# AISA CHILD PROTECTION GUIDANCE NOTE:

Child Protection Teams and Internal Reporting Guidance

**AISA**
Association of International
Schools in Africa

## ABOUT AISA

The Association of International Schools in Africa (AISA), established in 1969, is a non-profit education association supporting the professional learning and school improvement strategies of international schools on the continent of Africa. Based in Nairobi, Kenya, AISA offers a professional learning programme specifically designed to meet the unique needs of our diverse member school community. AISA also offers a number of supplementary programmes, scholarships and facilitates collaboration among member schools to advance school effectiveness and improve student learning.

> *"Schools have a duty of care to protect children and prevent them from harm, and act with a sense of urgency if a child is at risk of harm."*

<div align="right">

*International Task Force on Child Protection, School Evaluation Committee:*
*Final Report and Recommendations, 2015*

</div>

To meet accreditation standards, all international schools are now required to have a Child Protection Policy with procedures in place for reporting an allegation regarding an adult in the school or a concern that a child may be at risk of harm. Schools are required to appoint staff with oversight of child protection procedures and related school policies. But who should take on that responsibility? Should it be one person or a team, when does an action, incident or omission become a child protection concern, and what are the thresholds for reporting a concern? These are all questions that we receive regularly from schools, and that we seek to address in this Guidance Note.

## How to Use this Guidance Note

This Guidance Note has been prepared with input from various international schools in the AISA region, the International Centre for Missing and Exploited Children (ICMEC), the Council of International Schools (CIS) as well as drawing heavily from resources from the Safeguarding Unit at Farrer & Co. This Guidance Note offers model practice for international schools whilst recognising that the resources, legal frameworks, regulatory obligations and cultural sensitivities of each school are unique and will require an individual school response. Thus, this Guidance Note seeks to provide key principles from which each school can develop policies and procedures that meet the highest possible standards in child protection and safeguarding.

## Child Protection Roles and Responsibilities

Recommendations issued by the International Taskforce on Child Protection encourage schools to appoint a 'child protection officer' (**CPO**) to have oversight of the child protection procedures and related school policies.[1] Dedicating a member of staff solely to child protection and safeguarding duties ensures a consistent approach to concerns as well as building the capacity of staff to identify harm, manage disclosure and support students[2]. Some schools call these officers 'Designated Safeguarding Lead' (**DSL**), although some schools may choose not to use the term 'DSL' or 'CPO'. Here are some general principles to consider when deciding how child protection policies and practices should be managed and overseen in your school:

Whatever management model a school chooses to adopt, it is important that:

* the way that child protection is managed in school enables the school to implement child protection policies in practice;

---

[1] https://www.icmec.org/wp-content/uploads/2016/08/New-Standards-for-Child-Protection-Adopted-by-School-Evaluation-Agencies-2.pdf

[2] https://www.csnetwork.org.uk/en/beyond-referrals-multi-agency

* the roles and responsibilities of any CPO/DSL and child protection team members are clear, are included in job descriptions and addressed in appraisals;

* designated child protection staff and any child protection team members are empowered to take ownership of their roles and fulfil their responsibilities;

* reporting lines and records are centralised so that patterns can be spotted. Serious case reviews indicate a lack of centralised reporting lines and records can prevent schools from being able to spot patterns and identify harm at an early stage;

* **all staff have a responsibility to protect children from harm**. Having a CPO/DSL does not mean that staff can outsource child protection to that person.

## Child Protection Officer (CPO) or Designated Safeguarding Lead (DSL) Role

The question of who should fulfil the role of CPO/DSL often comes up and schools should make a decision based on their own circumstances. There is no one size fits all. Having said that, here are some guiding principles:

- it is considered model practice to have a school leader/administrator as CPO/DSL so that they have sufficient level of seniority to affect change. Smaller schools may consider a senior teacher. Given the sensitive nature of the role, it is also important that the CPO/DSL is trusted and respected by members of staff, the Board, the parent community and external partners.

- It is not advisable that the Head of School hold the role of CPO/DSL unless this is necessary (for example, in the case of a very small school). The CPO/DSL role requires considerable time commitment and, furthermore, staff may feel more comfortable reporting concerns to someone who isn't the Head of School, which is important in creating a culture where all concerns - no matter how small - can be shared.

- it is not advisable that the school counsellor hold the role of CPO/DSL, though it is useful if they are on the child protection team. Having the counsellor in the role of CPO/DSL can create a conflict of interest and undermine students' trust in the counsellor – students have frequently reported that where the counsellor was the CPO/DSL they would be less likely to speak openly to the counsellor because they also carried out inquiries as part of their CPO/DSL role. A key safeguarding review also found that the CPO/DSL should be distinct from the role of counsellor, so as to avoid any conflict of interest (see 7.17.10 and 3.6.16 of this review).

- Providing for a CPO/DSL who is not the school counsellor enables both people to work closely together and support each other.

- Where a school opts to have a counsellor who is also a CPO/DSL then it is very important that they do not carry out disciplinary actions, or any inquiries into student behaviour that would undermine the trust between the student and the counsellor. It is also important that they be trained on appropriate information sharing, and that they feel empowered to challenge school leadership where necessary.

* To adequately fulfil the duties of a CPO/DSL, it is estimated they will need at least a 0.5 time allocation for this role. Budget allowance should also be made for training and a child protection/safeguarding management software.

* Where a school has multiple campuses or multiple divisions (eg. the school is divided into elementary, middle, and high school) schools should consider allocating a CPO/DSL and possibly a Deputy to each division. This group should meet regularly as a team to ensure a consistent response to concerns, to ensure that any children subject to child protection concerns are supported as they transition through the school and to identify any patterns or risks to children that may be applicable to the whole school.

