

Document Title and ID	<b>Child and Student Safeguarding Policy v. 5.7</b> <i>RE.PO.01.04</i>		
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## Purpose

Dilijan International School of Armenia, Foundation (hereinafter “the DISA”) expects all individuals and groups affiliated with the school community to act with integrity and to take responsibility for keeping students safe. Whether you are a staff member, a service or activity partner, a volunteer, intern, contractor, guest, parent or visitor, it is our expectation that you will support our students and act with their well-being in mind at all times. This policy guides how we do so.

## Scope

This policy applies to all students of the school (even if they are legally adults) as well as any children living on or visiting the school campus.

## Policy Statement

Keeping children safe is everyone’s responsibility at DISA. In keeping with the mission and values of the UWC movement, we believe that every child and young person, regardless of age, has at all times and in all situations a right to feel safe and protected.

We are committed to safeguarding processes which include:

- protecting students from abuse and neglect,
- preventing risk of harm to children’s health or development, and
- ensuring children grow up with the provision of safe and supportive care.

## Introduction

At DISA we expect our community to be honest and act with integrity, to be compassionate and morally responsible, and to help other people. We believe that every child and young person, regardless of age, has at all times and in all situations a right to feel safe and protected. DISA expects all individuals and groups affiliated with the school community to act with integrity and to take responsibility for keeping students safe.

We know that students need a secure and supported environment in which to learn, and our safeguarding policies and procedures are designed to do so. They encompass: student

wellbeing; bullying; harassment and discrimination; use of physical intervention/safe handling; meeting the individual physical, psychological and medical needs of students; drug and substance misuse; educational visits; relationships and sexuality education; online safety; the welfare of residential students and students on school expeditions; as well as safe staff selection processes.

The Child Safeguarding Policy is aligned with the United Nations Convention on the Rights of the Child, as signed by Armenia in 1993, the UWC Safeguarding Standards and the recommendations of the International Task Force on Child Protection that has set the standards for safeguarding in schools worldwide.

The aim of the safeguarding approach as set out in this document is for the risk to be reduced as far as reasonably possible, in a manner consistent with the educational objectives of the UWC Movement (of personal trust and responsibility, student autonomy, independence and service as well as personal warmth, which are essential to a UWC education).

This policy is binding for all who have contact with the school community, including staff, service and activity partners, volunteers, associated agencies, interns, contractors, guests, parents and visitors. In keeping with this expectation, applicants for positions at the school must be willing to undergo child protection screening appropriate to the post, including checks with past employers.

Safeguarding is not a task that falls on some individuals. All members of our school community have a duty to safeguard our students and be aware that incidents can happen at any time and anywhere.

Any such policy is only as good as the staff who operate it and who are likely to become aware of issues. At DISA we expect all staff to take every opportunity to share concerns in the interests of students. Early recognition of potential problems is of the essence, as prevention is better than cure.

This policy is connected to the following:

- A. Staff Handbook.
- B. UWC Student Code of Conduct,
- C. UWCD Student Residential Code of Conduct
- D. Student Handbook.
- E. Data Use and Protection Policy
- F. Anti-Bullying Policy

G. Missing Student Policy

- H. Alcohol, Tobacco, Drug Misuse Prevention Policy
- I. Framework Procedure for Supporting Students
- J. Health and Safety Policy
- K. Mental Health and Psychological Wellbeing Policy
- L. Sexual Misconduct Prevention Policy
- M. Visitors Policy
- N. Infectious Disease Policy
- O. Any other policies and procedures that might be drafted and created later
- P. Animal Policy

These policies together form the “suite” of Child Safeguarding Policies and need to be available to the members of our community via our website/intranet. They are reviewed annually and presented to the Head of School for approval.

## Definitions

The following definitions are provided to ensure clarity and consistency:

### Child

While the United Nations Convention on the Rights of the Child defines a child as a person under the age of 18 years, at DISA, we define a child as any student of the school or child visitor to the school. We recognise that some members of our school community are more vulnerable than others due to their personal circumstances. We need to remember that there are children both resident on and who visit the campus. All the processes established to protect students must be applied equally to younger children who are, in some ways, even more vulnerable.

### Safeguarding

It is not just about protecting students from deliberate harm. It is linked to welfare and is what we do for all children. Safeguarding involves the process of protecting children from abuse and neglect, preventing harm to children’s health or development, and ensuring children grow up with the provision of safe and effective care.

### Child protection

It is part of the safeguarding process. It focuses on protecting individual children where there are concerns about abuse or neglect. This includes child protection procedures which detail how to respond to concerns about a child.

### Child abuse

Is a serious and complex problem that may occur in the lives of children and young people. It is the term used to describe different types of maltreatment inflicted on a child or young person. **Child Abuse includes non-accidental physical injury, neglect, sexual abuse and emotional or**

**psychological abuse.** In its most serious forms, abuse can lead to death or developmental harm to the physical or emotional wellbeing of a child or young person.

#### Peer-on-peer abuse

While often associated with adults, we need to remember that children can commit abuse on their own peers.

#### Physical abuse

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

#### Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve:

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

#### Sexual abuse

Sexual abuse involves forcing or enticing a child to participate in sexual activities whether the child is aware or not of what is happening. It does not necessarily involve a high level of violence.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts (such as masturbation, kissing, rubbing and touching outside of clothing). They may also include non-contact activities such as encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, whether online or

offline. Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children (peer-on-peer).

### Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment),
- protect a child from physical and emotional harm or danger,
- ensure adequate supervision (including the use of inadequate care-givers),
- ensure access to appropriate medical care or treatment, or
- neglecting or being unresponsive to a child's basic emotional needs.

### Sexual activity

Any activity by an individual or two persons or a group of people that causes sexual arousal in any individual regardless of whether they are taking part in the activity or not causing any physical or emotional change is sexual activity.

### Roles

The following individuals have safeguarding-specific roles.

Nominated Safeguarding Governor, John Guyatt

The governors, as part of their due diligence, carry out an annual review of the School, and safeguarding policy and procedures are part of this review. The Board is responsible for:

1. Reviewing the procedures for and the efficiency with which safeguarding duties have been discharged. It is not sufficient that there is a Student Protection Policy, and the Nominated Safeguarding Lead Governor should satisfy him/herself if it is being applied in practice.
2. Ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.
3. Approving amendments to safeguarding arrangements in light of the changing regulations and/or recommended best practice.

The Safeguarding Lead Governor should be a person familiar with safeguarding issues and fully aware of the importance of confidentiality in this connection. The DSL should, in consultation with the Head, keep the Safeguarding Lead Governor informed of any serious safeguarding issue that arises.

- Contact details: [john.guyatt@governor.uwcdilijan.am](mailto:john.guyatt@governor.uwcdilijan.am).
- Reports to the Chair of the Board.
- Responsibilities
  - Receives regular reports – number and types of cases
  - Support the School Safeguarding Lead and Head of School with implementation of the Safeguarding Policy
  - Budget for any Child Safeguarding needs or requirements, e.g.: training
  - Oversee and hold the school accountable for carrying out Child Safeguarding Policy

Head of School, Adam Alfred Armanski

- Contact details: [a.armanski@uwcdilijan.am](mailto:a.armanski@uwcdilijan.am).
- Reports to the Board of Governors.
- Responsibilities
  - Initiate the creation of the School Child Safeguarding Committee
  - Continue the process of revision of the Child Safeguarding Policy
  - Provide resources for the annual safeguarding budget.
  - In conjunction with the governors, ensure the safeguarding policy is reviewed annually for effectiveness and for compliance with the latest legislation or updated sooner where necessary.

Designated Safeguarding Lead, Madhu Banerji

- Contact details: [M.Banerji@uwcdilijan.am](mailto:M.Banerji@uwcdilijan.am),
- Reports to the Head of School.
- Responsibilities:
  - Provides advice, support and training for staff on child welfare and safeguarding
  - Coordinates 'support team' following allegations or disclosures of abuse
  - Responds to disclosures of abuse
  - Maintains records ensuring confidential storage and transfer of information as required
  - Manages the referral and support process
  - Keeps their line manager informed of all significant safeguarding matters

- Raise awareness on matters of safeguarding matters generally
- Supports the implementation of Armenian policies and procedures and liaising with Armenian Child Protection Services
- Supports the implementation of the PSE curriculum around safeguarding and Child protection

