RUGBY SCHOOL
THAILAND

CHILD PROTECTION AND SAFEGUARDING POLICY

THE WHOLE PERSON THE WHOLE POINT

The health, safety and wellbeing of young people are paramount to all the adults who work at Rugby School Thailand. Children have the right to protection, regardless of age, gender, race, culture, sexual orientation, or disability. They have a right to be safe in our School. Members of staff in the School have a legal and moral obligation to safeguard and promote the welfare of the students, taking all reasonable measures to protect them from harm whether from physical injury, abuse, neglect, emotional harm or from anything that interferes with their general development.

Version Control

Policy number: RST_005	Version number: 4	Effective Date: September 2025
Responsible: DSL and Safeguarding Coordinator	Reviewed by: Whole School Safeguarding Coordinator	Date last reviewed: September 2024
Approved by Sub-Committee: Dr Neil Hampton (GCS)	Approval Date: 25th September 2025	Date of next review: August 2026 or as required

This policy relates to:	Whole School community
Responsible Department(s):	DSL and Safeguarding Coordinator
Other standards:	Keeping Children Safe in Education 2025
Legislation or other requirements:	See section 2 of policy for legislation and guidance

Review process

Policy review frequency**:** Annually or as required	Responsibility for review: JLW
Review process: I. JLW to conduct policy review. II. Modification will be made where appropriate. III. Submit for review and approval by the Governance, Compliance & Safeguarding Committee and the full Governors	
Documentation and communication: Document decision changes will be written in as addition and approved via SLT. There will be an update on the Version Number of the Document.	

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1. AIMS

1.1. The School aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- All staff are aware of their statutory responsibilities with respect to safeguarding;
- Staff are properly trained in recognising and reporting safeguarding issues.

1.2. RST staff will be made aware that it is everyone's responsibility to ensure the safety and wellbeing of the students. Everyone who has contact with children has a part to play in safeguarding children. The approach we take must be child-centred and ensure that we take into account the child's best interests. To do this we must support children, provide prevention and protection to ensure we have safe children and safe staff in School.

2. LEGISLATION AND GUIDANCE

Convention on the rights of the child

2.1. As a school working in Thailand we endorse the United Nations Convention on the Rights of the Child (CRC), of which Thailand is a signatory.

Thai Legislation

2.2. As a school working in Thailand we have a statutory responsibility to uphold the Child Protection Act 2003 and make arrangements to safeguard and promote the welfare of children.

2.2.1. Article 25 – Parents/Guardians/Carers of a child are forbidden to act as follows:

- Abandon a child at a nursery or health care facility, or with a person employed to look after the child, or at a public place or any other place, with the intention of not taking him or her back;
- Neglect a child at any place without arranging for appropriate safety protection or care;
- Deliberately or neglectfully withhold from a child, things that are necessary for sustaining the child's life or health, to an extent which seems likely to cause physical or mental harm to the child;
- Treat a child in ways or manners which hinder his or her growth or development;
- Treat a child in ways or manners which constitute unlawful caring.

2.2.2. Article 26 - a person is forbidden to commit or omit acts which result in torturing a child's body or mind.

2.2.3. Article 63 - Schools shall set up systems and activities to:

- Provide guidance, counselling and training for students, and guardians, with a view to promoting appropriate behaviour, social responsibility and safety for the students.

2.3. In Thai law, Article 1567(2) of the Civil and Commercial Code allows parents to impose 'reasonable' punishment for the purposes of discipline. However, corporal punishment has been shown by research to seriously damage a child's mental and physical health and affect their long-term development. The School considers corporal punishment a form of physical abuse and does not condone its use in the home.

UK Legislation

2.4. As an international school which is partnered with a British school in England we are guided by the statutory guidance used in the UK because it contains principles for working with children across the whole world. This legislation is however not statutory in countries outside the UK. The Designated Safeguarding Governor must be informed of any significant child protection concern. For more information please see appendix 1.

3. DEFINITIONS

3.1. **Safeguarding and promoting the welfare of children** means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

3.2. **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

3.3. **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Children can be at risk of harm inside and outside of the school, inside and outside of home, and online. More information on different types of abuse can be found here: Types of Abuse.

3.4. **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to cause the serious impairment of the child's health or development. Types of Abuse define neglect in more detail.

3.5. **Children** include anyone under 18.

3.6. The policy is relevant for students of RST who are aged 18 years, with staff adhering to the staff Code of Conduct and Teaching Standards which outline that teachers must not abuse their position of trust.

4. EQUALITY STATEMENT

4.1. Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to

anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all students have the same protection, regardless of any barriers they may face.

4.2. We give special consideration to children who:

- Have special educational needs (SEN) or disabilities;
- Are young carers;
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- Have English as an additional language;
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- Are at risk due to either their own or a family member's mental health needs.

5. ROLES AND RESPONSIBILITIES

5.1. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, governors and proprietors. Our policy and procedures also apply to extended school and off-site activities.

All staff

5.2. All staff engaged in regulated activity with children will read and understand part 1 and Annex A of the UK Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

5.3. All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct (contained in the HR manual), the role and identity of the designated safeguarding leads (DSL) and deputy designated safeguarding leads (DDSLs), and the behaviour policy;
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- The process for making referrals to Department for Children and Youth including the role they might be expected to play;
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, and specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.
- Filtering and monitoring- expectations, applicable roles and responsibilities in relation to filtering and monitoring.

The Safeguarding Committee

5.4. The Safeguarding Committee is comprised of the Whole School Safeguarding Coordinator, the Designated Safeguarding Leads (DSLs) and Deputy Designated

Safeguarding Leads (DDSLs) working across the three parts of the School, the Lead Nurse, and the Chief Operating Officer (COO). Each DSL has an assigned area of responsibility.

Role of the Safeguarding Committee

Job Title	Name	Email	Responsibility
Whole School Safeguarding Coordinator and DSL Senior School	Jennie Windsor	jwindsor@rugbyschool.ac.th	Coordinating and assisting the safeguarding committee. Maintaining and updating the School's Child Protection and Safeguarding Policy; Providing safeguarding induction training. Lead contact for all safeguarding concerns in the Senior School.
DSL Pre Prep	Sarah Shuttleworth	sshuttleworth@rugbyschool.ac.th	Lead contact for all safeguarding concerns in the Pre-Prep School.
Deputy DSL (DDSL) Pre Prep	Chalita (Bui) Beales	chalita@rugbyschool.ac.th	Supports DSL for Pre Prep.
DSL Prep	William Howell	whowell@rugbyschool.ac.th	Lead contact for all safeguarding concerns in the Prep School.
Deputy DSL (DDSL) Prep	Ellen Barnes	ebarnes@rugbyschool.ac.th	Supports DSL for Prep.
DSL Operations	Virginia Wilson	vwilson@rugbyschool.ac.th	Lead contact for all safeguarding concerns in Operations.
Lead Nurse	Joy Balcita	joy@rugbyschool.ac.th	Lead Nurse, based in the Health Centre, is responsible for supporting the nursing team in understanding and fulfilling their roles and responsibilities in relation to safeguarding.

RST Safeguarding Leads	All DSLs	safeguarding@rugbyschool.ac.th	

Internal school contacts

Principal	Bruce Grindlay	bgrindlay@rugbyschool.ac.th	
Head of Prep	Sara Howell	showell@rugbyschool.ac.th	
Head of Pre Prep	Sarah Shuttleworth	sshuttleworth@rugbyschool.ac.th	
Chair of Governors	Khun Khunying Kasama Varanvarn	cog@rugbyschool.ac.th	
Designated Safeguarding Governor (DSG)	Dr Neil Hampton	ngh@rugbyschool.ac.th	
Chief Operating Officer	Virginia Wilson	coo@rugbyschool.ac.th	
Deputy Designated Safeguarding Governor	Dr Taya Kitiyakara	tayakiti@gmail.com	

5.5. During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns.

5.6. When the DSL is absent, the Head of Year will act as cover. Any urgent concerns will be referred to SMT.

5.7. If the DSL and deputies are not available, contact the Whole School Safeguarding Coordinator. If they are not available one of the Heads will act as cover (for example, during out-of-hours/out-of-term activities). If a Head is not available, the Principal will cover.

5.8. The DSL and deputies will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters;
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- Contribute to the assessment of children;
- Refer suspected cases, as appropriate, to the Department for Children and Youth or Police, and support staff who make such referrals directly;

- The DSLs will also keep the Whole School Safeguarding Coordinator, relevant Head and Principal informed of any issues, and liaise with the Department for Children and Youth and designated officers for child protection concerns as appropriate.

5.9. The full responsibilities of the Safeguarding Coordinator, DSL and deputies are set out in their job description and outlined in Appendix 11.

5.10. Please note – in subsequent sections, you should take any references to the DSL to mean "the DSL or deputy DSL".

Student Wellbeing Meetings

5.11. In each part of the School, a pastoral group meets to discuss vulnerable students and to consider their needs in line with this policy. Using the document entitled: 'Identifying levels of need and what to do next' which is contained in Appendix 6, the group should decide what wrap-around support could be offered to the student and or family and assess whether a Wellbeing Assessment and Plan is needed. The DSL should keep minutes of these meetings and upload any actions onto MyConcern. Wellbeing trackers are used to identify needs at the earliest stage.

5.12. **Pre-Prep**

- Year group meetings run weekly and children of concern are discussed in these meetings. Wellbeing concerns will be raised on MyConcern and key children raised with the DSL. Additional meetings can be arranged if necessary to follow up key children of concern.
- The Wellbeing task group meets once every half term and is attended by the DSL, DDSL, Nurse, School Counsellor (if applicable) EAL lead, Sports Lead, SFL lead, MFL teachers (Thai and Spanish) and Heads of Year.

5.13. **Prep**

- The Prep School will have weekly year group meetings to discuss students, DSL meets weekly with Heads of Year. The Wellbeing group meets at least once a half term and is attended by DSL, Heads of Year, Head of Prep Boarding, Nurse, School Counsellor, and the Heads of SfL and EAL . When required additional meetings will be set up to discuss particular students of need with relevant staff to attend.

5.14. **Senior**

- Student Concern meetings take place once every two weeks for each year group. The Heads of Year, Deputy Head Pastoral and DSL attend. Referrals are based on the threshold document 'Identifying levels of need document' (see appendix 6). In the meeting referred students are discussed individually using professionals around the child format, The Head of SFL, EAL and The School Nursing Service are invited as required. In these discussions actions are set and plans of action put in place for each child and level of need agreed between the team. In cases of high levels of need between 3 & 4 a Wellbeing Assessment Meeting takes place and a plan put together including all information and voice of the child, parents and professionals.

The Governing Board and Governance Compliance Safeguarding (GCS) Committee

5.15. The governing board will approve this policy at each review, ensure it complies with the law and hold the School leaders to account for its implementation.

5.16. The governing board will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy along with the full governing board.

5.17. The Designated Safeguarding Governor alongside the Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal (see Appendix 3).

5.18. All governors will read Keeping Children Safe in Education, this policy and staff code of conduct.

5.19. The Governance Compliance Safeguarding Sub Committee (GCS), is an executive committee chaired by two governors. The overall function is to oversee safeguarding at Rugby School Thailand. The Designated Safeguarding Governor along with the Safeguarding Coordinator will attend these termly meetings. Minutes of the meeting are shared with the full governing board and include minutes of the Safeguarding Pastoral Welfare Committee (SPWC). The GCS committee can also approve all safeguarding policies on behalf of the Governing Body.

Safeguarding Pastoral Welfare Committee (SPWC)

5.20. The purpose of the Safeguarding Pastoral Welfare Committee (SPWC) is to ensure that members of the Governing Body can be fully briefed and thus enabled to scrutinise and hold to account those responsible for students in the Rugby School Thailand community. The SPWC meet termly and provide the opportunity to share good practice and strengthen the whole school approach to safeguarding. It is attended, as required, by all those responsible for the oversight and management of safeguarding including- the Designated Safeguarding Governor, Safeguarding Coordinator, Thai Principal and DSL, Senior School DSL / DDSL, Prep DSL / DDSL, Pre Prep DSL / DDSL, Digital Wellbeing Lead, Whole Me Lead (s), Lead Nurse, Head of Counselling, Coordinator of SfL, Coordinator of EAL, Director of Sport, Director of Boarding.

The Heads and Principal

5.21. The Heads and Principal are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction;
- Communicating this policy to parents when their child joins the School and via the School website;
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 2);
- Ensuring the relevant staffing ratios are met, where applicable;
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

6. CONFIDENTIALITY

6.1. All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

6.2. It is reasonable for staff to discuss day to day concerns about students with colleagues to ensure the children's needs are met in School. However, staff should report all safeguarding and child protection concerns to the DSLs, relevant Head and/or Principal – or in the case of concerns about the Principal – to the Designated Safeguarding Governor and Chair of Governors. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need to know' basis.

6.3. If the staff member is unable to contact a DSL, Head, or Principal and the child is at immediate risk of significant harm, the staff member should alert the Department for Children and Youth and/or the Police. All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children.

6.4. Child Protection information will be stored and handled in line with the principles of the Personal Data Protection Act 2019 (PDPA) which is modelled on the GDPR.

6.5. Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices will be password protected or encrypted and kept in locked storage.

6.6. The School's policy on confidentiality and information-sharing is available to parents and students on request.

Transferring Child Protection Files

6.7. As a British International School, Rugby School Thailand is guided by the UK legal requirement that any receiving schools should be made fully aware of any child protection issues that have arisen in a student's previous school.

6.8. If a child for whom the School has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or the Department of Children and Youth are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. As part of our admissions process we also request such information from incoming students from previous schools.

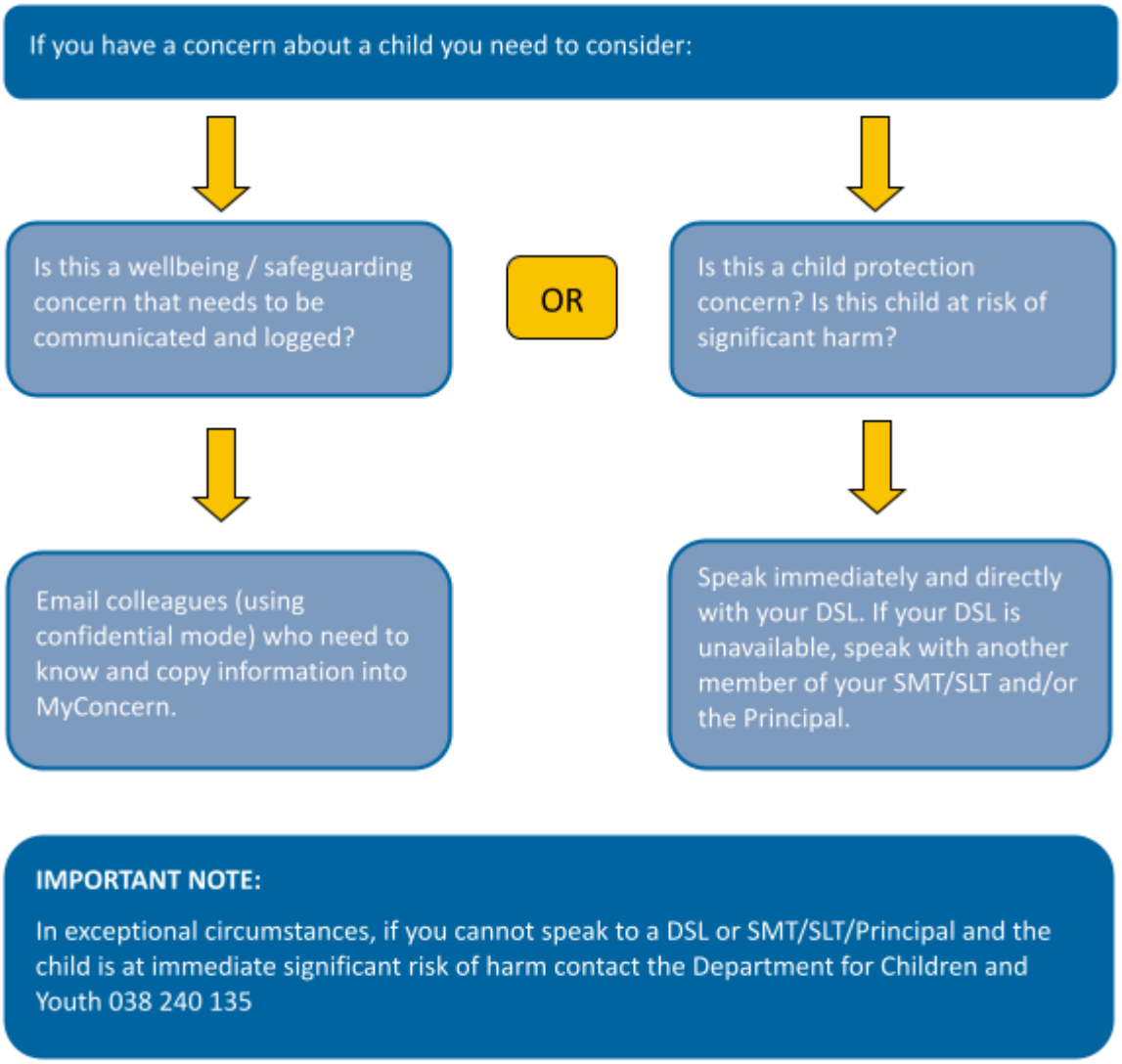
6.9. If a child is British and/or Dual Nationality British, we are also bound to share child protection concerns with the British Embassy in Thailand as they have a responsibility to monitor these concerns. If we do not have details of a forwarding school, the British Embassy will monitor the case and if necessary, involve Social Services in the UK if it is suspected that the child and family have returned to the UK.

6.10. Rugby School Thailand will also endeavour to involve other embassies where we have concerns about children who are non-Thai.

6.11. In addition, Rugby School Thailand is committed to complying with the requirements of the Personal Data Protection Act B.E. 2562 (PDPA) in Thailand. Under Section 24 (2) and (5), disclosure of child protection records without consent is permissible where it is necessary for preventing or suppressing a danger to a person's life, body, or health, or for carrying out tasks in the public interest. Section 27 further provides for disclosure without consent in limited circumstances, such as safeguarding matters. In all such cases, the paramount concern will be the safety and welfare of the child. Where disclosure is made without consent, a record of the disclosure will be logged on My Concern in accordance with Section 39 of the PDPA.

7. RECOGNISING ABUSE AND TAKING ACTION

7.1. Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.



If a child is suffering or likely to suffer harm, or in immediate danger

7.2. If in exceptional circumstances the DSLs and or member of SMT/SLT is not available, this should not delay appropriate action being taken.

7.3. Make a referral to the Department for Children and Youth and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger.

7.4. You can also seek advice at any time from the Child Line helpline on 1387. Share any action taken with the DSL as soon as possible.

7.5. **Anyone can make a referral to DCY/police and/or Child Line, however the Thai Principal should take the lead wherever possible.**

7.6. Tell the DSL as soon as possible if you make a referral directly.

If a member of staff is concerned about a student's welfare

7.7. There will be occasions when staff may suspect that a student may be at risk but have no 'real' evidence e.g. the student's behaviour may have changed. In these circumstances staff are encouraged and supported to ask students if they are OK, if there is anything the child would like to talk to them about and if they can help in any way. Staff are trained to do this by asking appropriate open questions which do not lead the child in any particular direction but invite the child to talk about anything if they wish to.

7.8. All safeguarding concerns need to be recorded using MyConcern. The DSL will add to the information about the concern details of any decisions reached and the reasons for them. MyConcern notes are visible to the person logging the concern, the DSL and any members of staff that the DSL may ask to help support the student. That concern will then be followed up and the child supported either internally by the School's wellbeing team or externally.

7.9. If the student does begin to reveal that they are being harmed, staff must follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, they must discuss their concerns with the DSL and record them on MyConcern.

7.10. Any other concerns that a staff member may have about a student (non safeguarding concerns) are recorded on iSAMs, using the Rewards and Conduct panel.

7.11. Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help process as outlined in this policy.

Dealing with disclosures and reporting procedures

7.12. **If a student discloses to a member of staff**

- It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

- Risks of harm may be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

- If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the student know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the student this, is a matter for professional judgement. If they jump in immediately the student may think that they do not want to listen but if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

- Students follow the Whole Me (PSHE) curriculum and they will have been taught about confidentiality and will generally understand the concept of safe and unsafe

secrets. They should have a good knowledge and understanding of why staff cannot keep some information confidential but also know that information is passed on to specific people on a 'need to know' basis only.

- It is also important to remember that children may not feel ready or know how to tell someone they are being abused.

7.13. During their conversations with students staff will:

- allow them to speak freely;
- remain calm and not overreact – the student may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – '**I'm glad you told me'; 'I want to help you'; 'It's not your fault'; 'We are going to do something about it';**
- not be afraid of silences – staff must remember how hard this must be for the student;
- at an appropriate time tell the student that in order to help them, the member of staff must pass the information on;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong;
- tell the student what will happen next;
- let the student know that someone (either the member of staff or another named person, e.g. the DSL) will come to see them before the end of the day;
- report verbally to the DSL;
- write up their conversation as soon as possible on My Concern; and seek support if they feel distressed or need to debrief.

Early Help and the Wellbeing Assessment process

7.14. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger), their needs could be met through completing a Wellbeing Assessment and plan.

7.15. The School recognises that providing early help is more effective in promoting the welfare of children than reacting later. Early Help means providing support as soon as a problem emerges, at any point in a child's life. *Keeping Children Safe in Education* emphasises that **all** staff should be aware of the Early Help process and understand their role in it. All School staff are therefore trained and required to notice any concerns about children which may help to identify that they would benefit from Early Help; to record those concerns on MyConcern and to share their concerns with the Designated Safeguarding Lead.

7.16. Early Help might be simple and something the School is able to address with parents so that the child's needs are met quickly and easily. The School will keep a record of any such help.

7.17. It may become necessary to talk with parents to understand a child's needs and circumstances. Children and families may also need support from a range of local

agencies beyond the School. Where the School has identified that a structured assessment would benefit a child in order to determine how best to meet their needs and support their family; or where a child and family would benefit from co-ordinated support from more than one agency (e.g. education, health, Police) and with her/his parents' consent, the School will use the Wellbeing Assessment process to identify what help the child and family require to prevent the child's needs escalating.

7.18. If Early Help is appropriate, the Designated Safeguarding Lead will generally lead on liaising with other agencies and setting up a Wellbeing Assessment as appropriate. Other staff may be required to work directly with students and their families and to support other agencies and professionals in a Wellbeing Assessment, in some cases acting as the lead professional.

7.19. The School will be particularly alert to the potential need for Early Help for any child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is showing signs of engaging in antisocial or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family whose circumstances present challenges for the child, such as substance abuse, adult mental health issues or domestic abuse;
- is at risk of being radicalised or exploited;
- is showing early signs of abuse and/or neglect; and/or is particularly vulnerable as they have a disability or a mental health need.

7.20. The Wellbeing assessment and plan will need the consent of the child or his/her parents. If assessed as Gillick competent students may consent to this in their own right. The Wellbeing assessment and plan should involve the child and family as well as all the professionals who are working with them.

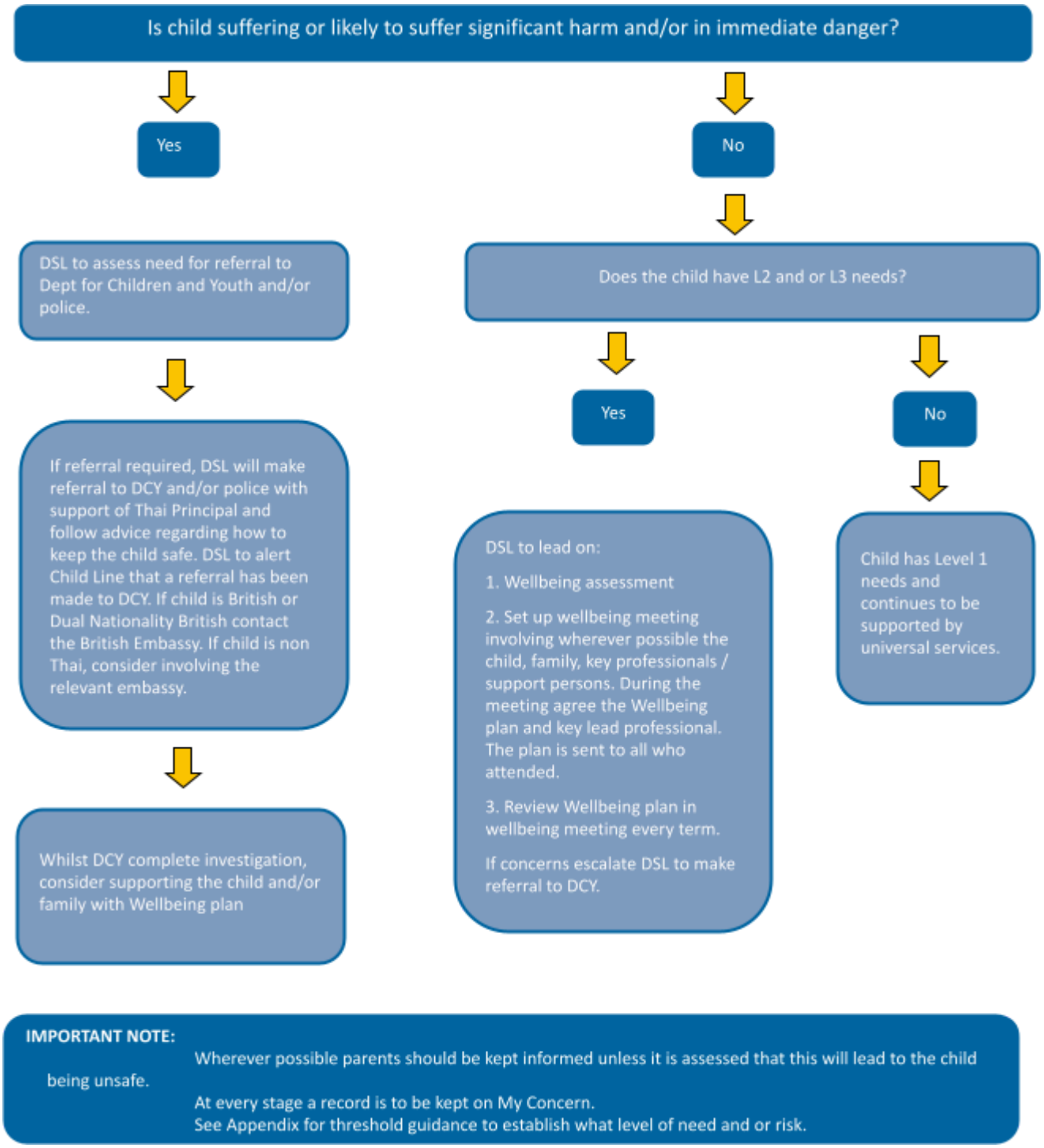
7.21. At the first Wellbeing meeting to discuss and develop a Wellbeing plan, the people present should identify the Key Lead Professional (KLP). The KLP will usually be the DSL but it might be another professional who is leading on aspects of care in the child's life. The DSL will keep the case under constant review, it is advisable that a Wellbeing plan is formally reviewed with key people every term. If the child's situation does not improve and/or the child's parents and/or the child do not consent to a Wellbeing assessment, the School will make a judgement about whether, without help, the needs of the child will escalate. If so, a referral to Department of Children and Youth may be necessary.

7.22. See Appendix 6 for Level of Needs table to help identify whether a Wellbeing Assessment and plan would benefit a child and their family.

7.23. See Appendix 7 for the Wellbeing Assessment form and plan, led by the DSL.

DSL SAFEGUARDING FLOW CHART

7.24. Procedures for DSL to follow when assessing safeguarding concerns



Home Visits

7.25. Home visits can be offered to families as part of the early help offer. Home visits should only really be conducted by a DSL and where possible two members of staff to attend the home. All visits should be recorded in the usual way on MyConcern under the chronology section.

7.26. If you suspect that a child is at significant risk of harm and it is during school hours, the DSL can also complete a home visit to ensure that the child is safe. In these situations, home visits MUST be completed with more than one person and the Whole School Safeguarding Coordinator must be informed.

8. REPORTING CONCERNS ABOUT A STAFF MEMBER OR VOLUNTEER

8.1. Staff who are concerned about the conduct of a colleague (including visiting professionals and volunteers) are undoubtedly placed in a difficult situation. They may worry that they have misunderstood a situation and they will wonder whether mentioning this could jeopardise a colleague's career. All staff must remember that the welfare of the child is paramount. This procedure empowers staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. Our Low Level Concern Form can be anonymous, protecting the identity of the person bringing to light conduct that they feel uncomfortable with.

8.2. As a British School overseas we are committed to follow KCSiE. In September 2021, the Department for Education introduced the necessary reporting of low-level concerns (LLC) in relation to the staff code of conduct.

8.3. *A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or 'nagging doubt', that an adult may have acted in a way that:*

- *Is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and*
- *Does not meet the allegation threshold*

8.4. Low-level concerns are part of a spectrum of behaviour. This includes:

- Inadvertent or thoughtless behaviour;
- Behaviour that might be considered inappropriate depending on the circumstances;
- Behaviour which is intended to enable abuse.

8.5. Examples of such behaviour *could* include:

- Being over friendly with children;
- Having favourites;
- Adults taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- Using inappropriate sexualised, intimidating or offensive language.

8.6. A Low-level concern form should be completed by all members of the community if they have a LLC so there is a formal means of registering issues.

8.7. In a large school like Rugby School Thailand, there is always a risk that a breach in child safeguarding or inappropriate behaviour may occur. Such activities cannot be tolerated and their rapid identification facilitates early intervention to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse in School.

8.8. The School also recognises that, for a number of reasons, staff often feel reluctant to raise such concerns. That is why the School will always support any and every member of staff who 'speaks up' about a concern they have. Your concern will be treated in the strictest confidence. The School will ensure that your concerns are investigated promptly and sensitively.

8.9. To make a disclosure in our School, you only need to act in good faith, e.g. with an honest belief about the concern you raise.

8.10. Alternatively, staff are free to approach the DSL / Head / Principal directly to discuss their concerns.

8.11. If the concerns/allegations are about the Principal, speak to the Designated Safeguarding Governor- Dr Neil Hampton (00447917108734) who will notify the Chair of Governors or email the Chair directly (cog@rugbyschool.ac.th).

8.12. The School will not hold responsible or at fault any staff member making a report of abuse that is later judged to be false, unless it can be demonstrated that the person wilfully and intentionally falsified a report. This could include reporting matters concerning members of staff.

8.13. If the concern reaches the threshold of allegation of abuse, The Principal / Designated Safeguarding Governor - Dr Neil Hampton (00447917108734) will then follow the procedures set out in Appendix 2, if appropriate.

8.14. The QR code below is posted around the School campus which gives access for staff to an anonymous LLC Form.



9. ALLEGATIONS OF ABUSE MADE AGAINST OTHER STUDENTS

9.1. We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

9.2. We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.

9.3. Most cases of students hurting other students will be dealt with under our School’s behaviour policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence;
- Could put students in the School at risk;
- Is violent
- Involves students being forced to use drugs or alcohol;
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos;

- (including sending nudes or partial nudes).

9.4. If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL, but do not investigate;
- The DSL might contact the Ministry of Education, the Department for Children and Youth and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.

9.5. We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent;
- Ensuring students know they can talk to staff confidentially by speaking to the DSLs;
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

9.6. See Appendix 4 for further details on child on child abuse and harmful sexual behaviour.

Sending nudes / youth produced sexual imagery

9.7. If you are made aware of an incident involving sending nudes, you must report it to the DSL immediately and follow the steps outlined in Appendix 5.

10. NOTIFYING PARENTS

10.1. Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

10.2. Other staff will only talk to parents about any such concerns following consultation with the DSL.

10.3. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the Department for Children and Youth before doing so.

10.4. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

11. STAFF CODE OF CONDUCT

11.1. The Staff Code of Conduct is contained within the HR Manual.

11.2. The Acceptable Use Policy should be read alongside this and the Social Media Policy which are contained in the Online Safety Policy.

12. VISITOR CODE OF CONDUCT

12.1. All visitors to the School must pass through security and are expected to adhere to the School's visiting procedures. The term visitor refers to locals or foreign individuals, suppliers, contractors, workers, and individuals or groups who rent the School's premises for any activities.

12.2. See Appendix 11 for the 'RST Visitor Code of Conduct'

13. SAFEGUARDING AND THE PHYSICAL ENVIRONMENT

13.1. The School must be a safe place for all students. The way we achieve this is outlined in our Health and Safety Policy. This policy covers all aspects of School health and safety including fire safety and crisis management, medical concerns and resource use.

14. STUDENTS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

14.1. We recognise that students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Students being more prone to peer group isolation than other students;
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers;
- We offer extra pastoral support for students with SEN and disabilities. Please refer to Support for Learning, Special Educational Needs and Disability Policy.

15. RECORD-KEEPING

15.1. We will hold records in line with our records retention schedule.

15.2. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on MyConcern. If you are in any doubt about whether to record something, discuss it with the DSL.

15.3. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

15.4. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the School.

16. FILTERING AND MONITORING

16.1 Rugby School Thailand operates a 4 layer filtering system which includes:

1. Hardware cyber attack firewall provided by Sangfor
2. Hardware filtering and bandwidth access point provided by Sangfor
3. Hardware filtering provided by Rukus wireless access points
4. Software firewall, monitoring and filtering provided by Google Objectionable Content (whole school), Mosyle (school provided iPad) and Securly (whole school with focus on BYOD)

16.2 Google Safe Search is forced across the domain and Google Vault allows transparency to Gemini AI prompts and Google Workspace messages

16.3 Alerts are triaged by the EdTech Team and followed up on as appropriate either directly with the student(s) involved and/or via the school's Safeguarding/pastoral team. iSAMS Concern and MyConcern are used to log as appropriate

16.4 See Appendix 12 for Filtering and Monitoring alerting Flowchart

16.5 Google Objectionable Content, Securly and Securly AI Filter provide realtime alerts to red flags across Google Search, Gemini and Workspace services, triaged as per 16.3

16.6 Mosyle delivers a summarised e-mail of concerns at the end of each day which is triaged as per 16.3

17. TRAINING

All staff

17.1. All staff members will undertake an induction their first day of work, this will include becoming familiar with this policy and other related policies including Online Safety policy which includes Social Media policy and how to report Low Level concerns, to ensure they understand the School's safeguarding systems and their responsibilities. See the Safer Recruitment and Selection Policy for an outline of the Induction. **No staff member who is engaged in regulated activity with a child should commence work until they have completed this basic induction. DSLs will lead on inductions for staff with an academic contract and HR will lead on inductions for other staff.**

17.2. **New Staff will then be booked onto the first available safeguarding training course** which is a detailed 2-hour course looking at: key legislation; the Thai context; how to identify signs of possible abuse or neglect; context specific case studies; how to respond to safeguarding concerns relating to children and staff, and the staff code of conduct. For most academic staff this will take place at the start of the year but courses will also be run monthly so staff joining part way through the year can attend.

17.3. The HR Manager, supported by the Safeguarding Committee, keeps detailed records of all staff safeguarding training and issues reminders when training updates are required.

17.4. It is good practice to include safeguarding as an agenda item in all staff meetings.

17.5. All current staff will receive regular safeguarding and child protection updates in the form of Inset training at the start of the academic year and through termly Continued

Professional Development (CPD) sessions which reflect key safeguarding concerns that staff need support with. The Digital Wellbeing Lead who runs regular sessions on Online Safety for staff and students further supports CPD. In addition to this staff will receive safeguarding updates through emails, half-termly safeguarding newsletters and staff meetings as required.

17.6. Staff will also be required to complete Educare courses and DSLs and HR will set study plans to include Online Safety amongst others.

17.7. Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

17.8. Volunteers and co-curricular activity providers will receive appropriate training and induction.

17.9. Full detail can be found in the Safeguarding Training Framework.

The DSLs

17.10. The DSLs will undertake child protection and safeguarding training at least every 2 years.

17.11. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

Senior Managers

17.12. Heads of School will complete safeguarding level 3 courses once every 2-3 years.

Governors and Proprietors

17.13. All Governors and Proprietors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. This will take place when they first start working as a Governor and once a year thereafter. The Governors' are made aware of their role in online safety, including an expectation that governors ensure this is a central theme in a whole setting approach to safeguarding.

17.14. As the Designated Safeguarding Governor and/or the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they will receive training in managing allegations for this purpose. The DSG should also attend DSL training every 2 years.

Parents and Carers

17.15. Parents and carers will be supported in understanding key safeguarding themes that will benefit them in being able to promote the wellbeing and safety of their children. The weekly newsletter will contain key information when relevant and workshops are offered throughout the year for different ages and stages. Workshops include looking at: what is safeguarding; roles and responsibilities around sharing concerns; online safety and parenting styles.

Recruitment

17.16. At least one person conducting any interview for a post at the School will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the UK Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

Minimum safeguarding requirements of all adults living on campus

17.17. There is an expectation for all residential occupants to adhere to the Safeguarding and Child Protection Policy and Code of Conduct. Resident adults are to read and sign a declaration form that they have read and understood the policy along with the conditions specified in the housing policy and licence.

Staff who have contact with students and families

17.18. All staff will be offered supervision when dealing with serious safeguarding concerns which will provide them with support, coaching and training to promote the interests of children and allow for confidential discussions of sensitive issues.

18. EXTERNAL SAFEGUARDING CONTACT DETAILS

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Head of Chonburi Shelter for children and family, part of Department for Children and Youth, Ministry of Social Development and Human Security	Head: Khun Nattamon Kitdamrongkul (Kn Kwan) Psychologist: Naruemon Montree (Kn Mon)	038240135 (24 hours) 098 5399594 (mobile) 083 6586372 (mobile)
Police: พ.ต.อ.สุรกิจ อินอ่ำ ผก ก.สภ.ห้วยใหญ่ Police Colonel Surakit In-am, Superintendent of Huai Yai Police Station. Address : 112/4 หมู่13 ถนน 331 Bang Lamung District, Chon Buri 20150	For an urgent report, the School should take this directly to the police and make a formal report to trigger an investigation.	Police Colonel Surakit In-am: 038 110 333 National emergency police number: 191 (general emergency call for police) 1155 (tourist police) 1672 - tourist assistance centre hotline - often the first to be able to support in cases of rape / sexual assault, whilst waiting for someone from embassy to arrive 1300 - one stop crisis centre in Bangkok for people who have experienced sexual assault

Childline Thailand	Provides services to any child under 18. Linking concerned adults/students to important information and services; Filing complaints with the police and courts on behalf of child victims. Also provide counselling on the phone for children and families.	info@childlinethailand.org 1387 – free number to call open 24 hours a day (Thai language)
Samaritans of Thailand	English Speakers providing confidential listening service to people who are in need.	02 713 6791
British Embassy	British Embassy - provide support and guidance, can advise on medical and emotional support available for British citizens and dual nationality British citizens. In cases of sexual assault they do not report to the police unless the survivor of assault wants this to happen.	02 305 833 (24 hours) www.gov.uk/world/organisations/british-embassy-bangkok Joanne Finnamore-Crorkin joanne.crorkin@fcdo.gov.uk
Reporting online abuse or child sexual abuse material (CSAM).	Hug Project should be contacted if there are concerns about students sharing inappropriate sexual images. They have links to the police internet crime division TICAC. To report CSAM material, report can be submitted via hotlines.	Hug Project report@hugproject.org 053 920 588 Thai Hot Line https://thaihotline.org/en/report

Harmful Sexual Behaviour	The Lucy Faithfull Foundation provides support on how to prevent HSB.	Lucy Faithfull Foundation
	‘Shore Space’ offers a confidential chat service supporting young people who are concerned about their own or someone else’s sexual thoughts and behaviour.	Shore Space
	The NSPCC provides free and independent advice about HSB.	NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.
	Beyond Referrals | Contextual Safeguarding provides a school self-assessment toolkit and guidance for addressing HSB in schools.	Beyond Referrals
	StopItNow – Preventing harmful sexual behaviour in children, a free confidential helpline	StopItNow

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These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

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APPENDIX 1: UK Legislation

UK Legislation

1.1. As an international school which is partnered with a British school in England we are guided by the statutory guidance used in the UK because it contains principles for working with children across the whole world. This legislation is however not statutory in countries outside the UK. The Designated Safeguarding Governor must be informed of any significant child protection concern.

1.2. This policy is based on:

1.2.1. The Department for Education's statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2023).

1.2.2. Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on independent schools to safeguard and promote the welfare of students at the School.

1.2.3. The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

1.2.4. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

1.2.5. The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

1.2.6. Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.

1.2.7. Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

1.2.8. The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

1.2.9. This policy also meets safeguarding and welfare requirements in the statutory framework for the Early Years Foundation Stage.

1.2.10. The National Minimum Standards for boarding that boarding schools must meet to safeguard and protect the children in their care.

Allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- It applies regardless of whether the alleged abuse took place in the School. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.
- We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the School so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the School so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to another business owned by the Proprietor.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or Designated Safeguarding Governor where the Principal is the subject of the allegation) – the 'case manager' – will take the following steps:

Immediately discuss the allegation with the DSL and Child Protection and Safer Recruitment Advisor (CPSRA). Where threshold of significant harm has been met, the Designated Safeguarding Governor should be informed. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or Department for Children and Youth. The case manager may, on occasion, consider it necessary to involve the police *before* consulting the DSL and Child Protection and Safer Recruitment Advisor – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the DSL/CPSRA (and the police or Department for Children and Youth, where necessary). Where the police and/or Department for Children and Youth are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the School is justified or whether alternative arrangements such as those outlined above can be put in place.

If immediate suspension is considered necessary, agree and record the rationale for this with the DSL/CPRSA/Principal. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the School and their contact details.

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the DSL/CPSRA what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, take steps as agreed with the DSL/CPSRA to initiate the appropriate action in School and/or liaise with the police and/or Department for Children and Youth as appropriate.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with Department for Children and

Youth and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

Make a referral to the DBS (or equivalent organisation if non UK staff) and inform embassy for their country of origin where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child. All concerns pertaining to Thai staff should be reported to the Ministry of Education, the Department for Children and Youth and the police.

All significant safeguarding concerns need to be shared with DSG who would in turn pass onto RSUK representative on RST board if the situation warranted them needing to know.

Early Years

We will inform the Thai Police and any relevant embassy of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations.

If the School is made aware that the UK secretary of state has made an interim prohibition order in respect of a British teacher, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Timescales

This is a guide based on best practice but is subject to outside agencies:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

- **Action following a criminal investigation or prosecution**
  The case manager will discuss with the DSL (RST) and DSG, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or Department for Children and Youth.

- **Conclusion of a case where the allegation is substantiated**
  If the allegation is substantiated and the individual is dismissed or the School ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the School's personnel make a referral to:
  - the DBS for consideration of whether inclusion on the barred lists is required and UK embassy (if person is from the UK)

    - Embassy from country of origin and equivalent of DBS for non UK staff
    - Ministry of Education, the Department for Children and Youth and the police if the staff member is Thai.

- If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the DSG who will in turn discuss with RSUK representative on the RST board whether to refer the matter to the Teaching Regulation Agency (or equivalent in country of origin for staff member) to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the School.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the student(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

Confidentiality

The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
The case manager will take advice from the DSL/CPSRA police and Department for Children and Youth, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the School will retain the records of the case on the individual's confidential personnel file. **We will retain all records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.**

We will retain all records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the DSG to determine whether there are any improvements that we can make to the School's procedures or practice to help prevent similar events in the future.
This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

APPENDIX 3: Allegations against staff report template

Allegations Against Staff or Volunteers

Chair/Lead		**Date**	
Venue		**Minute Taker**	
Professional subject to allegations		**Employer and role**	

Key people involved in the investigation		
Name	**Job Role / Organisation**	**Telephone and E-mail**

Purpose of this report
This report will: ● Consider the referral ● Share information ● Consider the current allegation in the context of any previous allegations or concerns ● Determine a way forward and agree actions to be taken by whom and by when. ● Risk assess to enable Safeguarding There are up to three strands in the consideration of an allegation: ● A police investigation of a possible criminal offence; ● Social care enquiries and/or assessment about whether a child is in need of protection or services; ● Consideration by an employer of disciplinary action.
Confidentiality Statement

Those involved are reminded that this is strictly confidential. Discussions should not be shared outside of those who are involved in the investigation unless they form part of the actions in this report. All agencies should develop procedures to ensure that the report is retained in a confidential and appropriately restricted manner. The report will aim to reflect that all individuals who are discussed should be treated fairly, with respect and without improper discrimination. All decisions undertaken will be informed by a commitment to equal opportunities and effective practice issues in relation to race, gender, sexuality, religion and disability.

This report could be shared as part of criminal, civil or disciplinary proceedings, or as part of investigations concerning whether an individual should be barred from working with children or vulnerable adults.

If further disclosure is felt essential, permission must be sought from the author of the report.

The report should not be photocopied or shared without the author's consent and must be kept in a restricted or confidential section of the agency files.

Report	
1	*Detail of the concerns / allegations (to include current and any previous allegations, details of person/s any historical allegation relate to-where necessary/appropriate):*
2	*How this is relevant to their professional role/employment (including volunteering) with children:*
3	**Facts:**
4	*Risk assessment (consider the safety and wellbeing of child/ren identified):*
5	*Confirm support to subject (where necessary):*
6	*Agree feedback mechanism to the referrer (who, what, when):*
7	*Planning the management of the investigation / fact-finding:*
8	*Strategy for media or other enquiries (if relevant):*

<table>
<tr><td>9</td><td>Next Steps / Actions (as Relevant):

<table><tr><td>Action</td><td>By Whom</td><td>By When</td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr></table></td></tr>
<tr><td>10</td><td>Outcome: (Substantiated, False, Malicious, Unfounded, Unsubstantiated)</td></tr>
<tr><td>11</td><td>AOB:</td></tr>
</table>

Specific safeguarding issues

This is based on the advice in Annex A of Keeping Children Safe in Education.

1. BULLYING, CHILD ON CHILD ABUSE AND HARMFUL SEXUAL BEHAVIOUR

1.1. This School believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other students in the School.

1.2. Children may be harmed by other children or young people. All staff recognise that children can abuse their peers and are trained to understand and implement the School's policy and procedures regarding child on child abuse. All child on child abuse is unacceptable and will be taken seriously. It is most likely to include, but is not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- sharing nudes including pressuring another person to send a sexual image or video content (also known as youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
- initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them;
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

1.3. Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's Wellbeing and in very rare cases has been a feature in the suicide of some young people.

1.4. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the School's anti-bullying. All students and parents are made aware of the procedures on joining the School and the subject of

bullying is addressed at regular intervals in Whole Me (PSHE) education. All members of staff receive a copy of the School's behaviour policy, which contains the anti-bullying procedures, as part of their induction and are trained to be aware of the harm caused by bullying and to respond to all incidents of bullying and child on child abuse proactively.

1.5. Abuse is abuse and will not be tolerated, minimised or dismissed as 'banter'; 'just having a laugh'; 'part of growing up'; 'boys being boys'; or 'girls being girls'. Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Whilst mindful of the particular vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.

1.6. We recognise that some students will sometimes negatively affect the learning and Wellbeing of others and their behaviour will be dealt with under the School's behaviour policy. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures. Notably, research suggests that up to 30% of child sexual abuse is committed by someone under the age of 18.

1.7. Occasionally, allegations may be made against students by others in the School, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Members of staff to whom such allegations are made and/or who become concerned about a student's sexualised behaviour, including any known online sexualised behaviour, should record their concerns in the usual way on My Concern and report them to the DSL as soon as possible, as with any other safeguarding concern.