* It is important that the CPO/DSL does not work alone. In addition to a CPO/DSL, it is model practice to allocate a Deputy to support the CPO/DSL, be available to receive concerns in their absence or provide an alternative reporting pathway.

* The Deputy CPO/DSL should be trained to the same degree as that of the CPO/DSL and the role needs to be explicit in their job description. The Deputy role can be undertaken by a more junior member of staff as this may offer staff a reporting pathway that they feel more comfortable with.

## Child Protection Officer (CPO) or Designated Safeguarding Lead (DSL) Responsibilities

The following are suggested key responsibilities that should be undertaken by the CPO/DSL (for further information see Annex B: Keeping Children Safe in Education or a Sample Job Description):

**Child protection programme leadership:**

* Lead the Child Protection Team, developing and leading the implementation of the child protection programme, including the review of all child protection related policies, audits.

* Ensure student voice is captured in child protection policies and implementation plans.

* Develop and maintain relationships with local service providers as an external Multi-Disciplinary Team (MDT) that can be activated as needed.

* Schools may also maintain a network of other school child protection designates for information exchange and professional development.

* Provide regular, anonymised reporting to the Board and liaise as needed with the Board designated child protection lead.

* Support the transfer of student child protection files when a student transitions to another school. Ensure the onward school is aware of any additional supports the student may require.

**Respond to child protection concerns**:

* Establish multiple reporting pathways for students, staff and parents.  Include anonymous reporting options.

* Act as the point of contact to school staff for all child protection concerns or queries.

* Regularly consult with the school counsellor and other staff members to review and support children who are at risk of harm.

* Establish and lead a Child Protection Response team to manage child protection concerns using a child centred, trauma-informed approach.

* Support staff who report a concern or low-level concern.

* Refer cases to the appropriate authorities, where applicable.

* Meet regularly with Principals or Division Heads and the Head of School to review all concerns, including low-level concerns.

* Meet regularly with year group faculty or other relevant staff members (eg. School counsellor, learning support) to review students at risk, ensuring reporting, follow-up and safety planning is undertaken.

* Maintain the Child Protection Central Record and the Low-Level Concerns central record.

* Regularly review child protection records to identify patterns of concerning behaviour.


**Training and Awareness Raising**

* Lead or support the training of all staff ensuring the school's child protection policies are known, understood, and used appropriately.

* Identify and support staff that can deliver training in the host country language for all local staff (eg. security, maintenance, drivers, catering, cleaning, etc.)

* Maintain a staff child protection training register.

* Oversee the design or adaptation, delivery and evaluation of an abuse prevention education curriculum.

* Lead or support parent and community outreach and awareness raising.

* Ensure the school's child protection policy is on the web site.

# Child Protection Team

Child abuse is preventable. But prevention requires a commitment by every member of staff to support and adhere to the school Code of Conduct and Child Protection Policies that together aim to create an ethos of prevention. Thus, it is recommended that schools adopt a team approach to child protection because a team approach:

* minimizes the impact of bias or perceived conflict of interest,

* reinforces a transparency of process,

* reduces the burden of responsibility for addressing allegations and concerns and eliminates a single point of decision-making,

* supports the CPO/DSL with multiple perspectives and cultural understandings when reviewing cases,

* comprised of trained staff across the school, means there is someone in every division that is trained to identify students that may be at risk of harm,

> **An External Multidisciplinary Team (MDT)** is an advisory committee that provides advice to your school's child protection team. MDT members may be drawn from local police and law enforcement, medical and mental health services, local government agencies representing children, NGO's, and local embassies.
>
> *See: Building and Using Multidisciplinary Teams for AISA Schools*

* ensures deep child protection expertise and a shared understanding of response protocols is maintained within a school despite inevitable staff transitions.


When establishing your team, consider:

* gender and cultural representation to ensure a diversity of voices and views,

* staff representation from various school divisions and levels of seniority,

* the character and reputation of team members, eg. highly regarded by staff and display characteristics of integrity, trustworthiness, responsibility, etc.

* annual training for all team members, including knowledge of local laws pertaining to child protection.

Regardless of the size or resources of your school, it is recommended that your child protection team:

| | Child Protection Team |
|---|---|
| **Purpose** | To support the CPO/DSL in creating a school culture that embodies an ethos of protection. |
| **Who** | * CPO/DSL<br><br>* Deputy CPO/DSL<br>* A vertical child protection team (usually no more than 5) that may include representatives from HR, counselling/pastoral, IT, medical, athletics, teacher rep's, support staff, etc. |
| **Key duties** | Meet regularly to review progress related to the implementation of the school's child protection policies/ programme, including, for example:<br><br>* staff training,<br><br>* parent engagement,<br><br>* student education & awareness campaigns,<br><br>* annually review all child protection policies and provide recommendations to the school leadership as to how to strengthen these,<br><br>* review anonymised cases, including responses, to inform school policies, to ensure consistency of approach and for training purposes<br><br>* receive and report to the CPO/DSL low-level concerns about adults in school.<br><br>* implement (or support) safety plans as needed<br><br>Sub-committees may be established for a specific role and duration (eg. to review a child protection policy or supplemental policy). These may be led by the CPO/DSL or a child protection team member and include:<br><br>* Board representative<br>* Parents<br>* Students<br>* External MDT members if appropriate |
| **Frequency of meeting** | Meet regularly (eg. weekly/fortnightly). |

# Responding to a Child Protection Concern About a Child in School: Response Team

Where there is a concern that a child may be exposed to harm or abuse, the CPO/DSL will lead the response to that concern, drawing on the deputy CPO/DSL and others if needed to support them in coordinating a child-centred, trauma-informed response. Every effort should be taken to maintain the confidentiality of the child & the alleged perpetrator, thus, this team should involve only those members of staff who bring specific skills or expertise to a response.

