HARROW INTERNATIONAL SCHOOL BENGALURU

SAFEGUARDING POLICY

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KEY CONTACTS

Child Protection Officer (CPO) and Designated Safeguarding Lead (DSL): Mr. Adam Jozef.

Deputy Child Protection Officers (DCPO) and Deputy Designated Safeguarding Leads (DDSLs) Secondary: Mr. Matthew McClune, Mr. Sudeep Sathyanaryanan, Ms Rohini Malhotra, Ms Prerna Nautiyal, Mr. Anthony Orme

Primary: Mr. Jack Mallon, Ms. Michelle Godber.

POLICY STATEMENT AND PRINCIPLES

Harrow International School Bengaluru takes a whole-School approach to safeguarding and child protection and this will be at the forefront and underpin all relevant aspects of process and policy development at the School.

- This policy applies to all students in the School.
- Any student, whether under or over the age of 18, will be regarded as a child for the purpose of this policy.
- All members of staff have a responsibility for the implementation of this policy.
- Any concerns regarding child protection and/or safeguarding must be reported immediately to the Child Protection Officer / Designated Safeguarding Lead or, in their absence, to one of the Deputy Child Protection Officers / Deputy Designated Safeguarding Leads Concerns about the School's own safeguarding practices, or unresolved allegations, may also be escalated externally to the Special Juvenile Police Unit (SJPU), the Child Welfare Committee (CWC), Childline (1098/112), or the Karnataka State Commission for Protection of

Child Rights (KSCPCR), which is the primary state body for external accountability, inquiry and inspection of a school's child-protection compliance under the Karnataka State Child Protection Policy framework.

- All staff should be alert to identifying children who may benefit from early help.
- If a crime has been committed, it should be reported to the police.
- All staff must know who the trained CPO (DSL) and DCPOs (DDSLs) are.
- All concerns of a safeguarding or child protection nature must be treated in the utmost confidence.
- Where there is a safeguarding concern, the Governing Body and SMT should always ensure that a student's wishes and feelings are taken into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and that they can safely express their views.

INTRODUCTION

Harrow Bengaluru recognises that it has a duty to ensure that safeguarding permeates all activities and functions and expects all members of staff, volunteers and other third parties to share its commitment to safeguarding and promoting the welfare of children. Adults at Harrow Bengaluru take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

LEGAL FRAMEWORKS

Harrow International School recognises that the safety, dignity and wellbeing of every child are paramount and that effective safeguarding practice must operate in accordance with both Indian national law and Karnataka state frameworks, as well as international child rights standards. Our policy aligns with the Protection of Children from Sexual Offences Act, 2012, which establishes robust legal protections against sexual abuse and mandates reporting of offences involving children; the Juvenile Justice (Care and Protection of Children) Act, 2015, which provides for the care, protection and rehabilitation of children in need; and the Right of Children to Free and Compulsory Education Act, 2009, which prohibits physical punishment and mental harassment in educational settings and promotes a safe and inclusive learning environment. We also adhere to the statutory principles set out in the Karnataka State Child Protection Policy and the relevant provisions of the Karnataka Education Act, 1983, ensuring compliance with state guidance for child welfare and school governance. In addition, this policy reflects India's commitments under the United Nations Convention on the Rights of the Child, which underpins our safeguarding practice by affirming children's rights to protection, participation and provision. The School cooperates fully with external compliance audits, inspections and certification processes as required under the Karnataka State Child Protection Policy framework. Together, these national, state and international instruments inform our safeguarding systems, procedures and training to ensure that all students are protected from harm and are able to thrive in a secure and supportive environment.

The operative procedures set out in this policy (including reporting routes, statement-recording and staff structure) are subordinate to, and must be read consistent with, the Protection of Children from Sexual Offences Act, 2012 (as amended by the POCSO (Amendment) Act, 2019), the POCSO Rules 2020, the Juvenile Justice Act, 2015, and the Karnataka State Child Protection Policy (2016, as revised 2023) and its Operational Guidelines for Educational Institutions. Where any UK-origin content in this policy conflicts with Indian law, Indian law prevails.

THE SCHOOL'S CORE SAFEGUARDING PRINCIPLES

- The School's responsibility to safeguard and promote children's welfare is paramount.
- It is everyone's responsibility to safeguard children. Everyone who comes into contact with children and their families has a role to play in keeping children safe.
- Safer children make more successful learners.
- The School's Safeguarding Policy will be reviewed at least annually by the CPO/DSL and by the Governors.
- The School will ensure that, in addition to this annual policy review, the School's Safeguarding Team reviews ongoing safeguarding cases weekly, and the Child Protection Committee conducts a formal review of policy implementation at least once every three months, consistent with the Karnataka State Child Protection Policy Operational Guidelines for Educational Institutions.

TERMINOLOGY

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Child protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

Members of staff refers to all those working for or on behalf of the School, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

CONTEXTUAL SAFEGUARDING

In order to help prevent and tackle peer-on-peer abuse, the School understands the value of contextual safeguarding. Contextual safeguarding is an approach to understanding and responding to children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers sometimes have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, safeguarding practitioners need to engage with individuals and sectors who do have influence over/within extrafamilial contexts, and recognize that assessment of, and intervention with, these spaces is a critical part of safeguarding practices.

Contextual safeguarding, therefore, expands the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts. Child includes everyone under the age of 18. However, the School's duty to promote welfare and health and safety applies to all the students in its care whether they are under or over the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, guardians, foster carers and adoptive parents.

SAFEGUARDING STATEMENT

Harrow International School Bengaluru fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all its students. The School endeavours to provide a safe and welcoming environment where students are respected and valued. Members of staff should be alert to the signs of abuse and neglect and follow procedures to ensure that students receive effective support, protection and justice. The procedures contained in this policy apply to all staff, Governors, volunteers and visitors.

SAFEGUARDING IN HARROW SCHOOL BENGALURU

This includes:

- Ensuring students' health and safety.
- Referring concerns or allegations about a child to the appropriate authority promptly.
- Preventing bullying and all forms of abuse.
- Preventing harassment and discrimination.
- Use of physical intervention and meeting the needs of pupils with medical conditions.
- An awareness of the link between mental health and safeguarding.
- Provision of first aid and medical support.
- Preventing alcohol, drug and substance misuse.
- Educational visits and intimate care.
- E-safety.
- Issues specific to the local area (for example road safety).
- School security.

GUIDING PRINCIPLES

The welfare of the child is paramount. All children, regardless of age, gender, ability, culture, race, language, religion, sexual identity, caste, class, skin colour, ethnicity, hair texture and linguistic identity have equal rights to protection. All members of staff have equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm. Students and staff involved in child protection issues will receive appropriate support.

POLICY AIMS

To provide all members of staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities; to ensure consistent good practice; to demonstrate the School's commitment with regards to child protection to students, parents and other partners.

