3.7.040 Safeguarding of Students

Adopted by	School Council	2 September 2025
Version history	Created: January 2017 Updated: May 2013, June 2018, August 2019, November 2023, September 2025	
Accountability	Deputy School Director - Pastoral	
Audience	Public	
Scope	This policy applies to all members of the Aiglon community, including staff, volunteers, contractors, governors, and any other adults associated with the School. Everyone has a role to play in keeping children safe.	

Relevant legislation and guidance	●OPE - Federal Ordinance on Placement of Children (in particular art. 13 seq.)
	●LProMin and RLProMin - Cantonal Law and Regulations on the Protection of Minors
	●Directives from the Vaud cantonal authorities on the protection of children (DGEJ)[1]
	Where applicable in respect with Swiss legislation, Aiglon also incorporates in their practices relevant guidelines from the following bodies:
	  - International Task Force on Child Protection (ITFCP);
	  - "Keeping Children Safe in Education" (KCSIE) guidelines published in the UK;
	  - Accreditation standards (CIS, COBIS, NEASC).	

Linked internal policies and guidelines	●3.6.310 IT Security and Acceptable Use Policy for Staff ●3.7.010 Staff Code of Conduct ●3.7.050 Staff Recruitment Policy ●3.7.147 Whistle Blowing ●4.8.310 Student Welfare and Safety ●4.8.320 Student Health & Wellbeing ●4.8.325 Missing Students ●Safeguarding Handbook	

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[1] Link to relevant publications: www.vd.ch/djes/dgej/upas

Part 1 - Scope & Responsibilities

1.1 Preamble

Aiglon College (hereinafter "Aiglon" or the "School") recognises its paramount responsibility to safeguard and promote the welfare of the children in its care, through mind (mental health), body (physical health) and spirit (positive understanding of oneself). The School is fully committed to ensuring a safe, supportive, and nurturing environment in which every student can thrive and reach their full potential.

Aiglon endorses the Convention on the Rights of the Child and the Universal Declaration of Human Rights, which recognise the equal entitlement to all rights and freedoms outlined, *"without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status"* (Article 2). Similarly, Aiglon safeguarding policies aim to reflect and follow best practice of the International Task Force on Child Protection (ITFCP), namely:

- all children have equal rights to be protected from harm and abuse;
- everyone has a responsibility to support the protection of children;
- all schools have a duty of care to children enrolled in the school and those who are affected by the operations of the school;
- all actions on child protection are taken with consideration for the best interests of the child, which are paramount.

The School will always act in the best interests of the child, and commits to:

- establishing and maintaining an open and safe environment where children feel heard, respected, and able to disclose concerns;
- responding promptly and effectively to concerns or allegations of harm, abuse, or neglect;
- ensuring that all staff and adults working with or on behalf of children are properly vetted, trained, and supported in their safeguarding responsibilities;
- working collaboratively with parents, guardians, and external agencies—both locally and internationally—to ensure holistic support and protection;
- embedding a culture of vigilance, accountability, and continuous review in all safeguarding practices.

The School addresses their commitment to these aims around 3 axis:

Prevention (Wellbeing)	Child protection	Transfer of care
The School provides proactive and preventive measures to **minimise the risk of harm to children's welfare**, including but not limited to: - Safer recruitment protocol and ongoing training of staff members; - Appointment of dedicated safeguarding functions; - Supportive, open and accepting attitude towards students; - Pastoral support accessible to all students; - Anti-bullying and online safety policies.	The School ensures appropriate actions are taken to **address concerns about the welfare of students**, including but not limited to: - Monitoring, needs assessment and continuous support for children known or thought to be at risk from harm; - Safeguarding children from any form of abuse or potential harm; - Following specific procedures when a child is suffering, or likely to suffer, significant harm.	**Where a child's welfare is at high risk**, the School may take actions to transfer caring responsibility, including but not limited to: - Referring the child to relevant health professionals; - Asking Parents / Guardians to take immediate measures; - Informing relevant child protection authorities.

Specific measures and guidelines linked with the above are detailed in part 2 of this policy.

Definitions
The following definitions apply to this policy and should be understood in the context of Aiglon's values and safeguarding responsibilities:

- **Child:** where a child is usually defined as a person under the age of 18, in accordance with the definition set out in the United Nations Convention on the Rights of the Child (UNCRC), the safeguarding protocols detailed in the present policy extend where possible[2] to all students placed under the care of Aiglon College.

- **Child protection:** refers to Aiglon's legal obligation - deriving from the Swiss and cantonal law and regulations - to act to protect all students from a situation that is coming harm or could cause harm.

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[2] When a student reaches the age of 18 years old, disclosure of information to their parents may only occur with the consent of the student. Referral to the authorities may also differ as per the applicable regulations.

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- **Safeguarding:** The proactive approach to protecting children from maltreatment, preventing impairment of their health or development, and ensuring that they grow up with the provision of safe and effective care. Safeguarding includes all measures taken to ensure students are protected from physical, emotional, sexual, and psychological harm, abuse, neglect, and exploitation.

- **Wellbeing:** At Aiglon, wellbeing is understood holistically through the lenses of Body, Mind, and Spirit. It encompasses a student's:
    - Personal dignity and emotional wellbeing (Spirit)
    - Mental health and cognitive development (Mind)
    - Physical health and safety (Body)

This approach reflects our commitment to developing self-awareness, resilience, and a positive sense of self in all students.

1.2 Responsibilities

> **All staff members, including part-time, temporary staff, contractors and volunteers** are expected to act in compliance with the present policy.
>
> **Where there are safeguarding or child protection concerns** that a student is potentially at risk, inside or outside the school environment, online or in person, **it should be reported immediately to the Designated Safeguarding Lead (DSL).**

1.2.1 Oversight

- At the ACSSA Board level, the **Designated Safeguarding Governor** ensures oversight and scrutiny of safeguarding policy, procedure and practice on behalf of the full ACSSA Board, whereas the **ACSSA Safeguarding Committee** monitors and oversees all aspects of the student experience at Aiglon in relation to safeguarding, wellbeing and health and safety structures, processes and provisions. The Chair of the Safeguarding Committee is usually the Designated Safeguarding Governor. The Designated Safeguarding Governor informs the Board.

- As an integral part of the Executive Leadership Team (ELT), the **Deputy School Director - Pastoral** oversees the safeguarding and wellbeing teams.

- The **Designated Safeguarding Lead (DSL)** takes lead responsibility for safeguarding and child protection at Aiglon. His role encompasses the following:
    - provide advice and support to other staff on child welfare and child protection matters;
    - take part in strategy discussions and external agency meetings;
    - contribute to the assessment of children;
    - take lead responsibility for safeguarding and child protection.
  The DSL regularly attends School Council meetings.

- The DSL is supported by trained **Deputy Designated Safeguarding Leads (DDSL)**. They provide expertise in specific areas to support the DSL, in areas such as e-safety mental heatlh, physical health, etc.

- Along with the DDSL, the **Junior School DSL** primarily focuses on students in Years 3 through to 8. They will work with the Director of the Junior School and will liaise

with the DSL on safeguarding matters. As part of the safeguarding team will look at best practice and strategies for safeguarding across the school.

- As an integral part of the Executive Leadership Team (ELT), the **Deputy School Director - Pastoral** oversees the safeguarding and wellbeing teams.

➔ In consultation with the DSL, the members of the Executive Leadership Team (ELT), and where applicable with the Chairperson, the **School Director** takes final decision regarding transfer of care or disclosure to the authorities (see chapter 2.3).

1.2.2 Pastoral support

Figure 1 below provides an overview of pastoral support functions :
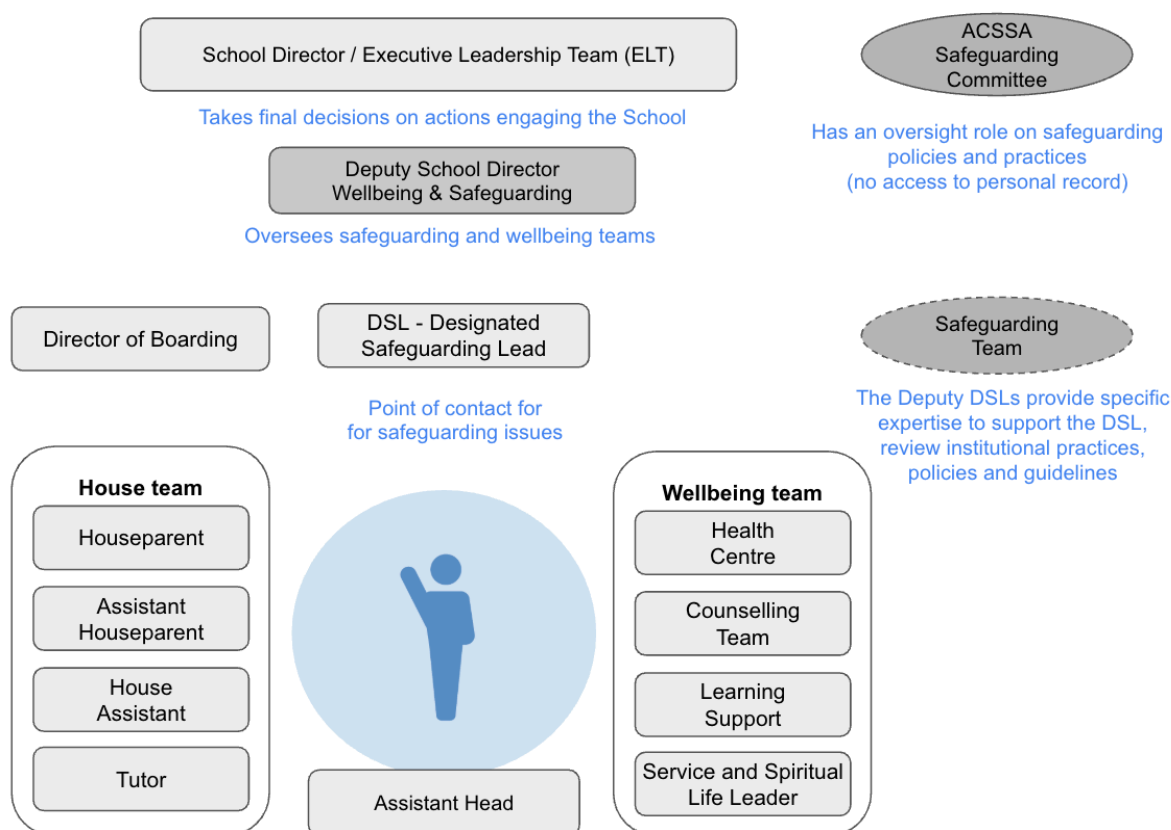

Figure 1 - Pastoral support functions (team around the child)

As detailed below, representatives of these functions meet regularly to organise student's support, discuss specific concerns and review wellbeing and safeguarding protocols.

a) <u>Wellbeing meeting</u>

The following functions meet weekly to discuss individual student's medical and mental health issues:
- Associate Director of Nursing
- Associate Director of Healthcare Services
- Counsellors

Guests to the meeting:
- The DSL
- The Deputy School Director - Pastoral
- External health professionals at least one a month for medical supervision.

➔ Data sharing: The meeting involves sharing of student's sensitive data among health professionals.

b) <u>Pastoral meeting</u>

During this weekly meeting , the following functions review SIN (students in need) situations and discuss appropriate strategies to support these students:
- The DSL
- 1 representative of the Counsellors team
- 1 representative of Health Centre team
- 1 representative of the Learning Support team
- The Director of IT (e-Safety Lead)
- The Assistant Heads
- The Director of Boarding
- The Deputy School Director - Pastoral

➔ Data sharing: Individual student's situations may be discussed, with sharing of sensitive information on a need to know basis only.

c) <u>Safeguarding meeting</u>

Chaired by the DSL, this half-termly meeting (4 times a year) is dedicated to informing the revision of school's policies and practices based on the analysis of wellbeing and safeguarding issues observed within the School or emerging threats and risks in these areas.
- The DSL
- The Deputy DSLs
- The Deputy School Director - Pastoral

Guests to the meeting:
- School Director
- Designated Safeguarding Governor

➔ Data sharing: Student's data are in principle anonymised in this meeting.

Part 2 - Wellbeing and Safeguarding processes

2.1 - Preventive measures (Wellbeing)

> The School ensures **all reasonable measures are taken to minimise the risk of harm to children's welfare**. The wellbeing system would aim to prevent issues from occurring through their proactive and preventative approach but also care for and aid students who need additional support in the event of experiencing issues that are damaging to their wellbeing.

2.1.1 Staff policies and guidelines

<u>Safer recruitment</u>

Recruitment of new staff members follows a thorough process that takes into account international best practices and goes way beyond mandatory safer recruitment processes in Switzerland. Safer recruitment principles are detailed in the *School Policy #3.7.050 Staff Recruitment*.

Similar criteria applies for external contractor, as detailed in the *School Policy #3.7.298 Employment of Service Providers*.

<u>Staff policies</u>

Staff members must sign off the following policies annually:
- Staff Code of Conduct: this document specifically covers the school expectations in terms of relationship and communication with students.
- IT Security & Acceptable Use Policy for Staff: this document details what constitutes acceptable use of the School's IT facilities and network by the staff of Aiglon, including but not limited to: confidentiality and data protection, use of AI, digital messages, students images, etc.

→ These policies form part of staff employment contract and any breach will result in serious disciplinary action, up to dismissal for gross misconduct or, and/or be reported to the authorities where applicable.

<u>Staff training</u>

All staff receive ongoing safeguarding and child protection training appropriate to their roles. This training is designed to ensure a strong and up-to-date understanding of safeguarding responsibilities, in line with statutory and best practice guidance:

- Onboarding training (new staff):
- Annual training & affirmation (all staff): all staff are required to undertake safeguarding and child protection training on an annual basis, which includes a review of key school policies, updated procedures, and recent safeguarding developments.
- Bi-annual in-depth training (all staff): in addition to annual updates, all staff participate in more comprehensive safeguarding refresher training at least every two years, which provides a deeper exploration of safeguarding themes and reinforces the school's reporting procedures and responsibilities.
- Role-Specific Training: staff in key pastoral, leadership, or boarding roles, as well as all members of the safeguarding team, receive enhanced and more frequent safeguarding training, as required by their responsibilities.

The Designated Safeguarding Lead (DSL) is responsible to plan the above-mentioned training sessions and monitor staff attendance. The DSL and their deputies deliver regular online and face-to-face training sessions throughout the year, which cover a range of safeguarding topics such as online safety, peer-on-peer abuse, contextual safeguarding, and safer working practices. These sessions provide opportunities for scenario-based learning and discussion of current issues.

Training records are maintained and regularly reviewed to ensure full compliance. All staff are expected to apply their training in practice, maintaining a culture of safeguarding awareness and professional curiosity.

2.1.2 Student policies and guidelines
<u>Student policies</u>
The expectations for students are outlined in Section 8 of the <u>Aiglon Guide</u> and include:

- A duty of care: students are expected to support one another and to report any concerns about the wellbeing or safety of members of the school community, including risks of self-harm or harm from others.
- A clear zero-tolerance policy on bullying in all its forms.
- Guidelines regarding appropriate student relationships and intimacy.

In addition, Section 14 of the Aiglon Guide sets out the school's expectations for responsible and safe use of the internet and digital technologies.

Wellbeing programme

Student wellbeing involves a proactive programme to encourage a physically healthy lifestyle and to be emotionally well-balanced. This is addressed via the Spirit Curriculum but more importantly is achieved through the Aiglon culture of leading a balanced, healthy lifestyle. This includes:

- weekly pastoral meetings;
- meditations and specialist speakers;
- tutor interactions;
- focussed spirit lessons to support the education of the students;
- use of external speakers and workshop on specific wellbeing areas (e.g. nutrition, sleep);
- appointment and training of wellbeing ambassadors from the student body to support wellbeing initiatives;
- wellbeing weeks built into the school calendar;
- review of school routines and shape of the school day;
- regular wellbeing surveys to monitor trends and indicators using student voice.

Pastoral care

The wellbeing of students also involves ensuring students are well-cared for in the event of needing additional social or emotional support. In the first instance, this care may come from the house teams with the support of the Health Centre and school Counsellors but may well involve the input of other healthcare professionals and specialists. Examples of ongoing and personal care may include:

- House support for initial concerns;
- Counselling support;
- Health Centre consultations;
- Sophrology, nutrition, physiotherapy and alternative medicines;
- External professional health consultations.

➔ Where the wellbeing of a student is of concern, e.g. but not limited to issues of bullying, eating disorders, self-harm and suicidal ideation and depression and low self-esteem, the DSL should be immediately notified (refer to 2.2).

2.2 Child protection

> The School ensures **all appropriate actions are taken to address concerns about the welfare of students.**

2.2.1 Safeguarding issues
All staff must be aware of the types of maltreatment of a child (abuse, neglect and child exploitation) and awareness of safeguarding issues as detailed in Appendix 1.

2.2.2 Monitoring of student's welfare and needs
Staff have a responsibility to help identify wellbeing issues and report safeguarding concerns to the DSL. All concerns are recorded on MyConcern. The DSL assigns actions to the team around the child and closely monitors the situation, in line with the School's protocol (please refer to the School's internal Safeguarding Handbook for additional information, in particular the "Thresholds of pastoral care guide".

2.2.3 Obligation to disclose[3]
Professionals working with children have an obligation to report to the child protection authority (DGEJ) when they become aware of a situation where a minor appears to be in need for assistance (e.g. concrete indications that the physical, psychological or sexual integrity of a child is threatened). According to the same provision, any person who passes the report to their manager is deemed to have fulfilled such an obligation.

- ➔ Staff members must pass on any concern regarding a child by using MyConcern or contacting the DSL.
- ➔ In principle, any disclosure to the authorities will be handled by the School Director.
- ➔ Where a staff member is concerned about the School's actions, they are encouraged to act based on the School's Whistleblowing Policy.

2.2.4 Missing student
Where a student is missing (unauthorised absence), staff must quickly inform the house team. If the concerned student is not to be found within 2 hours, School Director, parents and in some cases the authorities must be informed.

- ➔ The process is detailed in School Policy #4.8.325 "Missing Students".

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[3] Please refer to detailed guidelines within the Safeguarding Handbook.

2.2.5 Suicidal behavior

Any suggestion that a student may be considering suicide must always be taken very seriously. Students are instructed to inform a member of staff immediately if they are feeling suicidal, or if another student confides in them saying they are at risk from themselves and/or feel suicidal. The risk assessment screening form and safety plan is an additional aid for staff. Always consult, follow up and err on the side of caution.

➔ Suicidal behavior protocol and crisis response plan is detailed in the School's Safeguarding Handbook.

2.3 Transfer of care

Despite the range of preventive and protective measures offered by Aiglon College, our boarding school environment may sometimes not be suitable to address a student's immediate needs. In such case, the School will support a transfer of caring responsibilities, where applicable in coordination with health professionals and with cooperation of the parents.

Where a student's health and wellbeing is at risk, the School will assess the student's needs, where applicable with the support of health professionals and the cooperation of parents.

Where in such a scenario the School concludes that our boarding school environment is not suitable to address the student's needs, Aiglon reserves the right, in its sole and exclusive discretion, to request for Parents to arrange immediate transfer of caring responsibilities.

Continuation as a day student or organisation of academic support at a distance will be discussed on a case by case basis.

Appendix 1 - Types of maltreatment and specific safeguarding issues

A. Abuse, neglect and exploitation

Abuse, neglect and exploitation are forms of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child, including by fabricating the symptoms of, or deliberately causing, ill health to a child.

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person, age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape and oral sex) or non-penetrative acts. They may include involving children in looking at, or in the production of, pornographic material or encouraging children to behave in sexually inappropriate ways.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development, such as failing to provide adequate food, shelter and clothing, or neglect of, or being unresponsive to, a child's basic emotional needs. Children in wealthy families can also experience affluent neglect: this can be more difficult to spot, as the kind of neglect experienced by children and young people in these circumstances is often emotional.

In most cases, multiple issues will overlap with one another. All staff should also 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. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not

prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

Specific Safeguarding Issues

All staff should have an awareness of key safeguarding issues (e.g. Child sexual exploitation, Child Criminal Exploitation (CCE), Radicalisation, Honour based abuse, domestic abuse) and may find additional guidance in reference publications such as the UK KCSIE.

The child-on-child abuse, which are more likely to happen in a school environment, are detailed below.

Child-on-Child Abuse

Child-on-child abuse is any form of physical, sexual, emotional, or financial abuse, or coercive control exercised between children and within children's relationships, (both intimate and non-intimate), it is most likely to include, but not limited to: bullying (including cyber bullying), sexual violence/assault and sexual harassment, nude and semi-nude images, initiation/hazing type violence and rituals and upskirting,voyeurism All staff working with children are advised to maintain an attitude of **"it could happen here".** Addressing inappropriate behavior (even if it appears to be relatively innocuous) can be an important intervention that helps prevent abusive and/or violent behavior in the future. All child-on-child abuse is unacceptable and will be taken seriously. Child-on-child abuse must never be passed off as "just banter", "just having a laugh", "part of growing up" or "boys being boys". In the case of abuse by a pupil, or group of students, the key indicators that may identify abuse (as opposed adolescent misbehaviour, to be handled within the school's normal sanctions framework) are:

- the frequency, nature and severity of the incident(s);
- whether the victim was coerced by physical force, fear, or by a pupil or group of students significantly older than them, or having power or authority over them;
- whether the incident involved a potentially criminal act;
- whether if the same incident (or injury) had occurred to a member of staff;
- or other adult, it would have been regarded as assault or otherwise actionable.

We have nonetheless chosen not to restrict our approach to child-on-child abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all students, regardless of age. Although the starting point is that the School's response to child-on- child abuse should be the same for all students, regardless of age, there may be some additional considerations in relation to a pupil aged 18 or over or where there is a significant age gap between the students in terms of how local authorities respond. This, for example, is likely to be different on the part of

local authorities, given that their safeguarding duties are limited, in the case of children's social care services - save for a number of specific exceptions.to children and, in the case of adult social care services, to adults with care and support needs. Similarly, the School's response to incidents involving the exchange of Nude or Semi-nude images will need to differ depending on the age of the students involved. There is also likely to be a more significant criminal justice response in relation to any pupil responsible for abuse who is aged 18 or over.

Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences. This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of child-on-child abuse takes into account any potential complexity.

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital, and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two children may not constitute child-on-child abuse where the fight is a one-off incident, but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child. The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual pupil basis, but could also apply across the pupil body.

Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools need to take a whole-school approach in order to prevent escalation. For example, where multiple students of one gender are making inappropriate comments about students of another gender, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise; revising the School's spirit curriculum; and/or a discussion around whether anything is happening within the wider community that might be affecting the students' behaviour. It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be

capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on- child abuse, the School will follow the procedures set out below

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected;
- physical injuries;
- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;
- broader changes in behaviour including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- abusive behaviour towards others.

It should be noted that there is currently no definitive list of indicators of child-on-child abuse. The above list has been drawn from signs, symptoms and effects of child abuse and neglect from the NSPCC[4]. Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present will depend on their particular circumstances.

Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to

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[4] National Society for the Prevention of Cruelty to Children (NSPCC), the UK's leading charity specialising in child protection and the prevention of cruelty to children: www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects

their behaviour (for example, whether the child is being harmed or abused by another child) and, if so, what the concern is and how the child can be supported going forwards.

Aiglon recognises the unique nature of boarding accommodation and is aware that child-on-child abuse could take place in a boarding house where children share accommodation and that child-on-child abuse could occur between any students in the boarding houses, whether full, weekly or flexi boarders. The School ensures that there are appropriate levels of supervision and encourages an open safeguarding culture in the boarding houses. Each student is required to sleep in their own bed and no pupil is allowed to be in another pupil's bedroom after lights out. No pupil is allowed to issue a punishment to any other pupil and no induction rituals or hazing are allowed.

Bullying (including cyberbullying)
Bullying is defined as "behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group either physically or emotionally".

Bullying often starts with trivial events and it is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading hurtful and untruthful rumours, threatening or undermining someone; mocking; making offensive comments; taking belongings; inappropriate touching; or always leaving someone out of groups. It can happen anywhere - at school, at home or online. It's usually repeated over a period of time and can hurt a child both physically and emotionally. A child that is being bullied can feel like there's no escape because it can happen wherever they are, at any time of day or night.

There are many different forms of bullying including:
-   **'Cyberbullying':** involves sending inappropriate or hurtful text messages, emails or instant messages, posting malicious material online (e.g. on social networking websites) or sending or posting offensive or degrading images and videos;
-   **Racist and Religious Bullying:** A range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin or national status;
-   **Sexual, Sexist and Transphobic Bullying:** includes any behaviour, whether physical or nonphysical, where sexuality is used as a weapon by boys or girls;
-   **Homophobic Bullying:** targets someone because of their sexual orientation (or perceived sexual orientation);
-   **Disablist Bullying:** targets a young person solely based on their disability, this can include manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a certain aspect of the victims disability. It is important to remember that bullying can also be a combination of the above. Any report of prejudice-based verbal, physical or online incidents will be treated as bullying and

investigated and acted upon as a matter of urgency. This would most likely involve wellbeing support and the use of appropriate sanctions.

Children and young people have taken their lives through **suicide** due to being bullied. Professionals must understand the damaging and at times fatal effects bullying can and does have on children and young people and be able to respond to it effectively.

Harmful sexual behaviour (including sexting)
Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour, as both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage (which can be referred to as "harmful sexual behaviours").

At Aiglon, we use the Simon Hackett continuum model[5] which demonstrates the range of sexual behaviours presented by children, which may be helpful when seeking to understand a pupil's sexual behaviour and deciding how to respond to it:

Normal	Inappropriate	Problematic	Abusive	Violent
• Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making	• Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal	• Problematic and concerning behaviour • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity	• Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not able to be freely given • May include elements of expressive violence	• Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour • Sadism

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[5] https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour/understanding

Hackett's continuum relates exclusively to sexual behaviour and is not exhaustive. The Brook Sexual Behaviours Traffic Light Tool[6] can also be very helpful in identifying sexual behaviours by children. Staff should always discuss any concerns with the DSL (or, in their absence, a Deputy DSL). Where an (alleged) incident involves a report of sexually harmful behaviour the DSL must be informed.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and decide how to respond.

This could include, but is not limited to, whether it:

- is socially acceptable (including within the peer group);
- involves a single incident or has occurred over a period of time;is problematic and concerning;
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability;
- involves an element of coercion or pre-planning;
- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power;
- involves a misuse of power.

The School's statement regarding sexual relationships between students can be found in the Aiglon Guide (section 8 - Healthy Relationships / Student Intimacy). The School recognises that children can be particularly vulnerable in residential settings and is alert to the potential for child on child abuse.

It should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider in response to other alleged behaviour involving reports of other types of abuse. For example, the issue of consent and the nuances around it, is unlikely to apply in the same way in cases where the alleged behaviour is reported to involve emotional and/or physical abuse, as it could in cases of alleged sexual behaviour which is reported to involve harmful sexual behaviour.

In addition, the School could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour. It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving nude or semi-nude images may be inappropriate

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[6] www.brook.org.uk/education/sexual-behaviours-traffic-light-tool/

in one context, for example, when exchanged between two children in a consenting relationship, and abusive in another, for example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or c) used to pressure the child into engaging in other (sexual) behaviours.

Sexual Violence and Sexual Harassment

Sexual Violence and Sexual Harassment is a serious issue that all staff at The School should have a zero-tolerance attitude towards and so respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have taken place outside of school and online. By "zero-tolerance" the School means that we will never tolerate acts of misogyny or let it pass, even in minor forms. We will use a scale of consequences with perpetrators so that we have a proportionate response and aim for lessons to be learnt. The intention is to reduce the risk that offences are repeated and to ensure that every member of the community feels safe and supported.

Sexual violence and/or harassment can take place between two children of any age and sex, whether primary or secondary stages. Staff must adopt an attitude of "it could happen here" and acknowledge that unfortunately this is a widespread problem in our society. Staff must take all reports seriously, reassure victims, take them seriously and ensure they are supported and kept safe. A victim should never be given the impression that they are creating a problem. Staff should also be mindful that children might not tell staff directly about their abuse and it may be that staff overhear a conversation or the child's behaviour changes etc.

All reports of sexual violence and/or harassment (both online and offline) should be reported to the DSL via MyConcern. This will allow the DSL and/or Deputy DSL to perform a risk assessment, identify patterns of inappropriate behaviour and decide on the best course of action. There are four likely scenarios to consider when dealing with such reports; to manage internally, seek early help, make a referral to the Direction générale de l'enfance et de la jeunesse (DGEJ) and/or report to the police.

If the allegation is found to be unsubstantiated, unfounded, false or malicious the DSL should consider whether the child and/or the person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to the Direction générale de l'enfance et de la jeunesse (DGEJ) may be appropriate. If the allegation is found to be invented or malicious, the School should consider whether disciplinary action is appropriate.

The School recognises that victims of sexual violence/harassment may need ongoing support long after the incident(s) and will work with the victim, family and other agencies to ensure

that the needs and wishes of the victim are met. Sexual assault can result in a range of health needs and the School will support victims as appropriate. Indeed, the UK's Ofsted Report (Review of sexual abuse in schools and colleges) published in June 2021 suggests that "even where school and college leaders do not have specific information that indicates sexual harassment and online sexual abuse are problems for their children and young people, they should act on the assumption that they are".

The School also recognises that it has safeguarding and supporting duties to the alleged perpetrator(s) and, if they are found to be guilty of the alleged abuse, will work to ensure that they are given the correct support and education to try and stop them from reoffending, balancing this with the need to sanction them for their misbehaviour.