The members and size of any response team will vary on a case by case basis, and it is possible that an individual staff member provides multiple roles. A response team may include:

* **CPO/DSL**: coordinate a child protection response, including an internal inquiry, and provide recommendations to school leadership

* **Deputy CPO/DSL**: Support the CPO/DSL in leading the response and provide a second opinion on complex matters.

* Child Protection Team members or other member of staff as appropriate:

    - the Head of School – the threshold beyond which concerns should be reported to the Head of School will depend on the context of the school but could include, for example, where external agencies are involved, cases of intrafamilial abuse and/or where it raises legal issues for the school,

    - the school counsellor/psychologist – for example, where the child requires counselling support,

    - IT staff member - for example, if the case involves online abuse, image sharing, etc.,

    - School nurse – for example, where the child is the victim of physical abuse and requires assistance from the school nurse.

* Depending on the case, additional support from staff or an external partner may be required to be an advocate for the victim and victim's family and to support and speak on behalf of any victims

* External MDT members may be called upon to provide specific expertise (eg. Legal, communications, mental health professional)

**Responding to an Allegation against an Adult in School**

In cases involving an allegation of child abuse by an adult at the school, an allegations management team will be formed, led by the Head of School. The nature and size of this team will depend on the allegation. In addition to the team above, this team may also include a representative from HR and the Board Chair and/or Safeguarding Trustee. In the event that the Head of School is involved in the concern or allegation, or is unable to remain impartial, the Board Chair may lead the response.

For further details see: Managing Allegations of child abuse by educators and other adult – a protocol for international schools

For further information on the roles and responsibilities of the Response Team, see ICMEC: Child Protection Response Team Roles.

---

**GUIDING PRINCIPLES**

Every child protection concern or allegation of abuse is unique and thus requires a tailored response. Despite this, these three duties must guide any response to a concern or allegation:

\* **The duty to children:** Keeping children safe and acting in the best interest of the child is the school's primary consideration.

\* **The duty to the alleged perpetrator:** ensuring their rights are upheld and that the principles of natural justice are followed.

\* **The duty to the law and mandatory reporting**: ensuring that local and international legal obligations are complied with and that they school's actions protect, as far as possible, the integrity of any future criminal investigation.

See Managing Allegations of child abuse by educators and other adult – a protocol for international schools for further guidance.

---

# Internal Reporting of Child Protection Concerns

Schools are busy, fast moving institutions and with so much going on the recording and reporting of a child protection concern, particularly those that might be classified as 'low-level', can inadvertently fall off the priority list. As a result, in practice, the reporting of child protection concerns is often ad hoc or done in-person and informally which makes it difficult for schools to gain a thorough picture of the school climate in relation to child protection.

The following guidance is for how **adults** in a school report a concern, not students. [3] It refers to instances that may involve adults and/or children where there is a concern, suspicion or allegation regarding:

* another adult, such as an adult at home or in the community,

* another adult at school - no matter how small the concern,

* another child or student

* a disclosure of abuse by a child regarding themselves, or another child

* a suspicion a child is being harmed or is at risk of harm

*"Defining the threshold for making a report of questionable conduct; the recording of such reports; and the evaluation of a pattern of conduct over time, even if no single report amounts to a formal allegation, are absolutely central to promoting child protection."*

*Independent Review arising from the criminal conduct of W. Vahey*

## What is a Child Protection Concern?

All staff should be aware of the indicators of abuse and neglect so they can identify children who may be in need of protection or assistance. They should also be aware of the indicators of grooming so that they can identify adults who may be grooming or abusing children.

> *"Child protection concerns include suspected, alleged, self-disclosed, or witnessed abuse of a child by anyone which must be investigated and followed by appropriate action. Child Abuse constitutes "all forms of physical and emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, **resulting in actual or potential harm** to the child's health, survival, development or dignity."*
>
> *A person may abuse 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; children may be abused online or in person by individuals known to them, or more rarely, by a stranger. Children may experience multiple forms of abuse simultaneously. Most child abuse is inflicted by someone the child knows, respects or trusts. All adults should understand reasons children may not talk about the abuse they might have experienced."*
>
> Definitions, Signs and Indicators of Abuse, ICMEC

---

[3] *Students should be allowed to report to any adult in school that they trust and should be provided with multiple avenues to share concerns. Schools should not require students to report only to designated child protection staff, as this may reduce reporting rates.* Prominently displaying posters around a school can help to provide students with language to use and can encourage reporting.

# Why Report a Child Protection Concern?

All school staff (i.e. anyone associated with the school, including school governors) have a collective role in keeping children safe and are required to report a concern if they suspect or observe a child being harmed or if a child discloses abuse to them.

Reporting a child protection concern to the CPO/DSL (or deputy) ensures that the school is able to identify children at risk of harm and take appropriate action. Even in the event that no action is deemed necessary, tracking and monitoring all concerns supports the school's efforts to promote a proactive protective environment for children. Fostering a school culture that actively promotes the disclosure and reporting of concerns, **no matter how small**, will prevent abuse and harm to children.

Other reasons why reporting a concern is important:

* Reporting all concerns helps create a school culture of openness, trust and transparency.

