COBIS Safeguarding Policy

1. COBIS Safeguarding Statement:

We have an unfaltering commitment to promote the welfare of all children, young people, and adults at risk to keep them safe. COBIS is committed to reducing risk connected to all safeguarding and child protection matters.

COBIS recognises that:

- Safeguarding is everyone's responsibility and all staff, regardless of their role, have a part to play in safeguarding children and young people.
- A 'child' is defined as a person under 18, aligning with the definition under the UN Convention Right of the Child and Children Act 1989 in England and Wales
- Our approach to safeguarding is child-centred, with a consistent focus on what is in the best interests of the child.
- All children and young people deserve the same level of protection, regardless of age, gender, religion or belief, race, disability, or sexual orientation.
- Cultural attitudes towards child protection vary from country to country and these do not always reflect the child protection standards required for UK schools.
- In addition to emotional, physical, and sexual abuse and neglect, there are a range of other safeguarding concerns that COBIS aims to protect children from, including but not limited to:
    - bullying (including online bullying)
    - peer-on-peer abuse
    - self-harm (including harmful behaviours)
    - mental health
    - child sexual exploitation
    - domestic abuse

We believe that:

- Nobody who is involved in our work should ever experience abuse, harm, neglect or exploitation.
- We all have a responsibility to promote the welfare of all of our staff, sub-contractors and volunteers, to keep them safe and to work in a way that protects them.
- We all have a collective responsibility for creating a culture in which our people not only feel safe, but also able to speak up, if they have any concerns.

COBIS is a founding member of the International Taskforce on Child Protection (ITFCP) and supports the ITFCP's Statement of Commitment:

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

2. Policy Scope and Purpose

2.1 Scope

This policy applies to all staff and associates, including, but not limited to:

- Paid staff,
- Board Members,
- Sub-contractors (for ex: Lead Improvement Partners)
- Volunteers (for ex: Peer Accreditors)
- Consultants
- Facilitators
- Training Providers
- Interns/work experience colleagues
- Student Competition Judges, and any other individuals acting on behalf of the organisation.

NOTE: All references in this policy to **"staff"** should be interpreted as relating to all of the above groups, unless stated otherwise.

School members, Supporting Associates and Partner organisations will be expected have their own safeguarding procedures that must, as a minimum, meet the standards outlined below, and include any additional legal or regulatory requirements specific to their work, and or region.

2.2 Purpose

The purpose of this policy is:

- To protect children and young people in COBIS member or non-member schools
- To protect staff and representatives and provide them with the overarching principles that guide our approach to safeguarding and child protection

3. Framework and Legal Basis

This policy is informed by UK law and guidance that seeks to protect children including:

- Keeping Children Safe in Education 2025
- Working Together to Safeguard Children 2023
- United Nation's Convention of the Rights of the Child (1991)
- Data Protection Act (1998)
- The Children Act 1989/2004
- Sexual Offences Act (2003)
- Safeguarding Vulnerable Groups Act (2006)
- Children and Families Act (2014)
- Information sharing: Advice for practitioners providing safeguarding services to children and their parents/carers (HM Government 2015)
- Human Rights Act (1998)

This policy should be read alongside other COBIS policies including:

- Privacy Policy
- IT Acceptable Use Policy/ IT Policy
- COBIS Guide to Complaints (Corporate and School)
- LIP/PA Handbook/Code of Conduct
- Safer Recruitment Policy
- Whistleblowing Policy (safeguarding)
- COBIS Guide of Ethical Conduct

- BISSC Code of Conduct

3. Safeguarding in COBIS Member Schools

To gain or retain COBIS membership, Schools must demonstrate they have met the safeguarding requirements of COBIS's approved inspectorate and accreditation partner bodies, including:

  - COBIS Accreditation & Compliance
  - BSO or ISI Inspection
  - CIS, NEASC, WASC or OEAS accreditation

As a continuing condition of membership, Member schools also agree to adhere to the:

- COBIS Code of Ethical Conduct
- BISSC Safeguarding Code of Conduct

COBIS is committed to supporting member schools in keeping children and young people safe. We do this in a number of ways.

- The provision of best practice support and guidance, including:
  - Regular events/conferences and training
  - Resources and templates
  - Termly newsletter updates
  - Partnership with The Safeguarding Alliance
  - Access to safeguarding specialists in the Supporting Associate network
  - A dedicated COBIS Safeguarding Officer
- Safer recruitment support:
  - Access to prohibition checks
  - Partnership with ACRO for the provision of ICPC
  - Safer recruitment training
- Quality Assurance through COBIS Accreditation and Compliance

4. Safeguarding in COBIS Partner Organisations

To gain or retain COBIS Supporting Associate status, organisations must demonstrate a commitment to safeguarding and adhere to the Supporting Associate Code of Conduct.

Partner organisations must clearly display their safeguarding policies.