1.8. It is likely that for an allegation or concern to be addressed under child protection procedures, some of the following features will be found. The allegation or concern:

- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student;
- is of a serious nature, possibly including a criminal offence;
- raises risk factors for other students in the School;
- indicates that other students may have been affected by this student;
- indicates that young people outside the School may be affected by this student.

1.9. It is important for the School to consider the wider environmental factors and context within which child on child abuse occurs. Such factors may include the potential for bullying and child on child abuse to take place across a number of social media platforms and services; and for things to move from platform to platform online. The School will also consider the potential for the impact of the incident to extend further than the school local community (e.g. for images or content to be shared around neighbouring schools) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from **The UK Safer Internet Centre** helpline@saferinternet.org.uk and the **Internet Watch Foundation** at **https://www.iwf.org.uk/.**

2. CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

2.1 Sexual violence and sexual harassment can occur between two children of any age and gender and between children of the opposite or the same gender. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

2.2 Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. While it is important that all victims are taken seriously and offered appropriate support, staff are trained to be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

2.3 This policy largely refers to sexual violence and sexual harassment between students/students at the School. However, there may be occasions when students/students report sexual violence and/or harassment perpetrated by other young people who attend a different educational provision. In that situation, the DSL will liaise with the DSL at the alleged perpetrator's school as well as the victim's parents, the Police and Department for Children and Youth.

What is sexual violence, sexual harassment and harmful sexual behaviour?

2.4 When referring to sexual violence, this policy uses the definitions of sexual offences in the UK Sexual Offences Act 2003 as follows:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

- **What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

    - a child under the age of 13 can never consent to any sexual activity (UK law but this carries a larger penalty in Thai law);

    - The age of consent in Thailand is 15 (Offences Relating to Sexuality Penal Code S.276-287).

- A child under the age of 15 can never consent to any sexual activity and if the School becomes aware of sexual activity under the age of 15 it has a duty to report this (in the UK a child under the age of 13 can never consent to any sexual activity);

- But it is also the case that sex with a minor under age 18 is a compoundable offense, regardless of consent if one of the parents of the child aged between 15 years old and 17 years old decides to take action under the Offences Against Liberty and Reputation, Penal Code (S.317, S317, S319). Consent from parents does not however have to be verbal, if parents have observed the relationship and seen the couple kiss and have not stated they disapprove this lack of challenge could also be seen as consent in a courtroom;

- sexual intercourse without consent is rape.

2.5 Sexual harassment in the context of child on child behaviour is unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

2.6 Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence.

2.7 Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. The School therefore recognises the importance of recognising the nature of, identifying and challenging sexual violence and sexual harassment in its wider approach to safeguarding and promoting the welfare of children; through policies; and through the curriculum.

2.8 **Harmful sexual behaviour (HSB)** is a useful umbrella term to include problematic, abusive and violent sexual behaviour that is developmentally inappropriate and may cause developmental damage. It is important for professionals to place a child's sexual behaviour within the context of their age and development. Frameworks such as Brook's Sexual Behaviours Traffic Light Tool can also be used to identify when a child or young person's sexual behaviour is a cause for concern in relation to their development.

2.9 Any child or young person displaying harmful sexual behaviour should be safeguarded and supported in moving forward from the incident and adopting positive behaviour patterns.

3. MINIMISING THE RISK OF SEXUAL VIOLENCE, SEXUAL HARASSMENT AND HARMFUL SEXUAL BEHAVIOUR AT THE SCHOOL THOUGH A PLANNED CURRICULUM

3.1 The School's Whole Me programme teaches the students about healthy relationships and our Behaviour procedures and pastoral support system encourages the development of the relationship in the school community.

3.2 Our Whole Me (PSHE) programme includes the following topics:

- healthy and respectful relationships;

- what respectful behaviour looks like;
- boundaries and consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- how to recognize an abusive relationship, including coercive and controlling behaviour;
- the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and how to accesssupport;
- prejudiced behaviour;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- challenging cultures of sexual harassment including behaviour (potentially criminal in nature), dismissing or tolerating such behaviours risks normalising them;
- We recognise that, in some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT;
- Students are made aware of the process for them to raise their concerns or make a report and how any report will be handled during their induction process and includes teaching them about the processes when they have a concern about a friend or peer.

4. HOW THE SCHOOL WILL RESPOND TO REPORTS OF SEXUAL VIOLENCE AND SEXUAL HARASSMENT

4.1 It is not possible to anticipate every particular set of circumstances and therefore what the School's response will be to every case. This policy sets out a set of principles which the School will consider in responding on a case by case basis.

4.2 All responses to reports of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL, using her/his professional judgement and supported by other agencies, such as Department for Children and youth and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

Risk assessment

4.3 The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator/s (if she/he/they attend the same school);
- all the other children, (and if appropriate, adult students and staff) at the School, especially any actions that are appropriate to protect them from alleged perpetrator(s) or from future harms; and
- the time and location of the incident, and any action required to make the location safer.

The risk assessments should be recorded (paper or electronic) and should be kept

under review.

4.4 It might useful to refer to the child on child abuse toolkit available at https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/farrer--co-safeguarding-peer-on-peer-abuse-toolkit-2019.pdf

Action following a report of sexual violence and/or sexual harassment - what to consider

4.5 The Designated Safeguarding Lead is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead the School's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. However, if the victim asks the School not to tell anyone about the sexual violence or sexual harassment, the DSL will have to balance the victim's wishes against their duty to protect the victim and other children. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to protect the victim and other young people from harm and to promote the welfare of children;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- whether there are ongoing risks to the victim, other children, adult students or School staff;
- importance of understanding intra familial harms and any necessary support for siblings following incidents;
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation;
- informing parents/carers (unless this would put the victim at greater risk);
- only sharing information with those staff who need to know in order to support the children involved and/or be involved in any investigation. For instance, vocational staff may be asked to monitor the victim's welfare without needing to know that they are a victim of sexual violence or harassment.

Children sharing a classroom - initial considerations following a report of sexual violence

4.6 Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim and close proximity with the alleged perpetrator is likely to be especially distressing. Whilst the School establishes the facts of the case and starts the process of liaising with external agencies, the alleged perpetrator will usually be removed from any classes they share with the victim. Consideration will also be given to how best to keep the victim and alleged perpetrator a reasonable distance apart on School premises and on transport to and from the School, where appropriate. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

4.7 For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises and transport, will be considered immediately.

4.8 In all cases, the wishes of the victim, the nature of the allegations and the protection of all children in the School will be especially important when considering any immediate actions.

Responding to the report

4.9 If an offence has been committed, the Police will be informed. It is the prerogative of parents and victims to make complaints to the Police directly but the School will also speak to the Police in order to ensure effective action is taken to safeguard other young people as well as the victim.

4.10 If a child has suffered significant harm, a referral will also be made to Department for Children and Youth and relevant embassy if non Thai.

4.11 Responses to all incidents of both sexual violence and sexual harassment will be underpinned by the principles of:

- zero tolerance of sexual violence and sexual harassment;
- support for both the victim and alleged perpetrator/s, particularly pending the outcome of investigations
- all parties have an ongoing right to an education and are safest if they remain in School subject to appropriate risk assessments and risk management.
- exclusion will be avoided unless that is the only realistic option to keep one or more parties safe.

4.12 In principle, there are four possible responses to an allegation or concern about sexual

Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the School may take the view that the children concerned are not in need statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour policy and anti-bullying procedures, speaking to the child and her/his parents, making expectations of future behaviour clear (in writing where appropriate) and by providing pastoral support.
- Careful consideration will be given to the need to separate the victim and alleged perpetrator/s in lessons (as with sexual assaults) pending investigation would also be undertaken.

Early help

- The School may decide that the child/ren involved do not require statutory interventions but may benefit from a Wellbeing Plan, which can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

- A safeguarding record will be maintained of all concerns, discussions, decisions and reasons for decisions for all responses.

Referrals to Department for Children and Youth

- Where a child has been harmed, is at risk of harm, or is in immediate danger, the School will make a referral to the Department for Children and Youth and / or the police.

- Schools will generally inform parents or carers, unless there are compelling reasons not to (i.e. if informing a parent or carer is going to put the child at additional risk or create undue delay).

- Collaborative working will help ensure the best possible package of co-ordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

- However, the School will not wait for the outcome (or even the start) of an external investigation before protecting the victim and other children in the School. The DSL will work closely with Department for Children and Youth (and other agencies as required) to ensure any actions the School takes do not jeopardise an external investigation.

- The risk assessment as above will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at the School should be immediate.

Reporting to the Police

- Any report to the Police will generally be in parallel with a referral to Department for Children and Youth.

- Where the School receives a report of rape, assault by penetration or sexual assault, the starting point is this should be passed on to the Police. It is the prerogative of victims and their parents/carers to make direct complaints to the Police. However, the School should also be very clear with victims and parents/carers that the School has a duty to ensure the Police are informed when an alleged crime has been committed in order to safeguard other young people.

- Where a serious crime is reported, the School can report directly to the local Police station. Where a report has been made to the Police, the School should consult the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

- In some cases, it may become clear very quickly, that the Police (for whatever reason) will not take further action. In such circumstances, it is important that the School or continue to engage with specialist support for the victim as required.

Subsequent considerations

4.13 The needs and wishes of the victim should continue to be paramount (along with protecting the child) as the case progresses. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to

make the victim's daily experience as normal as possible, so that the School is a safe space for them.

4.14 Similarly, the alleged perpetrator/s has an ongoing right to an education and should be able to continue in their normal routine subject to the ongoing risk assessment and the needs of the victim.

4.15 If a student is convicted or receives a caution for a sexual offence, the School will update its risk assessment, ensure relevant protections are in place for all students and consider any suitable action in light of the behaviour policy. If the perpetrator remains at the School along with the victim, the School will meet with the student and her/his parents/carers to revisit and reiterate in writing expectations of the perpetrator in terms of future behaviour and complying with any restrictions and arrangements put in place to safeguard the victim and other students.

4.16 In the light of possible publicity, speculation and interest within the student and parent body, the School will consider any other measures necessary to safeguard both the victim and perpetrator, especially from any bullying or harassment (including online).

4.17 In respect of a not guilty verdict or a decision not to progress with a criminal prosecution, the School recognises that this will likely be traumatic for the victim and will continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

4.18 Support will be tailored on a case-by-case basis. Every effort will be made to avoid isolating the victim, in particular from supportive peer groups, but it is recognised that there may be times when a victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. The School will provide a physical space for the victim to withdraw.

4.19 Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the School will consider any suitable sanctions in light of the behaviour procedures, including consideration of permanent exclusion. In all but the most exceptional of circumstances, the rape or assault will constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the School would seriously harm the education or welfare of the victim (and potentially other students or students).

4.20 Where the perpetrator is going to remain at the School, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on School premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

4.21 The School will have a difficult balancing act to consider. On one hand it needs to safeguard the victim (and the wider student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other

children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials.

4.22 If a perpetrator (alleged or convicted) does move to another educational institution (for any reason), the School will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transferring the child protection file.

5. CHILDREN WHO ARE ABSENT FROM EDUCATION

5.1 A child who is absent from education, particularly repeatedly and/or for prolonged periods, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

5.2 There are many circumstances where a child may become absent from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from the families of service personnel
- Go missing or run away from home or care
- Cease to attend a school
- Come from new migrant families

5.3 Effective information sharing between parents and professionals local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education.

5.4 Attendance, absence and exclusions are closely monitored in accordance to the statutory guidance Working Together to improve school attendance 2024. The School secretary and senior management will monitor unauthorised absence and take appropriate action. Designated Safeguarding Leads (DSLs) in each area of the school are responsible for completing absence reports on a half-termly basis. These reports are formally shared with the relevant Heads of Year and the Pastoral Leadership Team to enable systematic monitoring, early identification of attendance concerns, and appropriate follow-up actions.

5.5 Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Telephone calls to all known contacts. Parents will be asked to provide a minimum of two emergency contacts in the event of children not arriving at School without prior notification and also for other emergency purposes;
- Letters home (including recorded delivery);
- Contact with other schools where siblings may be registered;
- Possible home visits where safe to do so;
- Enquiries to friends, neighbours etc. through school contacts;
- Enquiries with any other services known to be involved with the student/family;

- All contacts and outcomes to be recorded on the student's file.

