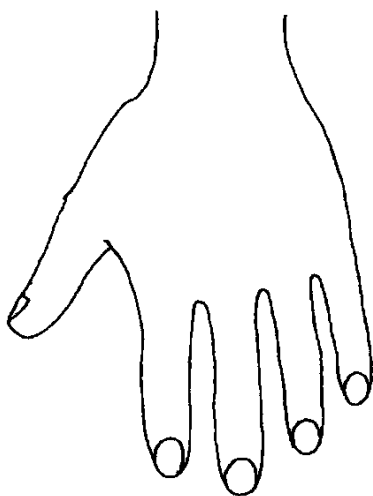
Left Foot

Right Foot



Top of Left Hand

Top of Right Hand



Palm Left Hand



Palm Right Hand



## **APPENDIX 3 – BVIS Internal Safeguarding Contacts**

***Concerns about a child should initially be reported to one of the designated officers.***

### **Designated Officers**

**Khuyen Tran | Senior Designated Safeguarding Lead (Whole school)**

Email: [khuyen.tran@bvisvietnam.com](mailto:khuyen.tran@bvisvietnam.com) Room 216 Tel: 0985 088 645

**Darragh Shanahan | Deputy Designated Safeguarding Lead (Primary)**

Email: [darragh.shanahan@bvisvietnam.com](mailto:darragh.shanahan@bvisvietnam.com) Room 116 Tel: 0325 405 744

**Rebecca Robinson | Deputy Designated Safeguarding Lead (Primary)**

Email: [rebecca.robinson@bvisvietnam.com](mailto:rebecca.robinson@bvisvietnam.com) Room 003/005 Tel: 0707 063 724

**Thuy Do | Deputy Designated Safeguarding Lead (Secondary)**

Email: [thuy.do@bvisvietnam.com](mailto:thuy.do@bvisvietnam.com) Room 133 Tel: 0909 281 549

**Chris Cooper | Deputy Designated Safeguarding Lead (Secondary)**

Email: [chris.cooper@bvisvietnam.com](mailto:chris.cooper@bvisvietnam.com) Room Tel: 0906 843 193

**Jon Every | Deputy Designated Safeguarding Lead (Secondary)**

Email: [jon.every@bvisvietnam.com](mailto:jon.every@bvisvietnam.com) Room 249 Tel: 0906 842 763

**Eliza Hart | Deputy Designated Safeguarding Lead (Secondary)**

Email: [eliza.hart@bvisvietnam.com](mailto:eliza.hart@bvisvietnam.com) Room 149 Tel: 0907 914 083

**Lyn Stanley | Deputy Designated Safeguarding Lead (Secondary)**

Email: [lyn.stanley@bvisvietnam.com](mailto:lyn.stanley@bvisvietnam.com) Room 249 Tel: 0703 648 741

### **School Leadership**

**Dee Grimshaw | Principal**

Email: [deirdre.grimshaw@bvisvietnam.com](mailto:deirdre.grimshaw@bvisvietnam.com) Room 038 Tel: 0938 625 728

**Iain Hope | Head of Primary**

Email: [iain.hope@bvisvietnam.com](mailto:iain.hope@bvisvietnam.com) Room 017 Tel:

**Toby Bate | Head of Secondary**

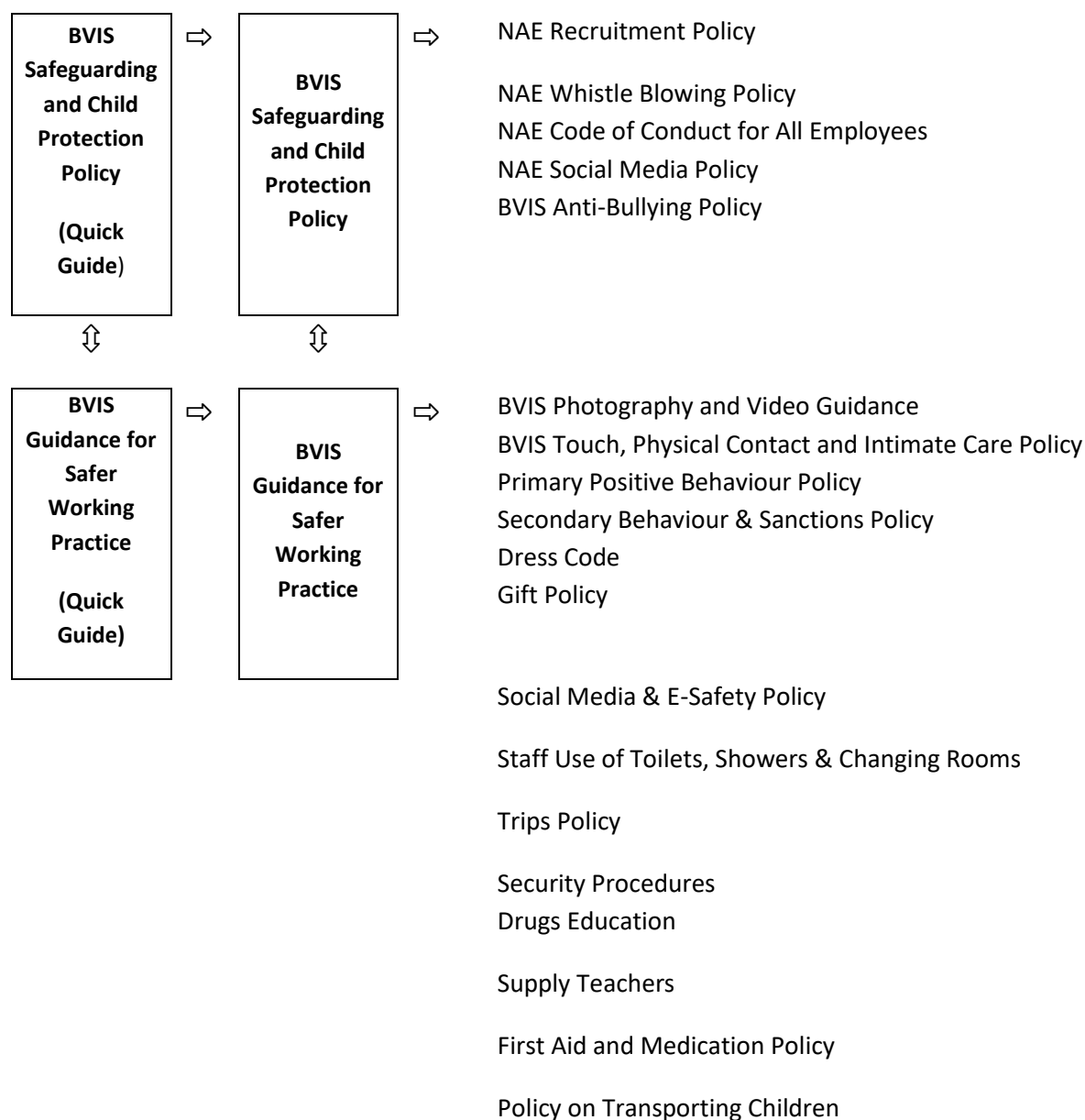
Email: [toby.bate@bvisvietnam.com](mailto:toby.bate@bvisvietnam.com) Room 040 Tel: 0901 831 534



Other Level 3 Qualified Staff**Rob Duff | Assistant Head of Secondary**Email [rob.duff@bvisvietnam.com](mailto:rob.duff@bvisvietnam.com) Room 249**Gavin Brown | Head of Dalat**Email [gavin.brown@bvisvietnam.com](mailto:gavin.brown@bvisvietnam.com) Room 247**Lee Adams | Head of Sixth Form**Email [lee.adams@bvisvietnam.com](mailto:lee.adams@bvisvietnam.com) Room 255**Katie-Anne Mumby-Cole | Head of Saigon**Email [katie-anne.mumby-cole@bvisvietnam.com](mailto:katie-anne.mumby-cole@bvisvietnam.com) Room 034**Lucy Kent | Head of PE**Email [lucy.kent@bvisvietnam.com](mailto:lucy.kent@bvisvietnam.com) Room 314SR**Tung Huynh | Secondary Vietnamese Teacher**Email [tung.huynh@bvisvietnam.com](mailto:tung.huynh@bvisvietnam.com) Room 135**Oliver Clark | Head of English**Email [oliver.clark@bvisvietnam.com](mailto:oliver.clark@bvisvietnam.com) Room 041B**Yen Tran | Upper Primary Phase Leader**Email [yen.tran@bvisvietnam.com](mailto:yen.tran@bvisvietnam.com) Room 209**Max Coupland | Lower Primary Phase Leader**Email [max.coupland@bvisvietnam.com](mailto:max.coupland@bvisvietnam.com) Room 102

## **APPENDIX 4 – BVIS Linked Policies and Guidance Map**

Copies of all policies are accessible on the Staff portal for staff in school or from the Designated Safeguarding Lead. [Core Policies](#)



For allegations against staff and volunteers BVIS follows the Nord Anglia Education policy *Managing Child Safeguarding Allegations Against Adults in Schools* and the *BVIS Allegations Against Staff Local Plan*.