* The school Code of Conduct is an embodiment of the school's values and behaviour standards relating to all adults within the school. Encouraging staff to report a concern should an adult breach the Code of Conduct reinforces organisational expectations in regard to the school's values and standards.

* Identifying early signs of abuse and neglect may help get support to a child and his/her family and to prevent issues escalating further. Sharing information without delay can ensure that children get the support they need when they need it.

* Comprehensive reporting of concerns enables the school to gain a better understanding of the vulnerabilities within the school. For instance, there might be an area within the school which is unsafe, or a group of students that are particularly vulnerable (eg. due to age, gender, sexuality, socio-economic, ethnic or cultural background, or disability).

* It is also important for every staff member to keep in mind that they are but one set of eyes and each report of a concern offers a potentially vital piece of information. Reporting and recording all concerns enable the child protection lead to evaluate if any patterns are emerging or if repeated reports of suspicion are being raised against an adult in the school.

**Disclosure**

Disclosure of abuse is incredibly courageous. There are many and varied reasons why disclosure is difficult for children and young people, which is why it is incumbent upon adults to be aware that disclosure is usually a process, not a one-off event. Disclosure might include:

* A child directly disclosing something has happened to them

* A child indirectly making statements that imply something happened to them

* You notice a change in behaviour, or a child displaying signs that something is wrong

* Non-verbal communication in the form of letters, poetry, artwork, etc indicate that something may be wrong.

Reporting all indications that something may be troubling a child as a child protection concern can help a child get the support they need.

Never wait until a child discloses abuse directly or fully before taking action.

# What to Report?

So, when does an incident become a child protection concern that should be reported to the CPO/DSL? Without clear reporting guidance, this can be a cause of confusion for teachers and school staff which may be a contributing factor to the low level of reporting within schools. Without clear guidance staff are left to make their own determination on reporting thresholds which contributes to under-reporting of child protection concerns.

## CONCERNS ABOUT CHILDREN: RECOGNISING THE SIGNS

Essentially, any indication that a child might be experiencing harm or is at risk of harm is a child protection concern worthy of reporting to the CPO/DSL.

Many signs that a child is experiencing harm are the same, regardless of whether the abuse is physical, emotional, sexual or if the child is experiencing neglect. These include a child:

*   being afraid of particular places or making excuses to avoid particular people

*   knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/or sexual behaviour

*   having angry outbursts or behaving aggressively towards others

*   becoming withdrawn or appearing anxious, clingy or depressed

*   self-harming or having thoughts about suicide

*   showing changes in eating habits or developing eating disorders

*   regularly experiencing nightmares or sleep problems

*   regularly wetting the bed or soiling their clothes

*   running away or regularly going missing from home or care

*   not receiving adequate medical attention after injuries.

These do not necessarily mean that a child is being abused and signs may not be present when a child is being harmed, but reporting **any indication of harm** as a child protection concern will ensure that the school can provide support and help to the child.

The list above is by no means an exhaustive list of signs and indicators of abuse. For a more complete list see:

*   ICMEC Education Portal here.

*   NSPCC Definitions and signs of child abuse

**Appendix 1** is an example by one international school of guidance for staff on what to report to their school CPO/DSL and what to report to the school counsellor. It is recommended that all schools consider their own context and reporting structures in the development of clear guidance for staff in written policies and training.

## CONCERNS OR ALLEGATIONS ABOUT ADULTS IN SCHOOL

Concerns regarding adults in school can range from grooming behaviour and sexual harassment to boundary violations and allegations of abuse. Reporting concerns that do not meet the threshold of an allegation are often a grey area for schools. The following guidance is provided to enable schools to develop clear reporting procedures for staff that will foster a school culture of transparency, trust and protection for children.

**Low-level concerns:** A low-level concern is any concern, no matter how small, about an adult who may have acted in a way that is:

* Not consistent with the schools Code of Conduct, or

* Relates to conduct outside of schools which may lead one to questions their suitability to work with children.

* Low-level concerns may also relate to a staff member's own behaviour.

**Grooming:** All staff should also be aware of individual and institutional grooming behaviour and report any suspicion that an adult in the school is grooming another adult or child to the CPO/DSL who should immediately report this to the head of school.

**The distinction between an allegation and a concern**

The term 'allegation' refers to any instance in which it is alleged that an adult has:

* Behaved in a way that has harmed a child, or may have harmed a child;
* Possibly committed a criminal offence against or related to a child;
* Behaved towards a child or children in a way that indicates they may pose a risk of harm to a child.

Where this threshold is met, the school policy on how to make an allegation needs to be followed immediately with a report to the school head or a senior leader as specified in the school child protection/managing allegations policy.

*See https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf*

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Perpetrators of grooming manipulate their victims over a period of time, sometimes years, gradually gaining the victim's trust, desensitising and sexualising them for the purposes of abuse.[4] Grooming behaviour can sometimes look like 'normal' caring behaviour, which is why it can be difficult to identify.

*Signs of grooming manifested by sex offenders:*

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

* Overly affectionate behaviour with a child

* Making close physical contact sexual, such as inappropriate tickling and wrestling/play fighting

---

[4] https://www.farrer.co.uk/globalassets/news-articles/downloads/grooming-in-organisations---how-to-keep-children-safe.pdf

* Affording special attention or preferential treatment to a child

* Time spent alone with a child outside of the classroom/school or in private or isolated areas

* Making friends with a child's parents and visiting their home

* Acting as a particular child's confidante

* Giving gifts, money, toys, cards, letters to a child

* Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child

* Openly or pretending to accidentally expose the victim to nudity, sexual material and sexual acts (this in itself is classified as child sexual abuse but can also be a precursor to physical sexual assault)

* Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child[5]

* Pattern of rule breaking or breaching the school Code of Conduct

All staff need regular training to ensure they understand the different forms of abuse and signs and indicators that a child may be experiencing harm, or a child or community is being groomed.