5.6 The School is required to have an admission register and an attendance register for students. All students must be placed on both registers.

5.7 The School is required to inform the Ministry of Education when they are to remove a student's name from the School admission register at non-standard transition points irrespective of the reason.

6. CHILD SEXUAL EXPLOITATION

6.1 Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

6.2 This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

6.3 Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

6.4 If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Department for Children and Youth and the police, if appropriate.

6.5 Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Having older boyfriends or girlfriends;
- Suffering from sexually transmitted infections or becoming pregnant;
- Displaying inappropriate sexualised behaviour;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and/or alcohol;
- Going missing for periods of time, or regularly coming home late;
- Regularly missing school or education, or not taking part in education

7. CHILD CRIMINAL EXPLOITATION (CCE)

7.1 CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

7.2 The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

7.3 Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional wellbeing;
- Children who mis-use drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or education or do not take part in education.

8. SO-CALLED 'HONOUR-BASED' ABUSE (INCLUDING FGM AND FORCED MARRIAGE)

8.1 So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

8.2 Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

8.3 All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

9. FGM

9.1 Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place;
- A mother/family member disclosing that FGM has been carried out.

9.2 A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable;
- Finding it hard to sit still for long periods of time (where this was not a problem previously);
- Spending longer than normal in the bathroom or toilet due to difficulties urinating;
- Having frequent urinary, menstrual or stomach problems;
- Avoiding physical exercise or missing PE;
- Being repeatedly absent from School, or absent for a prolonged period;
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
- Being reluctant to undergo any medical examinations;
- Asking for help, but not being explicit about the problem;
- Talking about pain or discomfort between her legs.

9.3 Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider);

- FGM being known to be practised in the girl's community or country of origin;
- A parent or family member expressing concern that FGM may be carried out;
- A family not engaging with professionals (health, education or other).

9.4 A girl:

- Having a mother, older sibling or cousin who has undergone FGM;
- Having limited level of integration within Thai society;
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman";
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period;
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
- Being unexpectedly absent from School.

9.5 The above indicators and risk factors are not intended to be exhaustive.

10. PREVENTING RADICALISATION

10.1 Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

10.2 Terrorism: is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

10.3 Schools have a duty to prevent children from being drawn into terrorism. We will assess the risk of children in our School being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners, relevant embassies and local police force.

10.4 We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at School and at home.

10.5 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

10.6 Radicalisation can occur quickly or over a long period.

10.7 Staff will be alert to changes in students' behaviour.

10.8 The UK government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:

10.9 Refusal to engage with, or becoming abusive to, peers who are different from themselves;

- Becoming susceptible to conspiracy theories and feelings of persecution;
- Changes in friendship groups and appearance;
- Rejecting activities they used to enjoy;
- Converting to a new religion;
- Isolating themselves from family and friends;
- Talking as if from a scripted speech;
- An unwillingness or inability to discuss their views;
- A sudden disrespectful attitude towards others;
- Increased levels of anger;
- Increased secretiveness, especially around internet use;
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- Accessing extremist material online, including on Facebook or Twitter;
- Possessing extremist literature;
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

10.10 Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

10.11 Increased vulnerabilities to radicalisation can also include:

- Low mental health;
- Personal / family experiences;
- Victims of physical / sexual abuse;
- Addictions to drugs or alcohol;
- Learning difficulties;
- Financial hardship;
- Grievance against a political regime or movement;
- A misinterpretation of religion;
- Lack of positive role models;
- Unregulated access to the internet;
- Lack of belonging;
- A desire for status;
- Feeling their culture or religion is under threat;
- Feel discriminated against;
- Be looking for a sense of belonging, purpose, or excitement.

10.12 Research shows that extremist views can be diminished, and that teachers facilitating discussions around attitudes and beliefs have a central role in achieving that goal. This forms part of the Whole Me programme and resources can also be found from: https://since911.com/education-programme/guidance-more-resources and Chanel which is part of the UK Prevent strategy can also provide support. As part of this programme we encourage and promote positive values and community cohesion, with open debate and critical thinking being supported. Children are also supported to

children recognise and manage risk, make safer choices and recognise when under pressure from others.

10.13 Staff should always take action if they are worried.

10.14 Parents also need to be sported through the provision of information.

11. NON-COLLECTION OF CHILDREN

11.1If a child is not collected at the end of the session/day, we will follow the Uncollected Child Procedure.

12. DOMESTIC ABUSE

12.1The definition of Domestic Abuse is:

- Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

- All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

13. MENTAL HEALTH

13.1 All staff are 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.

13.2 School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

13.3 Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy.

13.4 All significant safeguarding concerns should be passed onto the DSG who will in turn pass onto the RSTUK representative on the RST board if the situation warranted them needing to know.

APPENDIX 5: Procedures for managing the sharing of nudes / youth produced sexual imagery

Procedures for managing the sharing of nudes / youth produced sexual imagery

This is a suggested approach based on guidance from the UK Government for all staff and for DSLs and senior leaders. **Sharing nudes and semi-nudes: how to respond to an incident (overview)** December 2020 GOV.UK

Your responsibilities when responding to an incident
If you are made aware of an incident involving sharing nudes, you must report it to the DSL immediately and follow the below steps:

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Following a report of an incident, the DSL will follow the procedures outlined below:

Initial review

This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or Department for Children and Youth
- If it is necessary to view the imagery in order to safeguard the young person (in most
- cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or
- platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from
- devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents should be involved)

Finkelhor and Wolak's typology of youth-produced imagery cases can be used to define and assess incidents according to motivations.

Incidents can broadly be divided into two categories:

- aggravated: incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:
    - **adult involved**: adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders.
    - **youth only – intent to harm**: these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people.
    - **youth only – reckless misuse**: no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.

- experimental: incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
    - **romantic**: incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair
    - **'sexual attention seeking'**: the phrase 'sexual attention seeking' is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image.
    - **other**: cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

The DSL will make an immediate referral to police and/or Department for Children and Youth if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 15
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or Department of Children and Youth.

Further review by the DSL
If at the initial review stage a decision has been made not to refer to police and/or Department for Children and Youth, the DSL will conduct a further review.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to Department for Children and Youth and/or the police immediately.

Informing parents
The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the police
If it is necessary to refer an incident to the police, this will be done through our Police Contact listed above.

Recording incidents
All incidents and the decisions made in responding to them will be recorded.

Removing the image
Report remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet https://www.iwf.org.uk/our-technology/report-remove/

Curriculum coverage
The below is provided as an example of how you might demonstrate the way your curriculum covers sharing nudes. Insert details of your own approach here.
Students are taught about the issues surrounding sharing nudes as part of our Whole Me (PSHE) education and computing programmes. Teaching covers the following in relation to sharing nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sharing nudes is also shared with students so they are aware of the processes the School will follow in the event of an incident.

Identifying levels of need and what to do next

This document is a guide to assessing and meeting need of children and their families. It is not a 'tick list' and should be used as an aid to assist professional judgement and decision making. It is important that wellbeing assessments are based on a 'big picture' view of the child and their circumstances.

This table tells you what action to take once you have identified the level of need using the Level of Need document on the next page		
Level of need identified	**Wellbeing assessment required?**	**Action / support**
Level 1: Noted concern	No assessment required	Child, young person or family accessed relevant universal services for advice/support such as Doctor, school, dentist.
Level 2: Additional support	If a clear issue or area of need identified – wellbeing assessment may not be necessary. If a number of issues or needs at Level 2 are identified, a Wellbeing Assessment should be undertaken.	Offer support yourself, work with a professional partner or direct to relevant universal service for additional support. Based on results of Wellbeing Assessment – access appropriate early help services and set up a Wellbeing Meeting to develop a Wellbeing Plan.
Level 3: Wellbeing Assessment	If a Wellbeing Assessment has already been done, new information should be sent to the services already involved, to update the Wellbeing Plan. If not already done, Wellbeing Assessment should be undertaken and recommendations made for services required to meet assessed levels of need should start to form a Wellbeing Plan at a Wellbeing Meeting.	Appropriate support can be accessed by the Key Lead Professional involved with the Wellbeing Plan and Wellbeing Meeting.
Level 4: Child Protection	Likely that a Wellbeing Assessment has been done. At this stage refer the case to the Department for Children and Youth &/or the police. During the investigation a Wellbeing Assessment and Plan may be of benefit.	Immediate referral to Department of Children and Youth and/or the police.

Features	Level 1: Noted concern	Assessment process
Children with no additional needs and children who may from time to time require additional support that can be met within universal services	**Development Needs** All children whose needs can be met by universal services will occasionally experience difficulties in their lives which may be attributable to situational factors such as loss and separation, a change in their family's circumstances, illness or other short term detrimental factors such as bullying or being the victim of violence in the community.	Children should access universal services in a normal way. **Key agencies that are involved at this level:** Schools including SEND support Early years childcare settings Doctors Midwifery Dentist Opticians EAL School nursing School counselling service Police Voluntary & community sector Online counselling services
	Learning/education: • General development is age appropriate; achieving education key stages • Good attendance at School; no barriers to learning	
	Health: • Good physical health with age appropriate development, including speech and language	
	Social, emotional, behaviour, identity: • Good mental health and psychological Wellbeing • Good quality early attachments, confident in social situations • Knowledgeable about sex and relationships and consistent use of contraception if sexually active	
	Family and social relationships: • Stable families where parents are able to meet the child's needs	
	Self-care and independence: • Age appropriate independent	
	Family and environmental factors	
	Family History and Wellbeing: • Supportive family relationships	
	Housing, employment and finance: • Child fully supported financially • Good quality stable housing/amenities	
	Social and community resources: • Good social and friendship networks exist • Safe and secure environment • Access to consistent and positive activities	
	Parents and carers	
	Basic care, safety and protection: • Parents able to provide care for child's needs	
	Emotional warmth and stability: • Parents provide secure and caring parenting – praise and encouragement	
	Guidance boundaries and stimulation: • Parents provide appropriate guidance and boundaries to help child develop appropriate values	

Features	Level 2: Additional Support	Assessment process
Children and families with additional needs who would benefit from or who require extra help to improve education, parenting and/or behaviours, or to meet specific health or emotional needs, or to improve material situation. May require multi-agency intervention. Key lead professional and Wellbeing Meeting and Plan. Children with additional needs are best supported by those that already work with them such as schools organising additional support with local partners as needed.	**Development needs:** **Learning/education:** • Limited access to books, toys or educational materials • Poor stimulation • Identified language and communication difficulties; SEN support at school level • Occasional truanting or non-attendance and poor punctuality • Some fixed term exclusions • Few or no qualifications **Health:** • Slow in reaching development milestones • Overdue immunisations or checks • Minor health problems • Inadequate diet e.g no breakfast, being under/overweight • Dental problems and untreated decay – poor dental hygiene • Bed wetting or soiling • Experiment with tobacco, e cigarettes, alcohol and illegal drugs **Social, emotional, behaviour, identity:** • Difficulty making and sustaining relationships with peers and family • Social isolation; lack of positive role models; exhibits antisocial/antiauthoritarian behaviour • Low level mental or emotional issues requiring intervention • Children involved in bullying or low level cyber bullying • Lack of empathy • Early onset of sexual activity or at risk of early pregnancy • Lack of confidence/low self esteem which affects behaviour and development • Child subject to persistent discrimination • Emerging concerns in relation to attachment • Low level concern about child being radiclaised or exposed to extremism • Resistance to boundaries and adult guidance; exhibits aggressive challenging behaviour	Two or more services work together to meet child and family needs, coordinated by a service that knows the child/family best. A wellbeing assessment could be completed to gain a full understanding of the family's needs, a Wellbeing Meeting convened and a Wellbeing Plan agreed with the family, agreeing clear outcomes to be achieved and progress regularly reviewed. **Key agencies that may provide support at this level:** Targeted drug and alcohol information, advice and education Schools including SEND support Early years childcare settings Doctors Midwifery Dentist Opticians EAL School nursing School counselling service Police

The purpose of this intervention is to address these needs and prevent them escalating to a level that requires targeted services.	**Self-care and independence:** • Lack of age appropriate self-care & independent living skills that increase vulnerability and social exclusion.	Voluntary & community sector Online counselling services
	Family and environmental factors	
	Family and social relationships and family Wellbeing: • Parents/carers have relationship difficulties which affect the child • Child has some young carer responsibilities • Family is socially isolated • Low level inter-sibling violence and aggression • Unresolved issues arising from parents separation and family reconstitution or bereavement	
	Housing, employment and finance: • Overcrowding in poor housing conditions • Housing arrangements are temporary or unsecure • Unsecure or unknown immigration status • Families financial resources impact on child's basic physical needs being met • Serious debt or rent arrears	
	Social and community resources: • Families are victim of hate crime • Poor access to leisure and recreational amenities and activities • Associating with anti-social or criminally active peers • Risk of gang involvement or vulnerability to gang activity/exploitation	
	Parents and carers	
	Basic care, safety and protection: • Some exposure to dangerous situations in the home or community • Low level concerns about parental alcohol or substance use • Parental lack of insight into effects of child's exposure to parental conflict	
	Emotional warmth and stability: • Inconsistent parenting, but development not significantly impaired • Inconsistent responses to child/young person	
	Guidance boundaries and stimulation: • Lack of routine and inconsistent boundaries • Poor supervision within the home • Low level physical chastisement that does not cause physical injury • Inappropriate parental chastisement e.g. puts child in stress positions • Threatening and menacing behaviour towards the child	

Features	Level 3: Wellbeing Assessment	Assessment process
Children and families with complex needs requiring integrated targeted support. Because of the complexity of needs, especially around behaviour and parenting, a multidisciplinary/agency coordinated plan developed with the family is needed, coordinated by a Key Lead Professional. Vulnerable children and their families with multiple needs or whose needs are more complex, such as families who: have a disability resulting in complex needs, exhibit antisocial or challenging behaviour, suffer neglect or poor family relationships, have poor engagement with key services such as schools and health, are not in	**Development needs:** **Learning/education:** • Short term exclusions or at risk of permanent exclusion, persistent truanting • Parent does not engage with social and actively resists support • SEN school support • No access to books, toys or educational materials • Inadequate stimulation leading to developmental concerns **Health:** • Child has some chronic/recurring health problems or a disability; badly managed • Developmental milestones not being met due to parental care • Regular substance misuse • Lack of food • Unsafe sexual activity • Self-harming behaviours • Mental health issues emerging e.g. conduct disorder, ADHD, anxiety, depression, eating disorder, self harming • Failure to engage in antenatal services • History of FGM in the family • Growing professional concern about fabricated and induced illness but there is no current evidence of significant harm **Social, emotional, behaviour, identity:** • Child under 18 is pregnant where there are significant social family concerns • Low or medium indicators of Child Sexual Exploitation • Starting to commit offences and reoffend • Prosecution of offences resulting in court orders and/or fines • Child is engaging in cyber activity that potentially places others or themselves at risk of harm • Evidence of regular/frequent drug use which may be combined with other risk factors • Evidence of ang affiliation and gang related activities • Concern about child being radicalised or exposed to extremism • Child or young person engaging in risk taking behaviours • Mental health/physical needs impact adversely on the care of the child • Significant low self esteem • Clear concerns about parent and child attachment	Where practitioners identify that a child and their family would benefit from a more intensive multidisciplinary response than they can provide, they should discuss this with the family and complete a Wellbeing Assessment. The Wellbeing Assessment needs to identify the child's and family's needs and develop a SMART action plan to address these. A Wellbeing Meeting is to be convened and Key Lead Professional to be identified. There is an expectation that those who attend the Wellbeing Meeting have worked intensively together to meet the additional needs of the child and the family. These indicators are meant as a guide but clearly rely on professional analysis and interpretation. If you are in doubt about whether the child's circumstances are at Level 3 or 4 you can discuss this with the Department for Children and Youth.

education or work long term.	**Self-care and independence:** • Lack of age appropriate behaviour and independent living skills, likely to impair development or compromise safety	**Key agencies that may provide support at this level:** Targeted drug and alcohol information, advice and education Schools including SEND support Early years childcare settings Doctors Midwifery Dentist Opticians Mental health services Specialist health or disability services EAL School nursing School counselling service Police Voluntary & community sector Online counselling services
	Family and environmental factors	
	Family and social relationships and family Wellbeing: • History of ongoing domestic violence • Risk of relationship breakdown leading to child possibly becoming looked after by someone other than parents • Child is a young carer and this is adversely impacting on their development and welfare • Parental illness or disability leading to inability to provide basic care • Concerns about inter-sibling violence and aggression which does not result in significant emotional or physical harm • Destructive or unhelpful involvement from extended family	
	Housing, employment and finance: • Severe overcrowding, temporary accommodation, homeless, unemployment	
	Social and community resources: • Family require support services as a result of social exclusion • Parents are socially excluded, no access to local facilities • Families financial resources seriously compromise child's basic physical needs being met/their general wellbeing	
	Parents and carers	
	Basic care, safety and protection: • Child is left at home alone but this does not seriously place them at significant risk • Inappropriate child care arrangements which are consistently prejudicing the child's safety and welfare • Health and safety hazards in the home • Escalating concerns that parental alcohol or substance use is adversely impacting on the child • Parent fails to prevent child's exposure to potentially unsafe activity through cyber activity	
	Emotional warmth and stability: • Inconsistent parenting impacting emotional or behavioural development • Parent is unresponsive or fails to recognize child's emotional needs • Parent ignores child or is consistently inappropriate in responding to child	
	Guidance boundaries and stimulation: • Parent provides inconsistent boundaries or responses	

Features	Level 4: Child Protection	Assessment process
Children with complex additional unmet needs that require the intervention of the Department for Children and Youth and/or the police. Children who are at risk of significant harm which require a child protection response or legal intervention. Children who need to be accommodated by the Thai Government or by way of a court order.	**Development needs:** **Learning/education:** • Chronic non-attendance, truanting, permanent exclusions, consistently poor educational attainment/progress, which are attributable to the parenting that the child is receiving and the parent has consistently failed to cooperate with services at the early help level to address this • There are significant concerns that the child's educational needs are not being met • Inadequate stimulation leading to significant delay **Health:** • Serious physical and emotional health concerns that are consistently not addressed by the parent e.g. failure to thrive, seriously obese/underweight, serious dental decay, persistent and high risk substance misuse, acute mental health problems including self-harming behaviour, risk of suicide, specific physical or medical conditions which require specialist interventions • Concern about serious unexplained injury • Persistent presentation to professional with injuries: raising concerns about safety / parental behaviour • Child is at serious risk of FGM and/or there is evidence of FGM **Social, emotional, behaviour, identity:** • Serious persistent offending behaviour attributable to neglectful absent parenting • Allegations of child on child sexual harmful behaviour • Serious concerns that a child is being sexually exploited • Child under 15 (legal age of consent in Thailand) is pregnant where there are significant social family concerns • Safety and welfare seriously compromised by gang involvement and parents failure to manage these significant risks • Complex mental health issues requiring specialist interventions which are consistently not being adequately managed by the parent • Frequently goes missing from home for long periods which seriously compromises the child's safety and wellbeing • Child emotional and physical safety is compromised by exposure to radicalization and extremist ideology • Child is engaging in cyber activity that places them at risk of harm from others and is not managed by the parent • Child goes missing and child's age/level of vulnerability means that welfare and safety is seriously compromised	**Immediate safeguarding concerns / child protection** If a child is at risk of physical, emotional, sexual abuse, or neglect refer to Department for Children and Youth and/or the police. After any immediate protective action has been taken you need to speak in person to those who have taken the protection action. When referring a child and or family to the Department for Children and Youth and/or the police you should share a copy of the Wellbeing Assessment and Plan so they have all relevant background information. **Key agencies that may provide support at this level:** Department for Children and Youth Police Targeted drug and alcohol information, advice and education Schools including SEND support Early years childcare settings Doctors

	Self-care and independence: • Severe lack of age appropriate behaviour and independent living skills likely to result in significant harm	Midwifery Dentist Opticians Mental health services Specialist health or disability services EAL School nursing School counselling service Police Voluntary & community sector Online counselling services
	Family and environmental factors	
	Housing, employment and finance: • Clear evidence that a family is destitute	
	Social and community resources: • High levels of domestic violence that put the child at serious risk • Imminent risk of parental/carer and child relationship breakdown leading to child needing to be looked after by others • Child is a young carer and this is significantly impacting on their development and welfare • There are indicators that a child/young person is at risk of honour based violence or forced marriage • Parental illness or disability resulting in inability to provide basic care leading to serious neglect of the child's needs • Concerns about inter-sibling violence and aggression which does result in significant emotional or physical harm and is not managed by the parent • Child is subjected to physical, emotional, sexual abuse or neglect • Persistent but unsubstantiated concerns about physical, emotional or sexual abuse • Child is looked after by a guardian (similar to private fostering in the UK) • There is nobody with parental responsibility to ensure the child's Wellbeing and stability of care • Unaccompanied minors • Trafficked children	
	Parents and carers	
	Basic care, safety and protection: • Parents mental health or substance misuse seriously compromises the health, welfare and safety of the child • Parent has history of being unable to care for previous children • Parent has a severe physical or learning difficulty that seriously compromises their ability to meet their child's basic needs • Parental disclosure of serious harm to the child • Parent is unable to assess and manage serious risk to the child from others within their family and social network	
	Emotional warmth and stability: • Inconsistent parenting significantly impacting on emotional or behavioural development	
	Guidance boundaries and stimulation: • Consistent lack of effective boundaries set by the parent leading to risk of serious harm to the child	

Rugby School Thailand Wellbeing & Assessment Plan

RESPONSIBLE SAFEGUARDING TOGETHER

About the RST Wellbeing Assessment

- At Rugby School Thailand we want all children to have the best start in life, to enable them to reach their full potential. Sometimes children and families need additional support to achieve this.
- The aim of this Wellbeing Assessment is to help understand what is going on and to decide the best way forward.
- The DSL needs to sign off the assessment before it is shared with the parent or child.

How to include everyone's views in the Wellbeing Assessment

- In order to understand what everyone needs to move forward, a restorative approach can help us hear everyone's perspective and ensure that people can take ownership of the plan. It is important to consider a family's strengths as well as needs.
- It is important that each individual child can share their view.

When conducting this Wellbeing Assessment, staff are encouraged to:

1. Listen respectfully and impartially and support everyone to feel comfortable to share their views.
2. Repeat back / summarise / check to make sure they have heard and understood.
3. Record what has been said and then check with the parent/carer or child that this accurately reflects their views amending as necessary.
4. Use TED (Tell Me, Explain, Describe) to support your conversations and ensure you use the 'prompt sheet' provided.

Name of Student:

Name of Professional:

Please comment on how things are going for the child:

What has led to this assessment taking place? What could be better and why?
What is working well? What support do you have in place currently?

Child / Young Person's View

Name of Student: Name of Assessor:

Please use the prompts at the end of the form to help fill in this section.

Areas of your life	**What could be better and why?** Think about what's important to you and your family. What could be better? What would help you?	**What's working well?** This is where you record the good stuff! Think about what you're good at; your successes. Who looks after you and helps with problems?
Home What is it like at home? Are you comfortable, safe? Are you alone?		
Family relationships How do you feel about your family?		
School How do you feel about school?		
Social What are your hobbies? Describe your friendships?		

Health and Wellbeing Who helps you stay healthy? Who can you talk to about your feelings?		

Enter details below of who is in the student's family, who lives at home and how they care for the student.
Enter details of student's family history below including information about important things that have happened.

Parent / Primary Carer's View

Name of Parent / Carer:

Name of Assessor:

Please use the prompt sheet at the end of the form to help fill in this section

Areas of your life	What could be better and why? Think about what's important to you and your family. What could be better for you and your children? What are some of the challenges you face as a parent?	What's working well? Look at what is working well now and what has worked well in the past. Have you received any support that has been helpful from any agencies?
Home & Family relationships		
Work		
School - how do you feel about your child's school		
Social - family friends - support network		

Health and Wellbeing - health needs - emotional wellbeing		

Enter details below of who is in the family, who lives at home and how they care for the child.
Enter details of family history below including information about important things that have happened.

Wellbeing Action Plan

What needs to change? Set actions that will have positive outcomes for the student, decide who will lead on the action and what the outcomes will be.

Remember you should set specific actions that are easy to measure, achievable, realistic and timely, which can support positive change.

DATE PLAN:

DATE OF REVIEW:
(as a minimum the plan should be reviewed every term)

What will the outcome be? (BENEFIT)	What needs to be done? (ACTION)	Who will do it?	Who will help?	By when?
EXAMPLE Childs attendance will go above 90%	EXAMPLE Get up earlier to prepare for day. Family member to make breakfast and support getting child to school. Have a meeting where relationship breakdown has taken place.	Mrs EXAMPLE (Mother) Mr EXAMPLE (Father)	Mrs EXAMPLE (Teacher)	

Prompt Sheet for wellbeing assessment

When collecting views of the different people in the family, sometimes all you need to do is listen. But sometimes it can help to have prompts. This can also ensure that important issues are not missed.

Home and Family Relationships

- *Any significant life events? (death of a family member, house move, new partners)*
- *What is the current housing situation? E.g. private rental, any arrears?*
- *Are there family member(s) who struggle with their mental health problems, alcohol or drug dependency?*
- *Has there been any historical or any ongoing domestic abuse?*
- *Have there been known concerns about child neglect or abuse?*
- *Home environment; what's good / bad about it?*
- *Does the child have safe space and what they need to develop?*
- *What are parent/child/ren relationships like? Warmth? Routines? Consistency? Boundaries?*
- *How do the child/children behave at home?*
- *Who are the family members who understand your concerns and who will support you, who are they?*
- *For the child: Do you like where you live? Do you have your own space? What is your space like?*

Work

- *Are parents / older children employed? If not, what would help?*
- *How are you managing financially?*
- *Are you able to provide for your family's basic needs? What needs to change?*
- *What aspirations do the adults/older children have?*

School

- *Is the child persistently absent from school/missing?*
- *Are they achieving academically? What could help?*
- *How do child/ren behave at school? Triggers of behaviour?*
- *For the child: How do you feel about school? What are the best and worst bits?*

Social

- *Are there difficulties which make things worse for you or the child/children?*
- *Any anti-social behaviour or crime impacting your family?*
- *What support networks help the family?*
- *Do you have good friendships? What do you like doing in your spare time?*
- *Any concerns about emerging threats such as criminal or child sexual exploitation?*
- *Do you feel safe? Who are your safe people/places?*
- *For the child: Do you feel safe? Are you engaged in any hobbies? Do you have good friends?*

Health and Wellbeing

- *Are the child/ren clean, hygienic, well fed, over fed?*
- *How often are visits made to the doctor and dentist?*
- *Speech, language and communication skills? Any other additional health needs? Sexual health needs?*
- *Are there problems for adults about emotional wellbeing?*
- *Are the emotional needs of the child/ren met?*
- *Are there any caring tasks that pose a risk to the child? Or is the amount/type of care the child is providing impacting, or likely to impact on their health, development, education, social opportunities?*
- *For the child: Do you have any illnesses, health problems or disability? Who helps you stay healthy? Are there things that make you feel angry/sad? Who can you talk to?*

These are not exhaustive prompts but there as a guide to support a full understanding of the family/child's world

APPENDIX 8: Child Protection Risk Assessment Form

RUGBY SCHOOL
THAILAND

CHILD PROTECTION RISK ASSESSMENT

Assessment carried out by	
Assessment Number	
Date of Assessment	

Persons at risk
Details of the activity and potential risks
Control measures in place
Extra Control Measures – Be Healthy
Extra Control Measures – Stay Safe
Further control measures recommended
Who needs to know about these findings

Action completed by	
Signature	
Date	
Review date	

Designated Safeguarding Lead Checklist When Managing Child Protection Concerns.

Questions to ask	Comments	Yes/No
Have you been able to speak to the child and explain what happens next?		
Does the child have special educational needs and require specific form of communication / interpretation?		
Are there any reasons why the child may resist support? Are they being controlled by another?		
Where is the child now?		
Where are they in the next 24 hours?		
Is child at immediate risk of harm?		
If yes what have you done about this?		
If child is to return home and there remain concerns for their safety have you discussed a Safety Plan with the child and or others who may be in the home? This could involve asking a family friend to pop by or providing the child with an emergency number to call if the situation at home deteriorates.		
What information do you have about the family/carer?		
Are there any other services involved and have you spoken to them?		

Do you need to complete a Wellbeing Assessment? Have you done this?		
Have you contact the Dept for Children and Youth and/or the police?		
Have you contacted the relevant embassy?		
If you have had no response from the DCY/Police have you contacted Child Line?		
Have you consulted with the CPSRA & Principal?		
If threshold of significant harm is met have you contacted the Designated Safeguarding Governor?		
Have you talked with the person who has referred the situation to you to gather all the information?		
Are there siblings at risk of harm? If yes what have you done about this?		
If a decision has been made to contact the parent/carer, give brief details.		
If a decision has been made not to contact the parent/carer, give brief details.		
If a decision has been made to inform setting staff, what information has been given and to whom?		
Have you followed your settings procedures and recorded everything onto MyConcern?		
How and when are you monitoring the situation?		

Have you arranged as appropriate a meeting with the parents, including the Principal no later than 24 hours of the alleged abuse being disclosed?		
What else do you need to do?		

NOTES

RUGBY SCHOOL
THAILAND

All schools are required to appoint a member of the Senior Leadership Team to coordinate child protection arrangements and to ensure that there are appropriate cover arrangements.

The Designated Safeguarding Lead (DSL):

- is a senior member of staff from the School's leadership team and therefore has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff
- takes lead responsibility for safeguarding and child protection (including on-line safety) in the School, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies. The role and responsibility is explicit in the role holder's job description.
- is appropriately trained, receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role
- acts as a source of advice, support and expertise to the School community
- encourages a culture of listening to children and taking account of their wishes and feelings
- is alert to the specific needs of children in need, those with special educational needs and young carers
- has a working knowledge of locally agreed multi-agency safeguarding arrangements and procedures
- has an understanding of the early help process to ensure effective assessment and understanding of children's additional needs in order to inform appropriate provision of early help and intervention
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from, the student's general file
- refers cases of suspected abuse to Department Children and Youth or the Police as appropriate
- ensures that, when a student moves to a new school all child protection records are passed to the new school (separately from the main student file and ensuring secure transit) and confirmation of receipt is obtained. If the child is the subject of an open case to Department for Children and Youth, the students's social worker is also informed
- attends and/or contributes to strategy meetings and multi-agency meetings
- co-ordinates the School's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies including the local safeguarding partnership
- ensures that all staff sign to indicate that they have read and understood the Safeguarding and Child Protection policy; Staff Code of Conduct; Speak Up/Whistleblowing Policy; and the Behavioural Management Procedures
- has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted
- ensures that the child protection and safeguarding policy and procedures are reviewed and updated at least annually, working with the whole school community

of students, parents, staff and governors regarding this
- liaises with the nominated governor and Head
- keeps a record of staff attendance at child protection training
- makes the Safeguarding and Child Protection Policy available publicly on the School website
- ensures parents are aware of the School's role in safeguarding and that referrals about suspected abuse and neglect may be made
- ensures that the School holds more than one emergency contact number for every student
- ensures that the Head is aware of the responsibility under *Working Together* to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Department for Children and Youth, Education Ministry, Relevant Embassy and to the Disclosure and Barring Service (DBS) as appropriate.

The Deputy Designated Safeguarding Lead(s)
Are appropriately trained to the same standard as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of students. The role and responsibility is explicit in the role holder's job description. In the event of the long-term absence of the DSL, the deputy will assume all of the functions of the DSL as above.

RUGBY SCHOOL
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RST VISITOR CODE OF CONDUCT

RST values and welcomes the rich learning experiences the wider community provides for all of us. The following code outlines the general minimum conduct expectations for ALL visitors to RST. This code is intended to promote a positive environment which supports our child safeguarding policies and practices.

1. Visitors are expected to wear their ID badge so that it is clearly displayed at all times.
2. Visitors must not be alone with any students.
3. Visitors must avoid physical contact with students.
4. Visitors are expected to act and speak in a kind and respectful manner, particularly around young people.
5. Visitors are expected to use designated adult facilities, not student facilities (e.g., toilets, changing rooms).
6. Visitors are expected to treat others in a professional manner and with respect, upholding high standards of personal behaviour.
7. Visitors 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. Visitors must pass on the information immediately to a member of staff.
8. Visitors should not accept money or gifts from students, or offer money or gifts to students.
9. Visitors are expected to seek permission from a member of staff before taking images / videos of students.
10. Visitors 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.

By signing below, you acknowledge your agreement to the RST Visitor Code of Conduct as outlined above. If there is any violation of this Code of Conduct, you may be asked to leave the campus.

If you have any questions or concerns related to child safeguarding, please contact safeguarding@rugbyschool.ac.th or see a member of staff at Reception.

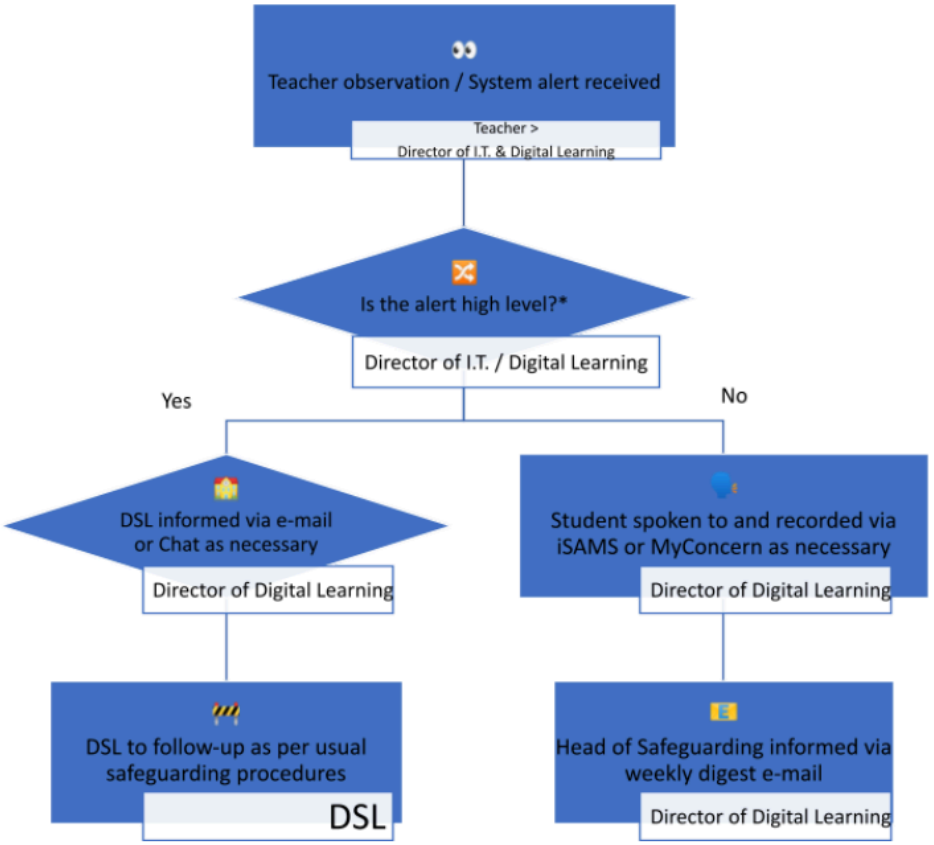
_____ _____

Full Name Signature

_____

Date

APPENDIX 12: Filtering and Monitoring Alerting Flowchart



*An alert is classed as “high level” if the action of the student indicates that themselves or others may be at immediate risk of harm or are initiating in illegal / dangerous activities EG: vaping, pornographic material etc.