**APPENDIX 5 – BVIS Child Protection Training Schedule**

Category of Staff	Training	Delivered by	Duration	Renewal
Teachers & TAs	NAE Online Safeguarding	Online	Online	2 years
	Local Induction	SG Team	1 hour	Never
	Annual Reminders	SG Team	1 hour	1 year
Supply Teachers	Local Induction	SG Team	1 hour	Never
	Annual Reminders	SG Team	30 mins	1 year
Examiners	Local Induction	SG Team	1 hour	Never
	Annual Reminders	SG Team	15 mins	1 year
Administration	Local Induction	HR	1 hour	Never
	Annual Reminders	HR	30 mins	1 year
Guards	Local Induction	HR	1 hour	Never
	Annual Reminders	HR	30 mins	1 year
Cleaners	Local Induction	HR	1 hour	Never
	Annual Reminders	HR	30 mins	1 year
Kitchen Staff	Local Induction	HR	1 hour	Never
	Annual Reminders	HR	30 mins	1 year

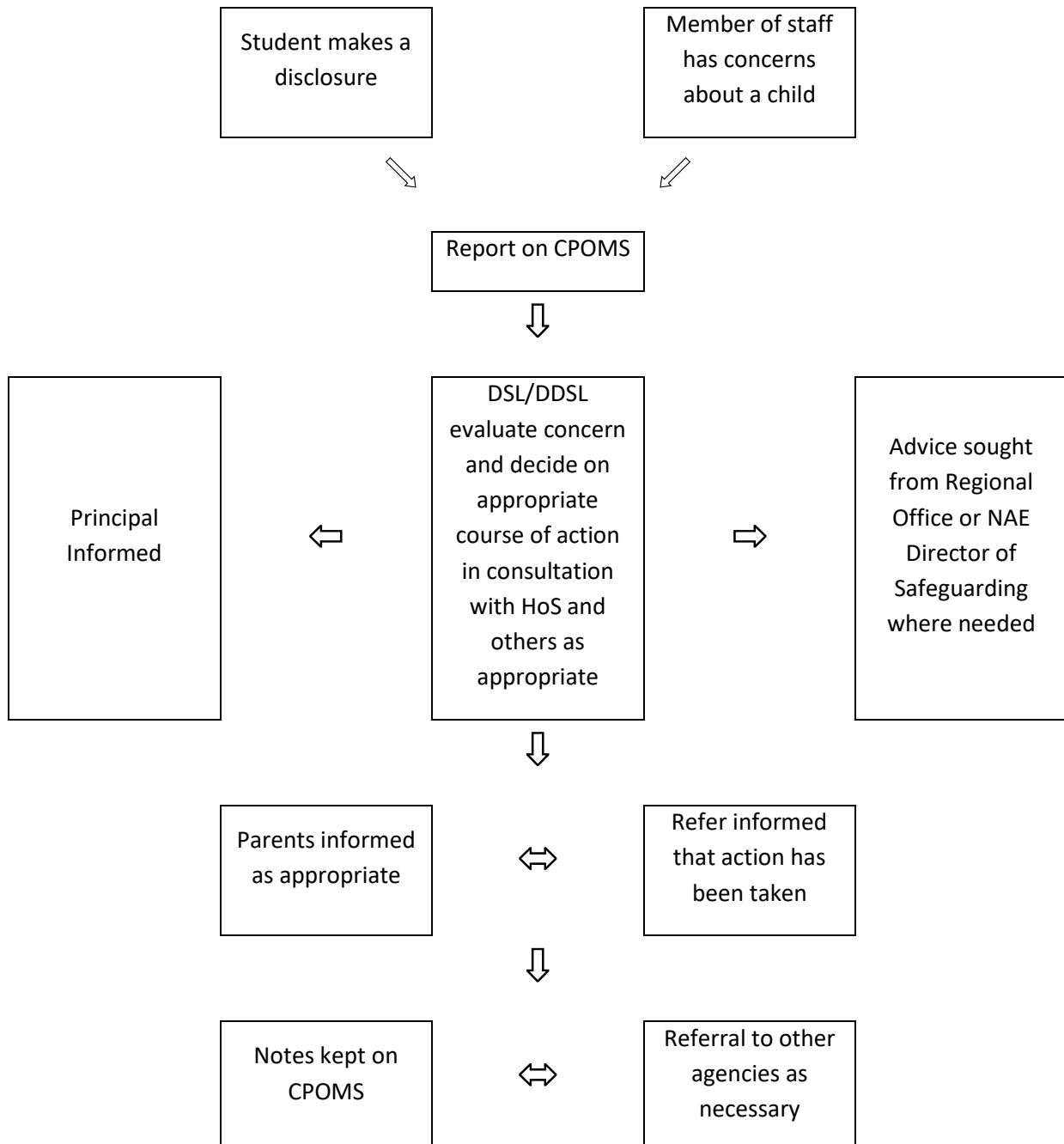
Volunteers	Local Induction	HR	1 hour	Never
	Annual Reminders	HR	15 mins	1 year
Contractors / ECA	NAE Online Safeguarding*	Online	Online	Never
	Local Induction	HR	1 hour	2 years
	Annual Reminders	HR	30 mins	1 year
LS Specialists **	NAE Online Safeguarding*	Online	Online	Never
	Local Induction	SG Team	1 hour	2 years
	Annual Reminders	SG Team	30 mins	1 year

