

# THE BRITISH SCHOOL OF BAHRAIN



## Safeguarding & Child Protection Policy

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## **BSB SAFEGUARDING & CHILD PROTECTION POLICY**

The British School of Bahrain recognises our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of Abuse and neglect and follow our procedures to ensure that children receive adequate support, protection and justice. Child protection forms part of the School's safeguarding responsibilities.

The School is committed to safeguarding and promoting the welfare of children and young people, from Nursery to Year 13. We expect all staff (teachers, administrators, clerical and support staff, directors) to share this commitment in their attitudes and actions. Such a determination is firmly based on the fact that child protection and safeguarding are everyone's responsibility. Parents are made aware of the Policy: it is on the School website. The Policy will be amended and improved, without delay, in the light of experience, learning from implementation and any changes arising from serious case reviews.

### **Child protection and safeguarding & promoting welfare.**

Child protection, safeguarding and promoting the welfare of children is defined for the purposes of this Policy as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in the circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes. In this connection, safeguarding is an overarching term which encompasses all activities regarding the safety and wellbeing of children under the age of 18 years.

Staff should not see child protection and safeguarding as isolated concepts but as features that run across a wide range of policy areas. These include:

- IT acceptable use policy;
- Behaviour and sanctions policy;
- Anti-bullying policy;
- Health and safety policy;
- Admissions and attendance policy;
- Staff code of conduct.

## **School Details**

### **Designated Safeguarding Leads (DSLs)**

Designated Safeguarding Lead, BSB Senior School:

Mr W Ridgway (Head of Seniors), member of SLT

Designated Safeguarding Lead, BSB Junior School

Mr R Howe (Head of Juniors), member of SLT

Designated Safeguarding Lead, BSB Infant School & Designated EYFS Lead

Mrs J Gilbert (Head of Infants), member of SLT

Designated Safeguarding Lead, Academies & Holiday Camps

Mrs K Estero (Head of Business Development), member of SLT

### **Designated Safeguarding Leads**

Deputy Designated Safeguarding Lead (DDSL) BSB Whole School:

Mr J Maguire (Executive Headmaster)

#### ***Senior School***

Deputy Designated Safeguarding Lead (DDSL) BSB Senior School

Ms L Jones (Deputy Head), member of SLT

Deputy Designated Safeguarding Lead (DDSL) BSB Senior School

Mr K Winstanley (Deputy Head), member of SLT

#### ***Junior School***

Deputy Designated Safeguarding Lead (DDSL) BSB Junior School:

Mrs S Arouche (Deputy Head), member of SLT

Deputy Designated Safeguarding Lead (DDSL) BSB Junior School:

Mr L Connor (Deputy Head), member of SLT

#### ***Infant School***

Deputy Designated Safeguarding Lead (DDSL) BSB Infant School:

Ms Stacey Clarke (Deputy Head), member of SLT

Deputy Designated Safeguarding Lead (DDSL) BSB Infant School & DDSL for EYFS

Ms Devika Nanda (Deputy Head), member of SLT

### **Safeguarding Board of Trustees Member**

Mr J O'Connor, Inspired Middle East & Africa Educational Director

## 1.0 Introduction

- 1.1 This Policy is based on best practice in the U.K. and comparable British international Schools and in line with benchmark publications on Child Protection: “Working Together to Safeguard Children - WTTSC” (2018), “Keeping Children Safe In Education” (2021).
- 1.2 In the absence of a specific statutory provision on safeguarding and local government agencies, the School will work with local non-governmental agencies in the area of child welfare and child protection.
- 1.3 This Policy has been prepared in consultation with the Leadership Team and the Education Committee of the Board of Trustees at BSB. The Board of Trustees will review the Policy on an annual basis and the efficiency with which child protection duties have been carried out. The review should involve knowledge of any live cases and how the Policy was applied to them.
- 1.4 The BSB Board of Trustees takes seriously its responsibility to protect children from harm, safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within the School to identify, assess, and support children who are suffering harm (whether actual or likely), children in need and children at risk.
- 1.5 We recognise that all adults, including Staff and Board members, have a full and active part to play in protecting students from harm, and that the child’s welfare is our paramount concern. Wherever the word “Staff” is used, it covers ALL Staff on-site, including Support Staff working with children. To this end, this Policy has been translated from English to Arabic and Safeguarding training has occurred with all ancillary, security and administrative staff.
- 1.6 All staff have a duty to promote a caring, protective and safe environment that fosters the social, physical and moral development of the individual child.

## 2.0 Aims

- 2.1 The aims of this Policy are:
  - 2.1.1 Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children;
  - 2.1.2 Raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
  - 2.1.3 Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of Abuse;
  - 2.1.4 Supporting students who have been identified as in need of early help or at risk of harm
  - 2.1.5 Establishing a safe environment in which children can learn and develop.
- 2.2 We recognise that because of the day-to-day contact with children, school staff are well placed to identify concerns early and to observe the outward signs of Abuse. The School will, therefore:

- 2.2.1 Establish and maintain an environment where children feel safe, secure, valued and respected and encouraged to talk, believing they will be listened to;
  - 2.2.2 Ensure children know that there are adults in the School whom they can approach if they are worried;
  - 2.2.3 Including opportunities in the curriculum, specifically through PSHE, Computing and I.T. for children to develop the skills they need to recognise and stay safe from Abuse and to know whom they should turn to for help.
- 2.3 We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm. To this end, we will ensure:
- 2.3.1 There are systems in place for children to express their views and give feedback, e.g. through school/class councils, safety questionnaires, participation in anti-bullying and e-safety events;
  - 2.3.2 That the child's thoughts/wishes, and feelings are sought and recorded on all referrals.
- 2.4 To support each child's development in ways that will foster security, confidence and independence.
- 2.5 To provide an environment in which all children and young people feel safe, secure, valued and respected, and also feel confident to approach adults if they are in difficulties, believing they will be effectively listened to.
- 2.6 To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of Abuse.
- 2.7 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the School, contribute to assessments of need and support packages for those children.
- 2.8 To emphasise the need for good levels of communication among all members of staff.
- 2.9 To develop a structured procedure within the School, which will be followed by all members of the School, in cases of suspected Abuse or where there are significant concerns about the wellbeing of a child. This means that any disclosure or suspicion of Abuse will be reported to a **Designated Safeguarding Lead (DSL)**, who is in turn responsible for informing the **Executive Headmaster**. Where there is reasonable cause and Abuse has been suspected, the Executive Headmaster will ensure that the **Chairman of the Board (COB)** is informed and those relevant external agencies are contacted.
- 2.10 To develop and promote effective working relationships with other local welfare agencies as appropriate within Bahrain.
- 2.11 To ensure that all adults within the School who have regular access to children have been

checked as to their suitability to work unsupervised with children.

### **3.0 Procedures**

- 3.1 Our School procedures for safeguarding children have been prepared in accordance with guidance issued by the U.K. and Bahraini governments. As such, we ensure that:
- 3.1.1 All members of the Board of Trustees understand and fulfil their responsibilities.
  - 3.1.2 The School will:
    - 3.1.2.1 Ensure it has a Senior Leader nominated as a Designated Safeguarding Lead (DSL) who will undertake regular, appropriate training and support for this role.
    - 3.1.2.2 Ensure that there is a designated member of staff with responsibility for safeguarding children within the EYFS.
    - 3.1.2.3 Ensure it has a member of staff who will act in the absence of the DSL.
    - 3.1.2.4 Ensure it has a nominated Board of Trustees member who will take leadership responsibility for the School's safeguarding arrangements
  - 3.1.3 Child Protection Awareness information, to develop their understanding of the signs and indicators of Abuse, along with individual responsibilities. Training of School Staff (full and part-time) occurs at regular intervals and in line with any changes to statutory guidance. The annual induction programme covers the Child Protection Policy and procedure for all new staff; it also includes a copy of part 1 and Annex A of KCSIE (Sept 2019). The School does use volunteers from time to time. In such cases, we endeavour to obtain safeguarding checks. In any case, volunteers are only allowed to work with children under the supervision of a BSB teacher.
  - 3.1.4 All members of staff and the designated Board member are advised on how to respond to 'Disclosures of Abuse'.
  - 3.1.5 Ensure every member of staff (including temporary and supply staff and volunteers) and knows the name of the DSL and any deputies and understands their role;
  - 3.1.6 Ensure that the DSL and/or a deputy DSL is always available to speak to during school hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
  - 3.1.7 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the School's Safeguarding Policy, and reference to it in our introductory School pack. Parents have access to the Policy on the School website
  - 3.1.8 Operate a lettings policy which ensures the suitability of adults working with children on school sites at any time; ensure that community users organising activities for children are aware of, and understand the need for compliance with, the School's child protection guidelines and procedures.
  - 3.1.9 Community users organising activities for children must present evidence that they have carried out checks on staff.
  - 3.1.10 We ensure that our selection and recruitment of staff includes checks for their suitability with the Disclosure & Barring Service (DBS), at an enhanced level when sourcing Staff from

the U.K. Operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training;

- 3.1.11 All teachers will be required to have the following checks:
  - 3.1.11.1 Enhanced DBS check or local police check;
  - 3.1.11.2 Two references followed by process of verification,
  - 3.1.11.3 Copy of passport or identity card,
  - 3.1.11.4 Statement of medical fitness;
  - 3.1.11.5 Up-to-date application form.
- 3.1.12 Where a DBS check is not possible, in cases where teachers have not been in the U.K. for more than three years, staff will be required to submit to a police check from the country they are leaving.
- 3.1.13 Where staff are sourced from non-UK areas, equivalent checks will be made, and recruitment agencies will be expected to perform DBS style checks, and referees will be asked to comment explicitly on a candidate's suitability vis-à-vis child protection matters. In addition, a 'police certificate of character' will be required. All references will be verified before the interview.
- 3.1.14 Ensure that a referral is made to the Bahrain visa department, the LMRA, the ISA, the DBS and the DFE, COBIS and BSME if a person in regulated activity has been dismissed or suspended or removed from a regulated activity where the harm criteria are met, due to safeguarding concerns, or would have been, had they not resigned. Such referrals will always be given priority and will be done promptly and made within at least one month of the person leaving our employment. We ensure that any member of staff found not suitable to work with children will be reported to the appropriate bodies, i.e. This will occur as soon as possible and/or within one month of them leaving the School.
- 3.1.15 Our procedures and the way they have been implemented are reviewed annually by the Board of Trustees.
- 3.1.16 Ensure that the Board of Trustees undertake an annual review of the School's child protection policies and procedures and of the efficiency with which the related duties have been discharged in accordance with current legislation
- 3.1.17 3.3 The names of the entire Safeguarding Team are clearly posted around the School, including in the staff room.
- 3.1.18 All new members of staff are given a copy of our Safeguarding Policy, with the DSLs' names clearly displayed, as part of their induction into the School.
- 3.1.19 All staff are required to read and sign the Policy annually.
- 3.1.20 Adults should not be taking images of children unless they fall within the framework of our school policies.

## **4.0 Training**

- 4.1 When staff and volunteers join BSB, they will be informed of the safeguarding children arrangements in place. This Policy will be referred to, and they will be told who the DSL in each part of the School is and who acts in their absence and what this role includes.
- 4.2 Staff are required to read this Policy including its Appendices, the Rewards, Behaviour and Sanctions policy, the current Keeping Children Safe in Education Part 1, the School Staff Code of Conduct
- 4.3 All Staff, volunteers and Board of Trustee members will receive an induction in Safeguarding Children.
- 4.4 The induction programme will include basic safeguarding information relating to signs and symptoms of Abuse, how to manage a disclosure from a child and when and how to record a concern about the welfare of a child, advice on safe working practice, the School's Safeguarding Children's Policy, the Staff Code of Conduct Policy, the identity of the DSL and a copy of Part 1 (including Annex A) of Keeping Children Safe in Education.
- 4.5 All volunteers, supply staff and regular visitors to the School will be told where the Policy is kept and given the name of the DSL and deputies and informed of the School's procedures in reporting concerns. A leaflet summarising the key issues for volunteers and regular visitors will also be available at security
- 4.6 All staff will receive training in child protection and safe working practice, updated at least every three years. Training will include signs and symptoms of Abuse and neglect, as well as specific safeguarding issues. It will also include how to record and report Abuse both within School and to Children's social care.
- 4.7 In addition, staff will receive safeguarding and child protection updates from each DSL as required, but at least annually.
- 4.8 Staff with specific responsibility for safeguarding children will undertake additional training at a level suitable to their role and responsibility, updated every two years. In addition to formal training, the DSL and deputy/ies will update their knowledge regularly.

## 5.0 Responsibilities

- 5.1 The Board of Trustees is responsible for the appointment, liaison and monitoring of DSLs, in discussion with the Executive Headmaster. This will include a periodic review to ensure that effective training has occurred.
- 5.2 The Board of Trustees and the Executive Headmaster will ensure that:
- 5.2.1 The DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility;
  - 5.2.2 The DSL and Deputy DSL role is explicit in the role holders' job descriptions;
  - 5.2.3 Safeguarding policies and procedures are in place, available to parents on the school website or by other means and reviewed annually;
  - 5.2.4 Safeguarding responses are put in place in cases where children go missing from education.
  - 5.2.5 Mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one (including Annex A) of Keeping Children Safe in Education.
  - 5.2.6 Annual report on the effectiveness of the School's safeguarding procedures are presented to the Board of Trustees
- 5.3 The Executive Headmaster will ensure that:
- 5.3.1 The Safeguarding policies and procedures are fully implemented and followed by all staff.
  - 5.3.2 Sufficient funding, support, time and resources are allocated to enable the DSL and other Staff to discharge their responsibilities with regard to child protection.
  - 5.3.3 All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures.
- 5.4 The Designated Safeguarding Leads are responsible for:
- 5.4.1 Organising child protection induction training for all newly appointed staff, volunteers and whole staff training, refreshed at least every two years with annual updates as required;
  - 5.4.2 Staff are aware of the Policy and have signed to this effect.
  - 5.4.3 Providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education.
  - 5.4.4 Undertaking, in conjunction with the Executive Headmaster and Safeguarding Board of Trustee member, an annual audit of safeguarding procedures.
  - 5.4.5 Providing an annual report for the Board, detailing any changes to the Policy and procedures; training undertaken by the DSL and by all Staff and Board members; the number and type of incidents/cases, and the number of children on the safeguarding register (referred to anonymously). This information will be used by the Board in conducting its annual review of the Policy, procedures and operation.
  - 5.4.6 The DSL will contact the Police in the case of serious harm as appropriate.

- 5.4.7 Liaising with the Executive Headmaster to ensure that they are informed of all child protection issues, especially ongoing enquiries.
- 5.4.8 Liaising with other staff (for example pastoral support staff, school nurses or counsellors, ICT technicians, Head of Year) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- 5.4.9 Keeping written records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately. Note staff must only view parts of a child's body which are normally visible.
- 5.4.10 Ensuring all child protection records are kept securely, separate from the main student file, and in locked/password-protected locations.
- 5.4.11 Ensuring that all child protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of the country and that a receipt of transfer is obtained.
- 5.4.12 Monitoring unauthorised absence, particularly where children go missing on repeated occasions.
- 5.4.13 Developing effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious.

## **6.0 Procedures for Managing Concerns**

Teachers and other staff in schools are in a unique position to observe children's behaviour over time and often develop close and trusting relationships with students.

6.1 If a child discloses directly to a member of staff, the following advice to staff will be followed:

- 6.1.1 Listen carefully to what is said.
- 6.1.2 Do not promise confidentiality.
- 6.1.3 Ask only open questions such as:
  - 'Could you tell me what happened?'
  - 'Please explain what you mean when you say....?'
  - 'Can you describe the person? or Can you describe the place?'
- 6.1.4 Do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the Abuse, e.g. 'Did your Dad hit you?'
- 6.1.5 Do not force the child to repeat what he/she said in front of another person.
- 6.1.6 Do not begin an investigation – for example, by asking the child to record what happened in writing or taking a photograph of any injuries.

6.2 All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing, in full, on the school's Concern Form.

- 6.2.1 The record should include the date and time of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it.

- 6.2.2 Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead ('DSL') or their deputy).
- 6.2.3 Where there is a safeguarding concern, the School will ensure the student's wishes and feelings are considered when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence.

6.3 The School manages this by providing: -

- 6.3.1 Vigilance: good relationships with staff will mean adults notice when things are troubling children.
- 6.3.2 Understanding and action: all aspects of the process or procedures will be explained to children and staff will listen to concerns and worries raised, with action taken where appropriate because of this.
- 6.3.3 Stability and support: a member of staff will be assigned as a point of contact for children to be able to develop an on-going stable relationship of trust with those helping. Children are supported in their own right as well as a member of their family.
- 6.3.4 Respect: there is the understanding from staff that children are competent and are treated with respect.
- 6.3.5 Information, engagement and explanation: children are informed about and involved in procedures, decisions, concerns and plans. Children are informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response.
- 6.3.6 Advocacy: Staff will accompany children to any meetings and conferences to provide them with advocacy to assist them in putting forward their views

6.4 Every member of staff, including volunteers working with children at our School, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this Policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

6.5 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or Disclosure of Abuse. More often, however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional Abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this Policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. Reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

- 6.6 It is not the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this Policy.
- 6.7 The Designated Safeguarding Leads (DSL) should be used as the first point of contact for concerns and queries regarding any safeguarding concern in our School. Any member of staff or visitor to the School who receives a disclosure of Abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to a DDSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of the Senior Leadership Team.
- 6.8 All concerns about a child or young person should be reported without delay, and a hand-written record should be made as soon after the Disclosure as possible, using the child's words as far as possible, and on the proforma given in this Policy. Members of Staff are also able to log a concern via the School's electronic safeguarding system.
- 6.9 Following receipt of any information raising concern, the DSL will consider what action to take, and all information and actions taken, including the reasons for any decisions made, will be fully documented.
- 6.10 Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration by raising concerns again with the DSL and/or the Executive Headmaster. Concerns should always lead to help for the child at some point.
- 6.11 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this Policy should raise their concerns with the Executive Head, Safeguarding Board of Trustee member.

## **7.0 Children Missing Education (CME)**

- 7.1 We recognise that a child going missing from education is a potential indicator of Abuse or neglect.
- 7.2 Staff are made aware of these procedures at induction and through our Attendance Policy. We will make every attempt to obtain more than one emergency contact number for each child registered at the School to ensure we are able to make contact with a responsible adult when a child is missing education and is also identified as a welfare and/or safeguarding concern.
- 7.3 We will ensure that we inform the local authorities when removing a child from the school roll at standard and non-standard transition points.

7.4 We will ensure that we follow these procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of Abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

## **8.0 Domestic Abuse**

8.1 We recognise that 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.

8.2 Domestic Abuse affecting young people can also occur within their personal relationships as well as in the context of their home life.

8.3 We will ensure that our students are educated to ensure they understand what a healthy relationship looks like.

8.4 All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the young person and make referrals where the threshold for intervention is met.

## **9.0 Radicalisation and Extremism**

9.1 The School recognises that children are vulnerable to extremist ideology and radicalisation. We recognise that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability in today's society.

9.2 The School will ensure that:

9.2.1 Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism are, why we need to be vigilant in School and how to respond when concerns arise.

9.2.2 There are systems in place for keeping students safe from extremist material when accessing the Internet in our School by using effective filtering and usage policies.

9.2.3 The DSL has received Prevent training and will act as the point of contact within our School for any concerns relating to radicalisation and extremism.

9.2.4 Through our curriculum, we will promote the moral, social and cultural development of all students.

9.3 We encourage students to respect the values of the Kingdom of Bahrain, including the rule of law, the King's Charter, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

9.4 We will use relevant information, tools and resources to help our staff and parents to recognise and address extremism and radicalisation in young people.

## **10.0 'Honour Based' Violence and Female Genital Mutilation (FGM)**

10.1 We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training.

10.2 If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for liaison with Police and children's social care.

10.3 Where FGM has taken place, the school will report to the Police where they discover (either through Disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement as needed.

## **11.0 Modern Slavery**

11.1 All staff should observe for signs or receiving intelligence relating to modern slavery.

11.2 The School bears the obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'.

11.3 Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery.

## **12.0 Peer on Peer abuse (including sexual violence & sexual harassment)**

12.1 We recognise that children are also vulnerable to physical, sexual and emotional Abuse by their peers or siblings.

12.2 This is most likely to include, but not limited to:

12.2.1 Bullying (including cyberbullying)

12.2.2 Physical Abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.

12.2.3 Sexual violence

- 12.2.4 Sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of Abuse);
- 12.2.5 Upskirting, which typically involves taking a picture under a person's clothing without them knowing to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- 12.2.6 Sexting (also known as youth produced sexual imagery)
- 12.2.7 Initiation/hazing type violence and rituals.

12.3 Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the Abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such Abuse will always be taken as seriously as Abuse perpetrated by an adult, and the same procedures will apply in respect of any child who is suffering or likely to suffer significant harm.

12.4 Staff must never tolerate or dismiss concerns relating to peer on peer abuse, must not pass it off as 'banter', 'just having a laugh' or 'part of growing up'.

12.5 We will ensure, through training, that Staff, volunteers and Board of Trustee members will have an understanding of the range of peer on peer abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and manage such issues. Staff will be given the skills to identify and manage harmful sexual behaviour.

12.6 Staff should be aware that some groups are potentially more at risk, for example, girls, children with SENDA.

12.7 Staff should be aware that such incidents and/or behaviours can be associated with factors outside the School and can occur between children outside the School. Staff, and particularly the DSLs, should always consider the context in which such incidents and/or behaviours occur – this is known as 'contextual safeguarding'.

12.8 Where the Abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our Behaviour and Anti-Bullying policies. It should be noted in accordance with our Anti-Bullying Policy the School will not tolerate the use of the term 'banter' in any way excuse what it deems to be inappropriate references to any person or persons. Where a child discloses safeguarding allegations of a sexual nature against another student in the same setting, the DSL should seek advice before commencing its own investigation or contacting parents. This may mean, on occasions, that the School is unable to conduct its own investigation into such incidents.

12.9 Reports of incidents of sexual violence or sexual harassment will be responded to in line with Keeping Children Safe in Education 2021

12.10 Support for the victims of Abuse will be in line with support outlined in the School's Behaviour and Anti-Bullying policies.

12.11 Depending on the nature of Abuse, the School may need to consider providing measures to protect and support the victim, the alleged perpetrator and other students and/or staff in the School by means of a risk assessment. The risk assessment should be recorded and kept under review.

### **13.0 Racist incidents**

13.1 Our Policy on racist incidents is set out within our separate Anti-Bullying Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

13.2 We maintain a log of racist incidents in School.

### **14.0 Anti-Bullying**

14.1 Our Policy on anti-bullying is set out in our separate Policy Anti-Bullying Policy.

14.2 To allow or condone bullying may lead to consideration under child protection procedures.

14.2.1 All incidences of bullying, including cyber-bullying, racist, homophobic and gender-related bullying, will be dealt with in accordance with the School's Anti-Bullying Policy.

14.3 We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in School.

14.4 We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Police.

### **15.0 Online Safety / E-Safety**

15.1 The DSLs understand the unique risks associated with online safety and have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School.

- 15.2 The DSLs are able to recognise the additional risks that children with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and have the capability to support SENDA children to stay safe online.
- 15.3 All members of staff are trained in and receive regular updates in e-safety and recognising and reporting concerns.
- 15.4 The School's Acceptable User Policy recognises that Internet safety is a whole school responsibility, involving staff, students, governors and parents.
- 15.5 Children and young people may expose themselves to danger, whether knowingly or unknowingly when using the Internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal.
- 15.6 The School, therefore, recognises its responsibility to educate its students, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the Internet and related technologies. These issues are addressed within the curriculum, in the PSHE programme and in assemblies.
- 15.7 We will ensure that filters are in place to prevent access to unsuitable sites and we will monitor the use of the school network and Internet to ensure that any student or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported.

## **16.0 Supporting Children**

- 16.1 We recognise that a child who is abused or witness violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.
- 16.2 We recognise that BSB may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 16.3 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 16.4 BSB supports all students by:
- 16.4.1 Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst attempting to counteract aggression and bullying.
  - 16.4.2 Promoting a caring, safe and positive environment within the School.
  - 16.4.3 The school ethos which promotes a positive, supportive and secure environment giving

students a sense of being valued;

- 16.4.4 A consistently applied Behaviour Policy that is aimed at supporting vulnerable students in the School. The School will ensure that the student knows that some behaviour is unacceptable, but they are valued and not to be blamed for any abuse which has occurred
- 16.4.5 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- 16.4.6 Providing access to trained nurses and our school counsellors.
- 16.4.7 Providing continuing support to a student about whom there have been concerns who leaves the School by ensuring that appropriate information is forwarded under confidential cover to the student's new setting.

### **17.0 Special Educational Needs, Disability & Accessibility (SENDA)**

- 17.1 We recognise that children with special educational needs and disabilities can face additional safeguarding challenges, and these are discussed in staff training. These additional barriers can include:
  - 17.1.1 Assumptions that indicators of possible Abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
  - 17.1.2 Children with SENDA and disabilities can be disproportionately impacted by behaviours such as things like bullying without outwardly showing any signs; and
  - 17.1.3 Communication barriers and difficulties in overcoming these barriers.
- 17.2 We will always consider extra pastoral support for children with SENDA to address these additional challenges.

### **18.0 Positive Physical Intervention / Use of Reasonable Force**

- 18.1 The School outlines its guidelines for the use of physical intervention within its Staff Code of Conduct.
- 18.2 All staff acknowledge that they have read the Staff Code of Conduct annually
- 18.3 The School acknowledges that when applying reasonable force in response to risks presented by incidents involving children with SENDA or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.
- 18.4 The School understands that physical intervention of a nature that causes injury or distress to a child may be considered under safeguarding children or disciplinary procedures.

- 18.5 A record of all incidents of physical intervention that occur will be maintained by each DSL
- 18.6 The School recognises that touch is appropriate in the context of working with children, and all staff are given 'safe working practice guidance' to ensure that they are clear about their professional boundaries.
- 18.7 The School recognises that the adoption of a 'no contact' policy could leave staff unable to fully support and protect students.

## **19.0 Record Keeping**

- 19.1 Any member of staff receiving a disclosure of Abuse from a child or noticing signs or symptoms of possible Abuse should make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated and signed, with names printed alongside the signature.
- 19.2 The form for logging a concern about a child's safety or welfare should be completed or via the School's electronic safeguarding system.
- 19.3 All records of a child protection nature should be passed to the relevant DSL, including case conference minutes, child protection plans and written records of any concerns. Child protection records are kept securely under lock and key or password-protected, with only appropriate persons having access to them.
- 19.4 Any referrals made to other agencies will be copied prior to sending and stored in the child's child protection file.
- 19.5 The DSLs / DDSLs will maintain and regularly audit the School's child protection records and ensure that each standalone file includes a chronology of significant events and that information and contact details are accurate and up to date.
- 19.6 The DSLs / DDSLs will transfer the child protection record in a safe and timely manner when a child moves School, ensuring receipt of transfer is obtained.
- 19.7 The DSLs / DDSLs may copy child protection records generated by the School prior to transfer and retain for as long as is necessary where there is justification for believing that the records may be required as evidence of the School's involvement with the child for statutory purposes (e.g.

court cases or serious case reviews). When the records are no longer required, they will be securely disposed of.

## **20.0 Information Sharing & Confidentiality**

- 20.1 The DSLs / DDSLs disclose any information about a student to other members of staff on a need to know basis only, and in accordance with relevant DFE guidance “Safeguarding Children and Safer Recruitment in Education”.
- 20.2 All staff are made aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 20.3 All staff are made aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing. In addition, staff are aware that leading questions must not be asked of children, as this could affect the reliability of statements made.
- 20.4 Personal information will be processed fairly and lawfully in line with our duties under the Data Protection Act 2018 and GDPR and will be held safely and securely. However, we recognise that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.
- 20.5 We recognise that all matters relating to Child Protection are confidential.
- 20.6 The DSL will disclose any information about a student to other members of staff on a need to know basis only.
- 20.7 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 20.8 All staff must be aware that they cannot promise a child to keep secrets that might compromise a child’s safety or wellbeing.
- 20.9 When a child about whom concerns have been raised and recorded leaves the School, the DSLs / DDSLs will consider if it would be appropriate to share information with the new School in advance of the child leaving to ensure that support is in place for when the child arrives.

## **21.0 Communication with Parents**

- 21.1 The School recognises that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.

21.2 The School will always undertake appropriate discussion with parents prior to the involvement of another agency unless to do so might place the child or an adult at further risk of harm or would impede a criminal investigation.

21.3 The School will ensure that parents have an understanding of the responsibilities placed on the School and staff to safeguard children and their duty to co-operate with other agencies in this respect.

## **22.0 Supporting and Supervision of Staff Supporting Staff & Volunteers**

22.1 The School recognises that staff working in the School who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.

22.2 The School will support such staff by providing an opportunity to talk through their anxieties with the relevant DSL and to seek further support such as counselling or regular supervision, as appropriate.

22.3 We will enable supervision for the DSL through network meetings, direct consultation with the Safeguarding Board of Trustees member to:

22.3.1 Promote best practice and challenge unsatisfactory or poor practice.

22.3.2 Reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

## **23.0 Safer Recruitment and Selection of Staff**

23.1 The School has a written recruitment policy statement and procedures linking explicitly to this Policy.

23.2 The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

23.3 The recruitment process is robust in seeking to establish the commitment of candidates to support the School's measures to safeguard children and to deter, identify, reject or identify people who might pose a risk of harm to children or are otherwise unsuited to work with them.

23.4 References are requested and scrutinised for all candidates, and any discrepancies or concerns are raised and discussed during the interview, including for any volunteers and internal candidates.

- 23.5 References are always requested directly from the referee and verified as being from a senior person with appropriate authority; electronic references are checked to ensure they originate from a legitimate source.
- 23.6 Where specific questions have not been answered satisfactorily, or insufficient information is provided, the referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee.
- 23.7 All staff working within the School who have substantial access to children have been checked as to their suitability, including verification of their Identity, qualifications, a satisfactory barred list check, and an enhanced DBS check.
- 23.8 All teachers working within the School have been checked to ensure that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions.
- 23.9 The School seeks written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with our students.
- 23.10 An Enhanced DBS check with barred list check is undertaken for all Board of Trustees.
- 23.11 The School maintains a single central record of recruitment checks for audit purposes, and this is checked and updated regularly and records all the recruitment checks undertaken by the School.
- 23.12 Any member of staff working in regulated activity prior to verification by BSB of their satisfactory DBS Certificate will not be left unsupervised and will be subject to a risk assessment.
- 23.13 Volunteers who are not working in regulated activity will be supervised at all times. A risk assessment will be undertaken to help decide whether or not an enhanced DBS check, without barred list check, is required.

## **24.0 Dealing with Allegations of Abuse against Staff**

- 24.1 We acknowledge that a student may make an allegation against members of staff or volunteers. If such an allegation is made, which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the Executive Headmaster.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)

- 24.2 All School Staff should take care not to place themselves in a vulnerable position with a child. Staff must also ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student. It is always advisable for interviews or works with individual children or parents to be conducted in view of other adults. Specific situations put staff in closer work with students: sports coaching, e-mail or phone communication, School trips. Staff should ensure absolute probity in these specific situations; for example, all communication should always be on a formal level. This includes professional conduct on social networking sites.
- 24.3 Should a student make an allegation against any member of staff, our paramount concern will be for child safety and wellbeing, and the allegation will be treated in strict confidence.
- 24.4 If an allegation is made against a Head of any school, this must be immediately reported to the CEO, Middle East & North Africa and this can be done without informing the Head against whom the allegation is being made.
- 24.5 In all cases of an allegation being made, and prior to undertaking any investigation, the School will immediately consider the nature, content and context of the allegation and agree on a course of action including any involvement of the Police. Discussions will be recorded in writing, and communication with both the individual and the parents of the child/children agreed.
- 24.6 When a report is made to the Disclosure and Barring Service about a teacher, then The Teaching and Regulation Agency will also be contacted, and this includes where a teacher has been dismissed or would have been dismissed had he/she not resigned.
- 24.7 BSB will make every effort to maintain confidentiality and guard against unwanted publicity. In the event of an allegation made against a member of staff, the School is aware of its legal obligations to do its utmost to protect the anonymity of the member of staff during the investigative stage. This legislation is to protect staff in the event that an allegation is found to be unfounded or malicious.

## **25.0 Abuse of a Position of Trust**

- 25.1 The School recognises that as adults working in the School, we are in a relationship of trust with the students in our care and acknowledge that it could be considered a criminal offence to Abuse that trust.
- 25.2 The School acknowledges that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation.
- 25.3 The School recognises that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

## **26.0 Complaints of Concerns expressed by Parents, students, Staff or Volunteers**

26.1 The School recognises that listening to children is an important and essential part of safeguarding them against Abuse and neglect.

26.2 To this end, an expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

26.3 The School will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the School will take but also be given an indication of the length of time that will be required to resolve the complaint.

26.4 The School will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint.

26.5 The School's Complaints Policy is readily available.

## **27.0 Whistle-blowing (Confidential Reporting)**

27.1 The School has a Whistleblowing Policy that staff should refer to.

27.2 The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Thus, all staff should be aware of their duty to raise concerns about the attitude or actions of others.

27.3 Any member of staff may make a referral to external agencies. Staff should report concerns about poor or unsafe practise and potential failures in the School's safeguarding regime. Such concerns can be raised directly with the Heads, Director of Finance or CEO Middle East & Africa

27.4 Whistleblowing concerns about any Head should be immediately reported to the CEO Middle East & Africa directly.

## **28.0 Photography and Use of Images (including hand-held devices)**

28.1 The welfare and protection of children are paramount, and consideration should always be given to whether the use of photography will place children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the Internet, particularly social networking sites.

28.2 For this reason, consent is sought from parents that they agree to their children being photographed

- 28.3 Only school-owned devices are permitted to be used to photograph any child.
- 28.4 Staff are not permitted to use their personal mobile devices or cameras in school.
- 28.5 Staff must only take photographs or video of students (whether on a personal or school device) for legitimate education usage or for publishing on the School's Social Media pages.
- 28.6 Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Executive Headmaster. Staff who act in breach of this may be subject to disciplinary action.
- 28.7 Staff working in the Early Year (for any amount of time) must read and adhere to the relevant section of the E-safety policy and are reminded that mobile phones are not permitted outside of the office and staff room of the Early Year.
- 28.8 Parents and visitors are not permitted to use their mobile phones or camera in or around the Early Years setting without prior approval from the Principal or Head of ELS.
- 28.9 An additional consideration is given to photographing vulnerable children,
- 28.10 Many students own or have access to hand-held devices, and parents are encouraged to consider measures to keep their children safe when using the Internet and social media at home and in the community.
- 28.11 Please also note guidance regarding use of mobile phones and other electronic devices is detailed in the relative Mobile Phone Policies
- 28.12 The safe and appropriate taking, using, and storage of images is outlined in the School's Images Policy.

## **29.0 Staff/student Relationships**

- 29.1 Further guidance for staff is given in the Staff Code of Conduct, which should be read in conjunction with this Safeguarding Policy.
- 29.2 The School provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students.
- 29.3 Staff found to be in breach of these rules may be subject to disciplinary action or a child protection investigation.

### **30.0 Health & Safety**

30.1 The School's Health and Safety Policy reflects the consideration we give to the safeguarding of our children both within the school environment and when away from school, for example, when undertaking school trips and visits.

30.2 Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, the risk to and from children displaying harmful behaviour.

### **31.0 Safe Environment**

31.1 The School undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.

31.2 The School has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours.

31.3 Visitors to the School, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

### **32.0 Staff Obligations and The Duty to Report Concerns**

32.1 All staff including full time, part-time, temporary and permanent members of staff, and volunteers must adhere to the School's Code of Conduct Policy and a copy of this Policy is available to all staff.

32.2 The Code of Conduct Policy provides details about the obligations of staff for keeping the School informed of reasons why they should not work with children.

32.3 Staff should be mindful of the need to consider safeguarding arrangements where children are engaged in a close one to one teaching, particularly in performing arts and sports activities.

32.4 Specific guidance can be provided on a case-by-case basis by consulting with the DSL as required.

### **33.0 Challenge and Escalation**

33.1 The School recognises that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children.

33.2 As part of our responsibility for safeguarding children, BSB acknowledges that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

33.3 BSB are aware of escalation procedures for raising concerns in respect of poor practice and our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

#### **34.0 Monitoring and Evaluation**

34.1 Our Safeguarding Children policy and procedures will be monitored and evaluated annually by:

34.1.1 the annual safeguarding report to the Board of Trustees.

34.1.2 The DSL and DDSLs at each School meet on a regular basis to discuss and review any safeguarding concerns.

34.1.3 The DSLs across the three schools discuss and share best practice.

34.1.4 Scrutiny of data and risk assessments;

34.1.5 Scrutiny of the school's single central record of recruitment checks;

34.1.6 Monitoring of logs of bullying/racist/behaviour incidents and records;

34.1.7 Supervision of staff involved in child protection which includes the DSLs providing the Board of Trustees member with responsibility for Safeguarding with regular updates as required and annual reports to the Board of Trustees

#### **35.0 Elements@BSB**

35.1 BSB hosts extra-curricular activities for students of BSB and others after 16:00 and during holidays.

35.2 This facility is for children attending any of our schools, as well as children that attend schools outside of our organisation.

35.3 When attending the BSB Elements, this safeguarding Policy will apply to all of the children attending the activities.

35.4 The BSB Academies staff will have completed safeguarding training at the school, and the Head of Operations is the trained DSL.

35.5 In addition to this, there is a DSL duty rota in place which ensures that a DSL or Deputy DSL from one of our schools is available to deal with any safeguarding concerns during holiday periods.

35.6 Any safeguarding concern we have about a child attending the BSB Elements who is not a student at one of our schools will be shared with the DSL at the child's school in accordance with the normal procedures for transferring files, and this will be done in a timely manner.

### **36.0 Arrangements for visiting speakers**

- 36.1 The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School.
- 36.2 The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.
- 36.3 Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British and Bahraini values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these.
- 36.4 In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.
- 36.5 Visiting Speakers, whilst on the School site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence.

### **37.0 Events/Activities involving multiple schools**

- 37.1 When taking part in events organised by other schools or organisations, e.g. sports or music events, the schools involved will consider what image guidelines should apply. For larger events it is reasonable to expect that specific image guidelines should be in place. Where relevant these should include reference to press images. Consideration should be given as to how those attending the event will be informed of the image guidelines that apply, e.g. a letter before the event, announcement at the event, or information in any printed programme.
- 37.2 Although the school will make reasonable efforts to safeguard the digital images of students, parents should be made aware that at some types of events it is not always realistic to strictly enforce image guidelines. The school cannot therefore be held accountable for the use of images taken by parents or members of the public at events.
- 37.3 Adequate supervision from members of the school's staff will ensure the safety of children particularly where contact with the public occurs. Specifically, staff will be alert to any problems which may occur in bathrooms or changing rooms, and this should form part of the risk assessment.

## **APPENDIX 1 – Recruitment & Selection checklist**

### **Planning**

- Timetable decided: job specification and description and other documents to be provided to applicants reviewed and updated as necessary.
- Application form seeks all relevant information and includes relevant statements about references.

### **Vacancy Advertised**

- Advertisement includes reference to Safeguarding Policy, i.e. statement of commitment to safeguarding and promoting the welfare of children, and the need for the successful applicant to be DBS checked.

### **Applications**

- Scrutinised – any discrepancies/anomalies/gaps in employment noted to explore if the candidate is considered for shortlisting.

### **Invitation to interview**

- Includes all relevant information and instructions.

### **Interview Arrangements**

- At least two interviews.
- Have met and agreed on issues and questions/assessment criteria/standards.

### **Interview**

- Explores applicants' suitability for work with children as well as for the post. Identity and qualifications of successful applicants verified by scrutiny of appropriate **original** documents: copies of documents taken and placed on file; as appropriate applicant completed application for **DBS** Disclosure.

### **Summary of Documents:**

- Proof of Identity: Original birth certificate; Current passport or identity card (local staff); Up-to-date CV; Two references

### **Conditional Offer of Appointment: pre-appointment checks**

- An offer of appointment made conditional on satisfactory completion of the following pre-appointment checks and successful completion of a probationary period.

### **References Sought**

- Directly from the referee who completes a BSB form which asks recommended specific questions. Telephone call of previous employer(s) made if deemed necessary.

**References received and verified**

- Checked against information on the application; scrutinised; any discrepancy/ issue of concern noted to take up with the applicant (at interview if possible).
- References checked with a phone call for verification purposes;
- Original certificates for all academic qualifications.
- Qualifications verified
- CRB/DBS/equivalent check from other countries (current);
- Safeguarding Policy read and signed by all staff annually.

## **APPENDIX 2 – Disclosure information**

### **Secure Storage, Handling, Use, Retention & Disposal of Disclosures and Disclosure Information**

#### **General principles**

- BSB complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information.
- It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

#### **Storage and access**

- Disclosure information is kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

#### **Handling**

- In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties.
- BSB maintains a record of all those to whom Disclosures or Disclosure information has been revealed, and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

#### **Usage**

- Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

#### **Retention**

- Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary.
- This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult the CRB about this and will give full consideration to the data protection and human rights of the individual before doing so.
- Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

#### **Disposal**

- Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning.
- While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).
- We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.
- However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

### **APPENDIX 3 – Recruitment of ex-offenders**

BSB complies fully with the DBS Code of Practice on the recruitment of ex-offenders.

In accordance with both regulatory and non-statutory advice issued by DFE (to supplement KCSIE), we do not employ ex-offenders to work with children under the age of 8 years.

## **APPENDIX 4 – Recognition of Abuse**

*Definitions are taken from 'Working Together to Safeguard Children' 2019, Appendix A*

### **What is Abuse?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger, for example, via the Internet.

Abuse can take place wholly online, or technology may be used to facilitate offline Abuse. They may be abused by an adult or adults, or another child or children.

### **Indicators of Abuse**

Caution should be used when referring to lists of signs and symptoms of Abuse. Although the signs and symptoms listed below may be indicative of Abuse, there may be alternative explanations. In assessing the circumstances of any child, any of these indicators should be viewed within the overall context of the child's individual situation, including any disability.

### **Emotional Abuse**

- Emotional Abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development.
- It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in regular social interaction.
- It may involve seeing or hearing the ill-treatment of another.
- It may involve severe bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of Emotional Abuse is involved in all types of maltreatment of a child, though it may occur alone.
- Emotional Abuse is difficult to:
  - define
  - identify/recognise
  - prove.
- Emotional Abuse is chronic and cumulative and has a long-term impact. Indicators may include:
  - a) Physical, mental and emotional development lags
  - b) Sudden speech disorders
  - c) Continual self-depreciation ('I'm stupid, ugly, worthless, etc.')
  - d) Overreaction to mistakes

- e) Extreme fear of any new situation
- f) Inappropriate response to pain ('I deserve this')
- g) Unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism
- h) Extremes of passivity or aggression
- i) Children suffering from emotional Abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay is again likely to be present
- j) Babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding
- k) Toddler/Preschool – head banging, rocking, bad temper, 'violent', clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills
- l) School-age – Wetting and soiling, relationship difficulties, poor performance at school, nonattendance, antisocial behaviour. Feels worthless, unloved, inadequate, frightened, isolated, corrupted and terrorised
- m) Adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive and delinquent behaviour
- n) A child may be underweight and/or stunted
- o) A child may fail to achieve milestones, fail to thrive, experience academic failure or underachievement
- p) Also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability

## **Neglect**

- Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the severe impairment of the child's health or development.
- Neglect may occur during pregnancy as a result of maternal substance abuse.
- Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision (including the use of inadequate care-givers) or failure to provide access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- There are occasions when nearly all parents find it challenging to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.
- Neglect can often fit into six forms which are:
  - a) Medical – the withholding of medical care, including health and dental.
  - b) Emotional – lack of emotional warmth, touch and nurture
  - c) Nutritional – either through lack of access to a proper diet which can affect their development.

- d) Educational – failing to ensure regular school attendance that prevents the child from reaching their full potential academically
  - e) Physical – failure to meet the child’s physical needs
  - f) Lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger
- With regard to the child, some of the regular concerns are:
    - a) The child’s development in all areas including educational attainment
    - b) Cleanliness
    - c) Health
    - d) Children left at home alone and accidents related to this
    - e) Taking on unreasonable care for others
  - Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person.
  - It is essential to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability.
  - This can be a consequence of:
    - a) Poor health, including mental health or mental illness
    - b) Disability, including learning difficulties
    - c) Substance misuse and addiction
    - d) Domestic violence
  - School staff need to consider both acts of commission (where a parent/carer deliberately neglects the child) and acts of omission (where a parent’s failure to act is causing the neglect).
  - This is a crucial consideration with regard to school attendance, where parents are not ensuring their child attends school regularly.
  - Many of the signs of neglect are visible. However, school staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a student is being neglected.
  - Children spend considerable time in school, so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare.
  - All concerns should be recorded and reflected upon, not simply placed in a file.
  - Here are some signs of possible neglect:

Physical signs:

    - i) Constant hunger
    - ii) Poor personal hygiene
    - iii) Constant tiredness
    - iv) Emaciation
    - v) Untreated medical problems
    - vi) The child seems underweight and is very small for their age
    - vii) The child is poorly clothed, with inadequate protection from the weather
  - a) Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are

crucially important signs of malnutrition include wasted muscles and poor condition of skin and hair.

- b) It is important not to miss an organic cause of failure to thrive; if this is suspected, further investigations will be required
- c) Infants and children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment
- d) Failure to thrive through a lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet
- e) Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- f) Consequences arising from situations of danger – accidents, assaults, poisoning
- g) Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- h) Health problems associated with a lack of necessary facilities such as heating
- i) Neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any disability

Behavioural signs:

- a) No social relationships
- b) Compulsive scavenging
- c) Destructive tendencies
- d) If they are often absent from school for no apparent reason
- e) If they are regularly left alone, or in charge of younger brothers or sisters
- f) Lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks
- g) Craving attention or ambivalent towards adults, or maybe very withdrawn
- h) Delayed development and failing at school (poor stimulation and opportunity to learn)
- i) Difficult or challenging behaviour

## Physical Abuse

- Physical Abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.
- Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.
- When dealing with concerns regarding physical Abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the Police and/or Children's Services in order to safeguard the child.
- Staff must be alert to:
  - a) Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
  - b) Injuries that are not consistent with the story: too many, too severe, wrong place or pattern, the child is too young for the activity described.

- Physical signs can include the following, but this is not an exhaustive list:
  - a) Bald patches
  - b) Bruises, black eyes and broken skin and/or bones
  - c) Untreated or inadequately treated injuries
  - d) Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
  - e) Scalds and burns
  - f) General appearance and behaviour of the child may include:
    - Concurrent failure to thrive: measure height, weight and, in the younger child, head circumference;
    - Frozen watchfulness: the impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.
  - g) Bruising:
    - Bruising patterns can suggest gripping (finger marks), slapping or beating with an object.
    - Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.
  - j) Other injuries:
    - Bite marks may be evident from an impression of teeth
    - Small circular burns on the skin suggest cigarette burns
    - Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
    - Red lines occur with ligature injuries
    - Retinal haemorrhages can occur with a head injury and vigorous shaking of the baby
    - Tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate.
    - Fractured ribs: rib fractures in a young child are suggestive of non-accidental injury
    - Other fractures: spiral fractures of the long bones are indicative of non-accidental injury
- Behavioural signs:
  - a) Wearing clothes to cover injuries, even in hot weather
  - b) Refusal to undress for gym
  - c) Chronic running away
  - d) Fear of medical help or examination
  - e) Self-destructive tendencies
  - f) Fear of physical contact - shrinking back if touched
  - g) Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
  - h) Fear of suspected abuser being contacted

- i) Injuries that the child cannot explain or explains unconvincingly
- j) Become sad, withdrawn or depressed
- k) Having trouble sleeping
- l) Behaving aggressively or be disruptive
- m) Showing fear of individual adults
- n) Having a lack of confidence and low self-esteem
- o) Using drugs or alcohol
- p) The repetitive pattern of attendance: recurrent visits, repeated injuries
- q) Excessive compliance
- r) Hyper-vigilance

## Sexual Abuse

- Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.
- The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- They may include non-contact activities, such as involving children in looking at or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for Abuse.
- Sexual Abuse can take place online, and technology can be used to facilitate offline Abuse. Sexual Abuse is not solely perpetrated by adult males.
- Women can also commit acts of Sexual Abuse, as can other children.
- The Sexual Abuse of children by other children is a specific safeguarding issue in education.
- Sexual Abuse is usually perpetrated by people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, people working with the child in school or through other activities.
- Characteristics of child sexual abuse:
  - a) It is usually planned and systematic – people do not sexually abuse children by accident, though Sexual Abuse can be opportunistic;
  - b) Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the Internet through chatrooms and social networking sites;
  - c) Grooming the child’s environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the Internet through chat-rooms and social networking sites.
  - d) In young children, behavioural changes may include:
    - Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
    - Being overly affectionate - desiring high levels of physical contact and signs of affection such as hugs and kisses

- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or childminder
- They may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age
- Starting to wet again, day or night/nightmares
- e) In older children, behavioural changes may include:
  - Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
  - Personality changes such as becoming insecure or clinging
  - Sudden loss of appetite or compulsive eating
  - Being isolated or withdrawn
  - Inability to concentrate
  - Become worried about clothing being removed
  - Suddenly drawing sexually explicit pictures
  - Trying to be 'ultra-good' or perfect; overreacting to criticism
  - Genital discharge or urinary tract infections
  - Marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or extraordinarily aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically.
  - The child may refuse to attend a school or start to have difficulty concentrating so that their schoolwork is affected
  - They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
  - The child may describe receiving special attention from a particular adult, or refer to a new, "secret friendship" with an adult or young person
  - Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
  - Low self-esteem, depression and self-harm are all associated with sexual Abuse
- Physical signs and symptoms for any age child could be:
  - a) Medical problems such as chronic itching, pain in the genitals, venereal diseases
  - b) Stomach pains or discomfort walking or sitting
  - c) Sexually transmitted infections
  - d) Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
  - e) Soreness, itching or unexplained bleeding from penis, vagina or anus
  - f) Sexual Abuse may lead to secondary enuresis or faecal soiling and retention
  - g) Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls
- Sexual Abuse by Young People
  - a) The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred.

- b) The determination of whether the behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.
  - c) This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, and Sexual Abuse against adults, peers or children.
  - d) Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other.
  - e) Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.
  - f) Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person.
  - g) It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.
  - h) If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention.
  - i) For some children, educational inputs may be enough to address the behaviour.
  - j) Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.
  - k) With any situation involving potential Abuse by a young person, the DSL will always seek guidance on the matter
- Assessment
    - a) In order to more fully determine the nature of the incident, the following factors should be given consideration.
    - b) The presence of exploitation in terms of:
      - Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
      - Consent – agreement, including all the following:
        - a) Understanding that is based on age, maturity, development level, functioning and experience
        - b) Knowledge of society’s standards for what is being proposed
        - c) Awareness of potential consequences and alternatives
        - d) Assumption that agreements or disagreements will be respected equally
        - e) Voluntary decision
        - f) Mental competence

- c) Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is the loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.
- d) In evaluating the sexual behaviour of children and young people, the above information should be used only as a guide.

## **APPENDIX 5 – Radicalisation & Extremism**

### **Preventing Radicalisation**

- Children are vulnerable to extremist ideology and radicalisation.
- Similar to protecting children from other forms of harm and Abuse, protecting children from this risk should be part of a schools' safeguarding approach.
- Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- BSB is committed to ensuring that all members of the school community are treated with tolerance and respect and that our students are safeguarded from extremist views and radicalisation.
- The school uses the following accepted definition of extremism: 'Vocal or active opposition to fundamental British and / or Bahraini values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or call for the death of members of our armed forces, whether in this country or overseas'.
- students should see their school as being a safe place where they can explore controversial issues safely, and teachers have a duty to encourage and facilitate this.
- All adults working in school have a responsibility to safeguard children, including safeguarding children from extremism and radicalisation.
- This is because exposure to extremist materials and influences can lead to poor outcomes for children, and as such, they are a safeguarding concern.
- BSB encourages students to respect the fundamental British values of:
  - a) Democracy,
  - b) The rule of law,
  - c) Individual liberty and mutual respect,
  - d) Tolerance of those with different faiths and beliefs.
- BSB ensures that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the students, reasonably practicable steps have been taken to offer a balanced presentation of opposing views to students.
- BSB values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values.
- Both students and teachers have the right to speak freely and voice their opinions.
- However, freedom comes with responsibility, and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.
- Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- BSB seeks to ensure our students are aware of the dangers of radicalisation, and we work to build their resilience to such dangers.

- BSB seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to extremist ideology
- The Staff Code of Conduct Policy provides for monitoring the appropriateness of visiting speakers and states that visiting speakers must not have unsupervised contact with any students.

## **APPENDIX 6 – Sexting**

### **What is sexting?**

- Sexting is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the Internet.
- Sexting is often seen as flirting by children and young people who think that it's part of normal life.
- Often, incidents of sexting are not clear-cut or isolated; schools may encounter a variety of scenarios.
- Sexting incidents can be divided into two categories – aggravated and experimental (Reprinted from Wolak and Finkelhor 'Sexting: a Typology' March 2011):
  - **Aggravated incidents** of sexting involve criminal or abusive elements beyond the creation of an image. These include further elements, adult involvement or criminal or abusive behaviour by minors such as sexual Abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who is pictured.
  - **Experimental incidents** of sexting involve youths taking pictures of themselves to share with established boys or girlfriends, to create romantic interest in other youth, or for reasons such as attention-seeking.
  - There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation.
- The consequences of sexting can be devastating for young people.
- In extreme cases, it can result in suicide or a criminal record, isolation and vulnerability.
- Young people can end up being criminalised for sharing an apparently innocent image which may have, in fact, been created for exploitative reasons.
- Because of the prevalence of sexting, young people are not always aware that their actions are illegal. In fact, sexting as a term is not something that is recognised by young people, and the 'cultural norms' for adults can be somewhat different.
- Some celebrities have made comments which appear to endorse sexting – 'it's okay, as long as you hide your face' - giving the impression that sexting is normal and acceptable. However, in the context of the law, it is an illegal activity, and young people must be made aware of this.
- The Law
  - a) Much of the complexity in responding to youth-produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery is 'indecent' is illegal.
  - b) This includes imagery of yourself.
  - c) If imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.
  - d) The law criminalising indecent images of children was created long before mass adoption of the Internet, mobiles and digital photography.

- e) It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual Abuse. It was not intended to criminalise children. Despite this, young people who share sexual images of themselves, or peers, are breaking the law.
  - f) Incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues.
  - g) Schools may respond to incidents without involving the Police. Where the Police are notified of incidents of youth-produced sexual imagery, they are obliged to record the incident. The incident will be listed as a 'crime' and the young person involved will be listed as a 'suspect.'
- Action to take in the case of an incident of sexting:
    - 1) Step 1 – Disclosure by a student**
      - Sexting disclosures should follow normal safeguarding practices and protocols.
      - A student is likely to be very distressed, especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up.
      - They will need pastoral support during the Disclosure and after the event.
      - They may even need immediate protection.
      - The following questions will help decide upon the best course of action:
        - a) Is the student disclosing about themselves receiving an image, sending an image or sharing an image?
        - b) What sort of image is it? Is it potentially illegal?
        - c) Are the school child protection and safeguarding policies and practices being followed? For example, has the DSL been consulted and is their advice and support available?
        - d) How widely has the image been shared and is the device in their possession?
        - e) Is it a school device or a personal device?
        - f) Does the student need immediate support and or protection?
        - g) Are there other students and or young people involved?
        - h) Do they know where the image has ended up?
      - This situation will need to be handled very sensitively. Whatever the nature of the incident, ensure school safeguarding and child protection policies and practices are adhered to.
    - 2) Step 2 – Searching a device**
      - It is highly likely that the image will have been created and potentially shared through mobile devices.
      - The image may not be on one single device, but maybe on a website or on a multitude of devices; it may be on either a school-owned or personal device.
      - It is important to establish the location of the image but be aware that this may be distressing for the young person involved, so be conscious of the support they may need.
      - When searching a mobile device, the following conditions should apply:
        - a) The action is in accordance with the school's child protection and safeguarding policies

- b) The search is conducted by the DSL
- c) Another member of the safeguarding team is present
- d) The search is conducted by a member of the same sex
- If any illegal images of a child are found, you should consider whether to inform the Police. Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the Police.
- Always put the child first. Do not search the device if this will cause additional stress to the student/person whose image has been distributed.
- If there is an indecent image of a child on a website or a social networking site, then you should report the image to the site hosting it.
- In the case of a sexting incident involving a child or young person where you feel that they may be at risk of Abuse then you should report the incident

**3) Step 3 – What to do and not do with the image**

- If the image has been shared across a personal mobile device:
  - a) Confiscate and secure the device;
  - b) Don't view the image unless there is a clear reason to do so;
  - c) Don't send, share or save the image anywhere;
  - d) Don't allow students to view images or send, share or save them anywhere.
- If the image has been shared across a school network, a website or social network:
  - a) Block the network to all users and isolate the image;
  - b) Don't send or print the image;
  - c) Don't move the material from one place to another;
  - d) Don't view the image outside of the protocols of your safeguarding policies and procedures.

**4) Step 4 – Who should deal with the incident?**

- Whoever the initial Disclosure is made to must act in accordance with the school safeguarding policy, ensuring that the DSL is involved in dealing with the incident.
- The DSL should always record the incident.
- There may be instances where the image needs to be viewed, and this should be done in accordance with protocols.
- The best interests of the child should always come first; if viewing the image is likely to cause additional stress, staff should make a judgement about whether or not it is appropriate to do so.

**5) Step 5 - Deciding on a response**

- There may be a multitude of reasons why a student has engaged in sexting – it may be a romantic/sexual exploration scenario, or it may be due to coercion.
- It is important to remember that it won't always be appropriate to inform the Police; this will depend on the nature of the incident. However, as a school, it is important that incidents are consistently recorded.

- It may also be necessary to assist the young person in removing the image from a website or elsewhere.
- If indecent images of a child are found:
  - a) Act in accordance with your child protection and safeguarding Policy, e.g. notify DSL
  - b) Store the device securely
  - c) Carry out a risk assessment in relation to the young person
  - d) Make a referral if needed
  - e) Contact the Police (if appropriate)
  - f) Put the necessary safeguards in place for the student, e.g. they may need counselling support, immediate protection and parents must also be informed.
  - g) Inform parents and/or carers about the incident and how it is being managed.

**6) Step 6 – Contacting other agencies (making a referral)**

- If the nature of the incident is high-risk, consider contacting appropriate agencies.
- Depending on the nature of the incident and the response you may also consider contacting local authorities.
- Understanding the nature of the incident, whether experimental or aggravated, will help to determine the appropriate course of action.

**7) Step 7 – Containing the incident and managing student reaction**

- Sadly, there are cases in which victims of sexting have had to leave or change schools because of the impact the incident has had on them.
- The student will be anxious about who has seen the image and where it has ended up. They will seek reassurance regarding its removal from the platform on which it was shared.
- They are likely to need support from the school, their parents and their friends.
- Education programmes can reinforce to all students the impact and severe consequences that this behaviour can have.
- Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students.
- The school, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected.
- The students' parents should usually be told what has happened so that they can keep a watchful eye over their child, especially when they are online at home.
- Creating a supportive environment for students in relation to the incident is very important.

**8) Step 8 – Reviewing outcomes and procedures to prevent further incidences**

- As with all incidents, a review process ensures that the matter has been managed effectively and that the school has the capacity to learn and improve its handling procedures.
- Incidents of sexting can be daunting for a school to manage, especially if the image has been widely shared between students in school.



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## **APPENDIX 7 – Safeguarding Request Form**

### **For the attention of the Designated Safeguarding Lead (DSL)**

Dear Sir / Madam,

With regards to safeguarding and any relevant pastoral information, I would be grateful if you could complete the table below and return it, via e-mail, to the British School of Bahrain at your earliest convenience.

If you would like to discuss any matters concerning this student, please feel free to contact me at [safeguarding@thebsbh.com](mailto:safeguarding@thebsbh.com) or by telephone: (00973) 17610920.

Yours faithfully,

Mr John Maguire

Executive Headmaster

|   |  |            |
|---|--|------------|
| <b>SURNAME OF CHILD</b>   |  |            |
| <b>FIRST NAME OF CHILD</b>  |  |            |
| <b>DOB</b>  |  |            |
| <b>NAME OF CURRENT SCHOOL</b>   |  |            |
| <b>NAME OF SAFEGUARDING LEAD</b>  |  |            |
| <b>DATES ATTENDED</b>   | <i>FROM:</i>   | <i>TO:</i> |
| <b>ARE YOU AWARE OF ANY SAFEGUARDING CONCERNS REGARDING THIS student? (Delete as appropriate)</b> | a. No, I am not aware of any safeguarding concerns about this student.<br>b. Yes, I enclose safeguarding / pastoral concerns information about this student. |            |
| <b>CONFIDENTIAL ELECTRONIC DELIVERY</b>   | Please e-mail to <a href="mailto:safeguarding@thebsbh.com">safeguarding@thebsbh.com</a><br>Please include the student's full name in the subject line        |            |
| <b>DATE FILE SENT</b>   |  |            |
| <b>SIGNED BY DSL</b>  |  |            |