Each school needs to develop clear guidance for all school staff on when and how to make a child protection report, including low-level concerns. **Appendix 2** provides an example **School Reporting Template** for schools to adapt.

## How Staff Report a Concern or Disclosure

Each school must have a procedure in place to report and record a concern. The following is offered as guidance for schools to develop clear reporting guidelines:

GUIDANCE ON REPORTING AN ALLEGATION OR CONCERN REGARDING AN ADULT OR MEMBER OF STAFF

* Subject to any law to the contrary in your country, it is considered good practice for all **allegations** about adults in school to be reported to the head of school. If the allegation is in relation to the head of school, then this should be reported to the Chair of the Board or equivalent.

* If there is a **concern** about an adult (as opposed to an allegation), staff should be encouraged to report to the CPO/DSL or a member of the Child Protection Team.

* The staff member making the report should not inform the adult in relation to whom the concern or allegation relates – it is for the CPO/DSL and head to determine when and how to inform this individual.

---

[5] https://www.cliftonlodgeschool.co.uk/wp-content/uploads/sites/21/2018/09/Safeguarding-and-Child-Protection-Policy-Sep-2018-FINAL.pdf

* For a concern about an adult that might be considered **low-level**, such as a breach of the code of conduct, schools might find it useful to put together a 'low level concerns' form.[6] Low-level concerns should ideally be reported directly to the CPO/DSL. All staff need to be aware of their responsibility to report to the CPO/DSL.

## GUIDANCE ON REPORTING A CONCERN REGARDING A CHILD/CHILDREN

* Subject to any law to the contrary in your country, it is considered good practice for concerns about children to be reported to the CPO/DSL (or, in their absence, their Deputy). This ensures that all information is channelled to a single contact point which allows for any patterns or regular incidents to be identified more quickly.
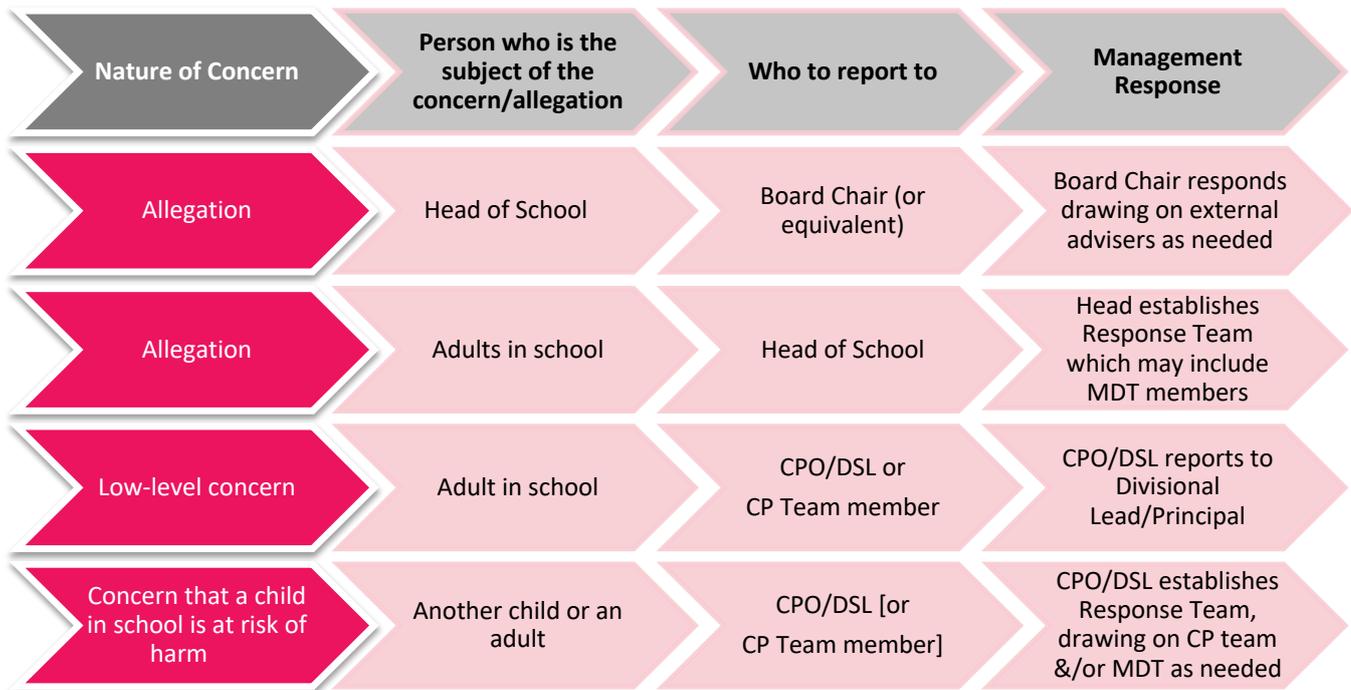
## REPORTING KEY PRINCIPLES

Here are some principles to bear in mind:

* Staff should be given the option to report any disclosure, suspicion, concern or allegations in writing (for example, by completing Part 1 of a Child Protection Report or low-level concerns form), or verbally. Where a verbal report is made, this must be followed up with a Child Protection Report to document that a child has been, or is at risk of being harmed, including exposure to family violence. For more guidance on Child Protection Reporting see **Appendix 2 for a Child Protection Report Template.** This downloadable form can be adapted to meet the needs of your school.

