Safeguarding Policy (HS13) Adapted to Harrow Chongqing

APPLIES TO:	All staff, visitors, volunteers, contractors, governors, guests, residents etc.
HARROW CQ RESPONSIBILITY:	SLT
LAST UPDATED:	8th December 2023
REVISIONS: (**Reviewer to enter initials and date**)	CS– 8th November 2023

1 INTRODUCTION

1.1 A Note on Language

In many schools 'safeguarding' and 'child protection' are terms that are used interchangeably; in still other schools, they are used side by side, as though they are inseparable.

We regard this latter use a tautology and so have opted to use only the term 'safeguarding' for all matters relating to ensuring that the children in our Schools are safe and well cared for. We prefer the term 'safeguarding' over 'child protection' because there is less scope for anyone to adopt assumption that ensuring the welfare of children simply means preventing them from coming into harm.

1.2 Scope of this policy

Under the Children Acts (UK) and the Law of the People's Republic of China on the Protection of Minors (China), a child is any registered student in HARROW CQ. Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (UK) as:
- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

This policy applies, but is not limited to, all staff, students, guests and visitors or anyone working in, or on behalf of, HARROW CQ.

1.3 Purpose of this policy

HARROW CQ fully recognise our shared responsibility for child safeguarding. To this end, it is the aim of this policy to document how we:
- protect all children and young people who attend our schools and use our services;
- provide all staff (as defined in Appendix 1) and visitors with the overarching principles that guide our approach to safeguarding.

HARROW CQ is committed to working to ensure that children and young people never experience abuse of any kind.

We recognise that we all have a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to seeking ways to continually review our practice such that each of our schools protects children and provides the conditions for humans to flourish.

1.4 Our core beliefs

We recognise and believe that:
- The wellbeing of students and staff is more important than all other consideration in school;

- All children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse;
- Some children are additionally vulnerable because of the impact of previous experiences, because of special educational needs, disabilities, or because they have a high level of dependency, communication difficulties or other issues; working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.
- Every adult who works with children has a responsibility to keep them safe. HARROW CQ is committed to ensuring all those who work with students receive appropriate safeguarding training.
- Staff should be particularly alert to the potential need for early, positive, and proportionate intervention. This includes making reasonable adjustments for children who are disabled and have specific additional needs, children who have special educational needs, are misusing drugs or alcohol themselves, are showing signs of being drawn into anti-social or criminal behaviour or are in family circumstances presenting challenges for the school, or those with a disability, special educational needs.

1.5 Legal framework

The following British and international documents have been referred to in devising this policy:
1. Keeping children safe in education (2023)
2. Law of the People's Republic of China on the Protection of Minors (1992)
3. Working together to safeguard children (2015)
4. Children Act (1989)
5. Children Act (2004)
6. Data Protection Act (1998)
7. United Nations Convention on the Rights of the Child (1991)

1.6 Roles and responsibilities

Across HARROW CQ, all staff are involved in safeguarding children, however there are some with very specific responsibilities.

Schools must have in place a:
- Designated Safeguarding Lead (DSL)
  The DSL is responsible for : policy generation; systems and compliance related to safeguarding; oversight of safeguarding procedures (including online safety and the understanding of filtering and monitoring system and processes in place); staff training; devising the safeguarding action plan; maintaining in achieving objectives in the safeguarding action plan; conducting internal audits of safeguarding, safer recruitment and the Single Central Register (SCR); leading the safeguarding team; maintaining the confidentiality and integrity of safeguarding records; leading on complex and serious safeguarding cases; ensuring that safeguarding remains at the forefront of the school's corporate consciousness; reviewing, and acting upon, serious case reviews; and any other duties which may periodically be necessary to maintain or improve the school's safeguarding policy and procedures. DSLs should help promote educational outcomes by working closely with their teachers and sharing information about their welfare, safeguarding and child protection concerns. The role of the DSL will also include:

Raise awareness
- Provide support, advice and expertise on all matters concerning safeguarding
- Encourage a culture of safeguarding among staff and of listening to students
- Ensure that a local safeguarding policy is known, understood and used appropriately, and reviewed at least annually
- Monitor the operation of the local policy and regularly review and update the procedures and their implementation, working with the safeguarding working party and governors as necessary
- Ensure that all members of staff and volunteers receive the appropriate training, keep and maintain records of this training and ensure that staff are aware of training opportunities and the latest local policies on safeguarding
- Have oversight of the policy and practices in place in regard to e-safety with an appropriate understanding of school`s systems for the filtering and monitoring of internet and network use, review such provision annually whilst ensuring all staff are appropriately e-safety trained

Manage referrals
- Advise and act promptly upon all safeguarding concerns reported to them
- Refer cases of suspected abuse as appropriate, support staff who make or consider making any such referrals and liaise with the local authorities as required
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service or other relevant service in China.
- Refer cases where a crime may have been committed to the police
- Maintain detailed, accurate, secure written records of concerns or referrals (e.g. CPOMS)
- Keep the Head informed of all concerns and actions
- Monitor records of students in the school who are subject to a child protection plan, to ensure that they are maintained and updated as notifications are received
- Monitor the confidentiality and storage of records relating to safeguarding and when a student leaves, ensure their child protection file is copied for the new school as soon as possible and transfer it separately from the main student file, ensuring secure transit and confirmation of receipt is obtained.
- Likewise, HARROW CQ will request safeguarding files for children during the admissions process
- Undertaken a review of practices after the closure of each safeguarding allegation or major concern and use this to improve practice

The DSL will also contribute to the HARROW CQ Safeguarding Working Party.

- Deputy Designated Safeguarding Lead (DDSL)
  The DDSL is responsible for day-to-day safeguarding issues in their designated area of the school. Duties in this regard include but are not restricted to: acting as the first port of call (designated focal point) for disclosures; maintaining the integrity and confidentiality of safeguarding records; keeping the DSL informed of safeguarding issues as they arise; liaising with parents, caregivers and other agencies to ensure the safety of children; organising case conferences where these are required; devising and implementing welfare plans for students where these are required.

- Safeguarding team
  The team is responsible for developing an annual development plan and a report to the Senior Leadership Team (SLT); are responsible for reviewing policy and procedure; are responsible for agreeing a timetable of training for staff and other adults. The team meet regularly to

review safeguarding cases and concerns; they operate under the direction of the DSL to ensure the effective implementation of policy and procedures.

- Designated Safeguarding Governor
  The designated safeguarding governor is responsible for overseeing policy and procedure; reporting back to the board on all issues to do with safeguarding; ensuring that safeguarding sits firmly within the board's collective consciousness; sampling first-hand the procedures in place at the school as often as is practicable, but no less than annually. Provide guidance, as necessary, to the DSL and wider safeguarding team.

- Board of Governors (BOG)
  The BOG has overall responsibility to ensure policy and procedures for safeguarding. It is the role of the BOG to provide scrutiny of safeguarding policy and practice. The BOG takes seriously its responsibility to fulfil its duty of care in promoting the welfare and wellbeing of students, ensuring their security and protecting them from harm. To this end the BOG will ensure that:

  – An effective, up to date safeguarding policy is in place and made available to the staff and on the school website;
  – Appropriate policies and procedures are in place and are operational
  – Required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register
  – All staff receive safeguarding training in accordance with this policy
  – Students are taught about safeguarding, including online safety
  – Appropriate filters and monitoring systems are in place to keep students safe online
  – Ensure important information sharing between school, relevant practitioners and local agencies takes place
  – Online safety: ensure the school assigns appropriate roles and responsibilities to manage the filtering and monitoring of the internet and network use, and review such provision annually

HARROW CQ Safeguarding Team Members:

Name	Role	School Job Title	Contact Email
Colin Shi	DSL	School Counsellor	Cshi@harrowchognqing.cn
Aaron Lennon	DDSL	Headmaster	Alennon@harrowchongqing.cn
Judy Kong	DDSL	Chinese Principal	Jkong@harrowchongqing.cn
Shirley Yang	DDSL	PA to Chinese Principal	Syang@harrowchongqing.cn
Rita Peng	DDSL	Chinese Principal of Early Years	Rpeng@harrowchongqing.cn

HARROW CQ has a Safeguarding Working Party. The role of the group is to:
- Review policy and procedures
- Evaluate and audit safeguarding practices
  – This will comprise an annual cycle of internal audit undertaken by the DSL
  – A three-year cycle of external objective review
- Develop an action plan encompassing operational practices and strategic development relating to the annual audit.
- Identify professional learning with regards to safeguarding

- Ensure all staff have experienced the appropriate level of training and that records are in place to affirm it
- Create peer to peer support and training channels and opportunities

All members of the Working Party will be trained to advanced level which in accordance with best practice will be formally refreshed every two years.

1.7 Record keeping

Well-kept records are essential to good safeguarding practice. Harrow CQ is clear about the need to record any concern about a student or students within our school, the status of such records and confidentiality.

Any member of a school community (including parents and carers) receiving a disclosure of abuse or noticing signs or indicators of abuse, must make an accurate record as soon as possible noting what was said or seen, putting the event in context, and giving the full date, time and location. If in doubt, report. All records are signed and include the action to be taken.

These notes are to be kept, in hard copy only, in a confidential digital format in CPOMS, which is separate to other files, and stored in a fireproof safe, locked with a combination lock. In the same way, notes are kept of any student who is being monitored for safeguarding reasons (this includes ongoing casework, case reviews and external supervision).

Where children leave a school, as appropriate, we ensure their safeguarding file is transferred to their new school as soon as possible. We make sure that these records are sent separately from the main student file, ensuring secure transit and confirmation of receipt is obtained.

1.8 How we keep young people safe

In HARROW CQ we keep young people safe by:
- employing rigorous recruitment procedures for all staff to check their suitability to work with children
- raising awareness of safeguarding and equipping children with the skills needed to keep them safe
- training all staff in safeguarding awareness incorporating online safety (including an understanding of expectations and applicable roles and responsibilities regarding filtering and monitoring internet and network use)
- ensuring that all staff have read and understand the Safeguarding Policy (HS13)
- ensuring that all staff are aware of the indicators of child abuse
- ensuring that all staff know how to respond to concerns or disclosures of abuse
- establishing a safe environment in which children can learn and develop
- adopting best practice as it relates to safeguarding
- establishing clearly defined procedures and a code of conduct for all staff, volunteers and visitors
- developing and implementing effective social media and e-safety policies and related procedures
- effective management for all staff and contractors through supervision, support and training
- sharing information about safeguarding and best practice with students, parents, staff outside providers, interns, volunteers and visitors

- sharing concerns with agencies who need to know and involving parents and students appropriately.
- when a student with an open safeguarding case moves to another school, there is a moral duty to inform, or attempt to inform, that school that there is an issue about which they should be aware. Schools must check the legal requirements in the country in which they are operating to ensure actions are fully compliant. Where the legal position is not clear schools should make a phone call rather than transfer documentation. If there are any safeguarding issues, it is appropriate to make the call and record the fact that the call was made in the student file, the date and time of the call, who the call was made to, their position in the school and the nature of the communication. It is expected that were transfer of information is permissible by law, it is undertaken with 5 days of the student transferring to the new school.
- Ensure all staff should be aware that safeguarding issues can manifest as child on child abuse. This is most likely to include, but may not be limited to:
  - bullying (including cyber bullying)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
  - causing physical harm
  - sexual violence and sexual harassment
  - sexting (also known as youth produced sexual imagery)
  - initiation / hazing type violence and rituals

  (see *Keeping Children Safe in Education 2023 p.105*)
- Ensure that staff are aware of other key issues that relate towards safeguarding students including the school:
  - Staff Code of Conduct
  - Staff Handbook
  - Anti-Bullying policy
  - Safer Recruitment policy
  - Intimate Care policy
  - Digital Safety guidance and online safety policy (including an understanding of the filtering and monitoring of digital use via school networks , internet access-including 3G,4G,5G use and pupil`s use of devices)
  - Educational trips policy and risk assessments for all events and educational visits

1.8.1 Early intervention

Early intervention relates to ensuring systems are in place to:
- Assess and identify early signs of safeguarding concern
- Record and track low level concerns
- Implement early intervention based on the data above

This means using CPOMS to record appropriately and using the data evaluatively. Supplementing this with systems for assessing levels of wellbeing (e.g., SpeakR) and evaluating the impact of interventions is essential in early identification of concerns. It is necessary for the DSL to ensure the safeguarding team are suitably trained and have responsibility to track and report on early concerns so that interventions can be implemented.

To assist in securing early identification and intervention, it is necessary for HS13 Safeguarding Policy to link to complementary policy and practices, including but not limited to:
- HS17 Learning and Individual Educational Needs Policy

- HS19 Personal, Social, Emotional and Health Education Policy
- HS22 Behaviour Management Policy, e.g. tracking behaviour trends
- HS20 Prevention of Bullying Policy, e.g. monitoring of bullying incidents
- HS26 Student Access to Technology and IT oversight for the tracking of internet searches of concern
- HS31 Whistleblowing policy

It is important to note that children with SEND more vulnerable to safeguarding risks.

1.8.2 Raising awareness and equipping students with skills to prevent abuse

It is recognised that because of the day-to-day contact with students, school staff are well placed to observe the outward signs of abuse and that all staff and governors have a full and active part to play in protecting our students from harm. School will therefore:

- Emphasise the importance of providing early help to students to provide support for a problem as soon as it arises, is recognised, in order to prevent the issue from escalating. Furthermore, it is recognised that students may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, anxiety and relationship issues.
- Ensure children know that there are adults in the school whom they can approach if they are worried
- Embed opportunities in the curriculum and school life for children to develop the skills they need to recognise and stay safe from abuse, including online
- Establish a PSHE or moral education programme that instills the language, knowledge and skills to support children in avoiding abuse.
- Raise the awareness to all staff members of the need to safeguard and promote the welfare of children, and of their responsibilities in identifying and reporting possible cases of abuse.
- Ensure every member of staff (including temporary, supply staff, trainee teachers and volunteers) and the governing body knows the name of the Designated Safeguarding Lead (DSL) and their deputies responsible for child protection and their role. (Keeping Children Safe in Education (Sept 2023))
- The name of the Designated Safeguarding Lead and their deputies will be clearly visible in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse and allegations.

1.9   Key contacts
All adults on our campuses are involved in keeping children safe.
Responsibility does not fall only on teachers, or only on the safeguarding team. However, as an Appendix to the local safeguarding policy, HARROW CQ has produced and published details of Safeguarding Leads within the school, these details are publicly viewable throughout the school.

2   RECOGNISING ABUSE – WHAT STAFF SHOULD LOOK OUT FOR

2.1   Importance of vigilance

All staff should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

2.2   Types of abuse and neglect

Abuse; 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. They may be abused by an adult or adults or another child or children. Children may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Physical abuse; a form of abuse which 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. This also extends to persistent child on child abuse.

Emotional abuse; the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development and mental health:
- 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. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another (e.g. witnessing domestic violence). It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Children's mental health was added to the KCSIE 2023 guidance, ensuring that staff should consider when this might become a safeguarding concern.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- Child on child sexual abuse involving the first two bullet points above

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 as a result of maternal substance abuse.
- Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- This would include failure to provide proper adult guardianship such as leaving children unsupervised at home for an extended period of time.

Often abuse is seen exclusively as something that adults do to children, but it is important to recognise that abuse can equally occur within the student body, between peers, or between students of different ages (child on child abuse). Vigilance for this type of abuse is just as important as for adult-child abuse; the means by which it should be reported are just the same.

It is important that staff are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

See *Appendix 2* for further information on the possible indicators of abuse.

3   PROCEDURES DEALING WITH DISCLOSURE OR REPORTING

3.1   Other than as designated, the role of all staff is not to investigate or verify the situation, but rather to report the concern or disclosure and set in motion the process of getting help for the child.

Step 1

You have a concern about a child's well-being, based on:
a)   Something the child or another child or adult has told you;
b)   Something you have noticed about the child's behaviour, health, or appearance;
c)   Something another child or adult said or did.

Even if you think your concern is minor, the DSL may have more information that, together with what you know, represents a more serious worry about a child. It is never your decision alone how to respond to concerns – but it is always your responsibility to share concerns, no matter how small.

Step 2

The DSL will decide whether you need to find out more by asking the child/young person, or their parent to clarify your concerns, being careful to use open questions:
…beginning with words like: 'how', 'why', 'where', 'when', 'who'?

Step 3

Let the child/young person/parent know what you plan to do next if you have heard a disclosure of abuse or you are talking with them about your concerns. Do not promise to keep what s/he tells you secret.

For example; 'I am worried about your bruise and I need to tell Mrs Kong so that she can help us think about how to keep you safe.'

Step 4

Use the *Concerns Logging Form (Appendix 3)* to make a written record as soon as possible after the event, noting:
a) Name of child
b) Date, time and place
c) Who else was present?
d) What was said/What happened/What you noticed … speech, behaviour, mood, drawings, games or appearance/injuries. If child or parent spoke, record their words rather than your interpretation
e) Analysis of what you observed and why it is a cause for concern

Step 5

Give the completed the *Concerns Logging Form (Appendix 3)* to the DSL/DDSL as soon as possible ensure it is handed in and not copied or stored electronically.

The DSL/DDSL will decide on further appropriate action and will remain in close communication with other professionals around the child/young person and with the family if appropriate.

4   PROFESSIONAL CONFIDENTIALITY

4.1   Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of safeguarding.

4.2   The only purpose of confidentiality in this respect is to benefit the child. A member of staff must never guarantee confidentiality to a student nor should they agree with a student to keep a secret. Where there is a safeguarding concern this must be reported to the Designated Safeguarding Lead.

4.3   Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a 'need-to-know basis' only. Any information shared with a member of staff in this way must be held confidentially.

5   MANAGING ALLEGATIONS AGAINST STAFF

5.1   Allegations of abuse can be made by children and they can be made by other concerned adults. Staff have a duty to cooperate in any investigation.

5.2   Any concern about the behaviour of a member of staff or volunteer, or allegation of abuse against a member of staff must immediately be reported to the DSL/DDSL or Head if the former is not available who will take the necessary action. Allegations against senior leader or the DSL should be made directly to the Head. Allegations against the Head should be made to the CEdO.

5.3   Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

5.4   Malicious allegations against staff will be investigated and dealt with by the Head and, if appropriate, a committee of governors.

Outcome of Allegations

The outcome of allegation investigations should be typically identified as one of the following:

Outcome Type	Definition	Action after investigation	Recording
Substantiated	There is sufficient evidence to prove the allegation.	Discussion with HR and/or other professionals, about referral to DBS and/or Disciplinary Hearing	There should be a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached. This should be kept in the confidential personnel file of the accused, and a copy provided to the person concerned
False	There is sufficient evidence to disprove the allegation.	Where the allegation is found to be false, unsubstantiated, or malicious, the information should not be included in any reference.	The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.
Unsubstantiated	This is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.		
Malicious	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.		Details of allegations that are found to have been malicious should be removed from personnel records.

In addition, there is a further outcome type (unfounded) which schools may wish to use, after liaison with their HR/ advisors.

*Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

6   CONCERNS ABOUT A COLLEAGUE: WHAT TO DO

6.1   Reporting channels

If a staff member has a concern about another staff member or volunteer this should be referred to the relevant Head of School.

Where there are concerns about a member of senior staff this should be referred to the Head.

Where there are concerns about the Head, this should be referred to the Chair of Governors and the designated Governor for Safeguarding. Any concern or allegation against a member of senior management or the Head will be reported without informing the individual concerned.

No individual should feel that they cannot speak up and let their concerns be known about any matter relating to the safety of children in the school. Individuals who raise such concerns are assured that they need not fear any deleterious consequences as a result of having raised such concerns. It is their absolute right – indeed their duty – to speak up when they have concerns.

6.2   Types of allegations

As specified in the UK's, 'Keeping Children Safe in Education' (2023, p/96) the following definitions should be used when determining the outcome of allegation investigations:
a)   Substantiated: there is sufficient identifiable evidence to prove the allegation;
b)   Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
c)   False: there is sufficient evidence to disprove the allegation;
d)   Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or
e)   Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw; alternatively, they may not have been aware of all the circumstances;

The content below is informed by MANAGING ALLEGATIONS OF CHILD ABUSE BY EDUCATORS AND OTHER ADULTS IN INTERNATIONAL SCHOOLS. This document accompanies this policy and supports the content below.

Any allegations against staff; other than the Head or governor that indicate that they may have undertaken any of the points below will be reported immediately to the DSL/DDSL
•   behaved in a way that has harmed a student, or may have harmed a student
•   possibly committed a criminal offence against or related to a student
•   behaved towards a child or children in a way that indicates he or she would pose a risk of harm to students

If the DSL/DDSL is not available, an allegation will be reported to the SLT member responsible for safeguarding. Subsequently, the Head will inform the governor responsible for safeguarding. It is the responsibility of the DSL/DDSL to take the next steps in the safeguarding process upon referral. Staff must feel confident that they will be supported if they report any concerns about a child. Staff will be expected to ensure that any reports written about any safeguarding situation are child-centred, in the child's best interests, rooted in child development and informed by evidence. The DSL/DDSL, under guidance from the Head may gather a response team, the

constitution of which will reflect the nature of the allegation. Decisions made by the response team should be agreed with the child and family where possible. A clear process of evaluation with a clear timeframe will be recorded along with the impact of any change on the welfare of the child.

Those reporting any safeguarding concerns will adhere to the lines of communication, ensuring confidentiality. Regardless of the duty of confidentiality, any member of staff who has reason to believe that a student is at immediate or significant risk of harm, has a duty is to forward this information without delay to the DSL/DDSL.

It is recognised that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of students. Risk assessments may pertain to the whole school, to specific phases or areas of the school that have hazards associated with them, or to individual students or staff. A record of the risk assessment must be maintained.

If the allegation made to a member of staff concerns the Head, the person receiving the allegation will immediately inform the safeguarding governor, who will consult as above, without notifying the Head first.

The name of any member of staff considered not suitable to work with children will be referred to the Disclosure and Barring Service (DBS) and ICPC, and other relevant organisations with the advice and support of the senior director of HR and in accordance with the DBS Referral Policy.

Occasionally a member of staff may have a personal difficulty that they know is impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so that professional and personal support can be offered. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of students in the school.

7   IMMUNITY & SPEAKING UP PROCEDURES

7.1   Staff who are concerned about the conduct of a colleague may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of a child is paramount. This procedure empowers staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

7.2   HARROW CQ recognises that its staff are often the first people to suspect or realise that something is wrong and is therefore fully committed to dealing responsibly and professionally with their genuine concerns about child safeguarding. HARROW CQ also recognises that, for a number of reasons, staff often feel reluctant to raise such concerns. That is why HARROW CQ will always support any and every member of staff who 'speaks up' about a concern they have.

7.3   To make a disclosure, you only need to act in good faith, e.g. with an honest belief about the concern you raise. Through its policies and practice, HARROW CQ actively encourages you to raise concerns internally making use of the accepted channels of reporting – either through the school's Safeguarding Officers or directly to the Head. Your concern will be treated in the strictest confidence. HARROW CQ will ensure that your concerns are investigated promptly and efficiently and, whenever possible, you will be advised of the outcome. If the concern relates to

the Head, then it should be raised directly with the Chief Education Officer/or the Governor with Responsibility for Safeguarding.

7.4 The school will not hold responsible or at fault any school employee making a report of abuse that is later judged to be false, unless it can be demonstrated that the person willfully and intentionally falsified a report.

8 SAFEGUARDING AND THE PHYSICAL ENVIRONMENT

8.1 HARROW CQ must be a safe place for all students. The way we achieve this is outlined in our Health and Safety Policy. Please also note the following key points, which relate specifically to the safety of children:
- Doors should have clear glass windows. Any film or blinds must still allow occupants to be visible from outside the room
- Staff bathrooms are available and are clearly identified as such. Staff must not use the same bathrooms as students. In cases where it is necessary to enter a student allocated bathroom, such as to attend to a behavioural or health and safety issue, leave the door open and announce your reason for entering the space as a warning to other students using the bathroom. Where possible in such situations avoid being alone. We understand that with very young children, staff will be assisting with children's toileting and intimate care needs. In this case please refer to the *Intimate Care Policy (HS16)*.
- If staff are in a one-to-one situation with students in a room, (e.g in boarding, on expeditions or trips etc.) they should ensure that the door remains open or move to a more public space where this is possible and appropriate.

9 SAFER RECRUITMENT

9.1 Our aims

The safer recruitment of all staff working in HARROW CQ is the first step to safeguarding and promoting the welfare of children in education and the HS37 Recruitment Policy sets out procedures and practices to be implemented in HARROW CQ. Our safer recruitment processes aim to:
- Deter potential abusers by setting high standards of practice and recruitment.
- Reject inappropriate candidates at the application and interview stages.
- Prevent abuse to children by developing robust policies and agreeing on safe practice.

9.2 Achieving our aims

We ensure that at least one member of staff on every recruitment panel has undertaken training in safer recruitment and that:
- Up-to-date police records (ICPC/DBS or local equivalent) from the country of origin and previous any countries of employment employment/study/residence longer than six continuous months have been received and checked by the school
- After two years, usually at the time of contract renewal, police checks are also renewed;
- We have at least two appropriate professional references from a candidate's current and previous employer, one of which must be from a candidate's Headmaster or SLT of the current or most recent employer. A telephone reference from the current employer done by one of SLT members is included for all staff and recorded on the SCR. If a teacher has worked in two or more schools, within 5 years, telephone contact is made with those schools

to ask why the teacher is leaving and if there were any concerns of a safety nature with children;

- A digital screening process is undertaken for selected candidates to ensure their suitability for the role. Candidates should be made aware of this safeguarding process in advance.
- Authentication of staff documentation.
- All new staff read and sign the *Safeguarding Policy (HS13)* and Code of Conduct;
- We give staff training on arrival in safeguarding and refresh this training formally on an annual basis.

9.3   Minimum safeguarding requirements expected of contractors

We expect the following as a minimum in the case of all contractors:
- Induction training provided which covers safeguarding;
- A designated senior member of the Operations team (or, in alternate School structures, the Head) ensures that CSP information is shared with relevant managers through regular meetings;
- Contractors read, complete and sign the CSP Self Declaration Form;
- Police checks for any member of staff who will be employed on-site for longer than 6 days;
- Our Code of Conduct for contractors is shared and a record is kept of their having read and understood it;
- Toolbox Talks - daily reminders given on CSP awareness.

9.4   Minimum safeguarding requirements expected of all adults living on campus

In schools where staff live on campus:
- The *Safeguarding Policy (HS13)* and staff Code of Conduct; made available to all at induction meeting (during new staff induction);
- Expectation for all residential occupants to adhere to the *Safeguarding Policy (HS13)* and our Code of Conduct;
- Resident adults read, complete and sign the CSP Self Declaration Form.

10   STAFF TRAINING

10.1   Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care.

10.2   Each school's HR Manager (or in schools with alternate structures, the Head), supported by the Safeguarding team, keeps detailed records of all staff safeguarding training and issue reminders when training updates are required.

10.3   It is good practice to include a safeguarding agenda item in all staff meetings.

10.4   All paid and unpaid members of staff have regular, mandatory safeguarding training (including how to ensure pupils stay safe online). This including school governors, senior managers, outside providers, volunteers, interns, and contractors, or anyone working on behalf of the school.

10.5   New staff have safeguarding training as part of the induction process and that this is kept up to date by refresher training annually.

10.6 In addition, the designated members of staff (DSL, and DDSL) will undertake multi-agency training every two years to keep their knowledge and skills up to date. We aim to ensure that this group of staff is all Level 3 safeguarding trained. All members of senior leadership to be Level 2 safeguarding trained.

10.7 Standards of behaviour expected of staff, are outlined in the Staff Professional Code of Conduct. It is expected that all staff read this code and sign to acknowledge that they have done so. All members of staff (and all adults working with students) read and agree to this Policy before their duties begin.

11 SELF-ASSESSMENT AND INTERNAL QUALITY CONTROL

11.1 To ensure that safeguarding documentation remains effective and up to date, schools will ensure that:
   a) A biennial external audit is carried out, which forms part of our safeguarding improvement action plan;
   b) An internal audit occurs annually.
   c) Safeguarding provision is to be evaluated against Harrow Standards 1.7 A Safeguarding culture and associated Success Descriptors.

12 BUDGETING FOR SAFEGUARDING

12.1 In recognition of the central importance of safeguarding to the entire enterprise, safeguarding is to have its **own designated and protected budget line** in the school accounts. From this budget comes:
   a) Funds for the biennial audit;
   b) Funds for signage;
   c) Funds for storage and office sundries.

   Training of staff connected to safeguarding is to be budgeted for under the main CPD budget.

13 RISK ASSESSMENT

13.1 Risk assessment is undertaken to good effect in promoting safety. Such assessments cover all aspects of the school's work, such as premises and equipment, on-site activities, off-site activities and the venues used, use of minibuses and other forms of transport.

13.2 Our risk assessments include sections to address child safeguarding risks and a risk management plan.

13.3 Our risk assessments consider all safeguarding matters when working with other partners and third-party providers, for example on expeditions and trips.

13.4 Where appropriate, short briefings/training input are given to staff of host organisations/locations on child safeguarding and how to report issues of concern.

13.5 Risk assessments are signed off by managers/senior leaders, not only by the trip or expedition leader.

14 IMPLEMENTATION ACTIONS

14.1 In order to implement and monitor this Policy, HARROW CQ will:
a) Designate a senior person for as DSL and DDSL, providing appropriate training, support and time for this role.
b) The DSL, or at least one Deputy DSL, should be fluent in the native language of the school`s location;
c) Ensure a nominated governor takes a lead role for safeguarding including championing safeguarding issues within the school and liaising with the Head, having an overview of the safeguarding and all related policies, auditing safeguarding measures annually alongside the Head following a calendared timeline;
d) Ensure every member of staff, volunteer, site user, employee and governor know the name of the designated safeguarding officer responsible for safeguarding and their role through the training programme and the display of posters around the site;
e) Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for recording any concerns and referring any concerns to the designated teacher responsible for safeguarding;
f) Ensure all visitors are aware of child safeguarding expectations and reporting procedures by having information on signed acknowledged visitor slips and CS reporting posters at key points around the school;
g) Ensure all staff receive safeguarding training annually, and that Designated Safeguarding Officers and safeguarding team members and Nominated Safeguarding Governor are trained to advanced level every two years;
h) Develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters;
i) Ensure all child welfare and safeguarding records are kept securely, and in locked locations
j) Ensure safer recruitment practices are always followed;
k) Ensure that any allegations against members of staff with a safeguarding aspect are dealt with following agreed procedures and all such concerns to be dealt with urgently;
l) Ensure that the school building and site are appropriately secure, with a clear record kept of any risk assessments carried out, by following school procedures on health and safety and risk assessments;
m) Ensure that other school policies which have a safeguarding element (e.g. health and safety; anti-bullying; e-safety; behaviour; HR recruitment; boarding sanctions) are all consistent with this policy and with each other and where appropriate make cross-reference to this policy;
n) Carry out an annual safeguarding audit, and track progress against a safeguarding action plan, reviewed mid-year. Governing Body will receive a safeguarding and safeguarding report at least once a year (based on the annual audit and review);
o) Ensure all staff, governors and volunteers receive and sign for a copy of this policy;
p) Ensure that parents receive information from the school about the responsibility placed on the school and staff for safeguarding through calendared workshops;
q) Provide age-appropriate education and safeguarding training to students;
r) Ensure that any use of the school`s campus and facilities by a third party complies with the school`s expectations of safeguarding practice.

15 CONTACT INFORMATION FOR SAFEGUARDING SERVICES

15.1 HARROW CQ will maintain a database of local child safeguarding agencies and support services. Details of these services will be available to the Safeguarding Team.

15.2 HARROW CQ will endeavour to keep these links fresh by making personal contact with the agencies on a biennial basis. This ensures that if the worst were ever to happen, schools have the contacts necessary to make the most of the services available to us.

Orgnizations	Contact Person	Contact Number	Note
Local EDB	Mr. Leo	023-67822002	
Local Counselling Centre	Reception	023-67070707	
Public Security Bureau	Mrs. Guo	17823387192	

APPENDIX 1: DEFINITIONS OF TERMS

The term 'all staff' as used in this policy includes, but is not limited to:

1. Teachers (including supply teachers)
2. Bilingual Classroom Practitioner
3. Administrative staff
4. Operations staff
5. Maids
6. Senior managers
7. Governors
8. All paid staff who are working for the School
9. Outside activity providers
10. Coaches

11. Volunteers
12. Graduate interns
13. Contractors/Outsource Staff
14. Consultants
15. Visiting speakers
16. Visiting professionals delivering training on-site

The term 'residential occupants and staff' as used in this policy includes, but is not limited to:
1. Spouses of staff residing in school houses or boarding residences on campus, who are not employed by the school;
2. Long-term guests or visitors of staff residing in staff houses or boarding residences on campus. For example, staying for an extended period (more than 6 days);
3. Any individual, employed by a residential occupant, to work in the staff houses or boarding residences on campus on a regular basis. For example, nannies and maids.

Schools must work with appropriate agencies to investigate when any adult who is/has worked at, or is involved with, the school has "**behaved or may have behaved in a way that indicates they may not be suitable to work with children**".

APPENDIX 2: INDICATORS OF ABUSE

What to look out for and when to be concerned

All staff should be aware of the types and signs of abuse and neglect so that they are able to identify students who may be in need of help or protection. If staff are unsure, they should always speak to the DSL/DDSL. Child 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. Students may be abused by an adult or adults or by another child or children.

Staff should be aware of the four main categories of child abuse which are commonly identified, although there may be cross over between categories:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm, providing them with alcohol or drugs and administering corporal punishment 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 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. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- 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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers) and not leaving children at home alone; or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Things to watch out for:

POSSIBLE INDICATORS OF PHYSICAL ABUSE	POSSIBLE INDICATORS OF EMOTIONAL ABUSE
• Unexplained bruises and welts on any part of the body • Bruises of different ages (various colours) • Injuries reflecting shape of article used (electric cord, belt, buckle, table tennis bat, hand) • Injuries that regularly appear after absence or vacation • Unexplained burns, especially to soles, palms, back, or buttocks • Burns with a pattern from an electric burner, iron, or cigarette • Rope burns on arms, legs, neck, or torso • Injuries inconsistent with information offered by the child • Immersion burns with a distinct boundary line • Unexplained laceration, abrasions, or fractures	• Emotional abuse can cause a child to change the way that they behave. • They might not care how they act or what happens to them, this is also known as negative impulse behaviour. • Or they may try to make people dislike them, which is called self-isolating behaviour. • A child who is being emotionally abused may develop risk-taking behaviours such as stealing, bullying and running away. • Self-harming or eating disorders • May lack social skills • Appear distant from parents
POSSIBLE INDICATORS OF SEXUAL ABUSE	**POSSIBLE INDICATORS OF NEGLECT**
• Sexual knowledge, behaviour, or use of language not appropriate to age level • Unusual interpersonal relationship patterns • Venereal disease in a child of any age • Evidence of physical trauma or bleeding to the oral, genital, or anal areas • Difficulty in walking or sitting • Refusing to change into PE clothes, fear of bathrooms • Child running away from home and not giving any specific complaint • Not wanting to be alone with an individual • Pregnancy, especially at a young age • Extremely protective parenting • Exposure to pornography	• Child is unwashed or hungry • Parents are uninterested in child's academic performance • Parents do not respond to repeated communications from the school • Child does not want to go home • Both parents or legal guardian are absent • Parents cannot be reached in the case of emergency

Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation
- Child criminal exploitation
- Domestic abuse
- Honour-Based Violence, Female Genital Mutilation, Forced marriage and Breast Ironing
- Radicalisation
- Children with family members in prison
- Child on child abuse
- Sexual violence and sexual harassment

These may manifest as:

1. **Children missing from education**; A child going missing from education is a potential indicator of abuse or neglect. Staff and community members (including parents and carers) should report any poor student attendance or absences which cause concern to the safeguarding officers or the DSL, particularly on repeat occasions and/or over prolonged periods of time, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of the child going missing in future.

2. **Child sexual exploitation (CSE)**; This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship to serious organised crime by gangs and groups. The perpetrator/s always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

3. **Female Genital Mutilation (FGM)**; This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. AISL follows UK advice in this area: it is mandatory to report FGM disclosures that concern any female under the age of 18.

4. **Radicalisation**; This refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. As with managing other safeguarding risks, staff should be alert to changes in a child's behaviour which could indicate that they may be in need of help or protection.

5. **Forced marriage/abduction**; In some cultures, forced marriages are still regarded as acceptable. Any member of staff who considers a child at risk of this particular form of abuse, should report it immediately to a member of the safeguarding team.

Signs of abuse

Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):
- The student discloses that he or she has been abused, or asks a question which gives rise to that inference
- A student's injury cannot be reasonably or consistently explained, or is unusual in type or location
- A pattern or frequency of injuries is emerging
- The student engages in extreme or challenging behaviour or there is a sudden change in the student's behaviour
- The student asks to drop subjects or displays significant changes in attainment or behaviour with a particular teacher and seems reluctant to discuss reasons
- The student appears neglected (e.g. dirty, hungry, inadequately clothed)
- The student appears reluctant to return home or has been openly rejected by parents or guardians
- The student's development is delayed in terms of emotional progress
- The student withdraws emotionally, showing a lack of trust in adults
- The student shies away from being touched or flinches at sudden movements
- The student loses or gains weight

Signs you may notice:

• withdrawn • suddenly behaves differently • anxious • clingy • depressed • aggressive • problems sleeping • eating disorders • wets the bed	• soiled clothes • takes risks • misses school/arrives very early • changes in eating habits • obsessive behaviour • nightmares • drugs • alcohol • self-harm • thoughts about suicide

NEGLECT

Appearance / hygiene
- be smelly or dirty
- have unwashed clothes
- have inadequate clothing, e.g. not having a winter coat
- often hungry or turns up to school without having breakfast or access to any food at home

Health & Development issues
- untreated injuries, medical and dental issues
- repeated accidental injuries caused by lack of supervision
- recurring illnesses or infections
- not been given appropriate medicines
- missed medical appointments such as vaccinations
- poor muscle tone or prominent joints
- skin sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- anaemia
- tiredness

- faltering weight or growth and not reaching developmental milestones (known as failure to thrive)
- poor language, communication or social skills.

Housing
- living in an unsuitable home environment (eg not having any heating)
- left alone for a long time
- taking on the role of carer for other family members
- living in a suitable home environment with food, shelter and warmth but lacking human contact, love and attention from family members (may be looked after by maids and drivers)

EMOTIONAL ABUSE

There often aren't any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions.

Changes in emotions are a normal part of growing up, so it can be really difficult to tell if a child is being emotionally abused.

Babies and pre-school children who are being emotionally abused or neglected may:
- be overly-affectionate towards strangers or people they haven't known for very long
- lack confidence or become wary or anxious
- not appear to have a close relationship with their parent, e.g. when being taken to or collected from nursery etc.
- be aggressive or nasty towards other children and animals.

Older children may:
- use language, act in a way or know about things that you wouldn't expect them to know at their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents, family members or friends
- lack social skills or have few, if any, friends
- appear upset and worried about postings on social media, WeChat etc
- feel they are being bullied online or taunted by others

SEXUAL ABUSE

Stay away from certain people
- they might avoid being alone with people, such as family members or friends
- they could seem frightened of a person or reluctant to socialise with them.

Show sexual behaviour that's inappropriate for their age
- a child might become sexually active at a young age
- they might be promiscuous
- they could use sexual language or know information that you wouldn't expect them to know at that age

Have physical symptoms
- anal or vaginal soreness
- an unusual discharge
- sexually transmitted infection (STI)
- pregnancy

SOURCE: https://www.nspcc.org.uk/preventing-abuse/

Listening to students and record keeping

The school is to provide a range of opportunities for students to be listened to. If a student discloses that he or she has been abused or neglected in some way, the member of staff should:

- Immediately stop any other activity to listen
- Listen carefully to the student and keep an open mind — do not interrupt the child or be afraid of silences
- Limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoid using leading questions such as, "has this happened to your siblings?" which may prejudice an investigation
- Not make any attempt to investigate the incident themselves or make a decision as to whether or not the student has been abused
- Reassure the student, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy
- Discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL or the Master
- Only share information on a need-to-know basis
- Make a full written record of the conversation as set out below.

Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible, perhaps using a resource such as CPOMS. The recording must be a clear, precise and factual account of the conversation or observations. Where a student has made a disclosure, the record must include details of:

- Its date, day of the week, time and place
- What was said and done by whom and in whose presence
- Any noticeable non-verbal behaviour or words used by the child.

Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL/DDSL as soon as possible. No copies should be retained by the member of staff or volunteer. Notes may be scanned and uploaded onto a resource such as CPOMS.

APPENDIX 3: LOGGING CONCERNS FORM (English version)

Your Name (PRINT):	Your Role:
Student Name: (first, surname and nickname)	**Class and Year/House Group:**
Time and Date of Incident: (if applicable):	**Date you became aware of the incident/issue:**
Describe the incident as factually as possible. Include who was involved, where it happened, exactly what happened etc. Remember to describe clearly any behaviour or physical signs you have observed.	
What actions did you take? Your Signature:	
Time and date of when the form was completed:	

This form should be handwritten. Do not create a digital record. Check your report before personally handing it over to the DDSL in your section of the school or DSL if the former is unavailable. Make sure this form is legible and uses plain English. Please remember this form might be read by someone not working at Harrow. This form could, for example, be used as evidence in legal proceedings.

FOR DSL USE

Received By	Date and Time:
Proposed Action By the designated person	

The diagrams below only need to be annotated if applicable to the concern/s expressed overleaf. The purpose of this page is to accurately locate physical contact or a mark/bruise/wound on the body.
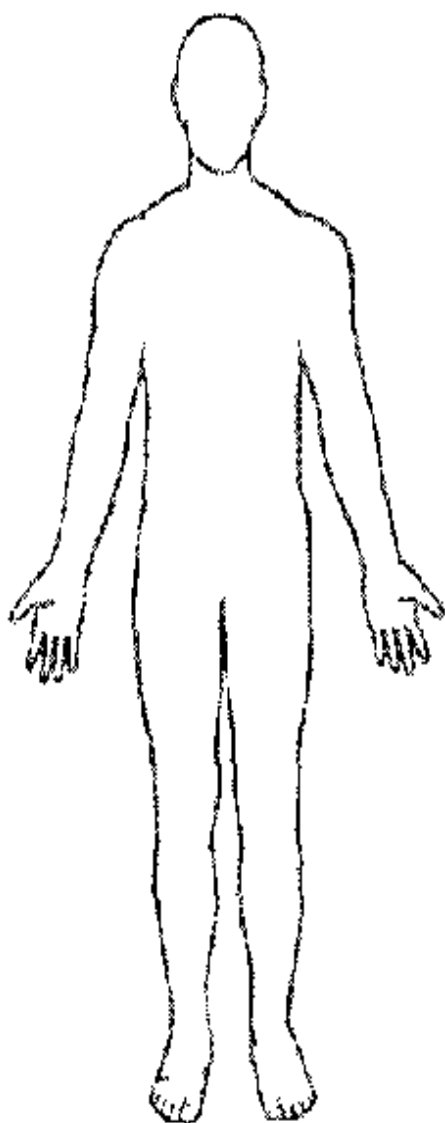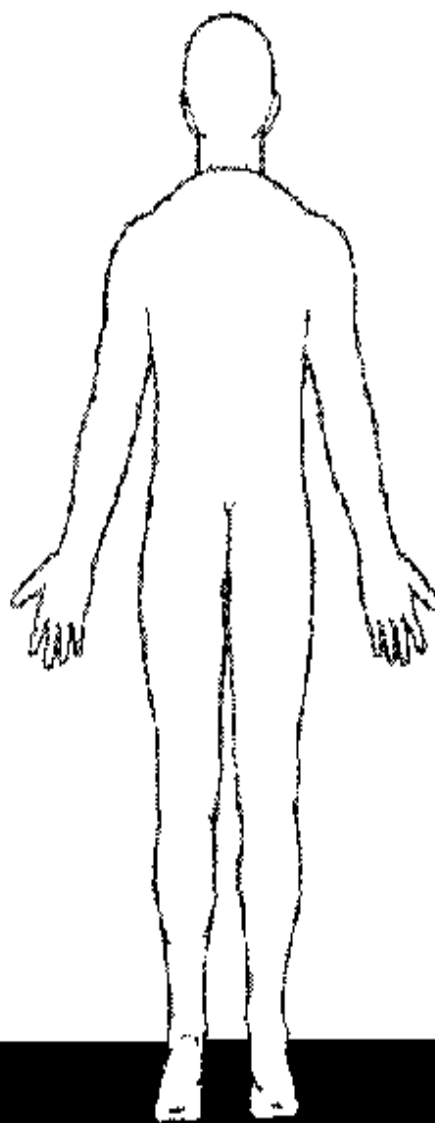
Front   **Back**

APPENDIX 4: REPORTING FLOWCHART

Safeguarding
Disclosures Reporting Flowchart

You have concerns about a student's welfare

Be alert to signs of abuse and question unusual behaviours or marks/injuries.

A student discloses abuse or neglect

Listen and believe - take the allegation seriously. **Support** them for being brave. Tell them what you will do next. Do not promise confidentiality.

Report

Report by completing the Concerns Logging Form to make a written record

Give the completed Concerns Logging Form to a Child Protection Officer as soon as possible.

APPENDIX 5: ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ABUSE AND ALLEGATIONS

Most instances of students causing harm to each other will be dealt with under the school's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a student towards another; referred to as child-on-child abuse. Examples of students' conduct towards each other that could raise safeguarding concerns are:

- Bullying (including cyberbullying)
- Physical violence such as hitting, kicking, biting or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing
- Youth produced sexual imagery (sexting)
- initiation/hazing types violence and rituals.

Peer-on-peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence. Students with Special Educational Needs or Disabilities are particularly vulnerable to peer-on-peer abuse. Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls and students with SEND are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexual remarks about a person's clothes or appearance, using sexualised names etc
- Sexual "jokes" or taunting
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing, displaying pictures, drawings or photos of a sexual nature

Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages, including on social media. This type of harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Schools have an important role in developing student understanding of what constitutes peer-on-peer abuse and instilling behavioural norms that minimise the risk of it taking place. Staff should also be aware of the importance of:

- Enforcing the explicit rules
- Implementing in a consistent way its Behaviour Policy
- Being clear that sexual violence or sexual harassment is abusive behaviour and is unacceptable
- Implementing the school's anti-bullying strategy and promoting the Harrow values.

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- Providing developmentally appropriate wellbeing, or other, lessons which develop student understanding of acceptable behaviour
- Systems for any students to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable
- Having robust supervision arrangements, particularly for those in boarding

If an allegation of peer-on-peer abuse has been made the DSL/DDSL must be informed as soon as possible. A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the school's policies on behaviour and discipline will apply. Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL/DDSL as part of these procedures will produce a risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the school) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other students; and any relevant contextual factors.

APPENDIX 6: LAWS AND CONVENTIONS GUIDING THE CHILD PROTECTION POLICIES FOR MAINLAND CHINA

The PRC *Minors Protection Law,* 2012: Article 5:
In the protection of minors, the following principles shall be followed: (1) respecting the personal dignity of minors; (2) following the laws which govern the minors' physical and mental development and the characteristics of such development; and (3) combining education with protection. Standing Committee of the National People's Congress, *Law of the People's Republic of China on the Protection of Minors (2012 Revision)* Order of the President No.65 PRC.

Anti-domestic Violence Law of the People's Republic of China, 2015:
In 2015, a new law was passed (effective March 1st 2016) that protects foreigners and Chinese citizens within China's borders from domestic violence. Two articles of this law have specific implications for children and schools:

Article 14: Schools, kindergartens, medical institutions, residents' committees, villagers' committees, social service agencies, aid management agencies, welfare agencies and their staff members shall promptly report cases to public security organs if they find, during the course of their work, that persons with no civil capacity or persons with limited civil capacity have suffered or are suspected of suffering domestic violence. Public security organs shall keep confidential the identity of case reporters.

Article 35: Where a school, kindergarten, medical institution, residents' committee, villagers' committee, social service agency, aid management agency, welfare agency and its staff members fail to report a case to a public security organ in accordance with Article 14 herein, resulting in serious consequences, the person directly in charge and other persons subject to direct liabilities shall be given disciplinary sanctions pursuant to the law by the relevant superior competent department or their own employer. Standing Committee of the National People's Congress, (2015) *Anti-domestic Violence Law of the People's Republic of China.* Order No.37 of the President, PRC.

APPENDIX 7: SAFEGUARDING TRAINING EXPECTATIONS

Position	Training	Frequency
Safeguarding governor	**Advanced**	**2 years**
AISL Safeguarding lead	**Advanced**	**2 years**
Snr Director of HR	**Advanced**	**2 years**
DSL	**Advanced**	**2 years**
Master	**Advanced**	**3 years**
School HR manager	**Advanced**	**3 years**
SLT*	**Advanced**	**3 years**
All staff*	**Basic**	**Annually**
Volunteers etc.**	**Introduction to safeguarding**	**Annually**

* Delivered by DSL along with online programmes

** Delivered by DSL or HR Manager supported by online programmes

APPENDIX 8: ACKNOWLEDGEMENT OF COMPREHENSION

Please print out this page and return it, signed, to the Designated Safeguarding Lead

I have read, understand and agree to abide by the *Safeguarding Policy (HS13)* and the Staff Professional Code of Conduct. I acknowledge that their scope covers both my private and professional life.

I understand that if I do not follow the guidance laid out therein, I will be subject to disciplinary action which may result in dismissal and/or my actions being reported to the police.

FULL NAME (capitals, please):

_____

SIGNED: _____   DATE: _____

Return this signed page to the Designated Safeguarding Lead; please keep the rest of the document for your own records.

保障政策 (HS13C)
适用于哈罗重庆

适用于：	所有员工、访客、志愿者、承包商、校董、来宾等
哈罗重庆学校负责人：	高级管理团队
最近更新时间:	2023 年 12 月 8 日
修订版: （审阅者输入姓名缩写和日期）	CS – 2023 年 11 月 8 日

1 引言

1.1 语言说明

在许多学校中，"保障"和"儿童保护"是可以互换使用的术语； 在其他学校中，它们并排使用，好像是密不可分的。

我们认为后者使用重言式，因此在确保我们学校的儿童安全且受到良好照顾的所有事项上，仅选择了"保障"一词。 与"儿童保护"相比，我们更喜欢"保障"一词，因为任何人都没有这样的假设，即确保儿童福利仅意味着防止他们受到伤害。

1.2 本政策的范围

根据《儿童法》（英国）和《中华人民共和国未成年人保护法》（中国）， 孩子是指在哈罗重庆学校注册的任何学生。 《共同保障儿童》（英国）中定义了保障和促进儿童福利：
- 保障儿童免遭虐待；
- 防止损害儿童的健康或发育；
- 确保儿童在与提供安全有效的照料相符的环境中成长；
- 承担该角色，以使这些孩子有最佳的生活机会并成功进入成年期。

本政策适用于但不限于所有员工，学生，来宾和访客，或在哈罗重庆学校中或代表哈罗重庆学校工作的任何人。

1.3 本政策的目的

哈罗重庆学校完全承认我们在保障儿童方面的共同责任。 为此，本政策旨在记录我们如何：
- 保护所有上学并使用我们服务的儿童和年轻人；
- 向所有员工（如附录 1 所定义）和访客提供指导我们保障方法的总体原则。

哈罗重庆学校致力于确保儿童和年轻人永远不会遭受任何形式的虐待。

我们认识到，我们所有人都有责任促进所有儿童和年轻人的福祉并确保他们的安全。

我们致力于寻求方式来不断地审查我们的做法，以便我们的每一所学校都能保障儿童并为人类的繁荣提供条件。

1.4 我们的核心信念

我们认识到并相信：

- 学生和教职工的福祉比学校中所有其他考虑更为重要；
- 所有儿童，不论其年龄，残疾，性别，种族传统，宗教信仰，性取向或身份如何，均有权获得平等保护，免受各种形式的伤害或虐待；
- 由于以前的经历，特殊的教育需要，残疾，或由于他们的高度依赖，沟通困难或其他问题，一些儿童更容易受到伤害；与儿童，年轻人，他们的父母，看护人和其他机构合作，对于促进年轻人的福利至关重要。
- 每一个与儿童一起工作的成年人都有责任确保他们的安全。哈罗重庆学校致力于确保所有与学生一起工作的员工都接受适当的保障培训。
- 员工应特别注意对早期积极、适度干预的潜在需求。这包括有特殊额外需求、需要合理调整的残疾儿童，有特殊教育需求、本身滥用药物或酒精、显示出被卷入反社会或犯罪行为的迹象或处于对学校构成挑战的家庭环境的儿童，或有残疾、有特殊教育需要的儿童。

1.5 法律框架

在设计此政策时，参考了以下英国、中国和国际文件：

1. 《确保儿童安全接受教育（2023）》
2. 《中华人名共和国未成年人保护法（1992 年)》
3. 《共同保障儿童（2015）》
4. 《儿童法（1989 年）》
5. 《儿童法（2004 年）》
6. 《数据保护法（1998 年）》
7. 《联合国儿童权利公约（1991 年）》

1.6　角色和责任

在我们的学校中，所有员工都参与了保障儿童的工作，但是其中有些人承担着非常具体的责任。

学校必须具备以下条件：

- 指定的保障负责人（DSL）

  DSL 负责制定策略； 与保障有关的系统和合规性； 监督保障程序（包括理解网络安全和确保过滤监控系统到位）； 员工培训； 制定保障行动计划； 保持实现保障行动计划的目标； 进行内部保障审核； 安全招聘和中央登记册（SCR）； 领导保障团队； 维护保障记录的机密性和完整性； 处理复杂和严重的保障案件； 确保保障措施始终是学校企业意识的重中之重； 审查严重的案件审查并采取行动； 以及维持或改善学校的保障政策和程序可能需要定期执行的其他职责。

  DSL 应该通过与教师紧密合作并共享有关其福利、保障和儿童保护方面的信息来帮助促进教育成果。DSL 的角色还包括：

增强意识

- 就所有保障相关事宜提供支持、建议和专业知识
- 鼓励员工参与保障和倾听学生声音的文化
- 确保当地保障政策被知晓、理解和适当使用，并至少每年审查一次
- 监督当地政策的运作，定期审查和更新程序及其实施，必要时与保障工作组和校董合作
- 确保所有员工和志愿者都接受适当的培训，保存和维护培训记录，并确保员工了解培训机会和最新的当地保障政策
- 与当地电子安全负责人密切合作
- 监督有关电子安全的政策和做法，适当了解学校过滤和监控互联网和网络使用的系统，每年审查这些规定，同时确保所有教职员工都接受过适当的网络安全培训

管理移交

- 就向他们报告的所有保障问题提供建议并迅速采取行动
- 酌情移交涉嫌虐待的案件，支持进行或考虑进行任何此类移交的员工，并根据需要与地方当局联络

- 将某人因**对**儿童造成**风险/伤**害而被解雇或离**职**的案件移交犯罪**记录查询**及限制雇佣局或其他部门
- 将可能涉嫌犯罪的案件移交警方
- **详细、准确、安全地维护此类问题**或移交的书面**记录**（例如 CPOMS）
- 所有**问题**和行**动**及**时**告知**负责**人
- **监控受儿童保护计**划保**护**的大学生的**记录**，以确保一收到通知就**对其进行维护**和更新
- **监控保障记录**的机密性和存**储**，当学生离校**时**，确保尽快将向新学校提供他**们**的保障档案复印件，并将其与主要学生文件分开寄送，确保安全寄送并**获**得确**认**收件回**执单。**
- 同**样**，哈**罗**重**庆**学校将在招生**过**程中要求提供儿童的保障档案
- 在每起保障指控或重大**问题**结束后**进行检讨**，并以此改**进实**践

    DSL 还将**为** 哈**罗**重**庆**保障工作**组**做出**贡献**。

- 指定的副保障**负责**人 (DDSL)
  DDSL **负责**其学校指定区域的日常保障事务。 在**这**方面的**职责**包括但不限于：作**为**披露的第一**联络**点（指定**联络**点）；**维护保障记录**的完整性和机密性；使 DSL 及**时**了解出**现**的保障**问题**；与父母，看**护**人和其他机构**联络**，以确保儿童的安全； 在需要的情况下**组织**案例会**议**；**为**需要的学生**设计**和**实**施福利**计**划。

- 保障**团队**
  该团队负责制定年度**发**展**计**划并向高**层**管理**团队汇报；负责**审查政策和程序；**负责**商定**员**工和其他成年人的培**训时**间表。**团队**定期开会**审查**保障案例和关切；**团队**成**员**在 DSL 的指**导**下运作，确保政策和程序的有效**实**施。

- 指定的保障校**董**
  保障校**董负责监**督政策和程序；向董事会**报**告所有与保障有关的**问题**；确保保障措施牢固地存在于董事会的集体意**识**中；在可行的情况下，尽可能多地**对**学校**现**有的程序**进**行第一手取**样**，但不少于每年一次。必要**时**向 DSL 和更广泛的保障**团队**提供指**导**。

- 校**董**会 (BOG)

BOG 全面负责确保保障政策和程序。BOG 的职责是对保障政策和实践进行审查；认真履行关怀职责，促进学生的福祉与健康，确保学生的安全并保护学生免受伤害。为此，BOG 将确保：

– 制定有效的最新保障政策，向员工提供并在学校网站上发布；
– 制定适当的、可以正常运行的政策和程序
– 及时进行所需的职前检查并将其正确记录在单一中央登记册中
– 所有员工均根据本政策接受保障培训
– 教授学生保障措施，包括网络安全
– 安装适当的过滤和监控系统，确保学生的网络安全
– 确保学校、相关从业人员和地方机构之间共享重要信息
– 网络安全：确保学校指派适当的角色和责任，以管理互联网和网络使用的过滤和监控，并每年对此类规定进行审查

制定落实《HS13 政策》的制度：

人员	职责	校内担任职务	联系邮箱
石林	DSL	心理咨询师	Cshi1@harrowchongqing.cn
Aaron Lennon	DDSL	外方校长	Alennon@harrowchongqing.cn
孔静	DDSL	中方校长	Jkong@harrowchongqing.cn
杨薛莉	DDSL	中方校长助理	Syang@harrowchongqing.cn
彭宇晴	DDSL	幼儿园中方园长	Rpeng@harrowchongqing.cn

哈罗重庆学校已成立保障工作组。 该小组的作用是：
- 检讨政策和程序
- 评估和审查保障实践
  – 这包括由DSL开展的年度内部审查
  – 三年为一周期的外部客观审查
- 制定包含与年度审查相关的运营实践和战略发展的行动计划
- 确定与保障相关的专业学习
  – 确保所有员工都接受过适当级别的培训，并且有记录证实这一点
  – 创建同辈互助和培训渠道与机会

哈罗重庆学校工作组的所有成员都将接受高级培训，按照最佳实践，该培训将每两年进行一次正式更新。

1.7 记录保存

妥善保管的记录对于良好的保障惯例至关重要。 哈罗重庆学校很清楚有必要记录对我们学校中一个或多个学生的任何担忧，此类记录的状态和机密性。

任何学校社区的成员（包括父母和看护人）， 如果收到披露虐待或注意到虐待迹象或指示的信息，则必须尽快准确记录，并说出所见。 并提供完整的日期，时间和位置。 如有疑问，请报告。 所有记录均已签名并包括要采取的措施。

这些注意事项仅以纸质形式保存在 CPOMS 中的机密数字格式中，与其他文件分开，并存储在用密码锁锁定的防火保险箱中。以同样的方式，会记录所有出于安全原因而受到监视的学生的笔记（包括正在进行的案例研究，案例审查和外部监督）。

在儿童离开学校的情况下， 我们确保将其保障档案尽快转移到他们的新学校。 我们确保将这些记录与主要学生档案分开发送，以确保获得安全的过境和收据确认。

1.8 我们如何保护年轻人安全

在哈罗重庆学校中， 我们通过以下方式确保年轻人的安全：
- 对所有员工采用严格的招聘程序，以检查他们是否适合与孩子一起工作
- 提高对保护和装备儿童的技能的意识，以确保他们的安全
- 培训所有员工的保障意识，包括在线安全培训（包括了解对过滤和监控互联网和网络使用的期望以及适用的角色和责任）。
- 确保所有员工均已阅读并理解《保障政策》(HS13C)
- 确保所有员工都知道虐待儿童的指标
- 确保所有员工都知道如何应对虐待或举报
- 建立一个安全的环境，使儿童可以学习和发展
- 采用与保障相关的最佳实践
- 为所有员工，志愿者和访客建立明确定义的程序和行为准则
- 制定和实施有效的社交媒体和电子安全政策以及相关程序
- 通过监督，支持和培训对所有员工和承包商进行有效管理

- 与学生，父母，提供者之外的**员工**，**实习生**，志愿者和**访**客共享有关保障和最佳**实**践的信息

- 与需要了解的机构共享关注并适当地**让**父母和学生参与。

- 当有未决保障案件的学生**转**到另一所学校**时**，学校有道德**义务**通知或**尝试**通知**该**学校他**们应该**注意此**问题**。学校必**须检查**其运**营**所在国家/地区的法律要求，以确保行**动**完全合**规**。如果法律立**场**不明确，学校**应拨**打**电话**而不是移交文件。如果存在任何保障**问题**，最好**拨**打**电话**，并在学生档案中**记录拨**打**电话**的事**实**、**拨**打**电话**的日期和**时间**、**拨**打**电话**的对象、他**们**在学校的**职**位以及通**讯**的性**质**。如果法律允**许**信息移交，**预计**会在学生**转**入新学校的 5 天内**进**行移交。

- 确保所有**员**工都**应该**意识到保障**问题**可能表**现为**儿童虐待儿童。这很可能包括但不限于：

  - 欺凌（包括网**络**欺凌）

  - 身体虐待，例如打、踢、**摇晃**、咬、拉**头发**等

  - 造成身体**伤**害

  - 性暴力和性**骚扰**

  - 色情短信（也称**为**青少年制作的色情**图**片）

  - 入会/**戏**弄类型的暴力和**仪**式

  《确保儿童安全接受教育》（2023 年版，105 **页**)

- 确保**员**工了解与保障学生相关的其他关**键问题**，包括学校：

  - 《**员**工行**为**准**则**》

  - 《**员**工手册》

  - 《反欺凌政策》

  - 《安全招聘政策》

  - 《贴身照料政策》

  - 《数字安全指南》和《网**络**安全政策》（包括了解通**过**学校网**络**、互**联**网接入（包括 3G、4G、5G 的使用和学生**设备**的使用）**对**网络使用的**过滤**和**监测**

  - 《教育旅行政策》和所有活**动**和教育**访问**的**风险**评估

1.8.1 早期干**预**

早期干**预**确保制度到位，以：

- 评估并**识别**保障**问题**的早期迹象

- **记录**和跟踪低**级别问题**
- 根据以上数据**实**施早期干**预**

这意味着使用 CPOMS **进**行适当的**记录**并**评**估性地使用数据。利用**评**估福祉水平和干**预**效果的系**统**（例如 Pulse）作**为补**充手段**对**于**问题**的早期**识别**至关重要。DSL 有必要确保保障**团队**得到适当的培**训**，并有**责**任跟踪和**报**告早期**问题**，以便**实**施干**预**措施。

为了帮助确保早期**识别**和干**预**，有必要将《保障政策》（HS13）与其他互**补**的政策和**实践结**合起来，包括但不限于：

- 《个人、社交、情感与健康教育政策》（HS19）
- 《学**习**与个人教育政策 》（HS17）
- 《行**为**管理政策》（HS22），（例如跟踪行**为趋势**）
- 《反欺凌政策》（HS20），例如**监测**欺凌事件
- 《学生接触技**术**和信息技**术**》（HS26），**监督对**关注的互**联**网**检**索的跟踪
- 《举**报**政策》（HS31）

需要注意的是，有特殊教育需要或残疾（SEND） 的儿童更容易受到保障**风险**的影响。

1.8.2 增强意**识**并**培养学生防止虐待的能力**

一般**认为**，由于每天与学生接触，学校**员**工可以很好地**观**察到虐待的外在迹象，所有**员**工和校董都可以**发挥**充分、**积**极的作用，保护我**们**的学生免受**伤**害。因此，学校将：

- **强调**向学生提供早期帮助的重要性，以便在**问题**出**现时**立即提供支持，防止**问题**升**级**。此外，人**们认识**到学生可能会面**临诸**多**导**致他**们**需要支持的挑**战**，要确保**员**工知**晓**这些挑**战**，包括：压力、同伴**压**力、身体形象**问题**、焦**虑**和人**际**关系**问题**
- 确保孩子**们**知道学校里有成年人，如果有**烦恼**，可以**寻**求他**们**的帮助
- 在**课**程和学校生活中**为**孩子**们**提供机会，**培养**他**们识别**和防止虐待（包括网**络**虐待）所需的技能
- 成立"个人和社会的健康教育（PSHE）"或道德教育**计**划，**传**授**语**言、知**识**和技能，以支持儿童避免虐待
- 提高所有**员**工**对**保障和促**进**儿童福利的必要性以及他**们**在**识别**和**报**告可能的虐待案件方面的**责**任的**认识**

- 确保每位**员**工（包括**临时员**工、供**应员**工、**实习**教**师**和志愿者）和管治**组织**都知**晓负责**儿童保障的指定保障**负责**人（DSL）及其副手的姓名和角色。《确保儿童安全接受教育（2023 年 9 月）》
- 指定保障**负责**人及其副手的姓名将**张贴**在校内醒目位置，并附声明，解**释**学校在移交和**监**督涉嫌虐待和指控案件中的作用。

1.9 关**键联**系人

我**们**校园中的所有成年人都参与保障儿童的安全。

责任不**仅**限于教师，也不限于保障**团队**。 但是，作**为**当地保障政策的附**录**，哈**罗**重**庆**学校已**经**在学校内部制作和**发**布"保障**负责**人"的**详细**信息-这些**细节**在学校中公开**显示**。

2 **识别虐待：员工应注意什么**

2.1 保持警惕的重要性

所有**员**工都**应**意**识**到虐待和忽**视**的迹象，以便能够确定可能需要帮助或保**护**的儿童案件。

建**议**所有**员**工在保障方面保持"在**这**里可能**发**生"的态度。

2.2 虐待和忽**视**的类型

虐待; 不妥当**对**待儿童的一种形式。 有人可能通**过**造成**伤**害或没有采取预防**伤**害的方式虐待或忽**视**儿童。 他**们**可能会被一个或多个成年人或另一个孩子或多个孩子虐待。儿童可能容易遭受多重**伤**害，包括（但不限于）性剥削、犯罪剥削和**严**重的青少年暴力。

身体虐待； 一种可能涉及的虐待形式； 殴打、**摇晃**、投**掷**、中毒、燃**烧**或**烫**伤、溺水、窒息或**对**儿童造成身体**伤**害。 当父母或看**护**人捏造儿童疾病的症状或故意**诱发**儿童疾病**时**，也可能造成人身**伤**害。**这**也延伸到持**续**的儿童虐待儿童。

情绪虐待： 对儿童的持续性情感虐待，例如对儿童的情感发展和心理健康造成严重和不利影响：

- 这可能涉及向孩子传达他们仅在满足另一个人的需要的情况下就毫无价值或不被爱，不适当或有价值的情况。
- 这可能包括不给孩子机会表达他们的观点，故意使他们沉默或"取笑"他们的言论或交流方式。
- 它可能具有年龄或对儿童强加的不适当的期望。这些可能包括超出儿童发展能力的互动，以及过度保护和限制探索与学习，或阻止儿童参与正常的社交互动。
- 这可能涉及看到或听到他人的虐待（例如目击家庭暴力）。它可能涉及严重的欺凌（包括网络欺凌），导致儿童经常感到受惊或处于危险之中，或者对儿童的剥削或腐败。
- 对儿童的所有形式的虐待都涉及某种程度的情感虐待，尽管这种虐待可能单独发生。

儿童的心理健康已添加到 KSCIE 2023 指南中，以确保员工应考虑何时可能成为保障问题。

性虐待： 涉及强迫或诱使儿童或年轻人参加性活动，不一定涉及高水平的暴力行为，无论儿童是否意识到正在发生的事情。 这些活动可能涉及：

- 身体接触，包括通过插入性（例如强奸或口交）或非插入性行为，例如手淫，接吻，摩擦和接触衣服外部。
- 还可能包括非接触式活动，例如让儿童参与观看或制作性影像，观看性活动，鼓励儿童以不适当的性行为举止或修饰儿童以备虐待（包括通过互联网）。
- 性虐待不仅是成年男性所为。 女性和其他儿童也可能实施性虐待。

涉及上述前两点的儿童对儿童的性虐待。

忽视： 持续未能满足儿童的基本生理和/或心理需要，可能会严重损害儿童的健康或发育。

- 怀孕期间母亲的疏忽。
- 孩子出生后，父母或看护人的疏忽可能导致他们未能：提供足够的食物，衣服和住所（包括被排除在家中或被遗弃）； 保障儿童免受身心伤害或危险；确保充分的监督（包括使用不适当的看护人）； 或确保获得适当的医疗护理或治疗。
- 它还可能包括对孩子的基本情感需求的忽视或不回应。

- 这可能包括未能提供适当的成人**监护**权，例如**长时间**不**让**孩子在家里接受**监**督。

通常，虐待只被**视为**成年人**对**孩子的一种行**为**，但重要的是要**认识**到虐待同**样**可能**发**生在学生群体内、同**龄**人之**间**或不同年**龄**的学生之**间**。 对**这**种类型的虐待保持警惕与**对**成年子女的虐待同**样**重要。 报告该报告的方式是相同的。

重要的是，**员**工要意**识**到家庭虐待可以包含一系列行**为**，它可能是**单**一事件或存在某种模式的一**连**串事件。**这**种虐待可以是但不限于心理、身体、性、**经济**或情感虐待。儿童可能成**为**家庭虐待的受害者。他**们**可能会在家中看到、听到或体**验**虐待的影响和/或在自己的**亲**密关系中遭受家庭虐待（青少年关系虐待）。所有**这**些都可能**对**他**们**的健康、福祉、**发展**和学**习**能力**产**生**长**期的不利影响。

有关可能的虐待指**标**的更多信息，**请参见**附录 2。

3 披露或疑虑的处理程序

3.1 除了指定的**职责**外，所有**员**工的**职责**不是**调查**或核**实**情况，而是**报**告**问题**或披露情况，并启**动为**儿童**寻**求帮助的**过**程。

第 1 步

您**对**孩子的健康有所关注，具体取决于：
a）孩子或另一个孩子或成人已**经**告**诉**您的事情；
b）您已**经**注意到有关孩子的行**为**，健康状况或外表的事情；
c）另一个孩子或成人**说**或做了的事。

即使您**认为**自己的担心微不足道，DSL 可能**还**会有更多信息，加上你所知道的，代表着**对**孩子更**严**忧的担**忧**。如何**应对**关注**绝**不是您一个人的决定，而是分享关注，无**论**大小如何，始**终**是您的**责**任。

第 2 步

通**过询问**孩子/年**轻**人澄清您的**问题**，DSL 将决定您是否需要了解更多信息，**请谨**慎使用开放式**问题**：

开头是诸如"如何"，"**为**什么"，"在哪里"，"何**时**"，"**谁**"之类的**词**。

第 3 步

如果您听**说过**虐待或正在与他**们谈论**您的担**忧，请让**孩子/年**轻**人/父母知道您下一步打算做什么。 不要保**证**将他/她告**诉**您的内容保密。

例如; '我担心您的**伤**痕，我需要告**诉**孔静女士，以便她可以帮助我**们**考**虑**如何确保您的安全。'

第 4 步

事件**发**生后，请使用 *关注日志表（附录 3）* 尽快**进**行**书面记录**，请注意：

a)　孩子的名字

b)　日期，**时间**和地点

c)　还有**谁**在**场**

d)　**说**了什么/**发**生了什么/您注意到了…言**语**，行**为**，情**绪**，**绘**画，游**戏**或外表/**伤**害。 如果孩子或父母**讲**话，**请记录**他们的**话语**而不是您的解**释**

e)　分析您**观**察到的内容以及**为**什么引起关注

第 5 步

尽快将完整的 *关注日志表（附录 3）* 交**给** DSL/DDSL，以确保将其上交并且不**进**行**电**子复制或存**储**。

DSL 将决定采取**进**一步的适当措施，并将与儿童/年**轻**人周**围**的其他**专业**人**员**以及家人（如果适用）保持密切**联**系。

4 　**专业机密**

4.1　保密是一个需要与儿童一起工作的所有人**讨论**并充分理解的**问题**，尤其是在保障方面。

4.2　在**这**方面保密的唯一目的是使儿童受益。 **教职员**工**绝**不能保**证对**学生的机密性，也不得与学生同意保密。 如果存在保障**问题**，则**必须**向指定保障**负责**人**报**告。

4.3 仅在必需了解的情况下，才会将有关个别案件的相关信息告知**员**工。与**员**工以**这**种方式共享的任何信息都**必须**保密。

5 针对员工的指控

5.1 虐待的指控可以由儿童提出，也可以由其他有关成年人提出。**员**工有**义务**配合任何**调查**。

5.2 **对**教**职员**工或志愿人**员**的行**为**的任何担**忧**，或**对**教**职员**工的虐待指控，**必须**立即**报**告给 DSL 或校**长**（前者无法履行**职**能**时**），他**们**将采取必要的行**动**。**针对**高**层领导**或 DSL 的指控**应**直接向校**长**提出。**针对**校**长**的指控**应**向集**团总**部首席教育官提出。

5.3 任何虐待指控均将以公平，一致的方式**处**理，**为**儿童提供有效保**护**，同**时**支持被指控的人。 在**调查**或考**虑**指控**时**，学校将竭尽全力**维护**机密并防止不必要的宣**传**。

5.4 由**员**工以及适当**时**由校董会**调查**和**处**理**针对员**工的**恶**意指控。

指控结果
指控**调查**的**结**果通常**应**确定**为**以下之一：

结果类型	定义	调查后续行动	记录
成立	有足够的**证据证**明指控。	与人力**资**源和/或其他**专**业人士**讨论**移交至犯罪**记录查询**及限制雇佣局(DBS)和/或纪律听**证**会。	**对**指控**进**行清晰全面的**总结**，**详细**说明指控是如何跟**进**和解决的，并**记录**所采取的任何行**动**和做出的决定。**记录**保存在被指控者的机密人事档案中，并向当事人提供副本。
虚假	有足够的**证据**反**驳**指控。		

不成立	这与虚假指控不同。 这意味着没有足够的**证据**证明或反驳指控。 因此，**该术语**并不表示有罪或无罪。	如果**发现**指控是虚假的、**未经证实**的或**恶意**的，**则该**信息不**应**包含在任何参考**资料**中。	**记录应**至少保留至被指控者达到正常退休年**龄**，或自指控之日起 10 年（如果更**长**）。
恶意	有足够的**证据**反**驳**指控，并存在蓄意欺**骗**的行**为**。		被认定**为恶意**的指控**细节应**从人事**记录**中**删**除。

此外，在与人力**资**源/**顾问**商**议**后，学校可能希望使用另一种**结**果类型（没有根据）。

*没有根据：没有**证**据或适当的依据可以支持**这**一指控。 它**还**可能表明提出指控的人曲解了事件或**误**解了所**见**。 或者，他**们**可能没有意**识**到所有情况。

6 对同事的疑虑：怎么办

6.1 报告渠道

如果某位**员**工**对**另一位**员**工或志愿者存有疑**虑**，**应**将其**转给**其所在学部**负责**人。

如果**对高级**管理人**员**有疑**虑**，**应转**交给校**长**。

如果**对**校**长**有疑**虑**，**应**将其交给校董会和指定的保障校董。 **对高级**管理人**员**或校**长**的任何关注或指控，将在不通知有关个人的情况下予以**报**告。

任何人都不**应**感到自己无法大声**说**出来，并**让**他**们对**与学校儿童安全有关的任何事情有所关注。 向提出此类**问**题的个人保**证**，他**们**不必担心由于提出此类**问**题而**带**来的任何有害后果。 在他**们**有**顾虑时**大声疾呼是他**们**的**绝对**权利，甚至是他**们**的**义**务。

6.2 指控类型

根据英国的《确保儿童安全接受教育》（2023 年，第 96 **页**）的**规**定，在确定指控**调**查的**结**果**时应**使用以下定**义**：

a) **证据确凿**：有足够的可识别**证据证**明指控；

b) **恶意**：有足够**证据**推翻指控，存在故意欺**骗**或**伤害**指控**对**象的行**为**；

c) **虚假**：有足够**证据**推翻指控；

d) **未经证实**：没有足够**证据证**明或反**驳**指控。因此，**该术语**并不意味着有罪或无罪，或

e) **毫无根据**：没有**证据**或适当的依据支持所提出的指控。**这**也可能表明，提出指控的人**对**事件的理解有**误**或**对**所看到的情况有**误**；或者，他**们**可能并不了解所有情况；

以下内容由《**国际学校教育工作者和其他成人虐待儿童指控管理**》提供。**该**文件伴随本政策并**为**以下内容提供支持。

除校**长**或校董以外的**员**工被指控涉嫌下列任一行**为**，**须**立即向 DSL/DDSL **报**告

- 做出**伤害**学生或可能**伤害**学生的行**为**
- 可能犯下侵害某学生或与某学生有关的刑事罪行
- **对**一个或多个儿童的行**为**构成其可能**对**学生造成**伤害**的风**险**

DSL/DDSL 无法履行**职**能**时**，**须**将指控上**报**至高**层**管理**团队**中的保障**负责**人。随后，**负责**人将通知保障校董。

DSL/DDSL 有**责**任在收到移交后采取后**续**保障步**骤**。**员**工在**报**告任何有关儿童的疑**虑**后，必**须**确信将**获**得支持。**员**工**须**确保任何关于保障情况的**书**面**报**告都以儿童**为**中心、符合儿童的最大利益、植根于儿童**发**展并且有**证**可依。在校**长**的指**导**下，DSL/DDSL 可成立**响应**小**组**，其成**员**构成根据指控的性**质**而定。**响应**小**组**所做的决定**应**尽可能得到儿童及其家人的同意。具有明确**时**间表的、清晰的**评**估**过**程以及任何**变**化**对**儿童福利**产**生的影响**须**记**录**在案。

报告任何保障**问题时须**遵守沟通渠道，做到保密。若任何**员**工有理由相信学生正面**临**直接或重大**伤害**风**险**，**须**不再顾及保密**义务**，而是有**义务**立即将此信息**传达**至 DSL/DDSL。

众所周知，**评**估风**险**并采取措施减**轻这**些风**险**有助于促**进**学生福利和保障。风**险评**估可能涉及整个学校、学校存在危**险**的特定学段或区域，或者涉及个别学生或教**职员**工。必**须**保留风**险评**估记**录**。

如果**对员**工提出的指控涉及到校**长**，指控接收者**须**立即通知保障校董，后者将按上述方式**进**行**协**商，而无需先通知校**长**。

任何被**认为**不适合与儿童一起工作的**员**工的姓名将在人力**资**源高**级**主管的建**议**和支持下根据犯罪**记录查**询及限制雇佣局（DBS）的移交政策**转**交至 DBS 和 ICPC 以及其他相关**组织**。

有时，员工可能会遇到他们知道会影响其**专业**能力的个人困难。**员工**有**责任**与直线经理讨论此类情况，以便为其提供**专业**和个人支持。虽然在大多数情况下此类**报**告是保密的，但如果个人困**难**引起有关学校学生福利或安全的担**忧，则**无法保**证这**一点。

7   豁免和**发声**程序

7.1   担心同事行**为**的**员**工可能会担心自己**误解**了情况，并且会**怀疑报**告是否会危害同事的**职业**。所有**员**工都必**须**记住，儿童的福利至关重要。**该**程序使**员**工能够自信地提出关注或指控，并**进**行敏感的**询问**。

7.2   哈**罗**重**庆**学校**认识**到，其**员**工通常是第一个**怀疑**或意识到某事不**对劲**的人，因此完全致力于以**负责**任和**专业**的方式**处**理他**们对**保障儿童的真正关注。哈**罗**重**庆**学校**还**意识到，出于多种原因，**员**工**经**常感到不愿提出此类担**忧**。这就是**为**什么哈**罗**重**庆**学校将**终**支持所有"大声疾呼"他**们**所关心的**问题**的**员**工的原因。

7.3   要**进**行披露，您只需要**诚实**行事，例如 **诚实**地相信您提出的关注。 哈**罗**重**庆**学校通**过**其政策和做法，**积极**鼓励您利用学校公**认**的**举报**渠道（通过学校的保障官**员**或直接**联**系校**长**）在内部提出疑**虑**。 您的**顾**虑将得到最**严**格的保**证**。 哈**罗**重**庆**学校将确保及**时**，有效地**调查**您的疑**虑**，并在可能的情况下告知您**结**果。如果**问题**与校**长**有关，**则**应直接向理事会主席和/或**负责**保障事**务**的理事提出。

7.4   学校不会**对**任何**举报**后来被判定**为错误**的虐待行**为**的学校雇**员**承担**责**任或不承担任何**责**任，除非可以**证**明**该**人故意捏造了**该报**告。

8   保障和物理环境

8.1   哈**罗**重**庆**学校都必**须**是所有学生的安全**场**所。我**们**的健康与安全政策中概述了**实现**这一目标的方法。另**请**注意以下要点，**这**些要点与儿童安全特别相关：

- 门应有透明的玻璃窗。任何胶卷或百叶窗仍必**须**允**许**房**间**外的人看**见**
- 有**职员**浴室，并有明**显**的**标识**。教**职员**不得使用与学生相同的浴室。如果有必要**进**入学生分配的浴室，例如行**为**或健康与安全**问题，请**打开门并宣布**进**入**该**空**间**的原因，以警告其他使用浴室的学生。在**这**种情况下，**请**尽可能避免独自一人。我**们**知道，**对**于年幼的孩子，**员**工将**协**助孩子上**厕**所和提供私人**护**理。在这种情况下，**请**参阅《贴身护理政策》(HS16C)。

- 如果**员**工与学生在一个房**间**内（例如登机，探**险**或旅行等）**处**于一**对**一的状**态**，**则**他**们应**确保门保持打开状**态**，或在可能的情况下移到更多公共适当的和**场**所。

9　安全招聘

9.1　我们的目标

安全地招聘哈**罗**重**庆**学校所有**员**工是**维护**和促**进**教育中儿童福利的第一步。《HS37 招聘政策》规**定**了在 哈**罗**重**庆**学校**实**施的程序和做法。我**们**更安全的招聘流程旨在：

- 通**过**制定高标准的**实**践和招聘来威**慑**潜在的**滥**用者。
- 在申**请**和面**试阶**段拒**绝**不适当的候**选**人。
- 通**过**制定有力的政策并就安全做法达成共**识**，防止虐待儿童。

9.2　实现我们的目标

我**们**确保每个招聘小**组**中至少有一名**员**工接受**过**关于更安全招聘的培**训**，并确保：

- 学校已收到并**检**查了来自教**师**原籍国和以前工作国的最新警察**记录**；
- 两年后（通常是在**续签**合同**时**），警察**记录**也将重新开具；
- 我**们**至少有两个适当的背**调**，必**须**来自候**选**人的当前或最近的雇主。其中一个必**须**是与候**选**人的前校**长**或学校高**级**管理**层**的背**调**。所有**员**工都有一份由哈**罗**重**庆**高**层**管理**团队**成**员**完成的**对**现任雇主的**电话**背**调**，中央登记册。如果教**师**曾在两所或两所以上学校工作，**则**在 5 年之内会与**这**些学校**进**行**电话联**系，询问该教**师**为什么要离开学校，以及是否**对**孩子的安全性有任何担**忧**；
- **对选**定的候**选**人**进**行网**络筛选**，以确保他**们**适合**该**职位。候**选**人应该提前知晓关于儿童安全保护的招聘流程；
- **对员**工所提交的文件**进**行核**实**；
- 所有新**员**工都**阅读**并**签**署了 《保障政策》(HS13) 和行**为**准**则**；
- 我**们**会在**员**工入**职时进**行保障方面的培**训**，并每年一次正式更新此培**训**。

9.3　承包商和志愿者预期的最低保障要求

对于所有承包商，我**们**希望至少做到以下几点：

- 提供了有关培**训**的培**训**，内容涉及保障；

- 运营团队的指定高级成员（或在其他学校机构中，则是负责人）确保通过定期会议与相关管理人员共享此政策中的信息；
- 承包商阅读，填写并签署此政策中的自我声明表;
- 警察检查将在现场工作超过 6 天的任何员工;
- 共享我们的承包商行为准则，并保存其阅读和理解的记录；
- 工具箱讲座-每天提醒儿童安全保护意识。

9.4 预期所有居住在校园内的成年人的最低保障要求

在员工居住的学校中：
- 在入职会议上（新职员入职期间）向所有人提供《保障政策》(HS13) 和员工行为准则；
- 期望所有居住者遵守《保障政策》(HS13) 和行为准则；
- 成年人阅读，填写并签署 CSP 自我声明表。

10 员工培训

10.1 培训应使指定的保障负责人充分了解自己的角色以及其他机构（尤其是儿童的社会照料）的过程，程序和职责。

10.2 在保障专责小组的支持下，每所学校的人力资源经理（或校长；在不同组织结构的学校中）会保留所有员工保障培训的详细记录，并在需要更新培训时发出提醒。

10.3 优良作法是在所有员工会议中列入一个保障议程项目。

10.4 所有有薪和无薪员工均接受定期的，强制性的保障培训（包括如何确保学生的网络安全），包括学校长官，高级管理人员，外部提供者，志愿者，实习生和承包商，或代表学校工作的任何人。

10.5 新员工在入职过程中进行了保障培训，并且每年进行一次进修培训，以使培训保持最新状态。

10.6 此外，指定的**员**工（DSL 和 DDSL）将每两年**进**行一次多机构培**训**，以使其知**识**和技能保持最新状态。 我**们**的目标是确保**这**批**员**工都**经**过 3 **级**保障培**训**。 所有高**级领导**人员都要接受 2 **级**保障培**训**。

10.7 **员**工**职业**行**为**守**则**概述了**员**工期望的行**为标**准。 期望所有**员**工都**阅读**此代**码**并**签**名以确**认**他**们**已**这样**做。 所有**员**工（以及与学生一起工作的所有成人）在开始工作之前均已**阅读**并同意本政策。

11 自我评估和内部质量控制

11.1 **为**了确保有关保障的文件保持有效和更新，学校将确保：
   a) 每两年**进**行一次外部**审**核，**这**是我**们**保障改**进**行**动计**划的一部分；
   b) 每年**进**行一次内部**审**核
   c) 保障服**务**将根据哈**罗标**准 1.7 保障文化和相关的**测评**指**标进**行**评**估。

12 保障预算

12.1 **认识**到保障**对**整个企业的重要性，保障是在学校**账**户中**拥**有**自己指定和受保护的预算项目**。 从此**预**算中得出：
   a) 两年期**审计**的**资**金；
   b) 标牌**资**金；
   c) 存放和**办**公室**杂**物的**资**金。

与保障有关的**员**工培**训费**用**应**在主要持**续专**业发展（CPD）**预**算内**编**列。

13 风险评估

13.1 **进**行**风险评**估**对**促**进**安全具有良好的效果。 **这**些**评**估涵盖了学校工作的所有方面，例如房舍和**设备**、**现场**活**动**、**场**外活**动**和所使用的**场**所、校巴的使用以及其他运**输**方式。

13.2 我**们**的风险评估包括**处**理儿童保障**风险**的部分和**风险**管理**计**划。

13.3 我们的**风险评**估在与其他合作伙伴和第三方提供商合作**时**会考**虑**所有保障事**项**，例如在**远征**和旅行中。

13.4 在适当的情况下，向**东道组织**/地点的**员**工提供简短的**简报**/培**训**信息，内容涉及儿童保障以及如何**报**告关注的**问**题。

13.5 风险评估由经理/高级领导签署，而不**仅**由旅行或探**险领队**签署。

14 **实施行动**

14.1 **为**了**实**施和**监**督本政策，哈**罗重庆**学校会：
   a) 指定一个高**级员**工担任 DSL 和 DDSL，并**为**此角色提供适当的培**训**，支持和**时间**；
   b) DSL 或者至少一位 DDSL，在学校内要达到英**语**母**语**使用者水平；
   c) 确保任命的校董在保障工作中**发挥领导**作用，包括在学校内部倡**导**保障**问**题并与校**长联**系，**对**保障措施和所有相关政策**进**行概述，并按照日程表安排每年与校**长**一起**审**核保障措施；
   d) 通过培**训计**划和在**现场张贴**海**报**，确保每个**员**工、志愿者、校园使用者、**员**工和校董都知道**负**责保障工作的指定保障人**员**的姓名及其作用；
   e) 确保所有**员**工和志愿者了解自己的**责**任，即警**惕滥**用的迹象以及**记录**任何疑**虑**并将**责**任**转交给负**责保障的指定老**师**的**责**任；
   f) 通**过**在学校的各个关**键**点获得已**签**署的**经认**可的**访客单**和 CS **报**告**张贴**者的信息，确保所有**访**客都知道儿童保障期望和**报**告程序；
   g) 确保所有**员**工接受保障培**训**，并且**对**指定的保障人**员**、保障工作**组**成**员**、以及指定的保障校董每两年**进**行一次培**训**；
   h) 与有关机构建立有效**联**系，并根据需要与他**们进**行有关保障事**项**的**查询**合作；
   i) 确保将所有儿童福利和保障**记录**安全地保存在**锁**定的位置
   j) 确保始**终**遵循更安全的招聘**惯**例；
   k) 确保按照商定的程序**处**理**对**涉及保障方面**员**工的任何指控，并**紧**急**处**理所有**这**些关切；
   l) 通**过**遵循有关健康，安全和**风险评**估的学校程序，确保学校建筑物和**场**所得到适当保**护**，并清楚**记录**所有**进**行的**风险评**估；

m) 确保具有保障性元素的其他学校政策（例如健康与安全、反欺凌、电子安全、行为、人力资源招聘、寄宿制裁）均与此政策保持一致，并且在适当情况下相互参照这项政策；

n) 进行年度保障审查，并根据年中审查的保障行动计划跟踪进度。 校董会将至少每年一次（根据年度审核和审查）收到一份保障报告。

o) 确保所有员工、校董和志愿者收到并签署本政策的副本；

p) 确保家长从学校收到有关学校和教职员工通过日历工作坊进行保障的责任的信息；

q) 为学生提供适合年龄的教育和保障培训。

r) 确保第三方提供的设施设备和任何在校园内使用的产品符合学校儿童安全保护的标准。

15 保障服务的联系信息

15.1 哈罗重庆学校将维护一个有关当地儿童保障机构和支持服务的数据库。 这些服务的详细信息将提供给保障团队。

15.2 哈罗重庆学校将通过与代理机构每两年进行一次私人联系来努力保持这些链接的新鲜度。 这样可以确保，即使发生了最糟糕的情况，学校也可以通过必要的联系充分利用我们提供的服务。

组织机构	联络人	联系方式	备注
当地教委	罗老师	023-67822002	
当地心理咨询中心	前台	023-67070707	
公安局	郭老师	17823387192	

附录 1：术语定义

本政策中使用的"所有**员**工"一词包括但不限于：

1. 教师（包括代**课教师**）
2. 双**语导师**
3. 行政人**员**
4. 运**营**人**员**
5. 女佣
6. 高**级**管理人**员**
7. 校董
8. 在学校工作的所有**带薪人员**
9. 外部活**动**提供方
10. 教**练**
11. 志愿者
12. **实习**生
13. 承包商
14. 顾问
15. 演**讲**嘉**宾**
16. **进**行**现场**培**训**的派遣**专业**人员

本政策中使用的"居民和**员**工"一词包括但不限于：

1. 在学校工作的住在校舍或寄宿宿舍的**员**工的配偶；
2. 在校内**员**工宿舍或寄宿宿舍的**员**工的**长访**客或来**访**者。 例如，停留较**长**时间（超过 6 天）；
3. 居住者雇用的任何人，**应**定期在校园内的**员**工宿舍或寄宿住宅中工作。 例如，保姆和女佣。

学校必**须**与适当的机构合作，**调查**在学校工作或参与的成年人**是否表现出或可能表现出不适合与孩子一起工作的方式。**

需要注意什么以及何时需要关注？

所有**员**工都**应**了解虐待和忽视的类型和迹象，以便他**们**能够**识**别可能需要帮助或保**护**的学生。**员**工不确定**时**，**应**始**终**与 DSL保持**联**系。虐待儿童是一种粗暴**对**待儿童的形式。有人可能通**过**造成**伤**害或不采取防止**伤**害的行**动**来虐待或忽视儿童。儿童可能在家庭或机构或社区**环**境中被他**们**认识的人虐待，或者更罕**见**的是被其他人虐待。虐待可以完全在**线上发**生，或者可以使用技术来助**长线**下虐待。学生可能会被一个或多个成年人或一个或多个儿童虐待。

员工**应**了解常**见**的四种主要虐童类别，尽管各类别之**间**可能存在交叉：

- 身体虐待：一种可能涉及殴打、**摇晃**、投**掷**、中毒、燃**烧**或**烫伤**、溺水、窒息或**对**儿童造成身体**伤**害（如向儿童提供酒精或**药**物以及**对**儿童**实**施体**罚**）的虐待形式。当父母或看**护**人捏造儿童疾病的症状或故意**诱发**儿童疾病**时**，也可能造成人身**伤**害。

- 情感虐待：**对**儿童的持**续**情感虐待，例如**对**儿童的情感**发**展造成**严**重和不利的影响。这可能涉及告**诉**孩子他**们**一文不**值**或不被**爱**、不够好或**仅**在**满**足他人需要**时**才有价**值**。这可能包括不**给**孩子机会表达他**们**的观点，故意**让**他**们**沉默或"取笑"他**们**的言**论**或交流方式。**这**可能具有强加**给**儿童与其年**龄**或**发**育不符的期望的特征。**这**些可能包括超出儿童**发**展能力的互**动**，以及**过**度保**护**和限制儿童探索和学**习**，或阻止儿童参与正常的社交互**动**。**这**可能涉及看到或听到他人被虐待。**这**可能涉及**严**重的欺凌（包括网**络**欺凌），**导**致儿童经常感到受惊或**处**于危**险**之中，或者**对**儿童的剥削或腐**败**。**对**儿童的所有形式的虐待都涉及某种程度的情感虐待，尽管**这**种虐待可能**单**独**发**生。

- 性虐待：涉及强迫或**诱**使儿童或年**轻**人参加性活**动**，不一定涉及高水平的暴力行**为**，无**论**儿童是否意**识**到正在**发**生的事情。**这**些活**动**可能涉及：身体接触，包括通**过**插入性（例如强奸或口交）或非插入性行**为**，例如手淫，接吻，摩擦和接触衣服外部。**还**可能包括非接触式活**动**，例如**让**儿童参与**观**看或制作性影像，**观**看性活**动**，鼓励儿童以不适当的性行**为**举**止**或修**饰**儿童以**备**虐待。性虐待可能在**线上发**生，技术可能被用来助**长线**下虐待。性虐待不**仅**是成年男性所**为**。女性和其他儿童也可能**实**施性虐待。

- 忽视：持**续**未能**满**足儿童的基本生理和/或心理需要，可能会**严**重损害儿童的健康或**发**育。忽视可能是**怀**孕期**间**母**亲**的疏忽。孩子出生后，父母或看**护**人的疏忽可能**导**致他**们**未能：提供足够的食物，衣服和住所（包括被排除在家中或被**遗**弃）；保障儿童免受身心**伤**害或

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危险；确保充分的监督（包括使用不适当的看护人）和不将孩子单独留在家；或确保获得适当的医疗护理或治疗。它还可能包括对孩子的基本情感需求的忽视或不回应。

注意事项：

身体虐待的可能指标	情绪滥用的可能指标
• 身体任何部位的原因不明的瘀伤 • 不同年龄的瘀伤（各种颜色） • 反映所用物品（电线、皮带、带扣、乒乓球拍、手）形状的伤害 • 缺席或休假后经常出现的伤害 • 不明原因的烧伤，尤其是脚底、手掌、背部或臀部的烧伤 • 以电炉、铁或香烟的图案燃烧 • 手臂、腿、脖子或躯干上的绳索勒伤 • 与孩子提供的信息不一致的伤害 • 具有明显边界线的灼伤 • 无法解释的撕裂，擦伤或骨折	• 情绪虐待会导致儿童改变其行为方式。 • 他们可能不在乎自己的行为或所发生的事情，这也被称为负面冲动行为。 • 或者，他们可能试图使人们不喜欢他们，这被称为自我孤立行为。 • 遭受情感虐待的孩子可能会冒冒险行为，例如偷窃、欺凌和逃跑。 • 自残或进食障碍 • 可能缺乏社交能力 • 远离父母
性虐待的可能指标	**可能的疏忽指标**
• 不适合年龄的性知识、行为或使用语言 • 不寻常的人际关系模式 • 儿童患有性病（不论年龄段） • 口腔、生殖器或肛门部位受到外伤或流血的证据 • 行走或坐姿困难 • 拒绝换衣服，担心上厕所 • 孩子离家出走，没有提出任何具体投诉 • 不想和一个人在一起 • 怀孕（尤其是年轻怀孕） • 极端保护的育儿方式 • 接触色情	• 儿童未有梳洗或饥饿 • 父母对孩子的学习成绩不感兴趣 • 家长不回应学校的反复沟通 • 孩子不想回家 • 父母或法定监护人都不在 • 紧急情况下无法与父母取得联系

严重欺凌是一种虐待形式，因此如果有合理理由怀疑儿童正在遭受或可能遭受重大伤害，则将被视为儿童保护问题处理。

员工应注意的其他形式的虐待包括：

- 儿童失学
- 儿童性剥削
- 儿童犯罪性剥削
- 家庭虐待
- 以名誉为由的暴力、切割女性生殖器官、强迫婚姻和熨胸
- 极端化
- 有家人在监狱里的孩子
- 虐待儿童的孩子
- 性暴力和性骚扰

这些可能表现为：

1. **儿童失学**；儿童失学可能是虐待或忽视的潜在指示。 员工和社区成员（包括父母和看护人）应报告任何引起保障官员或 DSL 担心的学生出勤率低或缺勤的情况，尤其是在屡次发生并且/或者延长假期的情况下，以帮助确定虐待和忽视的风险，包括性剥削，以及 帮助防止将来孩子失踪的风险。

2. **儿童性剥削（CSE）**；这涉及剥削性的情况，环境和人际关系，年轻人通过从事性活动而得到一些东西（例如食物，住宿，毒品，酒精，礼物，金钱或仅仅是感情）。性剥削可以采取多种形式，从看似"自愿"的关系到团伙和团体的严重有组织犯罪。犯罪者总是对受害者拥有某种权力，这种权力随着剥削关系的发展而增加。性剥削涉及不同程度的胁迫，恐吓或诱惑，包括来自同龄人的不必要性压力，进行性欺凌，包括网络欺凌和修饰。但是，同样重要的是要认识到，一些遭受性剥削的年轻人没有表现出这种虐待的任何外部迹象。

3. **切割女性生殖器官（FGM）**；这包括所有涉及部分或全部切除外部女性生殖器或女性生殖器官其他损伤的程序。 AISL 遵循英国在这方面的建议：必须报告涉及任何 18 岁以下女性的 FGM 披露。

4. **极端化**；这是指一个人支持恐怖主义和极端主义形式的过程。没有唯一的方法来识别可能容易受到极端主义意识形态影响的个人。可能导致脆弱性的特定背景因素通常与诸如家人，朋友或在线等特定影响因素结合在一起，并且极端主义或恐怖组织似乎可以提供答案的特定需求。与管理其他保障风险一样，员工应警惕孩子行为的变化，这可能表明他们可能需要帮助或保护。

5. **强迫婚姻/绑架**； 在某些文化中，强迫婚姻仍然被**认**为是可以接受的。任何**认**为儿童有遭受**这**种特定形式虐待**风险**的**员**工，**应**立即将其**报**告给保障小**组**的成员。

虐待迹象

虐待可能包括（但不限于）以下迹象，存在以下迹象也不一定意味着正在**发**生虐待：

- 学生透露自己遭到虐待，或提出了**导致该**推断的**问题**
- 学生受**伤**，无法得到合理或一致的解**释**，或者在类型或位置上不**寻**常
- **伤**害正在**显现**出一定的模式或**频**率
- 学生从事极端或具有挑**战**性的行**为**，或者学生的行**为**突然**发**生**变**化
- 学生要求放弃由某个教**师**教授的科目或在成**绩**或行**为**方面表**现**出**显**着**变**化，并且似乎不愿**讨论**原因
- 学生似乎受到了忽**视**（例如身上**脏**、**饥饿**、没有足够的衣服）
- 学生似乎不愿回家或被父母或**监护**人公开拒**绝**
- 学生的**发**展在情感**进**步方面有所滞后
- 学生在情感上退**缩**，表**现**出**对**成年人缺乏信任
- 学生回避被触摸或因突然的**动**作而退**缩**
- 学生体重减**轻**或增加

您可能会注意到的迹象：

- 回避	- 衣服**脏**
- 突然的行**为变**化	- 冒**险**
- 焦**虑**	- 旷课/早到
- 黏人	- **饮食习惯**改**变**
- 沮**丧**	- 强迫行**为**
- 具有侵略性	- 噩梦
- 睡眠**问题**	- **药**物
- **饮食失调**	- 酒精
- 尿床	- 自残
	- 有自**杀**的想法

忽视

仪表/卫生

- 身上臭或脏
- 衣服未洗
- 衣服不够，例如没有冬衣
- 经常饥饿，不吃早饭就上学，或在家中无法获得食物

健康和发展问题
- 受伤后未得到治疗、医疗和牙齿问题
- 因缺乏监督而造成的多次意外伤害
- 反复出现的疾病或感染
- 没有得到适当的药物
- 错过医疗预约，例如接种疫苗
- 肌肉张力差或关节突出
- 皮肤溃疡、皮疹、跳蚤叮咬、疥疮或癣
- 腹部变薄或肿胀
- 贫血
- 疲倦
- 体重或成长缓慢，未达到发育里程碑（称为发育迟缓）
- 语言、沟通或社交能力差。

居所
- 生活在不适宜的家庭环境中（例如没有任何暖气）
- 长期无人照料
- 承担照顾其他家庭成员的角色
- 生活在适宜的家庭环境中，有食物、住所和温暖，但缺乏人际交往、家人的爱和关注（可能由女佣和司机照顾）

情感虐待

情绪虐待或忽视通常没有任何明显的身体症状，但您可能会在孩子的行为或情绪中发现迹象。
情绪变化是正常的成长现象，因此很难判断孩子是否受到情感虐待。
受到情感虐待或忽视的婴儿和学龄前儿童可能：
- 对陌生人或刚认识的人过分亲昵
- 缺乏信心或变得警惕或焦虑
- 似乎与他们的父母疏远，例如被带到托儿所或从托儿所被接走时

- 对其他儿童和**动**物具有攻**击**性或**恶意**

大一点孩子可能：
- 存在您不希望他**们**在**这**个年**龄**使用的**语**言、行事的方式或知道的事情
- **难**以控制强烈的情**绪**或**发**生极端的爆**发**
- 似乎与父母、家人或朋友隔**绝**
- 缺乏社交技能或几乎没有朋友
- **对**社交媒体、微信等上的帖子**显**得心**烦**意乱、**忧**心忡忡
- 感到自己在网上被欺**负**或被他人嘲**讽**

性虐待

远离特定人群
- 他**们**可能会避免与他人**单独**相**处**，例如家人或朋友
- 他**们**可能看起来害怕某个人或不愿与他**们**交往

表现出不符合年龄的性行为
- 孩子可能在很小的**时**候就**变**得性活**跃**
- 他**们**可能**滥**交
- 他**们**可能会使用性**语**言或知道您不希望他**们**在那个年**龄**知道的信息

身体症状
- 肛门或阴道酸痛
- 异常分泌物
- 性**传**播感染 (STI)
- **怀**孕

来源: https://www.nspcc.org.uk/preventing-abuse/

倾听学生的声音和做好记录

学校将**为**学生提供一系列**倾诉**的机会。如果学生公开自己受到了某种形式的虐待或忽**视**，教**职员**工**应**：
- 立即停止任何其他活**动**，倾听学生的**诉说**

- 认真倾听学生的诉说并保持开明——不要打断孩子或害怕沉默
- 使用"什么、何时、如何、何地"将问题限制在弄清事实状况所需的最低限度；避免使用诸如"这发生在你的兄弟姐妹身上吗？"之类的引导性问题，这可能会影响调查
- 不得尝试自行调查事件或决定学生是否受到虐待
- 让学生放心，但永远不要承诺不告诉任何人。相反，请向学生解释哪些人必须知情，以确保根据本政策采取适当的行动
- 尽快与 DSL 讨论此对话，除非获得 DSL 或校长的指示，否则不要采取进一步行动
- 仅在需要知道的情况下共享信息
- 如下所述，对谈话进行完整的书面记录。

员工必须尽快以书面形式记录有关儿童的所有疑虑、讨论和决定，可以使用 CPOMS 等资源。相关记录必须是对谈话或观察的清晰、准确和真实的描述。如果学生进行了公开，记录必须包括以下详细信息：
- 记录的日期、星期几、时间和地点
- 谁在谁面前说了什么，做了什么
- 孩子使用的任何明显的非语言行为或词语

任何其他证据（例如，潦草的笔记、包含短信的手机、衣服、电脑）都必须妥善保存并尽快转交给 DSL。员工或志愿者不得保留任何副本。注释可以被扫描并上传到 CPOMS 等资源中。

附录 3：关注日志表（中文版）

您的姓名（打印）：	你的角色：
学生姓名： （首先，姓氏和昵称）	班级和年份/舍：
事件发生的**时间**和日期： （如适用）：	您知道事件/**问题**的日期：
尽可能**真实**地描述事件。 包括涉及的人员、**发生**的地点、**发生**的确切情况等。**记住要清楚**地描述您**观察**到的任何行**为**或身体症状。 	
您采取了什么行动？ 你的**签名**：	
表格填写的**时间**和日期：	

此表格**应**手写。不要**创建**数字**记录**。在**亲自**将**报告交给**学校所在地区的 DDSL 或 DSL（前者无法履行**职能时**）之前，**请**先**检查报**告。确保此表格清晰易**读**且使用**简明英语**。**请记**住，非哈**罗员**工可能会**阅读**此表格。例如，**该**表格可用作法律**诉讼**中的**证据**。

收到者:　　　　　　　　　　　　　　**日期和时间：**

事件跟进人员建议所採取之措施

> 下图仅在适用于表述的关注点时才需要注释。
>
> 此页面的目的是准确定位身体上的身体接触或痕迹/瘀伤/伤口。

附录 4：报告流程图

保障
公开报告流程

你担心学生的福祉

留心有关虐待的表徵，向学生提**问**其不**寻**常行**为**、**伤**痕或损伤。

学生表示受到虐待或忽视

聆听和相信 - 严谨看待其指控。**支持**学生勇敢面**对**。告**诉**他们你的下一步打算。不要承**诺**保密。

報告

填妥关注日志表并**报告**。将完成后的关注日志表儘快交予**负责**儿童保障的人员。
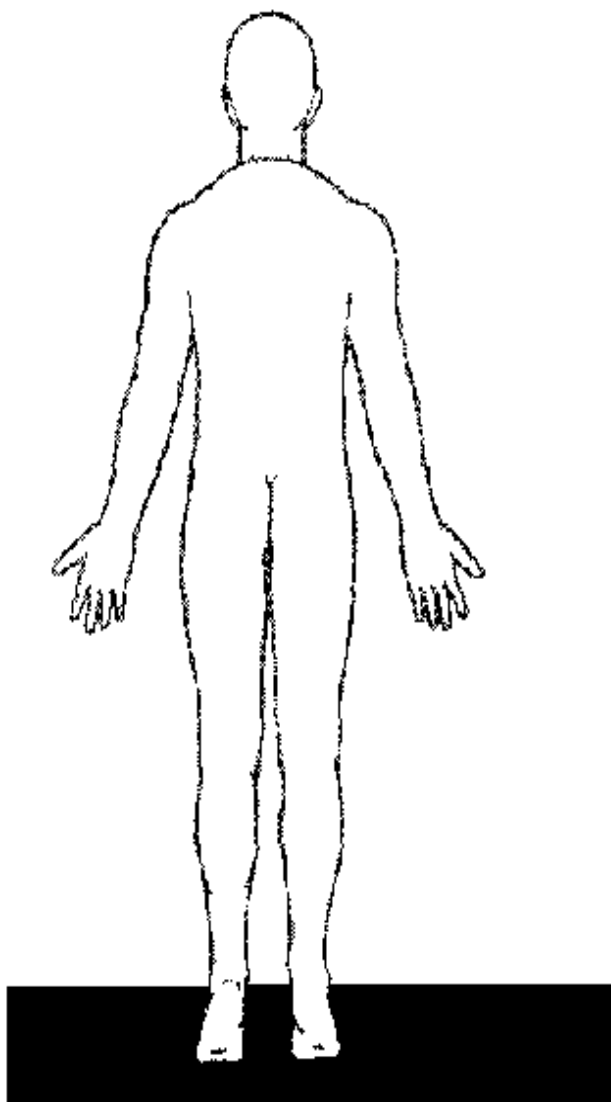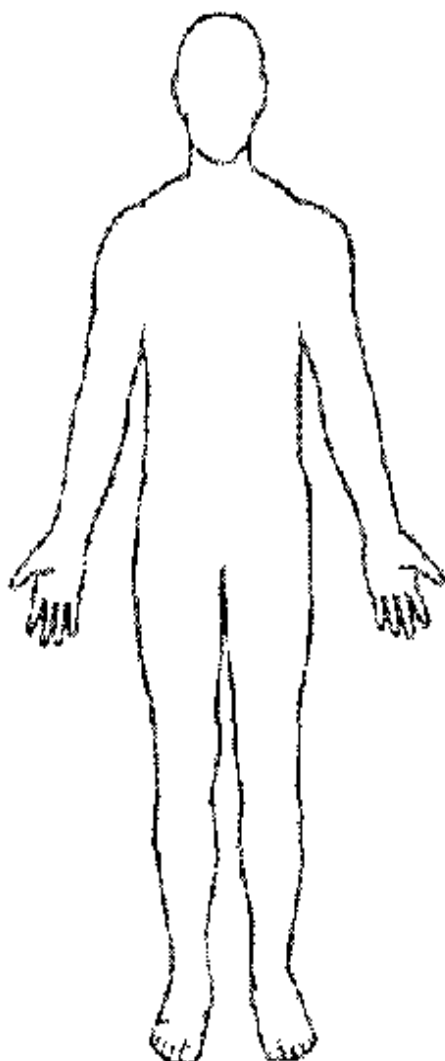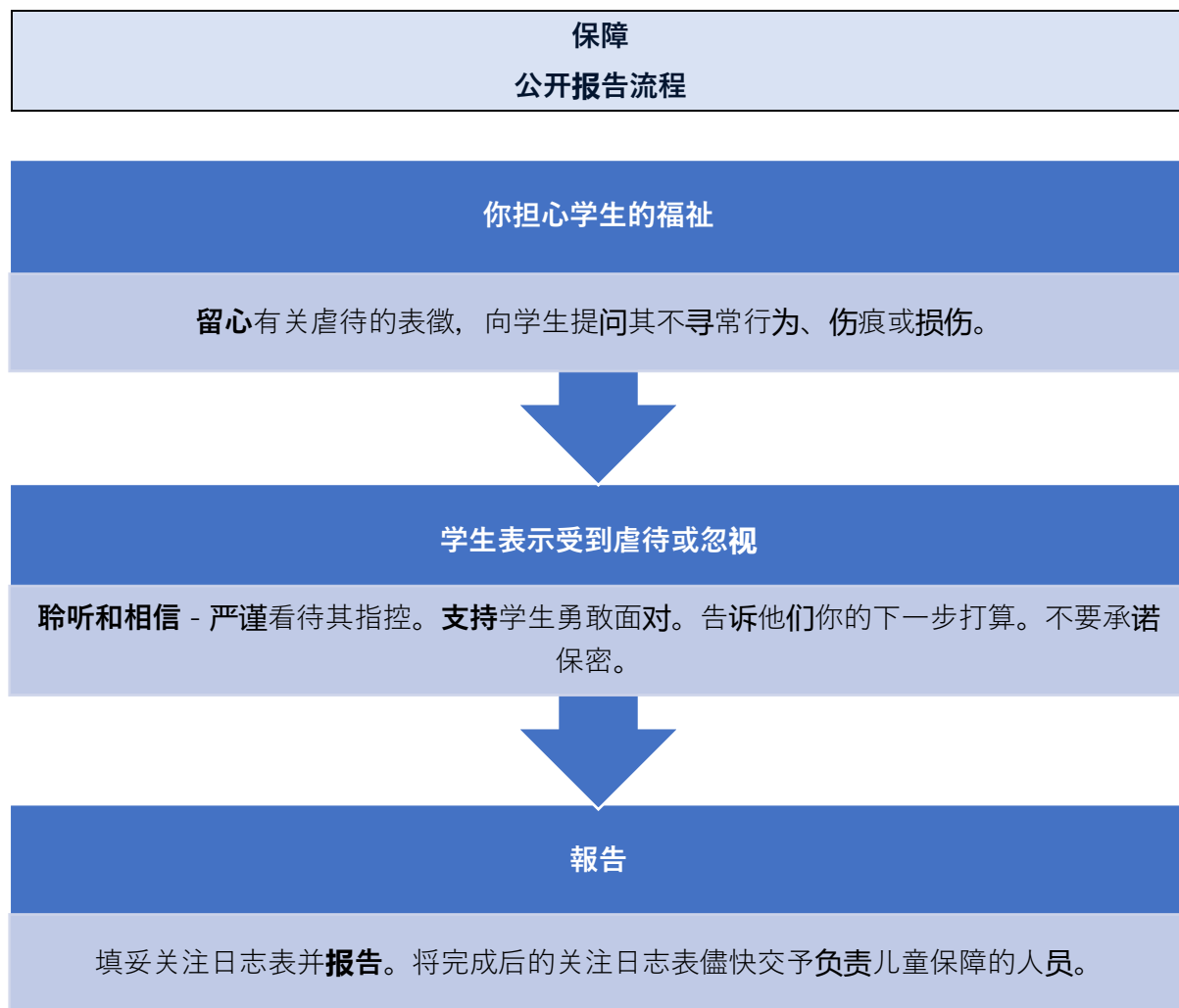
附录 5: 处理儿童虐待儿童和指控的安排

大多数学生互相**伤害**的情况将根据学校的《反欺凌和行**为**政策》进行**处**理。但是，所有教**职**员工都**应该**意识到，学生**对**另一个学生的行**为**可能会引起保障**问题**；这被称**为**儿童**对**儿童的虐待。
学生之**间**可能引起保障**问题**的行**为**示例如下：

- 欺凌（包括网**络**欺凌）
- 身体暴力，例如打、踢、咬或以其他方式造成身体**伤害**
- 性暴力，例如强奸、插入式性侵或性侵犯
- 性**骚扰**，例如与性相关的**评论**、言**论**、玩笑和网**络**性**骚扰**
- 偷拍，**这**通常涉及在他人不知情的情况下偷拍其裙底
- 年**轻**人制作的性意象（色情短信）
- 入会/戏弄类型的暴力和**仪**式

同伴之**间**的虐待**对**男孩的表**现**往往不同于**对**女孩的表**现**。例如，女孩似乎更容易遭受性侵犯和/或剥削，而男孩似乎更容易遭受与帮派有关的暴力和**严**重的青少年暴力。有特殊教育需要或残疾的学生特别容易受到同伴虐待。任何年**龄**和性别的学生之**间**都可能**发**生性暴力和性**骚扰**。但是，**员工应该**意识到，某些群体比其他群体面**临**更大的**风险**。患有特殊教育需要或残疾的女孩和学生更有可能成**为**此类虐待的受害者。性暴力包括性侵犯、插入式性侵和强奸等行**为**。**这**种行**为**的一个关**键**特征是性行**为**是在未**经**受害者同意的情况下**进**行的。只有在个人有**选择**参与性行**为**的自由和能力的情况下，才能**给**予同意。

性**骚扰**是指"不受**欢**迎的具有性特征的行**为**"，它可能在**线**上和**线**下**发**生。性**骚扰**可能会：侵犯儿童的尊**严**，和/或使他**们**感到被恐吓、**贬**低或羞辱，和/或造成**敌对**、冒犯或性化的**环**境。性**骚扰**有多种形式：

- 与性相关的**评论**，例如**对**他人的衣着或外表**发**表淫**秽评论**或性言**论**，使用有性特征的名称等
- 色情"笑**话**"或嘲弄
- 身体行**为**，例如故意摩擦他人，**拨**弄衣物，展示具有性特征的**图**片、**图**画或照片

网**络骚扰**，例如未**经**同意共享**图**像和视**频**、不受**欢**迎的色情**评论**和信息，包括在社交媒体上。**这**种类型的**骚扰**可能是独立的，也可能是更广泛的性**骚扰**和/或性暴力模式的一部分。
学校在培养学生**对**什么是同伴虐待的理解以及灌**输**行**为规**范以将同伴虐待**风险**降至最低方面**发挥**着重要作用。**员工还应**了解以下方面的重要性：

- **执**行明确的**规**章制度
- 以一致的方式**实**施《行**为**政策》
- 明确性暴力或性**骚扰**是虐待行**为**，是不可接受的
- **实**施学校的反欺凌策略并推广哈**罗**价**值观**

其他防止同伴虐待的策略包括：
- 提供适合**发**展的福祉或其他**课**程，**让**学生知道哪些行**为**是可以接受的
- 任何学生均可向教**职员**工提出疑**虑**的制度，**让**他**们**知道自己会被**倾**听、相信和重**视**
- **为**那些被**认**定**为**可能易受**伤**害的学生提供自信和安全的**针对**性工作
- 强有力的**监督**安排，特别是**对**于寄宿生

如果出**现对**同伴虐待的指控，必**须**尽快通知 DSL。被指控虐待的学生可能会在随后的**调查**期**间**被停学，学校的行**为**和纪律政策将适用。受害者和施暴者都将被**视为处**于危**险**之中，并将遵循本政策**规**定的保障程序。作**为这**些程序的一部分，DSL 将开展**风险评**估，**该评**估将考**虑**所有相关人**员**（受害者、施暴者和学校其他学生）的需求以及需要采取的保**护**和保**证**他**们**安全的措施。在**编**制**风险评**估**时**，将适当考**虑**以下因素：受害者的意愿；指控事件的性**质**；相关当事人的年**龄**；**该**事件是孤立事件**还**是某种模式的一部分；受害者和施暴者之**间**的任何权力不**对**等；**对**受害者和其他学生的任何持**续风险**；以及任何相关的背景因素。

附录 6： 指导中国大陆儿童保护政策的法律和公约

《中华人民共和国未成年人保护法（2012）》：第五条：

保护未成年人的工作，应当遵循下列原则： （1）尊重未成年人的人格尊严； （2）适应未成年人身心发展的规律和特点； （3）教育与保护相结合。全国人民代表大会常务委员会，中华人民共和国主席令第 65 号《中华人民共和国未成年人保护法（2012）》。

中华人民共和国反家庭暴力法（2015）：

2015 年通过的一项新法律（2016 年 3 月 1 日生效）保护在中国境内的外国人和中国公民免受家庭暴力。其中两个条款对儿童和学校有特定的意义：

第十四条：学校、幼儿园、医疗机构、居民委员会、村民委员会、社会工作服务机构、救助管理机构、福利机构及其员工在工作中发现无民事行为能力人、限制民事行为能力人遭受或者疑似遭受家庭暴力的，应当及时向公安机关报案。公安机关应当对报案人的信息予以保密。

第三十五条：学校、幼儿园、医疗机构、居民委员会、村民委员会、社会工作服务机构、救助管理机构、福利机构及其员工未依照本法第十四条规定向公安机关报案，造成严重后果的，由上级主管部门或者本单位对直接负责的主管人员和其他直接责任人员依法给予处分。全国人民代表大会常务委员会，中华人民共和国主席令 第三十七 号《中华人民共和国反家庭暴力法（2015）》。

附录 7：保障培训的期望

职务	培训	频次
保障校董	**高级**	**2 年一次**
AISL 保障**负责人**	**高级**	**2 年一次**
高级人力**资源总监**	**高级**	**2 年一次**
DSL	**高级**	**2 年一次**
校长	**高级**	**3 年一次**
学校人力**资源经理**	**高级**	**3 年一次**
高层领导团队*	**高级**	**3 年一次**
全体员工*	**初级**	**每年一次**
志愿者等**	**保障简介**	**每年一次**

* 由 DSL 和**线**上**课**程一起提供

由 DSL 或人力资源经**理提供，**辅**以**线**上**课**程

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我已**阅读**，理解并同意遵守《*保障和兒童保護政策*》*(HS13C)*和员工**专业**行**为**准则。 我知悉文件的范**围**涵盖我的私人生活和**职业**生活。

我了解，如果我不遵守其中的指示，我将受到**纪律处**分，**这**可能会**导**致解雇和/或将我的行**为报**告给警察。

全名（请大写）：

签署: ＿＿＿＿＿＿＿＿＿＿＿＿＿＿＿＿   **日期：** ＿＿＿＿＿＿＿＿＿＿＿＿＿＿＿＿

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