



**Kehoe-France
Safeguarding
&
Child Protection Policy**

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Section I. Introduction & Context

I. Our principles, beliefs and philosophy

Kehoe-France recognizes its role in safeguarding children as our primary concern. All staff of the school are considered by Louisiana state law as ‘mandated reporters’ who must report any and all allegations of abuse that are shared with them. In holding this responsibility for our students, Kehoe-France staff adhere to the following basic principles to maintain the safety of our students.

- A child’s welfare is paramount and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender, or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/guardians and/or other professionals to ensure the protection of our students.
- Our guiding principle throughout is always to act in the best interest of all students.

II. Aims and objectives

Our school aims to:

- Provide a world class, safe and happy environment to enable students to thrive and learn.
- Outline the systems and processes we all take to ensure that students remain safe at school.
- Raise awareness to all staff of safeguarding/child protection issues, and define their roles and responsibilities in reporting possible cases of abuse.
- Identify students who are suffering, or likely to suffer harm.
- Ensure effective communication between all staff on child protection/safeguarding issues.
- Set effective procedures for staff/volunteers or third party individuals who encounter any issues in relation to child protection/safeguarding to follow.
- Be clear with all parties, including students and their parents/carers, regarding our approach to safeguarding and child protection, through the provision of clear policies.

III. Accountability and ownership

This policy will be endorsed and adopted at the highest levels, both in our school and in the International Schools Partnership organization. The policy is both created in partnership with and approved by the ISP Group Health & Safety Director. This policy is to be applied to any partner organization or agency with unsupervised access to children and young people through their work in our school, as well as any contracted organization working on our school site.

IV. Definitions

Safeguarding: Safeguarding and promoting the welfare of children refers to the processes of protecting students from harm, preventing the impairment of their health and development, ensuring that we seek to improve the general health and well-being of all students in our care and enabling every student to have the optimum life chances and transition from their time at Kehoe-France successfully.

Child Protection: Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect.

Purpose of Policy: If our school's preventative work around safeguarding issues is not appropriate or extensive enough, students identified as being a concern may move to being identified as at risk of significant harm. It may be necessary to then employ outside agencies or support to best serve such a child. Although other factors outside of the school's control may influence a child in this regard, the purpose of the policy is to work proactively to ensure that we take whatever measures possible to avoid this as much as possible.

Section II. Rationale

I. Principles and expectations

This policy sets out the principles and expectations which must be adopted by all members of the staff and the school as a whole. The policy describes the steps that are taken in meeting our commitment to safeguarding students, at all levels: classroom, athletic fields, extracurricular spaces, and the school as a whole. Kehoe-France's policy for safeguarding is grounded in the following principles.

- The best interests of children must be the primary concern in decision making about them.
- Children have the right to get and share information as long as it is not damaging to them or another child.
- Children have the right to think and believe what they want and to practice their religion.
- Children have the right to be protected from hurt and mistreatment, physically and mentally.
- The school as an agency should take every measure to protect children from sexual exploitation and abuse.
- The school as an agency should take all measures to ensure that children are not abducted, sold, or trafficked.
- Children should be protected from any activity that takes advantage of them or could harm their welfare and development.
- No one is allowed to punish children in a cruel or harmful way.

II. Related documents

This overarching safeguarding/child protection policy should be read in conjunction with Kehoe-France's Health & Safety plans, the Kehoe-France Faculty Handbook and Family Handbooks, and the Kehoe-France Physical Intervention Policy.

Section III. Organizational & Individual Responsibilities

I. Senior Leadership Team Responsibilities

The Head of School and Division Principals recognize their ultimate responsibility to ensure that Kehoe-France School and its staff understand and follow the guidance provided by this and all other safeguarding related policies.

The Senior Leadership Team is responsible for the following:

- Ensure that this policy and procedures are implemented across the school and followed by all staff and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and any deputy Designated Safeguarding Lead to carry out their role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the school site is secure.
- Customize this policy and make amendments as necessary for Kehoe-France each school year.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's customized version of this policy.
- Only deploy staff, who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy.

II. Responsibilities of the Designated Safeguarding Lead (DSL) in the school

It is the policy of Kehoe-France to, at all times, identify at least one named person designated as the Designated Safeguarding Lead (DSL), to support the Head of School, Division Principals, and teaching staff on campus. The DSL will receive appropriate safeguarding training to equip them to undertake their role, be given sufficient time in the working day to undertake the role, and be able to prioritize safeguarding when necessary.

The DSL may be the Head of School or a Division Principal, but he/she will be subject to the same training and processes as every other Designated Safeguarding Lead. It is therefore advised that the Senior Leadership Team always give careful consideration before choosing a person in the SLT as the DSL.

The role of the DSL is guided by two principles:

1. The welfare of the child is always paramount.
2. Confidentiality should be respected as far as is reasonably possible.

The Designated Safeguarding Lead is responsible for the following:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the Head of School and Division Principals, make sure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Have appropriate training in addition to the basic training that all other staff receive.
- Collate and keep accurate and confidential records of any concerns about children.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL is and that the DSL maintains open lines of communication and availability for the school staff.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All staff have the responsibility to report to the Designated Safeguarding Lead any concern they have about the safety of any child in their care. The DSL's responsibility is to make decisions about what to do next and then to take appropriate action.

III. Responsibilities of all staff

All staff who have unsupervised contact with children are responsible for the following:

- Ensure they are familiar with and follow this safeguarding policy and all other safeguarding related policies (e.g., Health & Safety Manuals, Faculty Handbook, Family Handbooks, Intimate Care Policy, Physical Intervention Policy)
- Be subject to safe recruitment processes and checks prior to starting at the school (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed).
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead.
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by Kehoe-France School or International Schools Partnership) .
- All staff and volunteers need to recognize that if their behavior inside or outside the workplace breaches the ISP and Kehoe-France code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

All staff who have occasional or supervised contact with children (including staff from partnering or third party agencies) are responsible for the following:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- Provide written confirmation to demonstrate that, where appropriate, all partner groups or third party agency staff members have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these staff (appropriate and tailored according to their role with children and level of involvement), before they begin their role at Kehoe-France.
- If staff or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the Head of School/Division Principals/Designated Safeguarding Lead to assess this risk, not individual members of staff or partner organizations/third party agencies themselves.
- When partner organizations/third party agencies do not have their own safeguarding or child protection policy, Kehoe-France School will provide a copy of its own policy and ask the staff of said partner organizations or agencies to read and follow these procedures. These requirements must be part of any contractual agreement.
- Follow the guidance laid down in this policy at all times.
- Be provided with guidance on appropriate safe working practices.

Section IV. Training & Support

I. Training

Kehoe-France accepts the responsibility to ensure that:

- All staff and volunteers in schools are provided with appropriate general safeguarding training on joining the organization and then at least every three years. This training will be available through International Schools Partnership, Kehoe-France School and other online platforms, as well as face-to-face events.
- Relevant policies are made available in a range of relevant languages.
- Staff and volunteers are supported and have the necessary skills to recognize and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up-to-date knowledge and that they access appropriate additional and specialist training (approved by International Schools Partnership and the Senior Leadership Team of Kehoe-France School).
- All staff and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate staff are trained in safe recruitment. This safe recruitment training must be renewed every five years.
- Training for new starters must be complete before any new employee can have unsupervised contact with students.
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating authority (if involved), students can be offered direct support through our School Counselor or through an

outside agency's involvement. Kehoe-France School and its DSL are responsible to hold information in relation to local, regional, or national bodies that may be able to offer direct support in these circumstances.

II. Support

Kehoe-France also recognizes the importance and the duty of care to our staff when in reporting and responding to abuse. The DSL and SLT maintain a position of brokering appropriate external support or counseling for any staff member affected by a safeguarding issue.

Please remember that unless you are specifically asked to do so, never carry out an investigation about any suspected abuse. This can be highly specialized work and could interfere with a criminal investigation if this were required and appropriate under local laws.

Section V. Forms of Abuse

I. Four main types of abuse

There are a significant number of ways that students may be exposed to risk and danger. All require a response. Abuse is defined as any form of maltreatment of a child. This can manifest itself as direct harm to a child, or by a failure to take action to protect a child who is at risk of, or already suffering harm.

The more commonly referred to types of abuse are:

1. **Physical abuse**: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise causing harm to a child.
2. **Emotional abuse**: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved or valued only insofar as they meet the needs of another person.
3. **Sexual abuse**: involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This form of abuse can involve direct contact activities but also non-contact activities over social media or the Internet.
4. **Neglect**: this is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development.

II. Specific forms of abuse

While the above mentioned categories of abuse are the four main areas, abuse itself can take many forms involving one or more of these areas. Kehoe-France staff need to be aware of what to look for and what actions to take when concerned about any of these issues (or any other concerns).

1. **Female genital mutilation (FGM)**: FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with through the procedures set out in this document where possible. FGM is potentially damaging to children both emotionally and in terms of health issues. We recognize that this is a cultural practice in some countries and not always

seen as abusive. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the student's best interests.

2. Forced marriages (FM): A forced marriage is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g., threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g., if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent. As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests. The school procedures must be followed, however, in the same way as for any other safeguarding or child protection matter.
3. Self-Harm: Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. Therefore, whatever the reason, it should be taken seriously. The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving or having relationship problems with family or friends. The feelings that these issues bring up can include: low self-esteem, low confidence, loneliness, sadness, anger, numbness and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

There are some common themes that may help staff identify concerns including:

- Physical indicators such as cuts, bruises, burnes, bald patches (where hair has been pulled out)
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal

If staff suspect that a student is self-harming this must be referred to the DSL who will consider the next steps. It is likely that this will require discussion with the student involved and their parents/guardians to agree a course of action or referral to an organization that may be able to support the student.

4. Child Sexual Exploitation (CSE): The sexual exploitation of children and young people under 18 can involve exploitative relationships where young people receive something in return for performing sexual acts. Exploitation of

any student can occur on a face-to-face level or through the use of technology, such as mobile phones or computers. In these situations a student could be encouraged to send or post indecent images of themselves. In all cases the person exploiting students does so by misusing the power they have over them. This power may come through virtue of age, physical strength and/or economic resources. Violence, intimidation and coercion are common in exploitative relationships.

5. **Sexting:** Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. Sexting may also be referred to by students as trading nudes, dirties or pic-for-pic. There are many reasons why a student may want to send a naked or semi-naked picture, video or message to someone else:
 - Joining in because they think that ‘everyone is doing it’
 - Boosting their self-esteem
 - Flirting with others and testing their sexual identity
 - Exploring their sexual feelings
 - To get attention and connect with new people on social media
 - They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent

Students often do not realize that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting.

The above listed forms of abuse are not to be considered as an exhaustive list of all the potential forms of abuse that may harm a child and that staff may have to deal with. In any event of suspected abuse, the same protocol must be followed.

Section VI. Specific Safeguarding Issues

I. Internet safety

The growth in electronic media in everyday life and an ever-developing variety of devices create additional risks for children. Risks and dangers of being online include:

- Inappropriate content
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming)
- Grooming and sexual abuse
- Sharing personal information
- Gambling or running up debts
- Cyber bullying

Cyber bullying is an increasingly common form of bullying behavior and is most often related to social networks and mobile phones. Kehoe-France believes the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, as well as our school counseling program. The school’s curriculum includes appropriate and frequent

opportunities to teach children how to recognize when they and others are at risk and equips them with the skills, strategies and language they need to take appropriate action.

II. Mobile phone, iPad, and other photographic devices

It is our policy that teachers who use personal equipment to capture images of students upload these images to the school's system as soon as possible and immediately delete them from personal devices. The school issues a 'Publication Permission Form' each year for families to submit permission for the inclusion of their child's picture in the yearbook, local newspapers, school newsletter, and school social media. All staff have access to this list and must adhere to the permissions granted at all times.

III. Allegations against staff or school volunteers

An allegation can be made against a staff member or volunteer at any time. It is important that any such allegations are treated seriously and appropriate procedures followed.

An allegation is different to a complaint and can be defined as follows:

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal offense against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.

In the event of an allegation being made against a member of the school staff (or a volunteer), it will always be referred to and investigated by the Senior Leadership Team. If a criminal act has been committed, however, in which case the matter should be referred to the local authorities when appropriate. If a member of the SLT deems the allegation to be a safeguarding matter, then the DSL shall be informed as soon as possible, and no longer than 24 hours. Human Resources must also be informed by contacting the Regional HR Director as soon as possible and no longer than 24 hours. In the case of the allegation being made against a member of the SLT, the following staff shall be informed and move forward with protocol: Regional Director, Regional HR Director, ISP Group Head of Safeguarding, and the Kehoe-France Designated Safeguarding Lead. If it is felt after initial consultations that further inquiries are needed in the investigation, a staff member may be suspended. Suspension is maintained as a neutral act, and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the Regional HR Director and Group Head of Safeguarding before acting and will comply with nationally and locally agreed guidance on these matters. Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within ISP and Kehoe-France's code of conduct for staff and volunteers.

IV. *Whistleblowing*

Kehoe-France recognizes that we cannot expect children to raise concerns in an environment where adults fail to do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are considered to be a protected disclosure, and even if proven to be unfounded, no action will be taken against the whistleblower.

Malicious whistleblowing, however, will be seen as a potential disciplinary matter.

V. *Anti-bullying*

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviors. Bullying may involve either face-to-face interactions or the misuse of social media or technology. Concerns regarding bullying should be brought to our School Counselor.

VI. *Children with special educational needs or other exceptionalities*

All staff should recognize that children with special educational needs and disabilities can mean additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognize signs of abuse. For example, it is easy to assume that a child's mood, behavior, or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognized that children with disabilities may be disproportionately impacted by behaviors such as bullying, but they may not show any outward signs. Communication difficulties, in particular, can make it very difficult for a child to indicate what's happening, and therefore may make it very difficult to overcome any such barrier. Staff should be extra vigilant and report any and all concerns, avoiding making assumptions about the causes of any injury or behavior.

VII. *Peer-on-peer abuse (allegations made by a child about another child)*

Kehoe-France recognizes that it is an unfortunate truth that children are capable of abusing their peers. Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. Peer-on-peer abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse. Examples can include girls being touched/assaulted inappropriately by boys, or boys themselves being subject to initiation violence. This type of peer-on-peer behavior will not be tolerated. Under no circumstance should an allegation that one child has possibly abused another be treated as "just children being children" or "experimentation." If the alleged actions are unwanted or involve minors who may not be able to give consent by virtue of their age or any disability, then this is potentially abusive and the school procedures should be followed in the same way as for any other safeguarding or child protection matter.

VIII. Physical intervention/restraint

There may be times when adults in schools, in the course of their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm or causing harm against others. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation.

The Head of School and/or Division Principal(s) must require any adult involved in any such incident to report the matter to the Senior Leadership Team as soon as possible. The staff member is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified and spoken to when possible. Footage from security cameras may need to be referenced and saved as well as record of the incident.

When intervention has been required, a member of the SLT must debrief any students involved and allow them to describe the incident from their point of view. Written notes of this conversation should be kept and the student checked for any injuries.

Parents/guardians must always be informed when an intervention has been necessary.

Please refer to our Physical Intervention Policy for more detailed information.

IX. Safe recruitment and selection

Kehoe-France School will do all they can to ensure that all those working with children in our school are suitable people. In order to do this, all staff who will work in an unsupervised capacity with children or young people will be recruited using safe recruitment procedures.

Safe recruitment involves scrutinizing applicants through the interview process with the use of a team, application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last ten years, as well as the use of drug testing. At least one member of any interviewing team must have undertaken safe recruitment training.

Section VII. Procedures for safeguarding

I. Initial concern

If, at any time, staff suspect that any student in their care may be a victim of abuse, or is at risk of abuse or other form of harm, they should not try to investigate, and instead inform the Designated Safeguarding Lead about their concerns as soon as possible through the use of the school's "pink form" (Record of Concern Form).

Staff must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm. In many cases a student will not make a direct disclosure, but staff will be concerned because of a physical or emotional indicator. In these circumstances staff should still use the Record of Concern Form.

When a student makes any form of direct disclosure, the guidelines under the section below "Dealing with disclosure, reporting and further action" should be followed.

II. Dealing with disclosure, reporting and further action

Be aware that if a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.

The following guidance is based on five key practices for all staff:

1. **Receive**
When possible, always stop and listen to a child who wishes to speak in confidence. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say "I can't stop now but come and see me in my office at..." When possible during any disclosure try to listen, allow silences and try not to show shock or disbelief.
2. **Reassure**
Try to stay calm, make no judgments and empathize with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.
3. **React**
React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as "Is there anything else you need to tell me?" Try not to criticize the alleged perpetrator as this may be a family member for whom the child may still have feelings.
4. **Record**
Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date and place as well.

5. Report

When a child makes any disclosure, or when you have concerns for any reason, it is very important that the procedures outlined in this policy are followed. A full written/typed account of the concern must be made on the Record of Concern Form and given to the Designated Safeguarding Lead as soon as possible. If necessary, use the body map found at the end of this manual as well. If the DSL determines that a report must be made to the Louisiana Department of Children and Family Services, you will be responsible for making that report per Louisiana state law. The DSL will guide any individual through this process.

When a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Head of School/Division Principals in the absence of the DSL), should be informed as soon as possible. The DSL will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The DSL will then consider, and when necessary, consult on the information available. It is the role of the DSL to make decisions regarding what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially. Upon submitting a Record of Concern Form, a teacher or other staff member should not engage in conversation with other individuals outside of the DSL or members of the SLT regarding the concern. Issues recorded on these forms are inappropriate topics of conversation for large groups of staff, and it is the determination of the DSL as to who should be informed of the progress of any ongoing counseling or care of the child, or investigation.

It is the responsibility of the DSL to maintain a current list of external agencies or professionals whom the school can contact for support during this process. Additionally, it is always an option to contact the Group Head of Safeguarding with the International Schools Partnership for additional guidance and support.

Section VIII. Record Keeping & Confidentiality

I. Record Keeping

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept together securely and separately from the child's general school records. The information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it should not be shared more widely than that.

- Child protection records are held in a yellow folder in a secure filing cabinet accessible to the Designated Safeguarding Lead and other senior staff in our school to ensure reasonable access.
- Records of any child disclosure should be clearly dated and filed without future amendment.
- Child protection records should be separate from the general education file, but the child's general school record file should be marked to indicate that a

child protection file exists (e.g., red star or something similar). All staff who may need to consult a child's school file should be made aware of what the symbol means and who to consult if they see this symbol.

- A child protection file should be started for an individual child as soon as the school is aware of any child protection concerns about that child. This may arise in a number of ways:
 - If a member of staff raises a concern about the welfare or wellbeing of a child-this should be recorded in writing on a Record of Concern Form.
 - If information is forwarded to the school by a previous school attended by the child.
 - If the school is alerted by another agency of child protection concerns about that child.
- Members of staff should make a written/typed account of any concern they have regarding the welfare or wellbeing of a child, using the school's pro forma. This record should be passed as soon as possible to the Designated Safeguarding Lead. Concerns, which initially seem trivial, may turn out to be vital pieces of information later. So, it is important to give as much detail as possible. A concern raised may not progress further than a conversation with the DSL, but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from a file for any reason, a dated note should be placed in the file indicating who has taken it, why and when.
- The record pro forma must include:
 - A record of the child's details: name, date of birth, address and family details
 - Date and time of the event/concerns
 - The nature of the concern raised
 - The action taken and by whom: name and position of the person making the record
- In the case of disclosure, remember the record you make should include:
 - As full an account as possible of what the child said (in their own words)
 - An account of the questions put to the child
 - Time and place of disclosure
 - Who was present at the time of the disclosure
 - The demeanor of the child, where the child was taken and where returned to at the end of the disclosure

II. Confidentiality

Our school should regard all information relating to individual Safeguarding/child protection issues as confidential, and should treat it accordingly. Information should be passed on to appropriate persons only at the discretion of the Head of School/Division Principals/Designated Safeguarding Lead and this should always be based on the need to know.

All records relating to child protection should be secured appropriately. Such information can be stored electronically but contemporaneous notes should be scanned and kept in original format.

Section IX. Auditing, Reporting, Review and Sign-off

To support the implementation of the Safeguarding and Child Protection Policy and to ensure that our school remains in compliance with the expectations of the International Schools Partnership, it is customary for the Group Head of Safeguarding to provide routine audits of our program and files. It is the responsibility of the Senior Leadership Team and Designated Safeguarding Lead to respond to any items on the Action Plan as the result of an audit.

This policy is owned by Kehoe-France and is made available to students and/or parents in hard copy upon request. The policy can also be translated into key languages, if necessary.

This policy will be reviewed and updated on a regular basis but at a minimum of once every two years.