THE SCHOOL'S COMMITMENT

The School adopts an open and accepting attitude towards students as part of its responsibility for pastoral care. We hope that students and parents will feel free to talk about any concerns and see the School as a safe place when there are difficulties. Students' worries and fears will be taken seriously. Students are encouraged to seek help from members of staff.

Harrow School will therefore:

- Establish and maintain an ethos where students feel secure, are encouraged to talk, and are listened to.
- Ensure that students know that there are adults in the School whom they can approach if they are worried or are in difficulty.
- Include in the curriculum activities and opportunities that equip students with the skills needed to stay safe from abuse and which will develop resilience and realistic attitudes to the responsibilities of adult life.
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies.
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with the students.
- Ensure that all members of staff are aware of how and when to act on concerns that they have and work in a safe and appropriate manner at all times.

CONFIDENTIALITY

The School recognises that all matters relating to child protection are sensitive and confidential. The Head of School or the CPO/DSL will share that information on a 'need to know, what and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the School, unless in confidential meetings for that purpose.

Members of staff are expected to manage the requirement to maintain an appropriate level of confidentiality while at the same time liaising with relevant professionals such as the CPO/DSL. Members of staff should never promise a student that they will not tell anyone about an allegation, as this may not ultimately be in the best interests of the child. The name, age, address, photograph, family details, school, neighborhood or any other particulars that could lead to the identification of a child involved in a child protection matter will not be disclosed to any person or any form of media, until and unless a court of competent jurisdiction has permitted or ordered such disclosure.

CHILD PROTECTION PROCEDURES

All members of staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share information and to work together to provide children and young people with the help they need. Members of staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When concerned about the welfare of a student, staff members should always act in the best interests of the child. The School will act on identified concerns and provide early help to prevent concerns from escalating. Where there is knowledge, apprehension or suspicion that a child has been sexually abused, this must be reported immediately to the Special Juvenile Police Unit (SJPU), or in its absence the local police station, under section 19 of the POCSO Act; this duty arises on mere suspicion, not only where a child is in immediate danger. Non-offence child welfare concerns should be referred to the immediately, or the jurisdictional Child Welfare Committee (CWC). Childline (1098/112) should also be used as an emergency contact. The School will ensure it provides as much information as possible as part of the referral process to allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

RECOGNISING ABUSE

To ensure that students are protected from harm, it is important to understand what types of behaviour constitute abuse and neglect. All members of staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse is a form 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 others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. There are four principal categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

PHYSICAL ABUSE: A form of abuse that 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.

EMOTIONAL ABUSE: 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 a child 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.

SEXUAL ABUSE: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. 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 (also known as peer-on-peer abuse) in education and all staff should be aware of it and of the School's policy and procedures for dealing with it.

NEGLECT: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.

INDICATORS OF ABUSE

It is the responsibility of all members of staff to report any and all niggling worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a student has been abused. A child who is being abused or neglected may show a wide range of physical, emotional and behavioural signs, including but not limited to injuries, changes in eating habits, fearfulness, self-harm, or a change in behaviour. Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the CPO/DSL to decide how to proceed. It is therefore essential that members of staff report their concerns. Staff do not need 'absolute proof' that a student is at risk but should act on any hunches or worries in the knowledge that they will be supported in their safeguarding role. Reports made in good faith will always be dealt with in accordance with the School's Whistleblowing Policy, regardless of outcome.

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Other community safety incidents in the vicinity of a school can raise concerns among children and parents. Incidents of this type should be reported to Harrow Bengaluru Security. Students are given advice on how to keep themselves safe as part of the PSHE programme.

CHILD CRIMINAL EXPLOITATION

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance in power to coerce, control, manipulate or deceive a child into any form of criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Indicators of CCE include children who appear with unexplained gifts or new possessions, who associate with other young people involved in exploitation, who suffer from changes in emotional wellbeing, who misuse drugs and alcohol, who go missing for periods of time, or who regularly miss school or education.

CHILD SEXUAL EXPLOITATION

Child sexual exploitation (CSE) is a form of sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the CPO.

MENTAL HEALTH

All staff should be aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation. Only appropriately trained professionals should attempt to diagnose mental health conditions. Any member of staff who has a concern about the mental health of a student that might also be a safeguarding concern should speak to the CPO or a DCPO straight away.

VULNERABLE GROUPS

Harrow International School recognises that some children may be particularly vulnerable to harm and requires enhanced vigilance and protective measures. In accordance with the Karnataka State Child Protection Policy, the School acknowledges and safeguards all vulnerable categories identified within the state framework, including (but not limited to) children with disabilities and special educational needs; children in need of care and protection; children from economically or socially disadvantaged backgrounds; looked-after and separated children; children affected by abuse, neglect or exploitation; children at risk of child labour, trafficking or early marriage; children from minority or marginalised communities; and children experiencing mental health vulnerabilities. The School is committed to equitable, inclusive and trauma-informed practice, ensuring that additional barriers to safety are recognised and addressed through appropriate pastoral support, reasonable adjustments, early intervention and, where necessary, referral to statutory authorities.

PEER-ON-PEER ABUSE

Harrow Bengaluru has a zero tolerance and whole-School approach to peer-on-peer abuse. Consequently, it seeks to educate all governors, staff, volunteers, parents and students about the issue. All members of staff should be aware that children can abuse other children, that this can happen both inside and outside School and online, and should speak to the CPO/DSL (or a DCPO/DDSL) straight away if they have any concerns regarding potential peer-on-peer abuse.

Peer-on-peer abuse may take different forms, such as bullying (including cyberbullying), abuse in intimate partner relationships, physical abuse, sexual violence, sexual harassment, causing someone to engage in sexual activity without consent, consensual and non-consensual sharing of nudes and semi-nude images (sexting/YPSI), upskirting, and initiation/hazing-type violence and rituals. The School does not tolerate discrimination or prejudice against students on the basis of religion, caste, gender, language, physique, disability, or any other factor, consistent with the Karnataka State Child Protection Policy. This Safeguarding Policy operates alongside the School's Code of Conduct (Behavioural Guidelines) for students, which sets out the standards of behaviour expected of students towards one another.

ALLEGATIONS AGAINST STUDENTS

A student against whom an allegation of a child protection nature has been made may be suspended from the School during the investigation. The School's policy on behaviour, discipline and sanctions will apply. If it is necessary for a student to be interviewed by the police or other authorities in relation to allegations of abuse, the School will ensure

that, subject to advice from external agencies, parents are informed as soon as possible, and that the student is supported during the interview by an appropriate adult. Consistent with section 22 of the POCSO Act, a child shall not be punished for making a false complaint or providing false information, provided it was not done with the intent to malign any person. Only complaints made with malicious intent may attract disciplinary consideration. Where the person against whom an allegation is made is a child, they will be treated as a "child in conflict with law" under the Juvenile Justice Act, 2015. The student will be suspended from the School pending the outcome of any Police/Juvenile Justice Board inquiry, and will be referred, through their parents, to a counsellor or the Child Welfare Committee for rehabilitative support.

SEND

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with send or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.