\*or equivalent proof of basic safeguarding training.

\*\* Speech and Language, occupational therapy etc working on school site.

## APPENDIX 6 – Flowchart for Dealing with Child Protection Referrals

This flowchart will be used for dealing with child protection issues involving children. For allegations involving staff please see the Allegations Against Staff Local Plan.



## APPENDIX 7 –Information Sharing & Record Keeping Within School

Balancing a child or young person's right to privacy with the need to share information to investigate or keep that child or young person safe is a complex issue. The DSL, DDSL or Principal determines on a case by case basis what is shared with which staff but as general guidance the following applies. For cases involving allegations against staff, see the Nord Anglia Education policy *Managing Child Safeguarding Allegations Against Adults in Schools* and the *BVIS Allegations Against Staff Local Plan*.

### **Safeguarding concern involving a primary student**

The Deputy Designated Safeguarding Leads (Primary) or the Designated Safeguarding Lead as lead person will:

Consult:

- Primary Head Teacher
- Class Teachers
- *Class TA where necessary*

Inform (and consult as necessary):

- Principal
- Designated Safeguarding Lead when not the lead person
- Deputy Designated Safeguarding Lead (Primary) when not the lead person

Parents are usually informed unless this imposes a greater risk to the child than not doing so. This determination is made by the Primary Head Teacher and DSL/DDSL leading on the case. Where it is decided not to tell parents, the reasons for not doing so are recorded in the case notes.

### **Safeguarding concern involving a secondary student**

The Deputy Designated Safeguarding Leads (Secondary) or the Designated Safeguarding Lead as lead person will:

Consult:

- Secondary Headteacher
- Head of House
- Form Tutor

Inform (and consult as necessary):

- Principal
- Designated Safeguarding Lead when not the lead person
- Deputy Designated Safeguarding Lead (Secondary) when not the lead person

Parents are usually informed unless this imposes a greater risk to the child than not doing so. This determination is made by the Secondary Head Teacher and DSL/DDSL leading on the case. Where it is decided not to tell parents, the reasons for not doing so are recorded

in the case notes.

Where the concern has a significant impact on the students learning, the DSL or Key Stage Co-ordinator will inform all the student's teachers that there is a safeguarding concern and the action that teachers should take in their classes but not the nature or detail of the concern.

### **Child Protection Register**

The Schools Child Protection register is held as a secure online document. It contains the names of children on the register, date of birth and names of siblings or other children living in the family home. No case details are recorded (see Child Protection Files below). The following have access to the register:

- Principal
- Heads of School
- Deputy and Assistant Heads of School
- Secondary Heads of House
- Designated and Deputy Designated Safeguarding Leads

In addition, a coloured dot on a student's file indicates to other staff that there is secure a child protection file on that student. If they have good reason to know the contents of that file, they should consult the Designated Safeguarding Officer who will share any necessary information from the file but limited to that which is necessary to secure the safety and wellbeing of the student in question.

### **Child Protection File**

Each student on the Child Protection Register has a secure file which contains the record of concern, other notes and information relevant to the concern and a summary of all action taken about the concern. These files are on CPOMs. Only the following have access to these files:

- Principal
- Designated Safeguarding Lead / Deputy Designated Safeguarding Leads
- Headteachers

## **APPENDIX 8 – Extracts from Relevant Vietnamese Law**

The current legal framework for child protection in Vietnam is contained in the *Law on Children 2016* and the *Decree Detailing a number of articles of the Law on Children*. Some relevant extracts are below and full copies of the text/ unofficial translations can be found on the Z: drive.

The legal duty, or otherwise, for a school to report child protection issues is however unclear. The Business Manager consulted the 1088 call centre and their view is that when the school detects child abuse, the school informs the family first, if their family does not agree to report the police, the school will consider the seriousness and may decide report to police if it is critical to protect the child.

### **Law on Children 2016 [Law No.: 102/2016/QH13]**

#### **Article 6 - Prohibited acts:**

“11. Disclosing information on the private life and personal secrets of children without the consent of children aged 7 years or older and of parents, guardians of children”

“15. Refusing, not implementing or implementing inadequately or not timely support, intervention, treatment of children at risk or in danger, harm to the body, honor, human morale”

#### **Article 21 - The right to privacy of private life**

1. Children have an inviolable right to privacy, confidentiality and family secrets for the best interests of the child.
2. Children are entitled to the protection of the honor, dignity, prestige, confidentiality of letters, telephones, telegrams and other forms of exchange of personal information; is protected against unlawful interference with private information

#### **Article 51 - Responsibility to supply and process information, notices and denunciations against acts of infringing upon children**

1. Educational agencies, organizations, educational establishments, families and individuals shall have to provide information, notices and denunciations against acts of infringement upon children, cases where children are harmed or at risk of violence. , exploitation, abandonment to the competent authority.
2. The labor, war invalids and social affairs bodies, the police offices at all levels and the commune-level People's Committees shall have to receive and process information, notices and denunciations; Co-ordinate the verification, assessment, Investigation of the infringement, the unsafe or damaging situation, the risk of harm to children.
3. The Government shall set up permanent national telephone exchanges for reception and processing of information, notices and denunciations about the risks and acts of infringement upon children; Prescribing the process of receiving and processing information, notifying and denouncing acts of infringing upon children.



**Decree Detailing a number of articles of the Law on Children** [Degree 56-2017-ND-CP]**Article 25** - Receipt and coordination of information processing

- Report to national hotline for child protection (toll free, 24/24)  
Agencies, organizations and individuals tasked to protect, care for and educate children shall have to supply information and coordinate with the labor, war invalids and social affairs agencies at all levels and the police offices. The commune-level People's Committee at the place where the incident occurs or the place where the child resides shall conduct the inspection of the truthfulness of the infringing act, the unsafe situation and the risk of harm to the child. when asked.
- In case of receipt and settlement of reports or denunciations on crimes against children, the Criminal Procedure Code shall be applied.

**RESPONSIBILITY TO PROTECT CHILDREN IN THE NETWORK ENVIRONMENT****Article 33** - Information on confidentiality of private life and personal secrets of children

- Confidential Information Personal life, children's personal secrets are information about: name, age; personal identity; Information about health status and private life is recorded in the medical record; personal photos; information about family members, carers; personal property; phone number; personal mailing address; address, information about whereabouts, origin; address, school information, grades, academic performance and friends' relationships; Information on services provided to individual children.

**Article 34** - Communication, education and capacity building on child protection in the network environment

“2. Parents, teachers and caretakers are responsible for educating their children's knowledge and skills on safety for children participating in the network environment; Children have the duty to learn, to learn, to practice their self-protection when participating in network environment”.

**Article 36** - Measures to protect confidential information of private life for children in the network environment

1. Agencies, organizations and enterprises providing services in the network environment and individuals, when submitting confidential information on the children's private life, must go through the consent of their parents, carers children and children aged full 07 years and over; is responsible for ensuring the safety of children's information.
2. Agencies, organizations and enterprises providing services in the network environment must use measures and tools to ensure confidentiality of children's private life information and warning messages when children provide, change the privacy of children's privacy.
3. Parents, caretakers, children aged full 07 years and over, and agencies, organizations and individuals responsible for child protection as prescribed by law may request agencies, service providers and individuals who participate in the network environment to remove the confidential information of the private life of the child in order to ensure the safety and

best interests of the child.

## **APPENDIX 9 – Local Contacts**

Government Child Protection Hotline (toll free 24/7) in Vietnamese

Tel: 1088

Counsellors and Medical Services

BVIS **does not recommend** any counselling or medical service but the following have been found helpful by parents at either BVIS or BIS HCMC.

[Parent & Student MH Booklet.pdf](#)

[Services specific for counselling\\_STAFF \(updated May 2025\).docx](#)