* All concerns, including low-level concerns, should ultimately be reported to the CPO/DSL. Where concerns are reported to a child protection team member or other senior members of staff, this should promptly be reported to the CPO/DSL. This ensures that any patterns of concerning behaviour can be identified. All child protection reports must be recorded in the Central Record.

* If the school establishes a low-level concerns file this should be maintained separate, but alongside, the Central Record.

* An incident file should be created for all allegations, in line with the International Protocol for Managing Allegations of Child Abuse

* If a staff member wishes to remain anonymous when submitting a low-level concern about an adult, efforts should be made to accommodate this, although it should be made clear to the reporting staff member that there may be some circumstances which require the school to name the staff member.

* All concerns and subsequent discussions and decisions, including the rationale for decisions, should be recorded in writing.

---

[6] See, for example, pages 51 and 52 of the Farrer & Co. low level concerns toolkit: https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf

* In some countries, mandatory reporter legislation requires the person who received disclosure or witnessed concerning behaviour to report directly to local authorities within a given timeframe. Identify such requirements in your policies and procedures.

| Nature of Concern | Person who is the subject of the concern/allegation | Who to report to | Management Response |
|---|---|---|---|
| Allegation | Head of School | Board Chair (or equivalent) | Board Chair responds drawing on external advisers as needed |
| Allegation | Adults in school | Head of School | Head establishes Response Team which may include MDT members |
| Low-level concern | Adult in school | CPO/DSL or CP Team member | CPO/DSL reports to Divisional Lead/Principal |
| Concern that a child in school is at risk of harm | Another child or an adult | CPO/DSL [or CP Team member] | CPO/DSL establishes Response Team, drawing on CP team &/or MDT as needed |

* The CPO/DSL should immediately share any concerns pertaining to **an adult in the school** with the Head of School.

* The CPO/DSL should immediately share **low-level concerns** pertaining to **an adult in the school** with the Head of School or the relevant Divisional Head or Principal, as appropriate given the size and context of the school. All low-level concerns should be reviewed regularly with the Head of School to maintain consistency and review compliance to the school Code of Conduct.

* No concern should ever be handled by only one member of staff.

* Whilst it is **everyone's responsibility to protect children**, it is not everyone's responsibility to investigate child protection concerns or allegations. The CPO/DSL and the Child Protection Response Team will lead an inquiry.

* All allegations should be responded to in accordance with the Managing Allegations of child abuse by educators and other adults – a protocol for international schools.

# Child Protection Records

## Individual Records

The CPO/DSL should maintain an individual record of child protection concerns. See **Appendix 2** for a **Child Protection Report Template.** This downloadable form can be adapted to meet the needs of your school. Each record should include:

- Date/time of incident/disclosure

- Date/time of report

- Name and role of person concern reported to & name/role or person making the report, including contact details

- Names of all involved, including any witnesses

- What was said/done and by whom (in child's own words if from disclosure)

- Name and role of individual about whom the concern is being raised, if known or applicable

- Action taken to address the concern, including rationale

- The reasons why the school decided not to refer the concern to an external agency (if relevant)

**Reporting Principles**

Report and record the facts - what you saw, were told, overheard, became aware of or suspect. Report the facts.
It is not your role to investigate

Refer concern to the CPO/DSL.Reassure the individual (child or adult) that they have done the right thing by telling you

In the case of a disclosure, do not promise to keep the information confidential

## Central Record

All schools need to maintain a central record of all child protection concerns. A central record should:

* be divided into (a) concerns about children and (b) concerns about adults. Consider arranging each file by individual child or adult, so that patterns can easily be spotted.

* be held securely with access limited to a small number of staff such as the CPO/DSL, the Deputy(s), their manager, the Head of School and the HR manager. This is to maintain student and staff confidentiality.

* be maintained separately from personnel files or student records with a cross-reference recorded in staff/student records,

* where a concern is later found to be malicious, the report can be removed.

* A **Low-Level Concerns Log** a school may want to maintain a separate low-level concern log, or it may be a section within the Central Record. This should be divided by individual with low-level concerns recorded in date order. The CPO/DSL should monitor the log regularly to identify any patterns of concerning behaviour[7].

* An **Allegation Incident Report** should also be maintained to record any allegations made against adults in the school. The file should be confidential, secure and be separate from the employee file, though it should be cross referenced in the employee file.[8]

## Further Guidance

* Signs and indicators of abuse may be present when abuse is not happening and may not be present when abuse is occurring. There is no one way to determine if abuse has occurred.

* All child protection concerns are to remain confidential and the CPO/DSL and Child Protection Allegation Team must make every effort to ensure the confidentiality is upheld by only sharing relevant information to members of staff on a need to know basis.

* Schools must balance the child's right to privacy with their duty to keep children safe and do no harm. All decisions are to be made in the best interest of the child.

* Staff may expect to be informed of safety planning, without knowing every detail of why this plan is in place.

* **Referrals to external social services**: The school counsellor or learning support should ordinarily be made aware of all referrals to external children's services, psychologists or therapists.

