COGNITA

Safeguarding & Child Protection Policy

for

REGIONAL & SCHOOL ASIA

DOCUMENT CONTROL

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DEPARTMENT	Michael Drake	

Contents

1   PURPOSE

Our commitment is to safeguard and promote the wellbeing (including mental health) and safety of our students by creating and maintaining an open, safe, caring, and supportive atmosphere. This includes:

- Acting in the best interests of the child
- Ensuring that systems and procedures are in place to protect students
- Proactively teaching students about safeguarding

AN INSPIRING WORLD OF EDUCATION

We are committed to providing an environment that allows all children to feel safe, happy, and secure, in a learning environment where they are treated equally, respected and encourage to flourish.

Be distinctive so parents and students choose and stay at our schools

Improve education by living and breathing the Cognita Way

Embed a consistent understanding of Safeguarding

Educate children to keep themselves safe

Keep children safe by Managing abuse

Demonstrate policy in practice daily

Use data to Inform and drive continuous improvement

The Cognita Way
Brilliant Basics

The Safeguarding of Children is our number one priority

2   SCOPE

2. All adults working in Cognita.

Safeguarding and promoting the welfare of children is everyone's responsibility

We operate within a culture of openness and recognise and accept that abuse can happen in any organisation

We are a 'sharing organisation'

All concerns should be reported

3   RESPONSIBILITIES

> ## In our school, safeguarding is everyone's responsibility

All staff have the following responsibilities:

- Contribute to providing a safe environment in which all children can learn and flourish
- Know what to do if a child tells you that he or she is being abused or neglected
- Know what to do if you are concerned about the behaviour or conduct of an adult in the school
- Manage the requirement to maintain an appropriate level of confidentiality
- Identify children who may benefit from early help, support, and intervention, supported by the implementation of the contextual safeguarding model
- Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSL

Designated Safeguard Lead

The DSL is the key person in school responsible for leading and managing the safeguarding of children. They must have a leadership or senior role in school and be given the autonomy to make key decisions.

- Lead and manage all concerns and child protection cases.
- Lead Team around the Child meetings and work with key staff in school (Counsellors, Clinic staff, Heads of Year / Grade level Leaders) to ensure that the best outcome for the child is secured.
- Report to and work with key children protection services and other agencies in the community.
- Lead training and raise awareness in school for all staff.

4   GOVERNANCE

Governance and oversight are undertaken on behalf of the proprietor (owner). This is executed and reported in the following four ways:

1. **Safeguarding reviews in individual schools**

The proprietor exercises governance oversight through the deployment of safeguarding reviews in all schools. Safeguarding Reviews are undertaken by a team of specialist independent safeguarding reviewers.

2. **Monthly safeguarding reporting from each school**

Each school is required to submit headline data each month in relation to safeguarding. This information is used to inform reporting to the Cognita board. The data is analysed by the Regional Safeguarding Lead to identify relevant issues and trends in the region.

3. **Quarterly reporting to the board**

Each quarter, the Group Legal Director reports to the Cognita Board on:

§   Summary of outcomes from Safeguarding Reviews undertaken in schools

§   Trends in safeguarding data collected from each school monthly
§   Key findings and emerging themes

4.   Annual safeguarding review meeting in each region

The ultimate responsibility for safeguarding rests with the proprietor. Once each year, there is a Safeguarding Governance meeting in each region chaired by the Group Chief Executive Officer. This provides full proprietorial oversight of safeguarding within the group, taking account of safeguarding reviews conducted throughout the year.

PROCEDURES

5   PROCEDURES

> **All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL)**

> **If a child is in immediate danger or at risk of harm a referral should be made to the relevant Child Protective Services and/or the police immediately. This referral would be made by the DSL, in consultation with the Head of School. The school must always inform the Safeguarding Manager Asia**
> **fiona.dixon@cognita.com**

5.1   Escalation processes

Below are three situations that may occur in a school environment

Situation 1:   An allegation about another adult in school should be referred to the Head of School

Situation 2:   Any concern or 'nagging doubt' about an adult or child should be shared with the DSL or Head of School
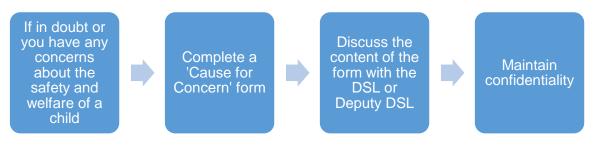
Situation 3:   An allegation about the Head of School should be referred to the Cognita Asia CEO

5.2   Reporting and recording your concerns

Safeguarding and promoting the welfare of children is everyone's responsibility (KCSIE (Keeping Children Safe in Education) (Keeping Children Safe in Education) 2021). All staff should know what to do when a child discloses abuse to them, they have concerns about a child's welfare, or when children or staff raise concerns about a student to them.

All staff should report their concerns to the DSL, using the **cause for concern form**. Where possible, it is good practice to speak directly to the DSL. All concerns must be put in writing, using the words of a child where relevant. Operational or support staff may find it more comfortable to report concerns to their Line Manager, who will support them to complete the cause for concern form and to submit to the DSL.

Schools using CPOMS as their reporting platform will report as per the CPOMS and school procedures. **It is essential that the DSL is informed as soon as possible.**

If in doubt or you have any concerns about the safety and welfare of a child	→	Complete a 'Cause for Concern' form	→	Discuss the content of the form with the DSL or Deputy DSL	→	Maintain confidentiality

Managing a disclosure

If a child tells a member of staff that they know about or have been a victim of abuse or neglect the member of staff should:

- Listen carefully and allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me." Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Questioning of the child about what they are saying should not be extensive as partner agencies will lead any investigation. Limit questioning to the minimum necessary for clarification using *What, When, How and Where* but avoid leading questions such as, "Has this happened to your siblings?" Do *not* use questions beginning with *Why* as this can apportion feelings of guilt within a child.
- If the child discloses abuse, then it is appropriate to ask whether any other adults were present and observed the abuse and whether the abuse has happened before.
- At an appropriate time tell the child that the matter will be referred in confidence.
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.

5.3   Recording a disclosure or a concern that you have about a child.

Staff should make a written record of the conversation with the child as soon as possible, using a Cause for Concern Form.' Staff should use the specific words that the child used (e.g. if referring to parts of their body), indicating these by using "speech marks/inverted commas." **If a disclosure of abuse has been made by the child, immediately discuss the concerns verbally with the DSL, Deputy DSL, or Head of School prior to writing up the record.** If the DSL is not available then this should not delay appropriate action being taken and staff should speak to the DDSL, Head of School or, failing that, a member of the SLT (Senior Leadership Team). All documents should be kept in a secure location with restricted access.

Confidentiality

Staff should never guarantee confidentiality to students or adults wishing to tell them about something serious as this may not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told to ensure their safety.

Concerns about the actions of an adult

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or Head of School of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children.

See the **Code of Conduct** for more information on **Low Level Concerns, Self-Reporting, Allegations** and **Whistleblowing.**

<div style="background:#1f7fc4; color:white; text-align:center;">

We are a 'telling' organisation
If you are concerned about the behaviour or actions of any adult…
speak to the DSL or Head of School

</div>

5.4   Making referrals to statutory agencies

If a child is thought to be at risk of harm

When a child is thought to be at risk of harm or is likely to be at risk of harm, then a referral should be made **immediately** to Child Protective Services or the police if a criminal act is thought to have occurred.

Whilst it is the role of the DSL, any member of staff can make a referral to Child Protective Services or the police. *The school does not require parental consent for referrals to be made to statutory agencies.* Consent to do this must **not** be obtained from the parents if to gain consent would put the child's safety at risk or to do so could jeopardise any investigation by partner agencies.

If a child has unmet needs

When a child is not considered at risk of harm, but still has unmet needs that could mean that they are a Child in Need, a referral should be made to Children's Protective Services via the local authority process. The school does not require parental consent for referrals to be made to statutory agencies in these circumstances, however, it is best practice that these concerns should be discussed with the parents and any subsequent referral made transparently with the parent's knowledge.

Statutory agencies across Asia vary widely in their efficacy. The DSL should become familiar with the services available and the support they can offer the child and their family. In many cases the school will need to take on the responsibility for organising a support plan for vulnerable pupils using internal resources, e.g., counsellors or signposting parents/child to external trusted specialists, e.g., psychologists.

5.5   Passing on safeguarding records when a child leaves the school

Information sharing is vital in identifying and tackling all forms of abuse. When a child leaves the school, it is the responsibility of the DSL to ensure that a copy of their safeguarding records is transferred securely and confidentially to the new school, where possible. The school must adhere to the recommendations on data sharing and consent in each country. Before transferring, the DSL should arrange a telephone call with the DSL or Head of School in the receiving school.

Following the conversation, they will arrange for the secure transfer of documentation. Confirmation of the receipt of the documentation should be retained with safeguarding records. A safeguarding record must be transferred separately from the main student file or academic reports. (See DSL Toolkit for further detail)

The Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school in advance of a child transfer. For example, information that would allow the new school or college to continue supporting victims of abuse / vulnerable children and have that support in place for when the they arrive.

5.6   Curriculum provision to keep children safe

The school is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad and balanced curriculum. Through ongoing work with the children, we aim to build resilience so that every child knows that we are a 'telling school' and that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another.

Safeguarding is taught in the different sections of the school.
<school to customise this section by inserting their summary of approach>

5.7   Relationships and sex education (RSE)

Our approach to ensure that all schools provide an age appropriate curriculum opportunity to all students is: <school to give overview of RSE provision>.

We actively promote the view that children should feel able to raise any concerns that they may have. This includes when they have a concern about a friend or peer. We take the following measures to ensure that children know how to raise a concern: <insert school's procedure for raising concerns>

Guidance and support will be given by the Regional Safeguarding Lead.

Keeping yourself safe

By adhering to the safeguarding policy, you will
- Make quick, prudent, informed, and confident decisions regarding safeguarding children
- Raise concerns around adult behaviours that leave you feeling uncomfortable or with a nagging doubt
- Protect yourself against false allegations
- Negotiate challenging times or situations in your working life, by being aligned with the agreed standards and expectations.

Remember: The Code of Conduct gives full details of how-to self -report, report a low-level concern about an adult, how to make an allegation or to whistle blow.

5.8   Types of abuse

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may need help or protection. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse			
Physical abuse	Emotional abuse	Sexual abuse	Neglect

Abuse

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 online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Note - Corporal punishment

Corporal punishment, or the threat of it, is never permitted in the school. Whilst we recognise that the use of corporal punishment is some of our communities in Asia, it is important that parents are invited into school to discuss this form of discipline, when the school becomes aware of it or a child discussed their concerns or fears with you.

The DSL should not only explain that we do not condone the use of physical punishment, but why it is detrimental to the emotional wellbeing of the child. The link between wellness and academic success should be made so that parents fully understand that they can be supported to ensure their child is successful, but that the school will not accept the use of physical discipline.

Physical abuse

Physical abuse is 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.

Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- respiratory problems from drowning, suffocation, or poisoning
- untreated or inadequately treated injuries
- bruising which looks like hand or finger marks or caused by an implement
- cigarette burns, human bites or
- scarring, scalds and burns.

Emotional abuse

Emotional abuse is 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 as far 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), 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. *Signs of emotional abuse tend to be behavioural rather than physical (see below).*

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving an elevated 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. The sexual abuse of children by other children is a specific safeguarding issue in education.

Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection/diseases
- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth
- urinary infections
- difficulty walking, sitting, or standing
- persistent sore throat; or
- stomach-ache.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because 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.

Signs of neglect include:

- the child seems underweight or is small for their age, or their weight deteriorates
- the child seems very overweight for their age
- they are poorly clothed, with inadequate protection from the weather
- they are often absent from school for no apparent reason; or persistently arrive late or
- they are regularly left alone, or in charge of younger brothers or sisters.

Behavioural signs of abuse and neglect in a child

If a child is being abused, their behaviour may change in several ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention, and require more discipline than other children
- become angry or disinterested and/or show little creativity
- seem frightened of certain adults
- become sad, withdrawn, or depressed
- have trouble sleeping
- become sexually active at an early age
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children
- refuse to change for gym or participate in physical activities
- develop eating disorders
- self-harm
- refuse to attend school or run away from home
- lack confidence or have low self-esteem or
- use drugs or alcohol.

Signs of abuse or neglect shown by the parents or other responsible adult

- unrealistic expectations of the child i.e. demand a level of academic or physical performance of which they are not capable
- offers conflicting or unconvincing explanation of any injuries to the child
- appears indifferent to or overtly rejects the child
- denies existence of or blames the child for the child's problems at home or at school
- sees and describes the child as entirely worthless, burdensome or in another negative light
- refuses offer of help for the child's problems or
- is isolated physically/emotionally.

Adverse Childhood Experiences

Adverse children experiences are stressful events that occur in childhood, such as being a victim of abuse, neglect or growing up in a household in which alcohol or substance misuse, mental ill health, domestic violence, or criminal behaviour are present. Adverse childhood experiences can impact on behaviour.

It is important that we use the contextual safeguarding model to take a holistic view of the child and to ask the right questions. Rather than asking "why did you do that or behave in that way"? we should be asking "tell me what has happened to you, what are you thinking and feeling and how can we help"?

Safeguarding - Mental Health and Wellbeing

Our students are supported by specialist staff and resources to proactively support the mental health and wellbeing. School counsellors are available to offer crisis, short- and long-term support to students. Access to support is via the referral systems in place in the school.

However, it is the responsibility of all adults to recognise when a student show signs of distress or present with mental health concerns, which need the intervention of the DSL. Students with significant mental Health and Wellbeing concerns will be placed on the Child Protection Record and a Team around the Child (TAC) meeting convened to agree a support plan. Parents / Carers will be informed in all cases unless involvement of Parents / Carers will place the child at additional risk.
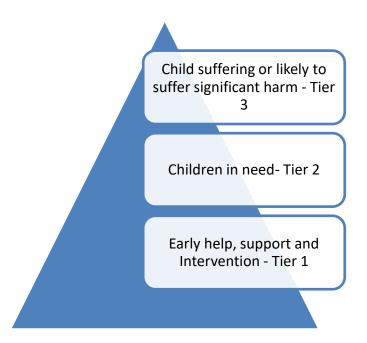
School will seek therapeutic support for the most vulnerable and adopt a multi agencies approach to the care of the child.

Additional Learning Needs and/or Disabilities

Children with additional educational needs (ALN) and/or disabilities are statistically more vulnerable to child abuse, including peer on peer abuse. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- that children with SEN / ALN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these challenges.

Vulnerable children and early help

All staff recognise when a child needs help that is over and above the support that every student receives. It is the responsibility of all staff to signpost these potentially vulnerable children to both pastoral and safeguarding leaders so that proactive intervention (early help) and support can be put into place.

When early help, support and or intervention is appropriate, the DSL or DDSL will lead on liaising with specialist support staff in school (TAC Meeting) or outside agencies, set up or attend an inter-agency assessment as appropriate.

Staff may be required to support other agencies and professionals in an appropriate assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to Child Protective Services (where available) for assessment if the child's situation does not appear to be improving or is getting worse.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs and additional learning needs.
- has special educational needs (whether or not they have a statutory education, health, and care plan).
- is a young carer.
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from our boarding facility, care* or from home; (*Children who are looked after by the state)
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking, or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; (see Adverse Childhood Experiences)
- has returned home to their family from care*; (*Children who are looked after by the state)
- is showing early signs of abuse and/or neglect.

- is at risk of being radicalised or exploited.
- is a privately fostered child
- is in a guardianship provision

Peer on Peer abuse

Peer on peer abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms, including, but not limited to, serious bullying (including cyber-bullying), relationship abuse, sibling domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, honour, and gender-based violence.

This form of abuse rarely takes place in isolation and often indicates wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member. 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/exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

Factors which may indicate that behaviour is abusive (and not behaviour that should be dealt with under the behaviour policy) include:

1. where it is repeated over time and/or where the perpetrator intended to cause serious harm
2. where there is an element of coercion or pre planning and
3. where there is an imbalance of power, for example, because of age, size, social status, or wealth.

This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL.

How can I identify victims of peer on peer abuse?

Identifying peer on peer abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from peer on peer abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document.

Signs can include:

a) failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard you would ordinarily expect
b) physical injuries
c) having difficulties with mental health and/or emotional wellbeing
d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much
e) drugs and/or alcohol use
f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age.

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by peer on peer abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

a) peer on peer abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.
b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.
c) children with SEN/D (ALN) are particularly vulnerable to both abuse and peer on peer abuse.

What should I do if I suspect either that a child may be being abused or that a child may be abusing others?

<div align="center">**Report your concern to the DSL without delay.**</div>

Sexual violence and sexual harassment between children.

Peer on peer abuse can include two specific forms known as sexual violence and sexual harassment. Any response to these should fall within the school's wider approach to peer-on-peer abuse.

Sexual violence includes all legal understood sexual offences.

Sexual harassment refers to 'unwanted conduct of a sexual nature. This can occur online (including but not limited to non-consensual sharing of images, making sexual comments on social media) and *offline* (including but not limited to making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group
- be perpetrated by a child of any age against a child of any age
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation
    1. include behaviours that exist on an often-progressive continuum and may overlap
    2. be online and offline (physical or verbal)

Children with Special Educational Needs (SEN / ALN) are more vulnerable, and there may be barriers in recognising abuse in this group of children. In addition, children who are perceived by their peers to be Lesbian Gay Bisexual Transgender or identify themselves as LGBT may be more vulnerable.

What should I do if I suspect either that a child may be being harmed or harming others?

<div align="center">**Report your concern to the DSL without delay.**</div>

What additional risks might present as concerns?

Online safety

All staff should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use, including cyber-bullying

All staff should be familiar with the school's Acceptable Use of Technology and Social Media Policy which sets out the school's approach to online safety in further detail. Student should also sign an acceptable use policy.

It is important to be vigilant whilst delivering lessons online. Our recent move to online learning has allowed teachers a window into student homes and therefore, all safeguarding concerns, with relation to the child or the adults in the home, must be raised as per the schools reporting process. Staff must ensure that they are familiar with the additional safeguarding guidance shared with schools.

What should I do if I suspect that a child may be being at risk?

Report your concern to the DSL without delay.

Youth produced sexual imagery/'Sexting'

Whilst many professionals refer to the issue as 'sexting', there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.'

Yet, recent the National Society for the Prevention of Cruelty to Children UK (NSPCC) research has revealed that when children are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.'[1] Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages, rather than images.

This policy only covers the sharing of sexual imagery by children. Possessing, creating, sharing, and distributing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks which need careful management. On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'.[2] This is to ensure clarity about the issues this advice addresses.

What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes children sharing images that they, or another child, have created of themselves.
- 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

What types of incidents are covered by this policy?

Yes:
- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18)
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult
- A child is in possession of sexual imagery created by another child

No:
- The sharing of sexual imagery of children by adults as this constitutes child sexual abuse and schools should always be reported to the DSL who will refer to the police
- Children sharing adult pornography or exchanging sexual texts which do not contain imagery[3]
- Sexual imagery downloaded from the internet by a child[4]

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[1] For the purposes of this policy 'child', 'youth' and 'young person' refers to anyone under the age of 18; 'adult' refers to anyone aged 18 or over

[2] This is in accordance with the new advice *Sexting in schools and colleges: responding to incidents and safeguarding young people*, which has been published by the UK Council for Child Internet Safety

[3] All such incidents should be responded to with reference to the school's Online Safety Policy at Appendix C, and in line with the school's Safeguarding Policy

[4] As above

- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult.

What should I do if I am concerned about youth produced sexual imagery?

Report your concern to the DSL without delay.

Forced marriage

Forced marriage is a not supported in our Asia countries. This can occur when an individual (male or female) is forced to marry without their full consent, when they do not have the capacity to consent (i.e. they have learning needs) or where they are coerced to marry either through psychological/emotional threats or other means. More information can be found in KSCIE (2019).

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

Female Genital Mutilation (FGM)

All staff should speak to the DSL (or deputy DSL) with regard to any concerns about FGM. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the DSL who will make a referral to Child Protective Services and / or the police. See Annex A of Keeping Children Safe in Education for further details.

What should I do if I suspect that a child may be being at risk?

Report your concern to the DSL without delay.

Signs of Grooming - to abuse a child

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female.

They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

Signs of grooming and / or online abuse. Children may:

- be very secretive, including about what they are doing online or on their mobile phone;
- Be withdrawn, upset or outraged after using the internet or texting;
- Be secretive about who they're talking to and what they're doing online or on their mobile phone;
- Have lots of new phone numbers texts or e-mail addresses on their mobile phone, laptop or tablet
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;

- have access to drugs and alcohol;
- go missing from home or school;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age.

Modus operandi of institutional groomers.

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibit some or all of these signs, it does not mean that they are a sex offender/institutional groomer. However, the signs are there to given guidance for decision making.

- Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs;
- Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy;
- Gain the trust of others: Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large;
- Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favoritism, special attention and/or opportunities for special trips or outings;
- Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members;
- Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts,
- Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

Signs of grooming for radicalisation

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement
- Being in possession of extremist literature
- Poverty
- Social exclusion
- Traumatic events
- Global or national events
- Religious conversion
- Change in behaviour
- Extremist influences

- Conflict with family over lifestyle
- Confused identity
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups

What should I do if I suspect that a child may be being at risk?

Report your concern to the DSL without delay.

Guardianship concerns

Schools work with families to identify formal and informal guardianship arrangements at the point of admissions so that they can support their children in school. There is a named person responsible for these students in each school, who will work with the DSL and families to ensure that the school experience is positive. We ask all parents to complete the necessary contact and authorisation documentation for all those who act in a loco parentis position.

Whilst overall responsibility for the wellbeing of the child remains with the parents, the DSL, and the school section leadership staff, will address any issues of concern with both the parents and guardians. Children whose guardianship arrangements are detrimental to their wellbeing will be placed on the Child Protection record and staff will work with the parents to support a change in guardianship placement.

Family Hosting

Cognita does not support the hosting of children with families, either on a temporary, school trip or long-term basis, unless this family hosting has been authorised by a statutory Child Protection Service.

Boarding

Currently, boarding provision is only available in Singapore for students attending SAIS (Stamford American International School) and AIS (Australian International School).

Children can be particularly vulnerable in residential settings and all staff in school and in the boarding facility should be alert to pupil relationships and the potential for peer-on-peer abuse.

School counselling and health teams will support boarders through additional dedicated curriculum provision.

Safeguarding concerns raised in the boarding facility will be managed by the DSL at the student's school.

Should an allegation of abuse be made against a member of boarding staff the Head of School and Safeguarding Manager for Asia will agree on the appropriate steps to take as outlined in the allegation protocol – see Code of Conduct 2022.

6   GLOSSARY AND DEFINITIONS

Definition of safeguarding

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

> In our school, safeguarding is everyone's responsibility

Everyone who meets children, and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, always, what is in the best interests of the child.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who meets them has a role to play in identifying concerns, sharing information, and taking prompt action. This is supported by 'Team around the Child' meetings in school.

This policy and procedures apply to all students in the school, including those in the early years. This Safeguarding policy applies to all teaching, non-teaching, operational, pastoral, support, peripatetic, contract staff, volunteers, including parent volunteers and non-school based staff employed by Cognita Asia Holdings Pte Ltd (Cognita) and any other adults working at the School.

All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned, unless otherwise stated. It applies to adults in the early years phase of the school. Throughout the document, the term DSL is used for the Designated Safeguarding Lead. For staff in the early years, they should report directly to the Early Years Designated Safeguarding Lead (EYDSL).

This Safeguarding Policy and the Code of Conduct applies to all students and adults in the school, including when being educated off-site and undertaking an educational visit.

Definitions and terminology

'Children' includes everyone under the age of 18
'DSL' refers to the school's named Designated Safeguarding Lead
'Designated Officer' refers to the advisory role undertaken by the Safeguarding Manager - Asia
'KCSIE' refers to the statutory guidance Keeping Children Safe in Education 2020 as shown in the link above

Notes

* All adults who work with students have a duty to keep children safe and to protect them from harm. Children have a right to be safe and to be treated with respect and dignity. Trusted adults are expected to take reasonable steps, make sound judgments, and manage risk to ensure the safety and well-being of students.

**These categories are to allow school to identify best fit when recording a concern about a child. We recognise that many children will experience concerns from more than one category. It should also be noted that this is not a diagnostic tool.

Child Abuse	Adverse childhood experiences
Physical abuse	Domestic violence
Emotional Abuse	Alcohol / drug abuse
Sexual abuse	Parental mental illness
Neglect	Parental separation
Other / Details needed	Alcohol / drug abuse
	Guardianship
Mental Health and Wellbeing (Safeguarding and Child Protection Concerns)	**Peer on Peer abuse**
Self-harm	Persistent or serious incident of bullying
Suicide ideology (SI)	Sexual coercion or harmful sexual behaviours
Eating disorder (ED)	Cyber bullying
Mental illness (MD)	Relationship abuse
Mental Health and Wellbeing	**Mental Health and Wellbeing**
Anxiety	PTSD (Post Traumatic Stress disorder)
Distress, e.g. bereavement, long term illness etc	Addiction disorders
Depression	Gaming addiction
Self-worth – self-esteem (significant)	Problematic technology usage
Social isolation / Vulnerable	Vulnerable (Risky behaviours)
Academic pressure – balance / stress	

7   RELATED DOCUMENTATION

- Code of Conduct Policy
- Acceptable Use of Information Technology / Social Media Policy
- Employee Handbook / Contract Handbook
- School Employee Handbook
- Staff or Company Contract document
- School Behaviour policy

School contacts	
Designated Safeguarding Lead (DSL)	Refer to Safeguarding Staff Asia 2021 – 2022
Deputy Designated Safeguarding Lead (Deputy DSL)	Refer to Safeguarding Staff Asia 2021 – 2022
Any other staff trained to DSL / Leadership level	Refer to Safeguarding Staff Asia 2021 – 2022
Designated Safeguarding Lead with responsibility for safeguarding in early years	Refer to Safeguarding Staff Asia 2021 – 2022
Deputy Designated Safeguarding Lead with responsibility for safeguarding in early years	Refer to Safeguarding Staff Asia 2021 – 2022
Head of School	Refer to Safeguarding Staff Asia 2021 – 2022
Head of HR	Refer to Safeguarding Staff Asia 2021 – 2022
Cognita (proprietor) contacts	
Cognita Safeguarding Manager - Asia (see note below)	Fiona Dixon – Safeguarding Manager Asia fiona.dixon@cognita.com
Education Director - Asia	Andrew Hancock andrew.hannock@cognita.com
Group Director of Education	Simon Camby Simon.Camby@cognita.com
Cognita Board member with responsibility for safeguarding	The Cognita Board Member with responsibility for safeguarding is Frank Maassen - Global CEO Frank.Maassen@cognita.com

Note: The Cognita Safeguarding Manager is a role which supports the development of effective safeguarding practice within the Cognita family of schools and will advise in the absence of statutory authorities. However, is not intended to replace, in any way, the statutory referral and reporting requirements of each country.

8   APPENDIX

8.1 SUMMARY POLICY
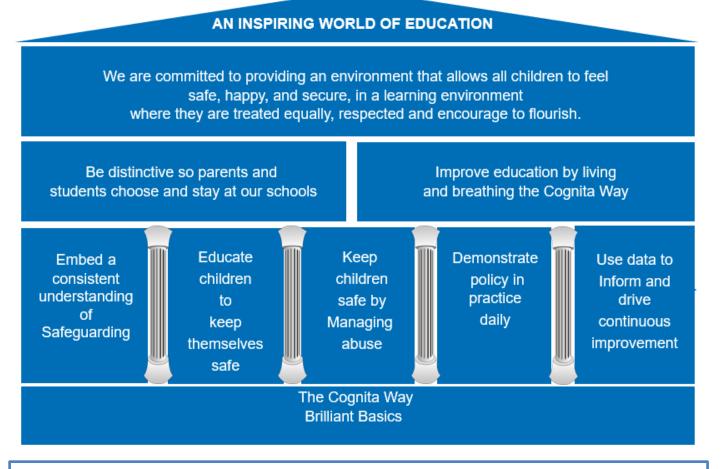
COGNITA

Safeguarding and Child Protection Policy

All adults working in Cognita Summary Policy

2022 – 2023
AIS 2023

Ownership and consultation	
Document author	CEO Asia / Safeguarding Manager – Asia
Consultation with	DSL's – Head of Schools, CEO Asia, Education Director - Asia
Guidance taken from UK Dept Education	"Keeping Children Safe in Education 2021"

Scope	All adults working in Cognita.

Document application and publication	
Asia	Yes

Version control	
Implementation date	July 2020
Review date	May 2021 May 2022 May 2023

Related documentation	
Related documentation	Code of Conduct Policy Acceptable Use of Information Technology / Social Media Policy Employee Handbook / Contract Handbook School Employee Handbook Staff or Company Contract document School Behaviour policy

AN INSPIRING WORLD OF EDUCATION

We are committed to providing an environment that allows all children to feel safe, happy, and secure, in a learning environment where they are treated equally, respected and encourage to flourish.

Be distinctive so parents and students choose and stay at our schools

Improve education by living and breathing the Cognita Way

Embed a consistent understanding of Safeguarding

Educate children to keep themselves safe

Keep children safe by Managing abuse

Demonstrate policy in practice daily

Use data to Inform and drive continuous improvement

The Cognita Way
Brilliant Basics

The Safeguarding of Children is our number one priority

Purpose

Our commitment is to safeguard and promote the wellbeing (including mental health) and safety of our students by creating and maintaining an open, safe, caring, and supportive atmosphere. This includes:

- Acting in the best interests of the child
- Ensuring that systems and procedures are in place to protect students
- Proactively teaching students about safeguarding

In our school, safeguarding is everyone's responsibility

Importance

All staff have the following responsibilities:

- Contribute to providing a safe environment in which all children can learn and flourish
- Know what to do if a child tells you that he or she is being abused or neglected
- Know what to do if you are concerned about the behaviour or conduct of an adult in the school
- Manage the requirement to maintain an appropriate level of confidentiality

Safeguarding Standards and Expectations

> # The safety and wellbeing of our students
> # is our number one priority

Safeguarding and promoting the welfare of children is everyone's responsibility	*We operate within a culture of openness and recognise and accept that abuse can happen in any organisation*	*We are a 'sharing organisation'* *All concerns should be reported*

All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL)

If a child is in immediate danger or at risk of harm a referral should be made to the relevant Child Protective Services and/or the police immediately. This referral would be made by the DSL, in consultation with the Head of School. The school must always inform the Safeguarding Manager Asia
fiona.dixon@cognita.com

An allegation about another adult in school should be referred to the Head of School	**An allegation about the Head of School should be referred to the Cognita Asia CEO**	**Any concern or 'nagging doubt' about an adult or child should be shared with the DSL or Head of School**

Types and signs of abuse

Abuse			
Physical abuse	Emotional abuse	Sexual abuse	Neglect

Abuse

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 online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Note - Corporal punishment

Corporal punishment, or the threat of it, is never permitted in the school. Whilst we recognise that the use of corporal punishment is some of our communities in Asia, the school will not accept the use of physical discipline.

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- respiratory problems from drowning, suffocation, or poisoning
- untreated or inadequately treated injuries
- bruising which looks like hand or finger marks or caused by an implement
- cigarette burns, human bites or
- scarring, scalds, and burns.

Emotional abuse

Emotional abuse is 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 as far 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), 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.

Signs of emotional abuse tend to be behavioural, for example, they may:

- *behave aggressively or be disruptive, act out, demand attention, and require more discipline than other children*
- *become angry or disinterested and/or show little creativity*
- *seem frightened of certain adults*
- *become sad, withdrawn, or depressed*
- *have trouble sleeping*
- *become sexually active at an early age*
- *exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children*
- *refuse to change for gym or participate in physical activities*
- *develop eating disorders*
- *self-harm*

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving an elevated 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. The sexual abuse of children by other children is a specific safeguarding issue in education.

Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection/diseases
- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth
- urinary infections
- difficulty walking, sitting, or standing
- persistent sore throats or
- stomachache.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse.
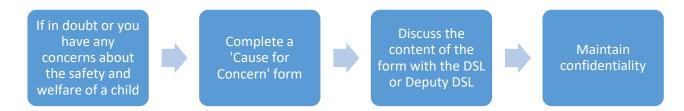
Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of neglect include:

- the child seems underweight or is small for their age, or their weight deteriorates
- the child seems very overweight for their age
- they are poorly clothed, with inadequate protection from the weather
- they are often absent from school for no apparent reason; or persistently arrive late or
- they are regularly left alone, or in charge of younger brothers or sisters.

Procedures- Reporting concerns

Safeguarding and promoting the welfare of children is everyone's responsibility (KCSIE 2019). All staff should know what to do when a child discloses abuse to them, they have concerns about a child's welfare, or when children or staff raise concerns about a student to them.

If in doubt or you have any concerns about the safety and welfare of a child	→	Complete a 'Cause for Concern' form	→	Discuss the content of the form with the DSL or Deputy DSL	→	Maintain confidentiality

All staff should report their concerns to the DSL, using the cause for concern form. Where possible, it is good practice to speak directly to the DSL. All concerns must be put in writing, using the words of a child where relevant. Operational or support staff may find it more comfortable to report concerns to their Line Manager, who will support them to complete the cause for concern form and to submit to the DSL.

Recording a disclosure or a concern that you have about a child.

Staff should make a written record of the conversation with the child as soon as possible, using a '**Cause for Concern Form**.' Staff should use the specific words that the child used (e.g. if referring to parts of their body), indicating these by using "speech marks/inverted commas."

If a disclosure of abuse has been made by the child, **immediately discuss the concerns verbally with the DSL, Deputy DSL, or Head of School** prior to writing up the record. If the DSL is not available then this should not delay appropriate action being taken and staff should speak to the DDSL, Head of School or, failing that, a member of the SLT. All documents should be kept in a secure location with restricted access.

Confidentiality

Staff should never guarantee confidentiality to students or adults wishing to tell them about something serious as this may not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told to ensure their safety.

Concerns about the actions of an adult

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt   communication to the DSL or Head of School of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children.

See the Code of Conduct for more information on Low Level Concerns, Self-Reporting, Allegations and Whistleblowing.

We are a 'telling' organisation
If you are concerned about the behaviour or actions of any adult…
speak to the DSL or Head of School

Key people and contacts

School contacts	
Designated Safeguarding Lead (DSL)	Refer to Safeguarding Staff Asia 2021 – 2022
Deputy Designated Safeguarding Lead (Deputy DSL)	Refer to Safeguarding Staff Asia 2021 – 2022
Any other staff trained to DSL / Leadership level	Refer to Safeguarding Staff Asia 2021 – 2022
Designated Safeguarding Lead with responsibility for safeguarding in early years	Refer to Safeguarding Staff Asia 2021 – 2022
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Head of School	Refer to Safeguarding Staff Asia 2021 – 2022
Head of HR	Refer to Safeguarding Staff Asia 2021 – 2022

Cognita (proprietor) contacts	
Cognita Safeguarding Manager - Asia (see note below)	Fiona Dixon – Safeguarding Manager Asia fiona.dixon@cognita.com
Education Director - Asia	Andrew Hancock andrew.hannock@cognita.com
Group Director of Education	Simon Camby Simon.Camby@cognita.com
Cognita Board member with responsibility for safeguarding	The Cognita Board Member with responsibility for safeguarding is Frank Maassen Global CEO

Note: The Cognita Safeguarding Manager is a role which supports the development of effective safeguarding practice within the Cognita family of schools and will advise in the absence of statutory authorities. However, is not intended to replace, in any way, the statutory referral and reporting requirements of each country.

Keeping yourself safe

By adhering to the safeguarding policy, you will:
- Make quick, prudent, informed, and confident decisions about safeguarding children
- Raise concerns around adult behaviours that leave you feeling uncomfortable or with a nagging doubt

- Protect yourself against false allegations
- Negotiate challenging times or situations in your working life, by being aligned with the agreed standards and expectations.

Remember: The Code of Conduct gives full details of the process of self -report, raising a low-level concern about an adult, making an allegation or how to whistle blow.

Cognita's role in protecting children is aligned to UK standards.

1. **Keeping Children Safe in Education 2021**
2. **Teaching standards (Part Two)**
   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/665522/Teachers_standard_information.pdf

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	Guardianship concerns
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Suicide ideology	Sexual coercion or harmful sexual behaviours
Eating disorder	Cyber bullying
Mental illness	Relationship abuse
Mental Health and Wellbeing	**Mental Health and Wellbeing**
Anxiety	PTSD (Post Traumatic Stress disorder)
Distress, e.g. bereavement, long term illness etc	Addiction disorders
Depression	Gaming addiction
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