5. Safeguarding in COBIS-hosted events or competitions

COBIS is committed to providing an environment in which all children and young people participating in COBIS-hosted events or competitions have a safe and positive experience.

5.1. Guidance for COBIS staff:

- Staff will ensure:
  - A risk assessment is conducted before an event where children and young people are attending/participating
  - A specific event safeguarding plan has been developed and made available to participants, including parents/carers of participants
  - Appropriate insurance cover is in place
  - Acceptable adult to child ratios, and attending adults have appropriate safeguarding checks in place

- Adherence to data protection best practice at all times

5.2. Guidance for conference participants (i.e. delegates, exhibitors, guests, speakers, sponsors, contractors, and venue staff)

- Conference participants must not be alone with any student
- Conference participants must avoid physical contact with students unless there is immediate danger
- Conference participants are expected to act and speak in a kind and respectful manner, particularly around young people.
- Conference participants should be mindful of topics discussed or language used that might not be appropriate for young people from a range of backgrounds
- Conference participants should not ask for or share any contact or social media details with students or arrange to contact a student who they have met through the event
- Conference participants must report concerns about a young person's welfare, or if a young person discloses that they are suffering abuse or reveals information that gives grounds for concern. Participants must pass on the information immediately to a member of COBIS staff (see reporting procedures below).
- Conference participants are expected to seek permission from chaperones and students before taking images / videos of students.
- Conference participants are responsible for their own actions and behaviour and should avoid any conduct which would lead a reasonable person to question their motivation or intentions.
- Students may be present at elements of the conference where alcoholic drinks will be served (e.g. Sunday reception). No alcohol should be consumed by students; conference participants should not offer alcoholic drinks to students; conference participants should be particularly mindful of maintaining professional behaviour during social events.

6. Safeguarding in partner-led events or competitions

COBIS works in partnership with a range of schools and organisations to deliver student competitions and events around the world.

Host schools and partners organisations are expected to have robust and individualised event safeguarding plans, to ensure risk is minimised for all children and young people taking part, and that staff responsibilities are clear and procedures are followed in a consistent and co-ordinated manner.

These event safeguarding plans should also include, as a minimum:

- Clear procedures for reporting and responding, informed by safeguarding best practice.
- Guidance around confidentiality, information sharing, and whistleblowing (including referral and incident forms templates)
- Guidance around photography and image use
- Any relevant regional or national laws to be aware of
- Specific nominated roles and responsibilities, including named DSL and comprehensive ICE contact details

Host schools are expected to make event safeguarding plans available to all participating children and young people, as well as their parents/carers.

COBIS staff are expected to adhere to the host school or partner organisation's safeguarding plan.

7. Safeguarding in COBIS Accreditation and Compliance

Robust safeguarding is at the heart of the COBIS Accreditation and Compliance process. All participants in the process, including LIPs, PAs and COBIS staff are committed to maintaining high standards. This

includes adhering to safeguarding best practice when visiting schools, through to safeguarding data and information that might pertain to children and young people.

- When visiting a school, COBIS staff/LIPs/PAs will familiarise themselves and adhere to the host school's own safeguarding policy.
- Any safeguarding concerns that arise (including minor concerns) should be reported immediately to the COBIS Lead Improvement Partners, and then to the school's head teacher and/or Designated Safeguarding Lead (DSL).
- Safeguarding concerns raised during a school visit should be shared with the COBIS Director of Accreditation.
- In settings where children and young people are, or may be, present, staff/LIPs/PAs should always behave in a manner that is respectful and professional, following safeguarding best practice.
    - This includes:
        - not being unaccompanied with a minor;
        - avoiding physical contact with children or young people unless preventing them from immediately harming themselves or others;
        - not exchanging personal contact details;
        - not making suggestive or inappropriate remarks, jokes or gestures.

This list is not exhaustive, and reference should be made to the host school's safeguarding policy.

- When submitting evidence to COBIS as part of the Accreditation and Compliance process, schools are encouraged to avoid sharing personal data pertaining to students.

8. Safer recruitment

COBIS will adhere to safer recruitment principles for the recruitment of all staff, sub-contractors and volunteers. This includes the following pre-employment checks as standard:

- DBS (where applicable)
- International Child Protection Certificate ('ICPC') (where applicable)
- Other relevant police certificate country applicable
- Pre-employment checks and verification of employment gaps
- 2 professional references (including from most recent employer and always one in which the candidate last worked with children or young people). These are validated verbally.
- Identity check (including photographic ID)
- Prohibition Check (for LIPs/PAs)
- Police Checks (for LIPs/PAs)
- Qualifications Check

All checks are recorded on a comprehensive Single Central Record.

9. Training

- All COBIS Head Office staff are required to complete Child Protection training (provided by COBIS) which includes information about forms of abuse and how to recognise signs of abuse. This training should be updated every three years.

- Members of the COBIS Safeguarding and DEIJB Committee are required to complete external advanced Child Protection training.
- COBIS Board members are expected to complete child protection training (at a minimum), updated every 3 years.
- All staff (other than Head Office staff) are responsible for keeping their own safeguarding knowledge and training up to date.
- Before deployment, LIPs/PAs are expected to provide evidence of safeguarding training having taken place in the last 3 years and are expected to be professionally and culturally competent.

10. Digital Safeguarding

- Photographs of children or young people should not be taken unless the correct permissions are in place.
- Photographs of children or young people should not be shared (e.g. on the COBIS website, social media, etc.) or used in promotional material unless the correct permissions are in place.
- Personal devices (ie mobile phones/tablets/laptops that are not owed by COBIS) should not be used to take or store photographs of children or young people.
- Personal details of children or young people (e.g. full names) should not be shared externally (e.g. on social media, COBIS website, etc.) unless the correct permissions are in place.
- Please refer to the COBIS Acceptable Use/ IT Policy / Data Privacy Policy for more guidance
- Parents/carers or young people may request the removal of images of personal data from the COBIS website at any time by emailing info@cobis.org.uk

11. Reporting safeguarding concerns

There are a number of ways to report safeguarding concerns to COBIS. If you are unclear about where to direct your concern, you can email COBIS's Safeguarding Officer directly on: louise.bell@cobis.org.uk.

11.1 Safeguarding concerns within COBIS:

- If COBIS staff have concerns about another member of COBIS staff/sub-contractor/volunteers this should be reported to the COBIS CEO or Deputy CEO or the COO

- If external parties have concerns about safeguarding within COBIS (regarding COBIS staff/sub-contractors/volunteers/Board members), this should be reported through the COBIS Corporate Complaints Policy, which can be found here.

11.2 Safeguarding concerns about a COBIS member school:

- Individuals reporting a safeguarding concern occurring within the COBIS school or associate network should refer to the COBIS **Whistleblowing Policy** here.
- General complaints are managed through **COBIS' Complaints Policy**, found here.
- COBIS is a founding member of BISSC, and adheres to the BISSC Safer Recruitment Code of Conduct. This outlines how safeguarding concerns can be raised with COBIS and other founding associations, and what action will be taken by the respective associations.

11.3 Reporting concerns when visiting a school (guidance for COBIS staff/sub-contractors/volunteers)

- When visiting a school, as stated above, any safeguarding concerns that arise (including minor/low-level concerns) should be reported immediately to the school's head teacher and/or Designated Safeguarding Lead (DSL).

- Safeguarding concerns should also be reported to the COBIS CEO (or the Director of Accreditation if the concern is noted by a Lead Improvement Partner or Peer Accreditor)
- **If there is an immediate risk emergency services should be called**
- When making an allegation there must be reasonable belief that the concerns are true, though there is no requirement to provide evidence to prove the allegation. The whistle-blower must be able to show that they believe that disclosing the concern is in the public interest and that it is a reasonable view to hold in the circumstances at the time.
- Responsibility for investigating the matter sits, in the first instance, with the school, in accordance with their own whistleblowing and safeguarding policies.
- The school will then be expected to respond according to its own whistleblowing and safeguarding policies
- If a whistle-blower makes an allegation that they believe is in the public interest, but it is not confirmed by the investigation, no action will be taken against them.
- If, however, the allegation is malicious or vexatious, legal, or disciplinary action may be taken against them.
- If a safeguarding disclosure has been made to staff/LIPs/PAs, by an individual, in whatever form that might take (email/conversation/meeting/other communication channel), be these recent or non-recent (i.e. historic), the staff member/LIP/PA should raise this issue immediately with the COBIS CEO or Deputy CEO or Director of Accreditation.
- In the event of a disclosure being shared with the CEO or Deputy CEO, COBIS will assess if the matter is within COBIS' jurisdiction to report to the relevant authorities and will take the appropriate steps.

12. Safeguarding Governance

COBIS has a dedicated Safeguarding and DEIJB Committee that is composed of serving Board members and Executive representatives. The Committee meets termly and adheres to terms of reference which are reviewed regularly.

The Board sign an annual safeguarding declaration.

COBIS's Safeguarding Lead on the Board is Chair of the Safeguarding & DEIJB Committee, Natasha Hilton, natasha.hilton@parkhouseschool.com

COBIS's Safeguarding Officer is Louise Bell, louise.bell@cobis.org.uk

COBIS's CEO with ultimate responsibility for ensuring this safeguarding policy is followed, is Colin Bell, colin.bell@cobis.org.uk

Other staff members mentioned in this policy are:

- Deputy CEO: Fiona Rogers. Fiona.rogers@cobis.org.uk
- Director of Accreditation: Mick Smith, mick.smith@cobis.org.uk
- COO: Margaret Garrard, Margaret.garrard@cobis.org.uk

This policy is contained within the Staff Handbook and displayed on the COBIS website.

This policy is reviewed annually. Last review January 2026.