---

[7] See page 13 of the Farrer & Co. low level concerns toolkit: https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf
[8] See page 24 of the International Protocol on Managing Allegations of Child Abuse against Educators and other Adults in school: https://www.icmec.org/wp-content/uploads/2018/09/Protocol-Managing-Allegations-of-Child-Abuse-by-Educators-and-other-Adults.pdf

# References

International Centre for Missing & Exploited Children (ICMEC) Education Portal at EdPortal.ICMEC.org

Department of Education, UK. 2019. *Keeping Children Safe in Education*. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf

Eastman, A., Foster, J., O'Rourke, O. and Smellie, D., 2020. *Developing and implementing a low-level concerns policy: A guide for organisations which work with children*. Farrer & Co. Safeguarding Unit Available at:
https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf

ICMEC, June 2020, Definition, signs and indicators of abuse. Available at:
https://cdn.icmec.org/wp-content/uploads/2020/06/Forms-of-abuse-definitions-signs-and-indicators.pdf

International Taskforce on Child Protection, September 2018, International Protocol on Managing Allegations of Child Abuse by Educators and other Adults, Available at: https://www.icmec.org/wp-content/uploads/2018/09/Protocol-Managing-Allegations-of-Child-Abuse-by-Educators-and-other-Adults.pdf

Lloyd, J., Walker, J. and Bradbury, V. June 2020. Beyond Referrals: Harmful sexual behaviour in schools: a briefing on the findings, implications and resources for schools and multi-agency partners. Contextual Safeguarding Network, University of Bedfordshire. Available at: www.csnetwork.org.uk/en/beyond-referrals-multi-agency

NSPCC Learning, *Definitions and Signs of child abuse*. Available at:
https://learning.nspcc.org.uk/research-resources/briefings/definitions-signs-child-abuse

# Appendix 1: Guidance on Reporting

This chart is provided as guidance only and is not a comprehensive list. It is recommended that each school develop reporting guidance for staff that meets the specific context and needs of their school.

---

*GENERAL PRINCIPLES*

* *When an adult in school notices that a child is struggling with their mental health or well-being, they should help to facilitate additional support for that child via the counsellor.*

* *Any signs or indicators of physical, sexual, emotional abuse or neglect, or any indications that a child may pose a risk of harm to themselves or to others, should be reported as a child protection concern. These do not always mean abuse is occurring but should be reported to the CPO/DSL immediately.*

* *It can be difficult to tell whether changes in behaviour or signs of distress indicate that a child is exposed to harm and abuse, and sometimes mental health struggles can be a symptom of abuse. For these reasons it's essential that counsellors are alert to any signs that a child they are supporting might be being harmed or abused and that the CPO/DSL and counsellors work closely together to make sure that any child protection concerns are referred to the CPO/DSL immediately, and that all children receive the right support.*

* *If an educator or another adult is unsure whether and to whom they should report a concern, they should seek guidance from the CPO/DSL.*

---

| Topic | School Counsellor: *Listed here are incidents or behaviours that should prompt staff to seek additional well-being support for a child.* *PLEASE NOTE that in any of the below examples, it's possible that the child may also be being harmed or abused, or may be harming or abusing others or themselves – where you suspect that this is the case, then a referral should also be made to the CPO/DSL immediately.* | Child Protection Officer/Lead *Listed here are incidents or behaviours that should prompt staff to report a child protection concern to the child protection lead in the form of a written report.* |
|---|---|---|
| Friendship matters, bullying & other forms of peer-on-peer abuse. | A child is having difficulty finding friends or is struggling to fit in. | You suspect that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s).[9] |

---

[9] Farrer & Co peer-on-peer abuse toolkit: https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/farrer--co-safeguarding-peer-on-peer-abuse-toolkit-2019.pdf and Rigg, K. and Lloyd, J. Learning from young people: How schools and universities can protect students from peer-on-peer abuse: https://www.cois.org/about-cis/news/post/~board/perspectives-blog/post/learning-from-young-people-how-schools-and-universities-can-protect-students-from-peer-on-peer-abuse

| Family issues | An illness or death in the family. | You suspect that a child's basic needs are not being met such as dental care, appropriate clothing or food. |
|---|---|---|
| | A divorce or separation is impacting on the child's mental health. | You become aware that the child's parents are going through a contentious divorce that involves intimidation, threats and/or violence in the home. |
| | The child seems to be anxious a lot of the time, worrying about living up to parental expectations. | You know or suspect the child is dwelling in a home where there is violence, substance abuse or addiction. |
| | Child is having difficulty dealing with family changes, eg. transitions/relocation issues. | You know or suspect a child is being left home without suitable adult guardianship for their age such as in unsafe environments, for excessive durations, or with another minor in charge of household. |
| Student | A behaviour modification plan needs to be drawn up between councillor, teacher and child. | You suspect that a student may be being groomed online by another child or an adult. |
| | You notice significant changes in the child' s behaviour over a period of time for example, more than 3-5 days. | You suspect that a child is in an abusive relationship |
| | Child's self-concept is low. | A child is touching other children in a way that is problematic or harmful, given their age and stage of development.[10] |
| | The child daydreams or seems preoccupied/distracted a major portion of the day. | You know or suspect that a child is putting pressure on another child to send a sexual image, or is sending unsolicited sexual images of himself/herself to others, or is taking sexual films or images of others without their consent. |
| | Child is falling asleep in class regularly. | A child is afraid of being around other students outside of the classroom setting, whether during lunch or break, in the playground, toilets or other areas, and you suspect that they are scared about being harmed. |
| | Child's grades declining. | Child is self-harming or exhibiting suicide ideation or eating related disorders such as anorexia, bulimia or consumption of foreign objects (paper, erasers). |

---

[10] Brook sexual behaviours traffic light tool: https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/

| | |
|---|---|
| Something seems to be 'bothering' the child – example, over emotional/ anxiety/angry/ crying frequently. | Intimate relationships between peers where there is a significant age gap, differences in ability, use of coercion, and/or where peer group pressure may be influencing behaviour in a way that is harmful to the child. |