Well-judged pastoral support and attention for these students is essential, along with ensuring any appropriate support for communication is in place. The cpo/dsl liaises closely and directly with the head of learning skills regarding all students with send at harrow.

SERIOUS VIOLENCE

Staff should be aware of the indicators that may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or excluded from School, having experienced child maltreatment and having been involved in offending, such as theft or robbery.Staff should share their concerns immediately with the CPO/DSL if they suspect such involvement.

USE OF REASONABLE FORCE

Harrow International School recognises that there may be rare occasions where the use of reasonable force is necessary to prevent harm. Reasonable force refers to the minimum degree of physical intervention required to prevent a student from injuring themselves or others, committing a criminal offence, causing serious damage to property, or seriously disrupting good order and discipline.

Any such intervention must be proportionate to the circumstances, appropriate to the student's age and understanding, and used only as a last resort when other de-escalation strategies have failed or are not possible. Force must never be used as a form of punishment. Wherever possible, staff should seek assistance before intervening and must record and report any incident involving physical restraint to the Child Protection Officer /DSL and senior leadership in accordance with school procedures. The welfare, dignity and safety of the child remain paramount at all times. In accordance with section 17 of the Right of Children to Free and Compulsory Education Act, 2009, corporal punishment and mental harassment of any student are absolutely prohibited, regardless of the circumstances. This is distinct from and in addition to the guidance on reasonable force above, which addresses only the narrow, exceptional use of physical intervention to prevent harm. Staff should also have regard to the NCPCR Guidelines for Eliminating Corporal Punishment in Schools.

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

The School adopts a zero-tolerance approach to sexual violence and sexual harassment.
It recognises that:

- Schools must protect any adult students (i.e. aged 18 and above) and engage with the authorities as required;
- Members of staff need to choose terminology carefully (for example the use of 'victim' and 'perpetrator') on a case by case basis;
- A student abusing another student may have been abused themself and may also need support;
- Sexual violence and sexual harassment can be driven by wider societal factors such as everyday sexist stereotypes and everyday sexist language;
- Sexual violence and sexual harrassment can happen both in and out of school as well as online, and often occurs in a mixture of environments;
- The scale of the problem is considerable and has probably been underestimated;
- Sexual assault can result in a range of health needs, both mental and physical, including unwanted pregnancy;
- Students might not find it easy to talk about their abuse verbally so might not tell staff about abuse; it may be that staff overhear a conversation regarding the abuse or a student's behaviour changes etc.;
- The definition of 'consent', including reference to an individual having the 'freedom and capacity to choose', needs to be included in the school's curriculum;
- All members of staff, particularly the CPO/DSL, need to adopt a contextual safeguarding approach to incidents, which involves considering the context in which incidents or behaviours occur;
- Assessments of students need to consider wider environmental factors present in a child's life that are a threat to their safety or welfare;
- Information sharing is important, especially where students involved in allegations of sexual violence or sexual harassment attended two or more different schools or colleges;
- In cases where police will not take further, the School will continue to engage with specialist support for the victim (and perhaps also for the perpetrator), as required;
- Issues and actions are regularly reviewed in order to ascertain patterns of behaviour and to look for further ways to improve procedures and practices; and
- How a School responds to an incident will impact future victims of sexual violence or sexual harrassment.

There are four likely routes to consider when managing a report of sexual violence or sexual harassment:

- Managing internally: in some cases of sexual harassment (such as one-off incidents) the School may manage the incident internally;
- Early help: this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- Referrals to outside agencies: in cases where there has been harm, or there is an immediate risk, a referral will be sought;
- Reporting to police: In cases where rape, assault by penetration or sexual assault is reported, the School will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other students in the School. The CPO/DSL will work closely with the police to ensure that the School's actions do not jeopardise the police investigation. If a student is convicted or cautioned, the School will carry out a risk assessment and consider suitable action.

Note: It is important for schools to ensure that the victim and perpetrator(s) remain protected, especially from bullying and harassment. Whatever the outcome of an incident, the School will continue to support both the victim and perpetrator, as appropriate. Records will be kept of concerns, discussions and decisions made, and the reasons for those decisions.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the CPO/DSL should consider whether the student who made the allegation is in need of help or may have been abused himself by someone else. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it.

BULLYING

The School's Counter-Bullying Policy should be read alongside this document. Bullying is one form of peer-on-peer abuse. While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and has even featured in the suicide of some young people. Members of staff should be aware of the harm caused by bullying and must use the School's counter-bullying procedures when necessary. In some situations, a student's behaviour may warrant a response under child protection rather than or as well as counter-bullying procedures. All incidences of bullying, including cyber-bullying and prejudice-based and discriminatory bullying, should be reported.

CONCERNS ABOUT A STUDENT'S WELFARE

All members of staff should be able to distinguish between a safeguarding concern about a child and a child who is in immediate danger or at significant risk of harm. There will be occasions when a member of staff may suspect that a student may be at risk but have no 'real' evidence. The student's behaviour may have changed, his actions may reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, the member of staff must try to give the student an opportunity to talk. The signs they have noticed may be due to a variety of factors. It is fine for a member of staff to ask the student if he is okay, or if he/she can help in any way. Members of staff should report their concerns to the student's House Master/Mistress. If the student starts to reveal that he is being (or has been) harmed, members of staff should follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, he/she should discuss their concerns with the CPO/DSL or with one of the DCPOs/DDSLs

IF A STUDENT MAKES A DISCLOSURE

It takes courage for a student to disclose that they have been or are being abused. They may feel ashamed, particularly if the abuse is sexual. The abuser may have made threats about what will happen if they tell. The student may have lost trust in adults, or he may believe, or have been told, that the abuse is their own fault. During such conversations with the student, members of staff will:

- Allow the student to speak freely;
- Remain calm and avoid overreaction;
- Offer reassurance and general words of comfort (rather than physical touch);
- Not be afraid of pauses or silences;
- Not ask investigative or leading questions;
- Explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility;
- Not reprimand the student for failing to disclose earlier;
- Establish next steps (agree to go to see his house master/mistress or the CPO/DSL) but let the student know that someone will come to see them before the end of the day;
- Report verbally to the CPO/DSL, even if the student has promised to do it by himself;
- Write up the conversation as soon as possible as a record of concern; and
- Seek support, if distressed.

NOTIFYING PARENTS

The School will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively. The School will contact parents in the event of a concern, suspicion, or disclosure. However, if the School believes that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought.

YOUTH-PRODUCED SEXUAL IMAGERY (SEXTING)

This refers to the consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery). Any incident involving youth-produced sexual imagery should immediately be reported to the CPO/DSL.

CONFIDENTIALITY AND SHARING INFORMATION

Staff should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support. All staff will understand that child protection issues warrant a high level of confidentiality, not only to respect any students or staff involved but also to ensure that information released into the public domain does not compromise evidence. Members of staff should only discuss concerns with the CPO/DSL or a DCPO/DDSL, the Head of School, Deputy Head of School or Chair of Governors (depending on whom the subject of the concern is). That person will then decide who else needs to have the information and they will disseminate it on a 'need- to-know' basis.

ROLES AND RESPONSIBILITIES

Everyone who encounters our students and their families has a role to play in safeguarding children. We place a high priority on identifying concerns early and provide help for the students to prevent concerns from escalating. We do this because we are aware that we play a vital role in the wider safeguarding system for children. Together with our colleagues in the police, health and other children's services, we promote the welfare of children and protect them from harm. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. In India, this professional duty is given specific legal force by section 19 of the POCSO Act, which imposes a mandatory obligation on every member of staff to report any knowledge, apprehension or suspicion of a child being sexually abused. Failure to do so is itself a punishable offence under section 21 of the POCSO Act. These standards also apply to trainees, inductees and newly qualified teachers and we fully adhere to these standards, applying the School's disciplinary procedures, where appropriate, in cases of misconduct.

THE CHILD PROTECTION OFFICER (CPO) and Designated Safeguarding Lead (DSL)

- Mr. Adam Jozef _____ is the Child Protection Officer (CPO) and Designated Safeguarding Lead (DSL) and is responsible for safeguarding and child protection at Harrow Bengaluru, including online safety;
- He/she has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff;
- He/she is a member of the Senior Management Team, can delegate activities to appropriately trained deputies, but cannot delegate the ultimate lead responsibility for child protection;
- He/she manages referrals from School staff or any others from outside the School;
- He/she acts as a source of support and expertise to the School community;
- He/he encourages a culture of listening to students and taking account of their wishes and feelings;
- He/she is alert to the specific needs of children in need or those with Special Educational Needs;
- He/she has a strong knowledge of Harrow Bengaluru safeguarding procedures;
- He/she has an understanding of locally agreed processes for providing early help and intervention;
- He/she keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from the student's general file;
- When students leave the School, ensures the child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file;
- He/she develops effective links with relevant statutory and voluntary agencies;
- He/she confirms that all staff have read and understood the school's Safeguarding Policy;
- He/she ensures that mechanisms are in place to help staff understand and discharge their responsibilities there under;
- He/she ensures that the Safeguarding Policy is annually reviewed by the Governing Body and the Child Protection Committee;
- He/she liaises with the Governing Body and the Head of School as appropriate;
- He/she ensures that a record of staff attendance at child protection training is kept;
- He/she makes the Safeguarding Policy available publicly;
- He/she in the Head of School's absence, ensures cases concerning a member of staff are referred appropriately
- He/she submits a monthly report to the Governing Body about how the School's duties have been carried out.

- During term time will be in School during school hours or, if not, will ensure that one of the DCPOs/DDSLs is in School.
- Outside school hours, the CPO/DSL and DCPOs/DDSLs will be available by phone.

THE DEPUTY CHILD PROTECTION OFFICERS (DCPOs) and Deputy Designated Safeguarding Leads (DDSLs)

- Are appropriately trained in safeguarding;
- In the absence of the CPO/DSL, carry out those functions necessary to ensure the on-going safety and protection of the student;
- Have the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff; and
- In the event of the long-term absence of the CPO/DSL, the DCPOs/DDSLs will assume all the functions as for the CPO/DSL above.

THE GOVERNING BODY

The Governing Body of Harrow International School Bengaluru is the School's apex governance and oversight body, comprising the Chairman of the Governing Board and its other members, and is responsible for the strategic oversight of safeguarding across the School, including approval of this Safeguarding Policy. The Governing Body is distinct from the Child Protection Committee (CPC): the Governing Body sets overall policy and holds ultimate strategic accountability for safeguarding, while the Child Protection Committee is the operational body, chaired by the Head of Institution and comprising the CPO, DCPOs, teacher, parent and student representatives and an independent member, responsible for the day-to-day implementation, case review and monitoring of child protection matters as set out in the Child Protection Committee section below.

School management will name a designated person against each of the Governing Body's safeguarding responsibilities set out below, so that responsibility for each function is clearly allocated and can be reported on:

Chairman of the Governing Board: Dr. Aseem Chauhan
Governing Body member responsible for liaison with the CPO and Child Protection Committee: Dr. Aseem Chauhan
Governing Body member responsible for annual review of the Safeguarding Policy: Dr. Aseem Chauhan .
Governing Body member responsible for safer recruitment oversight: Dr. Aseem Chauhan
Governing Body member responsible for receiving allegations against the Head of School: Dr. Aseem Chauhan (ordinarily the Chairman of the Governing Board).

Dr. Aseem Chauhan will conduct a review of safeguarding and child protection policies and the effectiveness of their implementation at least annually. In addition to the annual Governing Body review, the Child Protection Committee will formally review the implementation of this policy at least once every three months, and will seek feedback from the parent body (PTA/SMC) at least twice each academic year, consistent with the Karnataka State Child Protection Policy Operational Guidelines for Educational Institutions.

Role of Governing Body:

- Will ensure that the School has a Child Protection Officer (CPO/DSL) and Deputy Child Protection Officers (dcpos/ddsls), whose roles are explicit in the role holder's job description;
- Will ensure that the School has a safeguarding policy and safeguarding procedures, including a Staff Code of Conduct;
- Will ensure that the School's Safeguarding Policy and procedures are made available publicly;

- Will ensure that the School has procedures for dealing with allegations of abuse made against members of staff, including allegations made against the Head of School and allegations against other children;
- Will ensure that the School follows safer recruitment procedures that include statutory checks on staff suitability to work with children;
- Will ensure that the School develops a training strategy that ensures all staff, including the Head of School, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated (at least annually);
- Will ensure that the School makes all temporary staff and volunteers aware of the School's arrangements for child protection;
- Will ensure that the School provides a co-ordinated offer of early help when additional needs of student are identified;
- Will ensure that the School considers how students may be taught about safeguarding, including online, as part of a broad and balanced curriculum;
- Will consider a whole-School approach to online safety, which will include a clear policy on the use of mobile technology in the School;
- Will address and rectify without delay any deficiencies or weaknesses in the School's Safeguarding Policy and procedures, which are brought to the attention of the Governing Body

THE HEAD OF SCHOOL

- Ensures that the Safeguarding Policy and procedures are implemented and followed by all staff;
- Allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the CPO and dcpos to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings;
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures;
- Ensures that students are provided with opportunities throughout the curriculum and in PSHE Education to learn about safeguarding, including keeping themselves safe online;
- Oversees the procedure where an allegation is made against a member of staff or of the Governing Body.

THE CHILD PROTECTION COMMITTEE (CPC)

The School formally designates a Child Protection Officer (CPO), a permanent employee . The Safeguarding Committee comprises two teachers, two parents (one a woman), two student representatives, and an independent external member, meeting at least quarterlyThe Child Protection Committee is chaired by the Head of Institution, with the CPO as convenor

Additional representatives may be added at the discretion of the Committee Chair.

Distinct from the CP Committee, the Safeguarding Team:

will help to co-ordinate arrangements for the longer-term protection and support of each student who has made allegations of abuse, or is alleged to have suffered from abuse, taking his wishes into account;

- Will make arrangements, where feasible and appropriate, for any student who has been the subject of abuse to receive necessary counselling and support by agreement with his parents;
- Will support any student who is subject to a medical care plan;
- Will review any students who are considered at high risk of harm, and

- will ensure, through the relevant house master/mistress, that appropriate support and safeguards are in place for all such students.

The Child Protection Officer will maintain a Suggestion Book recording suggestions and complaints raised by students, with the actions taken shared with students and reviewed by the Child Protection Committee at least once every three months.

The School's Parent Committee will hold periodic meetings to discuss safety and protection standards, the behaviour and attitude of staff and other personnel, and other safety concerns raised by students and parents. The SDMC/PTA will communicate information about this Child Protection Policy to all members, parents and students, including details of the redressal measures, response system, referral service, and action taken on false reporting, consistent with the Karnataka State Child Protection Policy Operational Guidelines for Educational Institutions.

Periodic Trainings:

The Child Protection Committee shall comprise of the following designated persons:

1. Chair (Head of Institution): Dr. Caroline Pascoe
2. Child Protection Officer (CPO) and Designated Safeguarding Lead (DSL) (Convenor): Mr. Adam Jozef
3. Deputy Child Protection Officer (DCPO) and a Deputy Designated Safeguarding Lead (DDSL): Ms. Rohini Malhotra r
4. Teacher Representative 1: Mr. Zubin Sachdev
5. Teacher Representative 2: Ms. Seema ND. _____
6. Parent Representative 1 (woman): Ms. Michelle Godber
7. Parent Representative 2: Dr. Avneet Kaur _____
8. Student Representative 1: School Head Boy
9. Student Representative 2: School Head Girl _____
10. Independent External Member: Ms. Kamala Naganand

Structure and Functioning of the Child Protection Committee: The CPC is the School's operational child protection body, distinct from the Governing Body. It meets weekly (as the Safeguarding Committee case-triage meeting), holds a Core Committee meeting monthly, and conducts a formal review of policy implementation at least once every three months, in addition to its quarterly full-committee review, consistent with the Karnataka State Child Protection Policy Operational Guidelines for Educational Institutions. The CPC is responsible for: receiving and triaging safeguarding concerns and low-level concerns escalated by the CPO; overseeing case management and support for affected students; reviewing implementation of this Safeguarding Policy and recommending revisions to the Governing Body; maintaining the Suggestion Book and reviewing suggestions and complaints raised by students; and reporting termly to the Governing Body on safeguarding matters, including anonymised case statistics and policy implementation.

RESIDENTIAL BOARDING STAFF

All residential staff, principally House Masters/Mistresses, Matrons/Wardens and Assistant House Mistresses/Masters, will receive additional training in pastoral care and safeguarding, as it is recognized that they are likely to be on the frontline in terms of safeguarding and child protection. House Masters/Mistresses, and House Parents will report all child protection and safeguarding concerns immediately to the CPO/DSL.

SENIOR STUDENTS IN POSITIONS OF RESPONSIBILITY

Senior students who hold positions of responsibility over other students (for example School or House Prefects) will be briefed before they assume office on appropriate action to take should they have concerns of a safeguarding nature or receive any allegations of abuse. School Prefects will receive additional on-going support and training from members of the Pastoral Committee during the course of the academic year.

SCHOOL DOCTORS AND MEDICAL CENTRE STAFF

School nurses will liaise closely with the School doctors, the CPO/DSL, and other members of the School's safeguarding team. The School doctors will have their own obligations to report the same, either to the Head of School or CPO/DSL. Medical Centre staff will be invited to participate in any School INSET concerned with the welfare and protection of students.

ONE-ON-ONE SITUATIONS

In situations where a member of staff is required to work one-to-one with a student, Harrow International School recognises that such interactions must be conducted in a manner that safeguards both the child and the adult. One-to-one sessions should, wherever possible, take place in visible and open environments such as rooms with glass panels or doors left ajar, and at times and locations agreed in advance. Staff should inform a line manager or colleague that the session is taking place and record it where appropriate. Physical contact must be avoided unless professionally necessary, proportionate and appropriate to the student's age and needs. Boarding, pastoral and academic staff must maintain clear professional boundaries at all times, avoiding secrecy, favouritism or the sharing of personal information. Where a conversation leads to a safeguarding disclosure, staff must follow the School's reporting procedures immediately.

In no circumstances shall a suspected child sexual-abuse victim be subjected to any physical examination, directly or indirectly, by any staff member or member of management. The child must be referred immediately to a police or Child Welfare Committee-designated hospital for medico-legal examination in accordance with the POCSO Rules 2020. These measures reflect best safeguarding practice by promoting transparency, accountability and professional integrity while ensuring students feel safe, supported and respected.

MISSING STUDENTS

The School will follow its robust procedures for registration and attendance to ensure the safety of the students and to carry out its duty of care. The School recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore, members of staff will respond promptly to absences and follow the School's Missing Student procedures as appropriate. The CPO/DSL, through the Heads of Year and Tutors , will monitor any unauthorised absence at the start or end of any leave period, and will be particularly cautious if a student goes missing on repeated occasions. Whenever possible, the School holds more than one emergency contact number for its pupils.

HELPING STUDENTS TO KEEP THEMSELVES SAFE

Students are taught to understand and manage risk through numerous programmes, for example counter-bullying workshops, the PSHEE programme for all year groups, training in Peer Mentoring, lectures and seminars and through all aspects of their life at the School. The School conducts monthly child safety awareness sessions for all students, maintains a Child Rights Club, and incorporates self-defence training into the Physical Education curriculum, consistent with the Karnataka State Child Protection Policy Operational Guidelines for Educational Institutions.

Students are encouraged to think about risks they may encounter and to work out how such risks can be overcome. These discussions are empowering and enabling. They aim to promote sensible behaviour rather than fear or anxiety.

Students are also regularly reminded about e-safety and counter-bullying procedures. The School continually promotes an ethos of care and respect for others.
Students are encouraged to speak to a member of staff in confidence about any worries they may have. The School conducts an annual survey, which helps to inform pastoral strategy as well as shedding light upon areas of concern or specific trends in behaviour.

SUPPORT FOR THOSE INVOLVED IN A CHILD PROTECTION ISSUE

- Child abuse is devastating for the child. It can also result in distress and anxiety for members of staff who become involved. The School will support students, their families, and staff by:
- Taking all suspicions and disclosures seriously;
- Nominating a link person (normally the CPO/DSL or one of the dcpos/ddsls) who will keep all parties informed and be the central point of contact;
- Responding sympathetically to any request from students or staff for time out to deal with distress or anxiety;
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- Storing records securely;
- Offering counselling or other avenues of internal or external support;
- Following the procedures laid down in our whistleblowing, complaints and disciplinary procedures.

ALLEGATIONS OR CONCERNS RELATING TO STAFF

Allegations and concerns will be dealt with in accordance with safeguarding procedures and practice guidance. When an allegation is made against a member of staff or a concern expressed about their conduct relating to children, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A member of staff who is concerned about the conduct of a colleague towards a student is placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all members of staff must remember that the welfare of the child is paramount. No member of staff will suffer a detriment for raising a genuine concern. The School's Whistleblowing Policy enables members of staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

Members of staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently, and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, a member of staff may be suspended where this is deemed the best way to ensure that children are protected.

Harrow School adopts a whole-School approach to safeguarding. As such, it seeks to ensure that there is an open and transparent culture in which all concerns about any adults working in any capacity (employed or voluntary) on behalf of the School are dealt with promptly and appropriately. Creating a culture in which all concerns about adults are shared responsibly with the right person, recorded and dealt with appropriately, is critical. This should enable the

School to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of the School are clear about professional boundaries and the ethos and values of the School. It should also protect those working in or on behalf of the School from potential false allegations or misunderstandings.

WHAT IS A LOW-LEVEL CONCERN? The term 'low-level concern' does not mean that it is insignificant. A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the staff code of conduct. Examples include being over-friendly with children, having favourites, engaging with a child on a one-to-one basis in a secluded area, or using inappropriate sexualised, intimidating or offensive language.

SHARING LOW-LEVEL CONCERNS

Low-level concerns about a member of staff (or person employed by a contractor or agency) should be reported to the CPO/DSL via the Procedure outlined in the Low-Level Concerns Policy. The School seeks to create an environment in which staff are encouraged and feel confident to self-refer.

RECORDING LOW-LEVEL CONCERNS

All low-level concerns should be shared by the CPO/DSL with the Head of School and recorded, with details of the concern, the context in which the concern arose, and action taken. Records should be reviewed periodically. The School will retain information on low-level concerns at least until the individual leaves its employment.

REFERENCES

Only substantiated safeguarding allegations will be included in staff references. Low-level concerns relating exclusively to safeguarding will not be referred to in a reference.

STAFF TRAINING

All members of staff at the School will receive appropriate training in safeguarding and child protection, which is regularly updated. In order that the school community is aware of and compliant with local protocols, all members of staff shall have a thorough understanding of the Counter Bullying Protocol, the Child Safeguarding & Protection Policy of the School, POCSO (Protection of Children from Sexual Offence) Act and the JJ (Juvenile Justice) Act. The CPO/DSL and DCPOs/DDSLs will receive advanced-level safeguarding and child protection training updated at least every two years, in addition to annual updates. Legal Redressal and Reporting Procedures under POCSO: staff training and induction will substantively cover the section 19 mandatory reporting duty and the associated penalties: failure to report is itself an offence under section 21(1) of the POCSO Act (up to six months' imprisonment or fine), an institutional head's failure to report a subordinate's offence carries up to one year's imprisonment plus fine under section 21(2), and false complaints made with intent to malign are punishable under section 22 of the POCSO Act.

SAFER RECRUITMENT

The School endeavours to ensure that it does its utmost to employ 'safe' staff by following international standards. The School's Safer Recruitment Policy is adhered to in all recruitment activities. As part of safer recruitment, the School obtains verbal references in addition to written references for all prospective staff, and requires every new member of staff to sign the School's Code of Conduct and take the associated oath on appointment, consistent with the Karnataka State Child Protection Policy Operational Guidelines for Educational Institutions. The School also obtains police-department verification of each applicant for any pending criminal case related to child abuse before appointment to any role involving direct contact with children, and retains all recruitment vetting records until the employee's retirement, consistent with the same Operational Guidelines.

Compulsory Background Checks:

The School requires a compulsory background check, including police verification for any pending or prior criminal case related to child abuse, before engagement of every teacher, member of staff, labourer, contract worker, and any other person providing services to the School, whether directly employed, engaged through a contractor or agency, or otherwise regularly or occasionally present on School premises. This requirement extends to all visiting contract persons, including those engaged for maintenance, construction, catering, transport, or any other short-term or one-off assignment involving access to the School premises. No such individual will be permitted unsupervised access to students until the background check has been satisfactorily completed. Every teacher, member of staff, labourer, contract worker and visiting contract person will be informed, before commencing work at or for the School, that strict adherence to this Safeguarding Policy and the Staff Code of Conduct is a mandatory condition of their engagement, and will be required to acknowledge this in writing.

Training for Support and Ancillary Staff: In addition to the safeguarding training provided to teaching staff, the School provides annual safeguarding and child protection training to all other categories of staff and persons regularly present on School premises, including (but not limited to) gardeners and groundskeeping staff, cleaners and housekeeping staff, canteen and catering staff, maintenance and technical staff, contract and outsourced workers, bus drivers and conductors, and security guards. This training covers, at a minimum, recognising signs of abuse, the School's reporting procedures, the identity and contact details of the CPO and DCPOs, and the prohibition on corporal punishment and mental harassment. The training will be conducted in a language that each participant understands, will be repeated annually, and attendance will be recorded and retained by the CPO.

SITE SECURITY

Harrow Bengaluru is a self-contained site. We employ a security team to control access to the site and to ensure the safe oversight of students leaving the campus. Contact numbers for Childline (1098/112), the jurisdictional Special Juvenile Police Unit, the Child Welfare Committee, and the School's Child Protection Officer are displayed prominently at accessible locations across the School premises for staff, parents and students, consistent with the Karnataka Child Safety Checklist.

ROAD SAFETY

Staff regularly remind students about the importance of road safety. Bus drop off zones are clearly marked and protocol set. The Security Department supervises the bus drop off zone at key moments in the day. All School transport complies with the Karnataka Motor Vehicles (School Transport) Rules, 2012, including GPS and CCTV fitted on all buses, a staff escort on every journey, police verification of all drivers, and written agreements with vehicle owners fixing responsibility for driver conduct.

THIRD-PARTY USE AND OFF-SITE ARRANGEMENTS

The School's facilities may, from time to time, be used by third party users (TPUs). TPUs will be required to provide the School with a copy of their own child protection policies before approval is given for their use of the School's facilities.

PHOTOGRAPHY AND IMAGES

To protect our students, we will demonstrate respect, care and caution when including photographs in school publications; encourage students to tell a member of staff if they are worried about any photographs taken of them; and prevent the possibility of linking the name of a student to an image.

EXTERNAL ESCALATION AND OVERSIGHT

In addition to the School's internal CPO/DCPO reporting routes, concerns about the School's own safeguarding practices, or unresolved allegations, may be escalated to the Special Juvenile Police Unit (SJPU), the Child Welfare Committee (CWC), Childline (1098/112), or the Karnataka State Commission for Protection of Child Rights (KSCPCR), which is the primary state body for external accountability, inquiry and inspection of a school's child-protection compliance under the Karnataka State Child Protection Policy framework.

E-SAFETY

The use of technology is an integral part of everyday life but has also become a significant component of many safeguarding issues. All staff will be trained in the importance of online safety. The breadth of issues classified within online safety can be categorised into content, contact, conduct and commerce risks. The School's approach to online safety operates within the framework of the Information Technology Act, 2000, the Juvenile Justice Act, 2015, and the Indian Penal Code, and the School will coordinate with the Karnataka Police Cyber Crime department where a cyber safety incident may constitute an offence against a child.

Policy Published: October 2025.

Updated: October 2026.

Next Update: October 2027 and annually thereafter.

APPENDIX 1: INFORMATION FOR PARENTS

Harrow Bengaluru aims to safeguard and promote the welfare of the students in its care and protect them from serious harm. Staff and volunteers are vetted for their suitability to work with children prior to appointment. If you think your child may have been abused in School, you should contact our Child Protection Officer. If the allegation of abuse involves a member of staff, you should contact the Head of School directly, or if the Head of School himself is involved, the Chairman of the Governing Body should be contacted. Parents and students will be asked to provide a signed acknowledgement confirming they have read and understood this Safeguarding Policy, which will also be publicised via the school diary, notice boards, student handbook and website, and reinforced through student orientation at least once every three months, consistent with the Karnataka State Child Protection Policy Operational Guidelines for Educational Institutions. Where the parent/guardian of a child affected by abuse wishes to withdraw the child and seek admission elsewhere, the Head of School will issue a Transfer Certificate and refund the balance of fees for the remainder of the academic year, without penalty, within one month of such a request.

Annual Training for Parents: In addition to the acknowledgement process above, the School will conduct annual training for parents on this Safeguarding Policy. The training will cover the contents of the policy and the procedure for raising and escalating a concern, including the internal reporting routes (CPO/DCPOs) and the external bodies to which concerns may be escalated (SJPU, CWC, Childline, and KSCPCR). Notice of the training will be issued to all parents at least 30 days in advance, specifying the trainer(s) conducting the session, the language(s) in which it will be conducted, and the date, time and venue. Attendance will be recorded, and a signed acknowledgement of attendance will be obtained from all parents who attend.

APPENDIX 2: CONCERNS OR ALLEGATIONS RELATING TO STAFF

This section lays out the process for dealing with concerns or allegations relating to staff (including the Head of School), volunteers and others who are in contact with students in the School.

REPORTING CONCERNS

All allegations about members of staff (including the CPO, DCPOs, supply staff and volunteers) must be reported. Low-level concerns should initially be reported to the CPO; more serious allegations should initially be reported to the Head of School. All allegations against the CPO must be reported to the Headmaster. All allegations against the Head of School must be reported immediately to the Chairman of Governors.

HOW ALLEGATIONS WILL BE MANAGED

Decisions about course of action would be taken on a case-by-case basis, bearing in mind the paramount importance of the safety of any child(ren) involved. Upon receiving an allegation or concern about a staff member, the case manager will immediately discuss the allegation with the CPO and any required authorities.

STRATEGY MEETING

From discussions with the CPO, there are three possible courses of action: a police investigation and possible action through the courts; a disciplinary investigation; or a matter for the School to be dealt with through non-disciplinary routes.

ABUSE OF TRUST

All members of staff should be aware that it is an offence for a person over 18 to have a sexual relationship with a child under 18 where the person is in a position of trust (e.g. Teacher), even if the relationship is consensual.

RECORDS

A central record of all allegations and concerns against members of staff will be kept securely by the Head of School, separate from normal staff and student records. The record will be retained at least until the member of staff involved has reached normal retirement age, or for a period of ten years from the date of the allegation if that is longer.

APPENDIX 3: INDIVIDUAL RISK ASSESSMENT FORM

Safeguarding Risk Assessment for Individuals, including risk identification, risk reduction strategies, staff training needs, communication of risk actions, and periodic review fields.

Safeguarding Risk Assessment for Individuals

Name	
Assessment completed by	
Date	

Risk identification:	
What is the actual risk?	
What is the potential risk?	
Who is affected by the risk?	
In which situation may the risk occur?	
What kind of harm is likely to occur?	
Risk reduction strategies:	
Proactive interventions to prevent risk	
Reactive interventions to respond to risk	
Who needs to be involved to support the plan?	
Staff Training:	
Identified training needs	
Training provided to meet needs	
Date training completed	

Agreed by:	
Date:	

Communication of risk actions	
Plans and strategies shared with	
Communication method and date	

Review	
How effective have strategies and interventions been?	
Has the risk reduced?	
Has the risk increased?	
Are any additions or amendments required?	

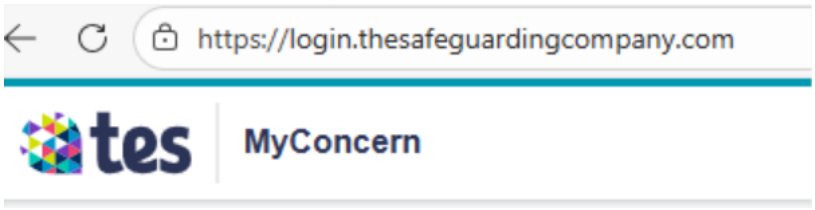
Agreed by:	
Date:	

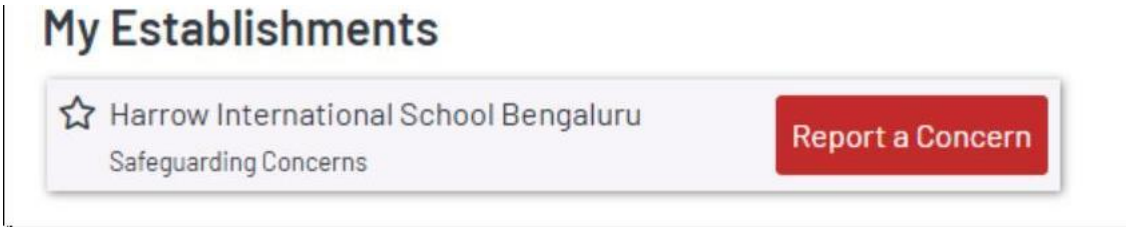
APPENDIX 4: HOW TO RAISE A CONCERN USING 'MY CONCERN'

Step-by-step instructions for logging a safeguarding concern via the My Concern platform (https://login.thesafeguardingcompany.com), including adding pupil names, a concern summary, date/time, origin, details, location, urgency flag, action taken, and attachments before submission.

How to raise a safeguarding Concern

1. **Log onto the My Concern platform**



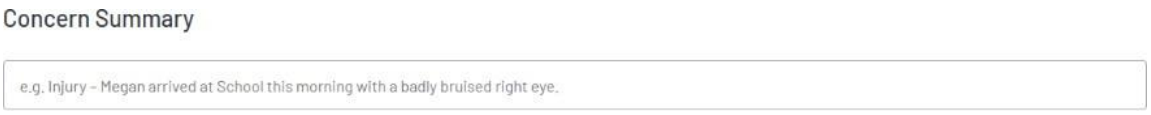
2. 

Click on the red 'report a concern' section

3. **Add the name of the child and any other children you would like to associate with the concern**



4. **Add a summary of the concern (max 250 characters)**



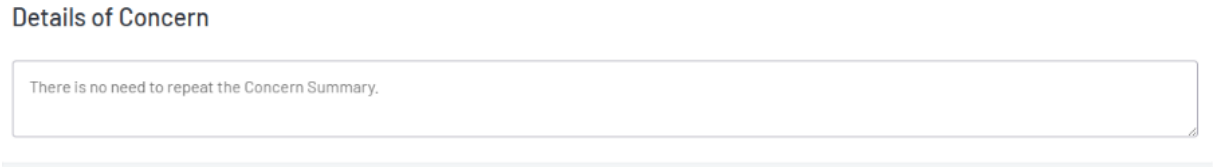
5. **Add the date and time of when the concerns first came to your notice**



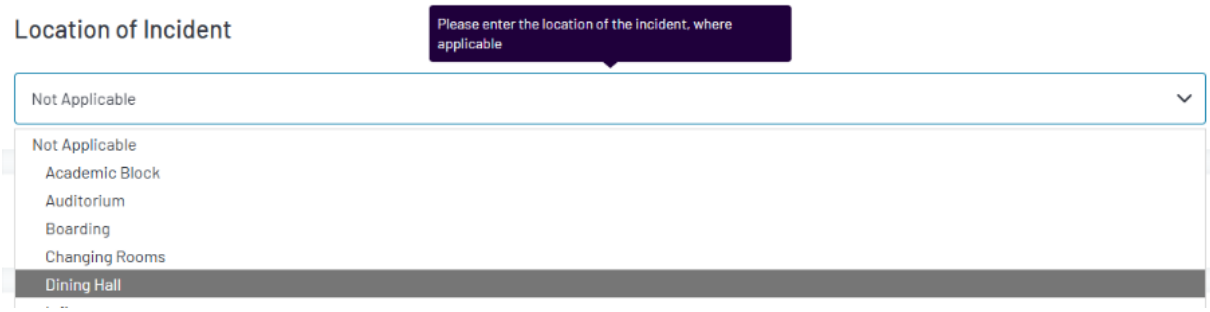
6. **Add the origin of the concern if applicable**



7. **Write the details of the concern. IMPORTANT: Provide only clear factual information including times, dates, names, locations and the child's actual words if relevant. Do not include any assumptions or suspicions.**



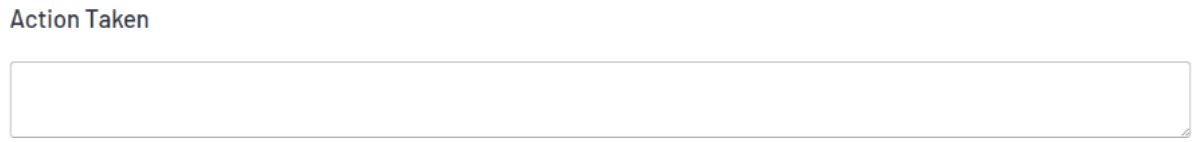
8. **Select the location of the incident from the drop-down menu**



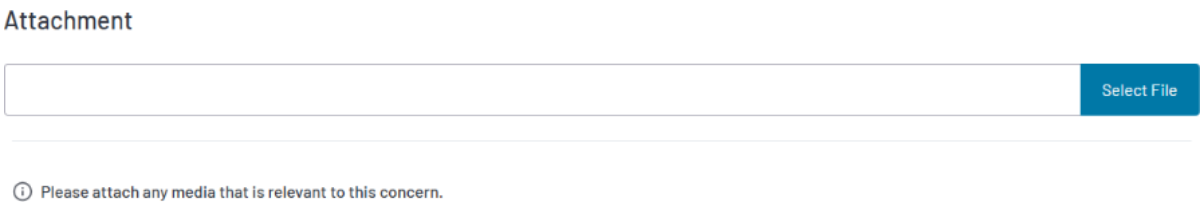
9. **If you believe the child is in imminent danger from themselves or others, mark the concern as URGENT**



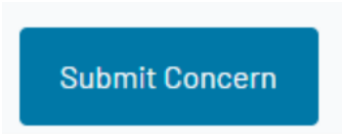
10. **Describe any action that you have taken in relation to this concern**



11. **Attach any files that you may have that are relevant to this concern.**
IMPORTANT: Never take pictures of students for any reason when reporting a concern



12. **Click the 'Submit Concern' button and the safeguarding team will be notified of the concern**



APPENDIX 5: IDENTIFYING A SAFEGUARDING CONCERN

A table setting out categories of concern (Safeguarding, Behaviour, Pastoral/Wellbeing, Academic, Attendance, Medical/Health, Welfare/Financial), examples, who normally manages each, when it becomes a safeguarding concern, and the required action if safeguarding.

Identifying a Safeguarding Concern

Category of Concern	Examples	Normally Managed Through	When It Becomes a Safeguarding Concern	Required Action if Safeguarding
Safeguarding (Harm / Abuse / Neglect / Exploitation)	Unexplained injuries; disclosure of abuse; sexualised behaviour beyond age expectation; sharing explicit images; suicidal ideation; persistent hunger; fear of going home; grooming indicators; coercive peer abuse; radicalisation concerns; forced marriage risk	DSL / Safeguarding Procedures	Already meets safeguarding threshold	Record immediately on safeguarding system and inform DSL. Do not investigate.
Behaviour	Disruption; defiance; rudeness; uniform breach; one-off vaping; isolated truancy; one-off peer disagreement	Behaviour Coordinator	Behaviour is persistent, escalating, sexualised, coercive, aggressive beyond age expectation, or represents a significant change from baseline	Record and refer to DSL in addition to behaviour sanction
Pastoral / Wellbeing	Friendship issues; exam stress; homesickness; low mood; social withdrawal	Tutor / Head of Year / Counsellor	Risk of self-harm, suicidal ideation, abuse indicators, extreme withdrawal, or vulnerability factors	Record and refer to DSL
Academic	Declining grades; missing homework; poor organisation; disengagement	Head of Year / Deputy Head Academic	Linked to neglect, caring responsibilities, emotional harm, or significant unexplained change	Record and refer to DSL
Attendance	Occasional absence; explained lateness; authorised leave	Attendance Policy / Head of Year	Persistent unexplained absence; child missing education; patterns suggesting neglect; fear of home environment	Record and refer to DSL
Medical / Health	Minor illness; known medical condition; explained injury	Medical Team / School Nurse	Unexplained injuries; repeated untreated medical needs; fabricated or induced illness concerns	Record and refer to DSL
Welfare / Financial	Temporary hardship; transport difficulties; fee queries	School Leadership / Welfare Support	Child lacks basic necessities; chronic hunger; inadequate clothing; unsafe living conditions	Record and refer to DSL