#### Deputy Designated Safeguarding Lead, Rangike Bandaranayake

- Contact details: r.bandaranayake@uwcdilijan.am.
- Reports to the Designated Safeguarding Lead.
- Responsibilities
  - Provides advice and support for staff on child welfare and safeguarding
  - Responds to disclosures of abuse
  - Maintains records ensuring confidential storage and transfer of information as required
  - Participates as needed in the referral and support process
  - Keeps their line manager informed of all significant safeguarding matters
  - Raise awareness on matters of safeguarding matters generally
  - The Deputy DSL is appropriately trained to the same level as the DSL. In the absence of the Designated Person, the Deputy carries out the functions necessary to ensure the ongoing safety and protection of the students.
  - In the event of a long-term absence of the DSL, the Deputy will assume all of the functions above.

#### Deputy Designated Safeguarding Lead (DIS), Namrata Lund

- Contact details: n.lund@uwcdilijan.am.
- Reports to the Designated Safeguarding Lead.
- Responsibilities
  - Provides advice and support for staff on child welfare and safeguarding in the DIS
  - Responds to disclosures of abuse
  - Maintains records ensuring confidential storage and transfer of information as required
  - Participates as needed in the referral and support process
  - Keeps their line manager informed of all significant safeguarding matters
  - Raise awareness on matters of safeguarding matters generally
  - The Deputy DSL is appropriately trained to the same level as the DSL. In the absence of the Designated Person, the Deputy carries out the functions necessary to ensure the ongoing safety and protection of the students.

- In the event of a long-term absence of the DSL, the Deputy will assume all of the functions above.

#### Wellbeing Counsellor, Rene Sandoval Sanchez

- Contact details: [r.sandoval@uwcdilijan.am](mailto:r.sandoval@uwcdilijan.am).
- Reports to Designated Safeguarding Lead.
- Responsibilities
  - Member of multidisciplinary support team
  - Provides counselling support and guidance following referral from the Designated Lead
  - Offers advice and psychoeducation where needed or anticipated.

#### Senior School Doctor, Dr Narine Okonyan

- Contact details: [N.Okonyan@uwcdilijan.am](mailto:N.Okonyan@uwcdilijan.am).
- Reports to Designated Safeguarding Lead.
- Responsibilities
  - Provide medical guidance as needed.
  - Liaise with medical personnel and authorities as needed.
  - Member of a multidisciplinary support team as needed.

#### Multi-disciplinary Team

- Reports to the Designated Safeguarding Lead. May involve the school senior doctor, the counsellor, mentors, Toon parents, external support agencies or anyone else as deemed necessary in the best interests of the child.
- Responsibilities
  - To support any student affected and help the school deal with the issue in a professional manner.

#### Best Practices

Visitors to UWC Dilijan are often struck by the familiarity and closeness that exist between many adults and students, which is part of the UWC spirit and which can improve the quality of living and learning in our community.

The use of first names between staff and students is accepted common practice. We seek clarity of preferred names and pronunciation with all members of our school community. Some students and staff may initially experience discomfort with this, and we show sensitivity to this. When in doubt, seek consent.

With so many people living and working so far from home, an atmosphere of being a community/family is appreciated by many. This is the reason for the residential experience, offering opportunities for living and learning together, whether it is sharing a tutor meal, a Project Week trip, a class, etcetera. At UWC you find fewer boundaries between students and adults than at many other academic institutions. For this reason, we should be especially vigilant about appropriate parameters and clearly agreed-upon forms of communication between adults and students. What follows is a summary of guidance tips:

- One-to-one tutorials should always take place in full view of others. This would typically be in a room where students and adults can be clearly seen through a window or open door. Staff are strongly advised not to be in a room one-to-one with a student unless necessary professional circumstances apply.
- For their own protection, staff will ensure that windows built into the doors are not covered.
- Apart from Toon Parents, staff should never conduct one-to-one tutorials or meetings in their homes. Members of staff are, however, most welcome and encouraged to invite groups of three or more students into their homes (for example, for tutor groups). Toon Parents may well have students coming to see them in their home individually, in which case it is preferable to have a friend with them or to have another adult somewhere in their flat. It is accepted that this is not always possible. However, there should never be any closed-door meetings with students.
- Students should not be visiting staff accommodation after check-in except in case of an emergency. No Toon Parents or other members of staff are allowed to host students overnight except with the prior permission of the Head of School.
- Members of staff should be wary of conveying individual students in their cars. Exceptions to this would apply to staff driving students in an emergency situation. However, permission should be sought from the Head of School.
- Where physical contact is needed with individuals, they should do so only in full view of others and in accordance with their particular professional guidance.
- No inappropriate touching or unnecessary physical contact should be made with students. Whilst a friendly hug or tap on the shoulder in full view of others is acceptable, excessive handling, cuddling or kissing (for example) are not.
- Staff should never be alone with students in secluded areas unless they have been searching for the student.
- Staff should never engage in rough, physical or sexually provocative games with students.
- Sexually suggestive remarks should never be made by staff in the presence of students.
- Staff should never share sleeping accommodation with students (e.g. On Project Week).

- Unless there are exceptional, urgent circumstances, electronic communication with students should never be made except via school systems (school email, ManageBac and so on). No member of staff should be connected with students via social networks such as Facebook until after the student has graduated from the school.
- If a member of staff feels that s/he may have overstepped that fine line between good staff-student relationships and inappropriate behaviour (for example, a comment that might be misconstrued), this should be reported to the DSL/DSL as soon as possible.
- For staff on residential duties or supervising trips, they should only enter student bedrooms after having knocked on the door and announced their presence. At night they should only enter student bedrooms when needed to conduct their duties, including for disciplinary or safety reasons.
- During an ongoing safeguarding investigation, all parties involved should not discuss the case amongst themselves or with anyone else except the DSL. The well-being counsellor can be part of a discussion at DSL's discretion or the student's request.
- Staff and students should not discuss any safeguarding cases with anyone not involved in the case even after the closure of the case.

### Specific Advice for Interns and Volunteers

Interns or younger volunteers are usually closer in age to the students than regular staff and, as such, may have a more casual relationship with students, which can be a useful bridge and a welcome addition to the range of student support networks at the school. At the same time, this can create difficulties for them in terms of managing a professional relationship. In order not only to safeguard students but also to prevent interns from putting themselves into situations which can be misconstrued, interns should:

- Be aware of cultural differences in their interactions.
- Not socialise with students in student rooms and limit their interaction to communal areas.
- While interns normally are of legal age and therefore can legally drink alcohol, like all DISA staff, they should never do so with students.
- Not be friends with students on social media whilst at the school (only after June 1st of the graduating year). Once they have finished their internship, they may do so.
- Be fully conversant with the Student Code of Conduct. A consequence of this is that they should cooperate with the school in implementing it and be ready to challenge inappropriate student behaviour.
- Whether staying on or off campus, interns should never have students visiting them in their rooms individually.
- Not give students lifts in their vehicle or get a taxi with an individual student alone. Like for all other staff, in an emergency situation this may not apply.

- Attend and participate proactively in events on and off campus, such as co-curricular activities, shows and so on.
- Respect the confidentiality of any professional meeting or discussion so that they are treated as staff and can engage with staff professionally. Breaking confidentiality may cause a disciplinary procedure and could cause the termination of the internship.
- Should not indulge in horseplay or any game which could be construed as sexual contact.
- Be cognisant of this policy and report to the Toon Parents any concerns they may have about the wellbeing or behaviour of any student/s. In case of serious concerns, they should report to the DSL/DDSL immediately.

### Safe Recruitment and Employment Practices

The school will take all reasonable and practical steps to ensure that school staff (including part-time staff, temporary and supply staff, and visiting staff such as musicians and sports coaches) are subject to child protection checks before starting work.

All governors, volunteers and contractors working regularly during term time are also subject to the relevant checks. The school shall maintain a central register of safeguarding checks in which all the information, self-declaration forms and confirmatory documentation are stored. In the event of any persons visiting the campus to carry out work where a child protection check has not been carried out, then they must be accompanied at all times by a member of DISA staff, which for this purpose includes permanent service providers on campus, such as engineering, cleaning and canteen services or other entities with which DISA has a direct contractual relationship and have complied with the conditions of the following paragraph.

In the event of an entity having a contract which requires them to enter the campus for any purpose, then, unless the person entering is accompanied at all times as provided in the preceding paragraph, they shall not enter unless the terms of the Safeguarding and Contractors Policy have been complied with.

### School Visitors

In the event of students showing visitors around, there shall be at least two students at any time, and the students shall be made aware that they are to remain together. A Visitor Code of Conduct will be produced in English and Armenian, and visitors will have to sign a copy stating that they will comply with it.

## Induction and Training of Staff

Every new member of the staff, including part-timers, voluntary, peripatetic and temporary staff working in the school, will receive appropriate induction training on their responsibilities in being alert to the signs of abuse (including bullying) and neglect and on the procedures for recording and referring any concerns to the DSL/DDSL via My Concern a safeguarding software tool used by the School Therefore, training in safeguarding will be mandatory during the induction process and include:

1. Reading the Child and Student Safeguarding Policy and acknowledging this by ticking the box on the school Safeguarding software tool called My Concern.
2. Ensuring that all staff are aware of the identity of the DSL and DDSs, how to contact them and in what cases they should be contacted.
3. Explaining the way in which disclosures and other student protection issues should be addressed, including how to access the Reporting Tool in My Concern.
4. A promotion of the awareness of the need to be alert to any indication of safeguarding issues and how to respond to them.
5. An introduction to the Staff Behaviour Policy, part of the UWCD Staff Handbook.

Staff members should not be friends with students on social media whilst at the school (only after June 1st of the graduating year).

## Promoting awareness of safeguarding issues

The school curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our students. All teaching staff play a vital role in this process, helping to ensure that all students relate well to one another and feel safe and comfortable within the school. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our students on issues relating to health, safety and wellbeing.

All school staff have an important role in ensuring that students always adhere to the standards of behaviour set out in the Student Code of Conduct and in reinforcing our Anti-Bullying Policy. If there are concerns about a student which fall short of requiring action under this code, such concerns should be shared with other staff members who may have their own concerns or be able to offer additional support to the student in question.

The DSL must consider ways in which to ensure that the students are aware of ways in which they should report any matter that causes them concern. This should include ensuring that the issue is addressed regularly during student meetings and may include the use of different

resources (online and offline) to ensure students know that any safeguarding issue is always treated seriously.

## Support to students

From a safeguarding perspective, the school supports students in the following ways:

1. Employment of a full-time wellbeing counsellor who is a trained psychologist. As a resident on campus, he is available to students who wish to have support on any particular issue.
2. Training is provided to peer listeners, specifically covering safeguarding issues and the importance of offering support to vulnerable students. They are trained and supported by the wellbeing counsellor and pastoral staff.
3. Toon Parents receive specific training to be particularly aware of safeguarding issues.
4. All school staff receive specific training in handling disclosures following this policy.
5. The medical centre provides the assistance of nurses and a doctor, all of whom have received safeguarding training.
6. DISA notice boards display advice on where students can seek help, stating clearly who to contact.
7. The school works continually on promoting a trusting and open relationship between staff and students, with the staff expected to remain open and aware of safeguarding issues.
8. Tutor groups are small by design and offer a key student-staff relationship that can facilitate disclosures.
9. The wellbeing counsellor runs sessions for all students on emotional life skills, including decision-making, consent and communication.

## **Procedures for Dealing with a Safeguarding Allegation or Concern**

Every member of staff, including part-timers, temporary, visiting, permanent contract and volunteer staff (including interns) working in the school (including staff employed by outsourced suppliers), is required to report via My Concern, a safeguarding software tool, instances of actual or suspected child abuse and/or neglect to:

1. The Designated Safeguarding Lead (DSL), unless
2. The allegation or concern affects the DSL, in which case it should be addressed to the Head of School.
3. If the allegation or concern affects the Head of School, it should be addressed to the Safeguarding Lead Governor.

## How to conduct the disclosure meeting

If a member of staff is approached by any student and told of any allegation of abuse and/or neglect, this is normally an act of considerable trust and speaks highly of the relationship the staff member has with the student concerned. Staff should follow the school policy on interviewing students. Some guidelines to be followed are:

1. **Make no promise of confidentiality.** If the student requests confidentiality, he or she should be told that anything said would be treated as confidential as far as possible but that the student must be aware that if there was anything to suggest that that student or another was at risk, then the information would have to be shared on a minimum basis so that action could be taken to protect all involved. Confidentiality cannot be guaranteed where there is a purported act of criminality, and in consequence, the laws of Armenia have been broken.
2. **Listen seriously and calmly.** Provide reassurance that what is being said is important and is being listened to and, if necessary, will be acted upon.
3. **Let the student tell you in his or her own words what they want to speak about.** In particular, be very careful not to probe or put words into the student's mouth. Limit questioning to the minimum necessary for clarification.
4. **Do not ask leading questions.** Questions which can be answered "yes" or "no":
  - a. "Did he hit you?" is bad!
  - b. "What happened next?" is good!
5. **Be cautious about note-taking.** Contemporaneous notes taken during an interview are hugely important evidentially and a support for recollection. Always request permission to make a note explaining that it is to help make sure you can remember important details and emphasise that they will be stored securely. There are some situations that are so delicate that taking notes may not be appropriate; in this situation, make a full note – including the time and date of the meeting specifying the starting and end times – as soon as you part from the student. Strive to quote actual words used, differentiating what was said, and focus on the factual.

Whether information which raises safeguarding concerns comes to you from a student or any other means, you should report it directly and within 24 hours to the DSL through the My Concern tool, attaching the original of any File Report Form or other document. Please keep a copy for your own records and store it securely.

Please do not use email to make a report, as it is not a secure means of communication, and there is no guarantee that the recipient will read the email. The member of staff should inform the DSL immediately.

Please do not discuss the matter with anyone, even if it is the Head of School.

In borderline cases or where any person is not sure if the matter should be considered a safeguarding issue, the matter should still be raised with the DSL/DDSL via the My Concern platform.

### **The Need for Immediate Action**

It is vitally important that students receive the right help at the right time to address risks and prevent issues from escalating. Early signs of abuse and neglect should be acted upon without delay, and clear records kept. Information must be shared quickly, and inaction challenged.

Throughout the process, the views of the student(s) should be listened to, and concerns should be reassessed when situations do not improve. There is a need to differentiate between the safeguarding of students who have suffered or are likely to suffer significant harm and those who need additional support. Although decisions to seek support for a student would normally be taken in consultation with the parents and the student/s, there is no consent required where there are reasonable grounds to believe that the student is at risk of significant harm.

Where:

1. A serious allegation is made against a staff member or other adult, or
2. There is reasonable cause to suspect a child or student is suffering, or is likely to suffer significant harm, or
3. It appears that a criminal offence may have been committed.

The Head of School (or, in their absence, the Assistant Heads) shall be informed immediately. The Head/Assistant Heads will decide, in consultation with the DSL/DDSL, immediately and in any event within 24 hours, whether the allegations shall be reported to the Armenian Police or any other relevant Armenian authority.

### **Allegations against students**

Where an allegation is made of abuse by one or more students against another and there is a reasonable cause to suspect that a student or students is/are suffering or are likely to suffer significant harm, the DSL will regard all students as being at risk. For example, a bullying incident should be treated as a safeguarding concern when there is “reasonable cause to

suspect that a child is suffering or likely to suffer significant harm". Where there is no reason to suspect or fear significant harm, the Anti-Bullying Policy should be consulted.

### Allegations or concerns about School Staff

Any concerns about the behaviour of any school staff towards a student should be discussed with the DSL or DDSL within 24 hours and reported via My Concern. Any allegations of abuse and/or neglect must be reported to the DSL/DDSL immediately and, in any event, within 24 hours.

### Historical allegations

Any kind of historical allegations against a member of staff, a volunteer, a governor, a student, a parent or any other person connected to the school to the DSL will be considered by the DSL/DDSL in consultation with the head in order to decide how they will be handled.

### Extremism

DISA is committed to the tolerant acceptance of the views of others, and there is no place in our community for any attempt to persuade others to be involved in any kind of activity which replaces a commitment to peace and goodwill between different groups with extremist and violent views.

Although by its nature the UWC movement is unlikely to attract those who wish to unduly influence others, all staff should be aware of the risks. As with managing other safeguarding risks, staff should be alert to changes in a student's behaviour which could indicate that they may need help and/or protection. Staff should use their professional judgement in identifying children who might be at risk of being unduly influenced and act proportionately in consultation with the DSL/DDSL.

## Protocol for Following up on Allegations and Concerns

### Recording of Safeguarding Issues

The DSL will keep a record of all matters referred to as safeguarding issues in a confidential file which will record the outcome of the investigation, indicating whether:

1. The allegation was **Established** (there was sufficient evidence to prove it).
2. **Unresolved** (insufficient evidence either to prove it or disprove it),

3. **False** (sufficient evidence to disprove it), or
4. **Malicious** (sufficient evidence to disprove it and show that there has been a deliberate act to deceive).

A written record will be made of the decision and retained on the individual's personnel file, clearly noting in cases 3 and 4 that the allegations have been disproved. The reason for the retention of disproved allegations is to ensure that the file contains information which negates any rumour or query concerning the matter.

### **Protocol for action when dealing with allegations or concerns about staff**

The Head, in consultation with the DSL and DDSL, shall take such steps set out below as are relevant and appropriate:

1. Involvement of Armenian authorities: If the matter is such that it is appropriate that the Armenian police and/or child protection authorities be informed.
2. Action in respect of a staff member: This will include considering whether the staff member should be suspended. If a suspension is deemed necessary pending an investigation of a safeguarding issue,
3. The staff member will be asked to leave and remain away from the school campus whilst the matter is investigated and resolved.
4. The reasons and justification for the suspension will be recorded, and the staff member informed of them in writing.
5. Where a member of the staff resides on campus, suitable arrangements must be put in place for alternative accommodation away from children at the expense of the school.
6. The matter will be dealt with in accordance with the UWCD Student Residential Code of Conduct.

### Sharing of information

During the course of any investigation, the Head, in consultation with the Senior Management Team, will decide what information should be given to parents, staff and other students and how press queries are to be dealt with.

If an investigation leads to the dismissal or resignation prior to dismissal of a member of staff, the Head shall consider whether, and if so, how, steps should be taken to protect children from any risk to them that it is judged that the staff member may offer in the future. This could include making a referral to organisations such as UWC or CIS, as well as relevant national organisations (for example, the Disclosure and Barring in the UK).

Protocol for action when dealing with allegations or concerns about students

In the case of allegations or concerns about potential abuse by a student, the matter will be dealt with under the Student Code of Conduct and will include immediate consideration of whether the student concerned or any other student is at risk and what actions are to be taken to address that risk.

It is extremely important that we all remember that, whatever the nature of the allegation, the student concerned is in our care, and his/her best interests must be protected as far as possible, bearing in mind the need to protect other students. The school must continue to act as any parent would in such circumstances and ensure that any students who are involved will receive support and care, including, if necessary, legal support.

### **Appendix to Child and Student Safeguarding Policy 5.6 version**

#### **Best Practice for Inquiries on Serious Incidents**

The following are the basic features for investigating and dealing with a serious incident. By

serious are meant such allegations as may be construed as possibly criminal, the most obvious being sexual assault, possession and selling of illegal drugs, theft involving significant sums of money or valuable articles, and “hazing” and bullying. Following proper procedures is vital to ensure that students are treated fairly and justly and that the school is not sued or its reputation damaged.

1. When a student is questioned, a trusted staff member of the school must be present to inform the students of their rights. If the student wishes to leave the room to speak separately to the adult, the

Questioning is paused to allow this. A student may bring a friend to the meeting. The presence of another adult besides the person conducting the interview is important to enable what is said to be witnessed.

2. Notes should be taken during the interview by the interviewer and written up as soon as possible afterwards and within 24 hours. The students will each be requested to write an account of the matter under investigation. Any other students who become involved in the investigation as witnesses must maintain strict confidentiality and sign a confidentiality agreement.

3. No guarantee of blanket “immunity” or confidentiality can be given to a student disclosing since criminality or potential harm to other students is involved. The School cannot avoid acting.

or commit to concealing information; this is not to say that the school necessarily will disclose information to external agencies.

4. Where an allegation is accepted by the school, the final decision on the outcome lies with the head, based on consultations.

5. The Safeguarding Governor should be informed about serious allegations of a sexual nature (and other allegations such as those relating to illegal drugs?) within 48 hours and may be consulted at any stage of the procedure.

6. If the student must leave the school, the Chair of Governors must be informed. The Head's report to the Board will include the outline of any serious

disciplinary matters that have arisen and will serve as a permanent record.

7. The school has a duty of care towards everybody involved that extends beyond their time at the school.

8. The right of appeal by parents will have been included in the documents sent to parents when their child joins the school. The grounds for appeal generally fall into the following categories:

a. The truth of the allegation is challenged.

b. The investigative procedure was flawed.

c. The punishment was disproportionate.

#### Safeguarding Incidents: Confidentiality provisions

In all the cases when, during the Safeguarding incident investigations, students become involved in the investigation as witnesses, they must maintain strict confidentiality. Information about complaints and incidents shall be kept confidential to the extent possible. A confidentiality agreement will be signed by the witnesses internally.

Information obtained about an incident or complaint of student abuse, harassment, or assault, including identifying information about any student or staff member involved, must not be disclosed.

While the investigation is ongoing, the student who has allegedly experienced abuse, harassment, or assault; the alleged harasser(s); and any witnesses should not discuss the incident or complaint or the investigation with each other or other students and/or staff members and/or witnesses.

The Head of School, Designated Safeguarding Lead or the Safeguarding Governor may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

### Safeguarding Incidents: Confidentiality Agreement Form

1. I, (Name), student ID, \_\_\_\_\_ have received and read the confidentiality provisions above and understand them.
2. I agree to hold in confidence information obtained in the process of a complaint made and investigations initiated under the School Safeguarding Policy.
3. I hereby commit to preserving the confidentiality of the proceedings and not to discussing this incident separately, whether online or offline.
4. I understand that if I have any questions about this agreement and my rights and responsibilities under it, I may speak with the Head of School and/or the Designated Safeguarding Lead.

Student Name (please print):

Signature:

Date:

### **Appeals Procedure (Annex)**

1. If a student feels that a disciplinary issue or removal of place decision has been inappropriately handled by a member of the staff, they should discuss the incident with the Head of School.

2. After taking the steps set out above, a student and their parents have the right of appeal directly to an Appeal Committee established by the Board. The application for the appeal shall describe the disciplinary matter and set out the basis of the appeal as well as attach any documentation in support of the appeal and be forwarded to the Chair of the Board and to the Secretary of the Board. Such an appeal should be made within 28 days of the decision, although, on application, the Chair of the Board may, for good reason, extend the time to allow a late appeal. Appeals may be made by email copied to the Secretary to the Board, Jemma Panoyan (j.panoyan@uwcdilijan.am), and to the Head (head@uwcdilijan.am).
3. Appeals must be based on the following grounds:
  - a) The proper procedure was not followed correctly, and this affected the decision and/or the sanction.
  - b) The decision reached was not supported by the evidence presented.
  - c) The sanction awarded was disproportionate, considering the nature of the misconduct and the mitigating circumstances.
  - d) Where new relevant and pertinent evidence has become available.
4. The Board will then nominate an Appeal Committee consisting of 3-5 (three to five) Board members who have not been involved and have no connection to the matter in question.
5. That Appeal Committee shall review the case. The decisions of the Appeal Committee are adopted by the simple majority of the votes of the members participating in the meeting. While the appeal process is proceeding and until a decision has been made, the decision appealed against will stand.
6. The Appeal Committee will govern its own procedure but shall offer the student and his/her parent(s) an opportunity to make submissions and submit evidence.
7. If the Appeal Committee decides on the necessity of further testimonies, participants will be asked to submit written statements. These must be submitted promptly in order to expedite a conclusion.

8. The Head of School will set out the case for expulsion. The Appeal Committee has the authority to uphold or overturn the decision or make such directions in that connection as it sees fit, and its decision will be final.
9. The Appeal Committee will come to the decision within a reasonable time depending on the volume of the information and evidence provided.