**Disclaimer: This grid is designed to give you some guidance about when to elevate or document a child protection concern. It is not inclusive or rigid. In most cases counsellors will work in tandem with those taking a child protection role or recording concerns in a central record.**

## Appendix 2: Child Protection Report Template

*This template is provided as a guide only and should be adapted to meet the needs of your school. In this template 'child' is used rather than 'student', this is to include cases in which the child is not a student at the school but is associated with the school in some way. Although the term 'child' is used, this form, or an equivalent, should nonetheless be completed in relation to all students including those who are aged 18 or over, albeit they may no longer legally be a 'child' in your country.*

| CHILD PROTECTION REPORT |
| --- |
| **PART 1: TO BE COMPLETED BY THE STAFF MEMBER MAKING THE REPORT OR THE CPO/DSL** |
| Staff Member Leading the Response |
| Name of staff member: <br><br> Role: <br><br> Relationship to child: |
| Child's Information |
| Child's Name: <br><br> Gender: <br><br> Grade: <br><br> Age: <br><br> Other details: (*note here any other background details that may be relevant to this child protection report*) <br><br><br><br><br> |
| Details of the Incident, Disclosure or Suspicion |
| Full Name (of person making the report): <br><br> Staff role &/or relationship to student: <br><br><br><br> |

| Contact details: |
| :--- |
| |

| |
| :--- |
| Date of incident or disclosure: |
| Time of incident or disclosure: |
| Location of incident or disclosure: |
| Name of alleged perpetrator (if known): |
| Relationship to child: |

Details of the incident, disclosure or suspicion:

* *Provide a clear account of the incident or disclosure noting how you became aware of the incident and include the names of witnesses, if relevant.*
* *Be as specific as you can. Use names to add clarity to your statements.*
* *Where possible, use the exact words of the student(s) and note this using quotation marks.*
* *Avoid speculation or personal conclusions, for example, say child was crying, not child was upset.*
* *If reporting a suspicion, what are the indicators or instances which led you to consider that a child may be subject to harm or at risk of harm (including family violence). Consider physical, behavioural and emotional indicators of abuse and any patterns of behaviour that have raised a suspicion.*
* *Attach a body map, if appropriate, to indicate the injury shape, location, and colour*

FRONT    BACK    RIGHT    LEFT
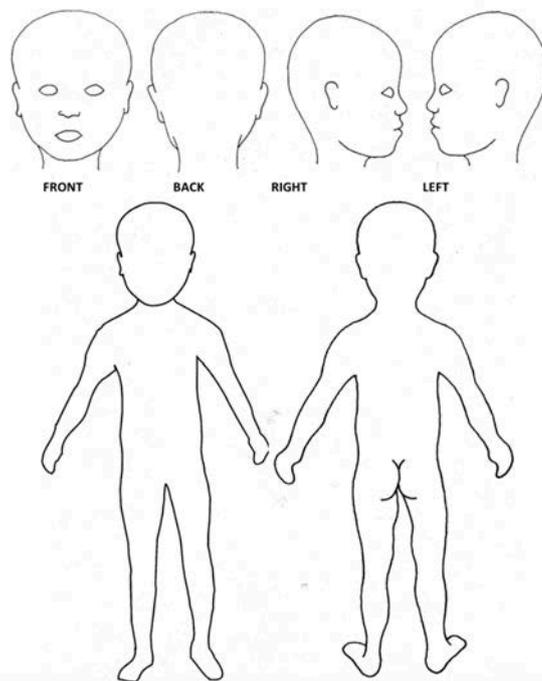
PART 2: TO BE COMPLETED BY THE CPO/DSL ONLY

## Action Taken: School

* *Report any action taken, eg. safety planning, referrals, disciplinary action, etc*

* *Provide details of discussions with the child protection team, including discussion outcomes*

* *Provide details of discussions with any member of the multi-disciplinary team that may have been consulted*

* *Provide details of discussions with school leadership, including discussion outcomes*

## Action Taken: Parents/Carers

* *Provide details of your discussion with the child's parents/carers and any follow-up action that may have been taken. Include who was involved in the discussion(s).*

*  *If parents/carers were not informed of the incident or disclosure, state reasons why this was not deemed appropriate (eg. family member involved in abusing the child, someone may be put in danger or informing parents may interfere with a criminal investigation).*

## Action Taken: Extern Agencies

*  *Note if any external agencies have ben informed of this concern, eg. embassy, police, local support services, ICMEC response team, local hotline or cyber tip line etc.*

Signature:


Date of report:

## Planned Actions & Ongoing Support

*  *Note here any further action, responses, or recommendations from the child protection committee have been undertaken to support the child, including any referral to specialised services.  These should include risk assessment, risk mitigating actions, and safety plans with the names of those accountable for following up.*

*  *Include the names of anyone to whom information of the incident was shared.*

## Safety & Well-being Review

*  *Complete this section 4-6 weeks following the reporting of an incident.*

Is the child safe from abuse or harm?

o   No

o   Yes

   *If no, what steps need to be taken?*

Does the child have any well-being issues that are not currently being addressed?

o   No

o   Yes

   *Are further actions or supports needed to improve the well-being and mental health of this child?*

Does the person/staff member that made the report need any support?

- o No

- o Yes

  *What actions, if any, were made to support the member of staff and was this adequate?*

Does the school need to take any further action? Tick all that may be appropriate:

- o Review child protection policies and procedures

- o Review and adapt safety plans for child/ren involved

- o Engage child's parents/carers

- o Are there any learning's from this incident that can be used to prevent harm to children

Signature of Child Protection Officer:

Date:

Signature of Principal and/or Counsellor:

Date:

Signature of Director

Date: