



Safeguarding Policy 2026 - 2027

This policy applies to: BCVN Early Years Foundation Stage, Preparatory and Senior School

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	This policy is reviewed by the College Designated Safeguarding Lead working with the Head of College and Head of Prep

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SECTION ONE: INTRODUCTION, SCOPE, PERSONNEL

1.1 Introduction to Safeguarding at Brighton College Vietnam

Safeguarding and promoting the welfare of children is defined as:

- *Providing help and support to meet the needs of children as soon as problems emerge*
- *protecting children from maltreatment, whether that is within or outside the home, including online*
- *preventing the impairment of children's mental and physical health or development*
- *ensuring that children grow up in circumstances consistent with the provision of safe and effective care*
- *taking action to enable all children to have the best outcomes.*

The core safeguarding principles of both Brighton College Vietnam Senior School and Brighton College Vietnam Prep School, including those in the Early Years Foundation Stage, referred hereafter to as the 'College', are:

- a. It is the responsibility of the College to safeguard and actively promote the welfare of children.
- b. Children who are and feel safe make more successful learners.

The Safeguarding and Child Protection Policy, together with the effectiveness of its implementation, is reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

This policy (which includes all sections and all of the appendices in this document) is one of a series in the College's integrated safeguarding portfolio. This policy, is addressed to all members of staff and volunteers, is available to parents on request and is published on the College website. It applies wherever staff or volunteers are working with pupils even where this is away from the College, for example at an activity centre or on an educational visit.

Vietnamese Law (102/2016/QH13 and Decree No56/2017/ND-CP) provides a clear statutory framework to support Child protection in Vietnam. BCVN strictly adheres to all applicable local laws with regard to Safeguarding and Child Protection.

This policy has been developed in accordance with the principles established by the UN Convention on the Rights of the Child, *Education and Skills Act 2008*, the *Children Acts 1989 and 2004*, the *Children and Social Work Act 2017* and the *Childcare Act 2006*; the *Education (Independent School Standards) Regulations 2014* ; and in line with government publications: [Working Together to Safeguard Children](#) (December 2023), [Keeping Children Safe in Education](#) (September 2026) (KCSIE). This policy also takes into account further statutory guidance applicable to the College comprising:

- [Disqualification under the Childcare Act 2006 \(DfE, August 2018\)](#)
- [Multi-agency statutory guidance on female genital mutilation \(HM Government, July](#)

2020)

- *What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)*
- *Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)*
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people (HM Government December 2020)*
- *Children missing education (DfE, September 2016)*
- *Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017)*

In this policy, the Head refers to the Head of College of Brighton College Vietnam, and the Head of Prep. 'CDSL' refers to the College Designated Safeguarding Lead, 'DSL' refers to the 'Designated Safeguarding Lead' and 'DDSL' as the Deputy Designated Safeguarding Lead.

In significant or complex cases, it will be necessary to call upon the expertise and advice of the BCI and BCUK teams who may be prevailed upon to provide specialist support where this is not locally available and to ensure that actions are in line with best practice in the UK.

In ensuring this policy is put into practice in the College, where the CDSL/DSL is unavailable, the DDSL will act to fulfil the responsibilities and roles outlined below.

1.2 Policy Statement, Principles and Aims

Policy Statement

The protection and welfare of pupils at Brighton College Vietnam is of paramount importance. Children and parents have a right to expect the College to provide a safe and secure environment and the College has a general duty for children's welfare as part of its role "*in loco parentis*". The College recognises its moral and statutory responsibility to safeguard and promote the welfare of all children and create a culture of safety, equality and protection. We endeavour to provide a safe and welcoming environment where children are listened to, respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

Principles

Equality, inclusion and anti-discriminatory safeguarding

Safeguarding at BCVN is inclusive and non-discriminatory. The College will consider how disability, additional educational needs, language or communication barriers, social circumstances, discrimination, prejudice, isolation and other contextual factors may affect a pupil's ability to recognise, disclose or escape abuse. Staff must avoid assumptions that changes in behaviour, mood, attendance or presentation are solely attributable to a pupil's existing needs or circumstances.

The College will promote dignity, respect, participation and pupil voice. Pupils should be supported to express their wishes and feelings, and these views should inform safeguarding decisions wherever this can be achieved safely and appropriately.

'It Could Happen Here'

This is a vital principle underpinning all training and approaches to safeguarding at Brighton College Vietnam.

Brighton College Vietnam is committed to safeguarding and promoting the welfare of children and young people and fostering a culture of safety, equality and protection. It expects all staff to share this commitment so as to create an open environment where staff and pupils feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary:

- The College will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities, policies and processes.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties.
- All staff are responsible for safeguarding the welfare of children as part of their professional duties.
- Indeed, everyone who comes into contact with children and their families and carers has a role to play in safeguarding children.
- No single professional can have a full picture of a child's needs and circumstances; everyone who comes into contact with the child and their family has a role to play.
- All staff have an equal responsibility to act, in accordance with this policy, our College procedures and on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of harm; The safety of a child is of the utmost importance, overriding any additional concerns, for example, relating to data protection or fears of sharing information;
- The College plays a key role because staff are in a position to identify concerns early, provide help for children and prevent concerns from escalating.
- The welfare of pupils at the College is safeguarded and promoted by the drawing up and effective implementation of written risk assessment policies; and appropriate action is taken to reduce risks that are identified.

The Best Interests of the Child

A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible.

Paramount in all dealings should be asking what is in the best interests of the child and all the College's systems, processes and policies operate with the best interests of the child at their heart.

Safer Recruitment

The College is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the College's Recruitment policy.

Appropriate Support and Training

All pupils and staff involved in child protection issues will receive appropriate support from the CLT who will follow this policy guidance in all that they do.

Multi-agency work

The College will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering harm or who may suffer harm without appropriate intervention. The College will work with UNICEF Vietnam, the Vietnamese Department of Child Affairs, the Police, Health and other services to promote the welfare of children and to protect them from harm. The College understands its duty to work with the local agencies to support assessments made of children in need.

The College recognises and understands the important role it plays in the wider safeguarding system, particularly in relation to in-school help and any initial support given to the pupils to ensure that pupils receive the right help at the right time.

Seeking Early Help in our Vietnamese context means providing support as soon as a problem emerges at any point in a child's life. It may require staff to support other agencies and professionals in an assessment, sharing information in the best interests of the child.

Where requested to do so, the College will allow access for children's social care from the Local Vietnamese Children's Services and, where appropriate, for that authority to conduct, or to consider whether to conduct, further investigations or an assessment. In addition, the College will comply with any request to supply information to Local Vietnamese Children's Services that it requires in order for it to perform its functions.

The College understands the importance of all involved in supporting children and families sharing information and taking prompt action.

Aims of this policy

The aims of this policy are as follows:

- to actively promote and safeguard the welfare of children, staff and others who come into contact with BCVN and to protect them from harm, thereby fostering a culture of safety, equality and protection.
- to have clear procedures in place for dealing with and referring concerns about a pupil's welfare and allegations of abuse.
- to raise the awareness of all those within the school communities who come into contact with children, including the Head, staff and volunteers, of their responsibilities to safeguard children and to report concerns.
- to ensure consistent good safeguarding practice throughout the College.

1.3 Framework for the policy

There are five main elements:

- Establishing a safe environment in which children can learn and develop, and which protects all those who come into contact with the school from harm.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Ensuring safe recruitment in checking the suitability of staff and volunteers to work with children.
- Developing and then implementing procedures for identifying and reporting cases, or suspected or likely cases, of abuse, neglect or harm.

- In accordance with his/her agreed child protection plan, supporting pupils who have been abused.

Extra-familial and contextual safeguarding

The College recognises that safeguarding risks may arise outside the family home and outside the school site, including in peer groups, relationships, the community, online environments, transport, residential settings, host-family arrangements and other places where pupils spend time. Staff should consider the wider context of a pupil's life when assessing risk and should not assume that a safeguarding concern is confined to the location where it was first identified.

1.4 Practical Use

Although this policy is necessarily detailed, it is important to the College that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The College welcomes feedback on how we can continue to improve our policies.

1.5 Key Personnel

All key personnel can be found on page 1.

Ann Jackson as the College Designated Safeguarding Lead (CDSL), has lead responsibility for safeguarding and child protection (including online safety) across the College, with **Kate Brosnan** acting as the DSL in the Early Years Foundation Stage and Prep School. Whilst the activities of the C/DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection (including online safety) remains with the College Designated Safeguarding Lead.

The Safeguarding team also comprises **Mr David Healey** (Lower Prep, Deputy DSL), **Mr Daniel Smith** (Upper Prep, Deputy DSL), **Mr Peter Richards** (Head of KS3, Deputy DSL), **Ms Nicola Taylor** (Head of KS4 and Deputy DSL), **Mr Jason Sannegadu** (Head of KS5, Deputy DSL). The Safeguarding Team are supported by the Pastoral Care Officers, the School Psychology Officers and the School Nurses. The DSLs meet at least fortnightly during term time. Each school's D/DSL team also meets regularly, and the College DSL team meets twice a Term.

The DSL in each school is the first point of contact for all staff. The CDSL will communicate with Children's Services and Police locally, where necessary. The Head of College is informed as a matter of course about all safeguarding matters and a team-based approach is always the method of proceeding. She will inform the CEO of any cases that may require appropriate high-level support.

Pupils are made aware of the Safeguarding Team's names through assemblies, tutor periods, RSHE sessions and prominent signs in both the Senior School and Prep School.

SECTION TWO: AREAS OF COLLEGE LIFE UNDERPINNED BY SAFEGUARDING

2.1 Pupils' respect for each other

2.1.1 Child-on-Child abuse

Children may be harmed by other children or young people. All staff working with children are advised to maintain an attitude of 'it could happen here', and this is especially important when considering child-on-child abuse.

The College will remain alert to serious violence, criminal exploitation, sexual exploitation, coercive peer relationships, discriminatory abuse and harmful sexual behaviour between pupils. Behaviour that appears consensual or mutual should still be assessed where there is an imbalance of power, coercion, manipulation, exploitation or developmental concern.

All staff should be aware of how **child-on-child abuse** may manifest itself:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers (sometimes called teenage relationship abuse);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Physical assault and harm, or the threat of harm with a weapon;
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, misogyny, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery), including those generated using AI;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

As stated in the 'The Independent Inquiry into Child Sexual Abuse' (IICSA) report, in relation to harmful sexual behaviour between pupils, staff should adopt the attitude "**it is probably happening here**".

Sexualised behaviour exists on a continuum from developmentally expected behaviour through inappropriate or problematic behaviour to abusive or violent behaviour. Staff should not wait for behaviour to escalate before raising a concern. Early intervention, professional curiosity, appropriate education and safeguarding action should be used where behaviour indicates a potential risk of harm.

The College seeks to minimise the risk of child-on-child abuse through appropriate supervision of

pupils, and regular education on high standards of courtesy and respect expected in the language and behaviour of pupils to one another, whether on- line or in person. Child-on-child abuse can be 'gendered' but staff are clear that all child-on-child abuse is unacceptable and will be taken seriously; so-called 'banter' is not an acceptable vehicle for unkindness or abusive behaviour towards others and specific lessons about effectiveness of messaging and reporting processes.

Staff will be aware of the harm caused by bullying and will use the College's anti-bullying procedures where necessary. However, there will be occasions when a child's (or children's) behaviour warrants a response under child protection rather than anti-bullying procedures. All such instances must be reported to the DSL and will be dealt with in accordance with the procedures above. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and local services.

Investigating child-on-child abuse

Regardless of the form in which child-on-child abuse manifests itself, the College's initial response will be to support all members of the College community who may be involved as a priority. Until investigations have been undertaken and findings made, the College will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation.

Part 5 of KCSIE contains information about how schools should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and/or online.

Investigations into alleged child-on-child abuse require particularly sensitive handling, as the College will be dealing with potentially traumatic and conflicting accounts from pupils. The College will usually seek to involve parents at an early stage so that pupils, whether alleged victims or alleged perpetrators, have family support. In the case of alleged behaviour that is potentially criminal, the College will seek appropriate advice from the Police before carrying out any investigations.

In line with KCSIE, the College will seek to give alleged victims as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. Regarding the alleged perpetrator(s), disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent the College from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. The College will consider this on a case-by-case basis, with the DSL taking a leading role and coordinating closely with other agencies. The College always considers if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. A pupil (or pupils) against whom an allegation of abuse has been made may be suspended from the College during the investigation.

The alleged victim and the alleged perpetrator of child-on-child abuse will be given strong support, in co-ordination with their family or carer, via the pastoral system and a school psychologist, using external experts where appropriate.

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the College will work with other relevant agencies to maintain the safety of the whole College community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and

perpetrator – i.e. all children involved will be treated as being “at risk”.

2.1.2 Sexual Violence and Sexual Harassment

The College has a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable, and it will not be tolerated.

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with Additional Needs and LGBTQ+ children are at greater risk.

Staff at Brighton College Vietnam are all expected to be aware of the importance of:

- making clear that sexual violence and sexual harassment is never acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Staff must understand that dismissing or tolerating such behaviours risks normalising them.

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

Sexual violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

What is consent?

This vital question is covered in RSHE in the Senior School to ensure that pupils understand consent in an age-appropriate context. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Sexual harassment

Sexual harassment is ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can cross a line into sexual violence and in considering this the College will take into account the experience of the victim.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual

- remarks about clothes and appearance and calling someone sexualised names.
- sexual “jokes” or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes.
- displaying pictures, photos or drawings of a sexual nature.
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include consensual and non-consensual sharing of nude and semi-nude images and videos; sharing of unwanted explicit content; upskirting; sexualised online bullying; unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threats.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the DSL or a DDSL. Pupils are regularly reminded of how to contact the safeguarding team, or another member of staff, with any concerns they may have. Whilst making a report to an appropriate adult is the preferred route for pupils to raise concerns, it is recognised that pupils may, on occasion, use the internet/social media to relate stories of harassment/violence. If these are brought to the attention of the school, they will be investigated and referred in accordance with the procedures within this policy. Where there is a safeguarding concern, the school will ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide.

Any external agencies, who can help and support victims of sexual violence and harassment, should be publicised to pupils, along with the internal Brighton College reporting and support mechanisms.

2.1.3 Sharing nudes and semi-nudes/Sexting (Youth Produced Sexual Imagery)

What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges, this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services such as Apple’s AirDrop which works offline or other digital services.

The College's safeguarding response also covers self-generated, digitally altered or wholly AI-generated nude or semi-nude images, including images sometimes described as deepfakes or 'deep nudes'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year-olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention: Report it to the DSL immediately.

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), self-refer this to the DSL, and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

The College employs a very wide range of measures to support pupils and parents in making wise and sensible use of the internet. These include assemblies and sessions within the RSHE curriculum for all year groups; parents' workshops or seminars; online safety courses; annual Safer Internet Day. All of this takes place within a framework of work on self-esteem, confidence and treating people with kindness and respect, in 'real life' and on-line.

In addition to making the sanctions for involvement in the sharing of digital nudes or semi-nudes very clear, the College will provide appropriate pastoral support to the perpetrator and the victim

2.1.4 Sexually active pupils

If a pupil reveals that he or she is sexually active it may be a child protection issue. The member of staff concerned should report this to the DSL. They will then decide, having due regard to the pupil's age and maturity, whether this is indeed a child protection issue. If so, steps should be taken to arrange appropriate support. The School Nurses, parents and members of the Senior Leadership Team will be consulted where appropriate. If sexual activity were to take place on school premises or on a school trip (when normal school rules always apply), this would also be considered a disciplinary matter.

The DSL will, when considering who needs to be informed, consider matters of the age of the pupils involved and the possibility of child-on-child abuse.

2.1.5 Children who may be at increased risk of harm

Some pupils may be at increased risk because of disability or additional educational needs, communication difficulties, isolation, discrimination, previous trauma or abuse, family circumstances, exploitation, or other vulnerabilities. Staff should consider whether these factors affect a pupil's ability to recognise, report or protect themselves from harm and should adapt support accordingly.

To ensure that all our children receive appropriate protection, we will give special consideration and attention to children who are:

Disabled or who have Additional Needs:

- who may be particularly vulnerable or for whom additional barriers may exist in recognising or communicating about abuse and neglect.
- assumptions may be made that behaviour, mood or injury may relate to the disability, without exploring the possibility of abuse.
- children with Additional Needs or disabilities may be disproportionately impacted by things like bullying without outwardly showing any signs, or more prone to peer group isolation than other children, making them even more vulnerable.

Children who are lesbian, gay, bisexual, transgender (LGBTQ+) or gender questioning

- The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Also, children who are:

- missing from education.
- requiring mental health support.
- young carers.
- living in an identified domestic abuse situation.
- affected by known family challenges, such as substance misuse, adult mental health problems or domestic abuse.
- misusing alcohol or substances themselves.
- frequently missing or who go missing from education, care or home; showing signs of being drawn into criminal or anti-social behaviour, including gangs or organised crime groups.
- involved directly or indirectly in prostitution, modern slavery, child trafficking or exploitation.
- at risk of being radicalised or exploited.
- being fostered.
- showing early signs of abuse/neglect.
- living away from home.
- vulnerable to being bullied or engaging in bullying.
- living in temporary accommodation.
- living transient lifestyles.
- living in chaotic, neglectful and unsupportive home situations.
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality.
- has experienced multiple suspensions and/ or is at risk of permanent exclusion.

Special consideration and attention include monitoring through the pastoral systems of the College.

2.2 Bullying

Bullying is a subset of abuse that can take different forms, including physical, emotional, verbal, ostracism, homophobic and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by text or email or via other means using technology). The College is determined that no kind of bullying will be tolerated by pupils, parents or staff.

- Bullying may constitute abuse and is also a common feature of child-on-child abuse and harassment.
- Accordingly, bullying will often require a safeguarding response from staff.
- Wherever there is a safeguarding concern, staff must discuss with the DSL so that appropriate action may be considered and taken.

The College's Anti-Bullying Policy also applies to bullying behaviour outside of the College of which the College becomes aware.

2.3 Online Safety

The College's approach is set out in full in the E-Safety Policy. The DSLs retain ultimate responsibility for this area. Most of our children will use mobile devices and computers a great deal of the time. They are important tools for communication and education as well as for recreation and socialising. However, we know that some adults and young people will use these technologies to harm children. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online: this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

The College recognises that generative artificial intelligence and image-manipulation tools can be used to create or alter sexualised, humiliating, threatening or otherwise harmful images of pupils. Such material may constitute a safeguarding concern even where no physical image was originally taken of the pupil. Staff must not forward, download, save or circulate suspected illegal or sexualised imagery. Concerns should be reported immediately to the DSL, with evidence preserved only where this can be done safely and lawfully through approved College systems.

Pupils receive guidance on safe use of the web (including anti-bullying) through the Computing and RSHE curricula and in year group assemblies.

Cyber-bullying by children via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-Bullying Policy and procedures.

Children are also at risk from Cybercrime. An interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

Chat rooms and social networking sites are sources of risk of inappropriate and harmful behaviour in the digital arena. Some children will undoubtedly be 'chatting' on mobile or social networking sites at home. The College runs parent seminars, to help parents understand the possible risks.

The College uses appropriate internet filters to safeguard pupils from potentially harmful and inappropriate online material. This includes regular consideration to 'over-blocking' to avoid unreasonable restrictions as to what pupils can be taught regarding online teaching and safeguarding.

2.4 Mental Health and Wellbeing as a safeguarding consideration

Mental health and wellbeing difficulties can, in some circumstances, become safeguarding concerns or may indicate that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff should be alert to significant changes in behaviour, persistent sleep difficulties, withdrawal from social situations, loss of interest in usual activities, signs of self-harm, eating difficulties, suicidal thoughts or other significant changes in presentation. Staff should not attempt to diagnose a mental health condition. Concerns should be recorded and referred through the College's safeguarding and pastoral procedures, with appropriate involvement of the Medical Centre, School Psychology Officers and DSL as required.

2.5 Pastoral and Safeguarding Education

Safeguarding education helps pupils understand what constitutes unsafe or harmful behaviour, including abuse by adults or peers, exploitation, online harm, coercion, bullying and harmful sexual behaviour. Pupils are regularly reminded of the trusted adults and reporting routes available to them, including how to raise a concern for themselves or another pupil. The College will seek feedback from pupils about whether safeguarding arrangements feel accessible, safe and effective.

The College promotes the safeguarding and welfare of children through the Tutor/ Class system, Assembly programme, RSHE programme, the computing curriculum and parents' forums. Pupils are given information to avoid situations and persons, including over the internet and mobile technology, which/who could lead them to harm. In the Early Years Foundation Stage, safeguarding education is delivered through age-appropriate teaching, stories, routines and play, helping children understand safety, feelings and trusted adults.

2.6 Safer Recruitment

The College is committed to safer recruitment and the College's CLT and HR department are responsible for implementing these practices. It is clearly understood that the use of recruitment procedures that help deter, reject or identify people who might abuse children is essential. The level of check (prohibition, direction, sanction, restriction) and/or Police/ICBC certificate depends on the role that is being offered and the duties involved. The College carries out the required local checks on staff as well as other such checks as are available.

The College will undertake proportionate safeguarding due diligence before appointing staff, volunteers, contractors and other adults who may have contact with pupils. References and relevant suitability checks will be completed and concerns resolved before appointment wherever practicable. Where a third-party organisation supplies personnel to work with pupils, the College will obtain appropriate assurance regarding safeguarding checks, training and supervision.

No adult who has not completed the checks required for their role will be permitted to work unsupervised with pupils where the College has determined that such checks are necessary. Contractors and visitors should be identifiable while on site and should be supervised where their role or circumstances require it.

More detailed information about our Recruitment policy and practice can be found in our HR Recruitment policy

2.7 Monitoring/Supervising Staff and Volunteers

The College is committed to safer recruitment and ensuring that all necessary and appropriate checks are carried out for staff and volunteers. As part of the recruitment process, all new staff follow a comprehensive induction process which includes a 'Day One Induction' meeting which focuses on safeguarding procedures and information, including online safety.

Clear expectations are set out for all staff (including locally appointed, part-time and supply staff) and volunteers in the Code of Conduct which emphasises safeguarding and appropriate behaviour for staff and appropriate supervision for pupils and this is re-issued at the start of each academic year to all staff. The Whistleblowing policy is also highlighted to all staff who may have a concern about the behaviour of a colleague or, more generally, the College's safeguarding practices.

The College's expectations of appropriate supervision and monitoring of visitors are set out in the Visitors' Policy.

2.8 Abuse of Trust and Inappropriate Relationships

All College staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach. The Code of Conduct separately sets out expectations of staff. All staff are aware of the potential for a pupil's relationship with another pupil to be or become abusive and are alert to this possibility and the requirement for concerns of this nature to be referred.

2.9 Guidance on Physical Restraint

In line with global best practice, UK law and guidance for schools, staff may reasonably intervene to prevent a child from:

- committing a criminal offence.
- injuring themselves or others.
- causing damage to property; and
- engaging in behaviour prejudicial to good order and to maintain good order and discipline.

Under no circumstances should physical force be used as a form of punishment.

Where the school or setting judges that a child's behaviour presents a serious risk to themselves or others, they must always put in place a robust risk assessment which is reviewed regularly and, where relevant, a physical intervention plan.

In all cases where physical intervention has taken place, it is good practice to record the incident and subsequent actions and report these to a manager and the child's parents. Similarly, where it can be anticipated that physical intervention is likely to be required, a plan should be put in place which the pupil and parents / carers are aware of and have agreed to.

2.10 Complaints about staff

2.10.1 Complaints procedure

The Complaints Policy is available to all staff on MyBCVN. It is published on the school website and is available upon request to all parents of pupils at the College. The policy is available to parents of currently registered pupils. It is also available to parents of former pupils where the complaint was initially raised by them when the pupil was still registered.

2.10.2 Whistleblowing Policy

Complaints from staff involving wrongdoing in the workplace are dealt with under the Whistleblowing policy which is available on MyBCVN. Note that where a staff member feels unable to raise an issue with the College or feels that their genuine concerns are not being addressed, additional whistleblowing channels are open to them, including contacting BCI or BCUK, or the CEO.

2.10.3 Managing Allegations and Low Level Concerns Against Adults (including volunteers, contractors and those from organisations or individuals using the College premises)

Where anyone in the College has a concern about the behaviour of an adult (including online) who works or volunteers at the College, including Governors, contractors and those from organisations or individuals using the school premises, they must immediately consult the Head of College.

Should the Head of College be subject to allegation or suspicion the matter should be referred immediately to the CEO without notifying the HOC first.

BCVN operates a Low Level Concerns (LLC) procedure in accordance with KCSIE 2026. Low level refers to behaviour that is: inconsistent with expectations set out in the Staff Code of Conduct, including inappropriate conduct outside of work, and/ or does not meet the allegations threshold.

Reporting low level concerns helps to create and embed a culture of openness, trust, and transparency in which the College's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

All Low Level Concerns will be reported to the Head of College or DSL.

Appendix 3 gives further information about the College's approach to dealing with Allegations or Low Level Concerns against Adults

2.11 Training

It is important that all staff have training to enable them to recognise possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

All new staff receive training at induction, delivered by the DSL. The training, which is updated regularly based on both UK and Vietnamese good practice advice, includes:

- this policy, including the safeguarding response to children missing education and procedures to deal with child-on-child abuse.

- the staff Code of Conduct including Whistleblowing, Acceptable use of IT and staff/pupil relationships.
- Online Safety.
- the identity and role of the DSLs and D/DSLs.
- the Behaviour Policy and the Anti-Bullying policy.

All staff are required to sign to confirm they have read, understood and agreed to comply with the requirements outlined in these documents. All staff receive regular and current safeguarding and child protection training that is updated at least annually.

Staff are trained to manage a disclosure of child-on-child sexual violence and sexual harassment in accordance with Part 5 of KCSIE.

A register is taken at each Safeguarding and Child Protection training session. This is sent to the HR Department who collate all lists and keep a register of the training completed. The HR Department identify those whose training needs to be updated and inform the relevant DSL, arranging suitable times to hold the necessary training. To assess understanding, each member of staff subsequently completes a questionnaire and CLT will follow up if a need for further training or clarification is highlighted.

The DSLs and Deputies receive updated training at least every two years. The DSLs and DDSLs also regularly keep abreast of developments and updates, for example, by seeking out current UK and Vietnamese good practice advice, receiving email notifications from international safeguarding trainers, government and training providers.

2.12 Health & Safety, Extended School Activities and Educational Visits

The Health and Safety and Educational Visits policies reflect the consideration given to the protection of our children both physically within the school environment and away from the school when undertaking school trips and visits.

Where extended school activities are provided by and managed by the College, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site the member of the College staff responsible for arranging the services or activities, working alongside the HR department, will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures, to keep children safe. Arrangements will also be made to ensure that they are readily identifiable and appropriately supervised.

When our children attend off-site activities, including those abroad on school trips, we will check that effective safeguarding arrangements are in place.

2.13 Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images. To protect pupils, we will:

- only use images in accordance with College guidelines.
- ensure that children are appropriately dressed.

- encourage children to tell us if they are worried about any photographs that are taken of them.

Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Code of Conduct

From time-to-time professional photographers are invited into the College to take group photographs or pictures of significant events; any professional photographers hired by the College will be subject to appropriate vetting checks.

Photographs, digital images or videos of pupils may be taken by parents and family members, either on the College site or when pupils are involved in organised activities off site. Parents and family members are welcome to take photographs or videos of school events which may include images of other pupils. To respect the privacy of others and in some cases for protection purposes, these images should not be made publicly available on social networking sites or on other public areas of the internet. Parents should not take photographs of their child or other pupils in the swimming pool or changing rooms.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult and report the matter to the DSL as soon as possible, to allow the concern to be followed up.

2.14 Secure premises

The College will take all practicable steps to ensure that College premises are as secure as circumstances permit.

All visitors must sign in and sign out and are escorted whilst on school premises by a member of staff or appropriately vetted volunteer. All visitors are given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the school premises. The Security team is vigilant in stopping all visitors who are not known to them. The College manages large events (such as Parents' Evenings, Concerts, Lectures, Careers Fairs) differently, locking down areas of the College and allowing guests access only to the appropriate venue(s). Pupils sometimes take visitors/families for a tour of the College. They must follow a set route which remains in the main public areas of the College, and they are briefed on what to do if anything concerns them during the tour.

2.15 Staff Ratio's and Supervision

Pupils in the Prep School are supervised in relation to UK guidance with appropriate pupil: adult ratios that reflect the age and needs for the pupils throughout the day. For Early Years Foundation Stage specific supervision guidance, refer to the Early Years Foundation Stage policy.

2.16 Intimate Care

Occasionally, illness or a medical condition may lead to intimate care being required at school or on a school visit. All staff, when involved in helping a child following a soiling or wetting incident should inform another member of staff that they are helping a child. Respect for the child's privacy is paramount, and staff should be aware that some children will want to remove soiled clothes themselves and others may require help. All staff have access to non-latex gloves, wet wipes and

bags for dealing with soiling or wetting incidents. Clothes will be rinsed off and placed in a plastic bag ready to give to parents or carers at pick-up time. Spare clothes are available.

In the Early Years Foundation Stage (EYFS), intimate care is approached sensitively, with staff supporting children to develop independence while ensuring dignity, privacy and safeguarding at all times. Please refer to the EYFS Intimate Care Policy for further details.

2.17 Use of College premises by third parties

It is a requirement of KCSIE that, where the College facilities or premises are made available to other organisations or individuals, for example for the running of Co-Curricular Activities, the College ensures that appropriate arrangements are in place to keep children safe. This includes:

- Seeking assurance that the organisation has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed).
- Ensuring that there are arrangements in place to liaise with the College on these matters where appropriate.
- Ensuring that safeguarding requirements are included in any agreement with the third party as a condition of use and occupation of the premises.
- Ensuring that failure to comply with these safeguarding requirements may lead to termination of the agreement.

These requirements apply regardless of whether or not the children who attend any of these services are pupils of the College.

SECTION THREE: REVIEW OF POLICY AND PRACTICE

Monitoring and review

Any child protection incidents at the College will be followed by a review of the safeguarding procedures within the College and a prompt report to the Head of College. Where an incident involves a member of staff, the Brighton College International Team and members of the World leadership team will assist in this review to determine whether any improvements can be made to the College's procedures.

SECTION FOUR: SPECIFIC CHILD PROTECTION PROCEDURES

4.1 Child protection procedures, definitions, signs and symptoms of abuse

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to: identify, act on and refer to the early indicators of abuse and neglect; keep clear written records; listen to the views of the child; reassess concerns when situations do not improve; share information quickly and challenge inaction.

All staff must read KCSIE Part one, Part five and Annex A

[1. \[Annex A\] Keeping children safe in education 2026.pdf](#)

[2. \[Part 1\] Keeping children safe in education 2026.pdf](#)

[3. \[Part 5\] Keeping children safe in education 2026.pdf](#)

4.2 What to do if you suspect a child is at risk of harm

If a member of staff is concerned that a pupil may be suffering harm or is at risk of harm, they must act on this immediately. Staff should follow this policy, and the matter should be referred to the DSL, or Deputy in the DSL's absence, as soon as possible.

If there is a risk of immediate serious harm to a child a referral should be made to Children's Local Social Care immediately. The DSL should be informed as soon as possible.

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning, or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Record these early concerns on CPOMS and pass it to the DSL immediately.

Follow-up options to support a child include:

- Managing support internally via the College's own pastoral support processes.
- A referral to local services.

4.3 If a child discloses information to you

It takes a lot of courage for a child to disclose that they are being neglected and / or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise confidentiality. The point at which you do this is a matter for professional judgement.

During your conversation with the child:

- Allow them to speak freely.
- Remain calm and do not over-react.
- Give reassuring nods or words of comfort.
- Do not be afraid of silence.
- Under no circumstances ask investigative or leading questions.
- Tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort.
- Reassure them that they are being taken seriously and that they will be supported and kept safe.
- Never make them feel ashamed or give the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.
- Tell the child what will happen next. The child may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.
- Write up your conversation as soon as possible and give directly to the DSL/ record on CPOMS.
- Seek support if you feel distressed.

Note: best practice dictates that you should not write any notes whilst the pupil is speaking.

Write up your notes immediately after the meeting, and give the DSL these notes, however rough. If an aide-memoire is required, only very brief phrases or notes should be jotted down - the priority is to listen, not to write down everything that is said, and the writing of any notes may lead a pupil to clam up. Remember that you should only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker, observations can be made but should be clearly recorded as such. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.

4.4 Incident Reporting Procedure

To ensure that all incidents regarding Safeguarding and Child Protection are handled consistently, effectively, and in full compliance with applicable laws, BCVN implements the following procedure:

Incident Reporting

All incidents or concerns regarding Safeguarding and Child Protection must be reported immediately or as soon as practicable to the Safeguarding Team through our official safeguarding reporting platform CPOMS.

Escalation

Depending on the nature and severity of the incident, the Safeguarding Team will conduct a preliminary assessment before determining next steps. In the most serious cases, the Head of College will ascertain with the DSL if a referral is possibly required. At this point, the Head of College will consider reporting the case to the Chief Executive Officer and Company Leadership Team.

If the Head of College determines that the incident exceeds internal authority or requires notification to competent authorities, the matter will be escalated to the Chief Executive Officer (CEO), Deputy CEO of Business Operations (DCEO.BO), and/or the Human Resources Director and Quality Assurance (QA) Director for timely direction and support.

Legal Advice, Security, and Single Point of Contact

The QA Director is responsible for seeking advice from the Legal and Security departments to assist the College when working with authorities.

The College will designate one official Single Point of Contact (SPOC) responsible for liaising with the pupil, family, and competent authorities throughout the process until the matter is fully resolved.

Pupil Support and Professional Collaboration

The Pastoral Team, including the DSL and SPOs, will provide continuous pastoral and academic support to the pupil(s). When the College deems it necessary and requests the family to seek external professional assessments or specialised services, the pupil's family is expected to fully cooperate.

Throughout the reporting, investigation, and support process, the College consistently prioritises the safety, well-being, and best interests of the child, while ensuring all actions fully comply with applicable laws and the child protection policies.

4.5 Notifying parents

A safeguarding referral does not require parental consent where the College considers that making the referral is necessary to protect a child. The College will normally work openly with parents and carers, but the child's best interests remain the overriding consideration.

Where informing parents or seeking their agreement could increase the risk of harm, prejudice an investigation, or otherwise place the child at greater risk, the DSL will seek appropriate professional advice before sharing information and will act without delay where necessary.

4.6 Action by the DSL - Referral

If there is room for doubt as to whether a referral should be made, the DSL will consult with the local authorities or safeguarding colleagues from BCI/BCUK on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of harm, a referral will be made without delay.

Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures set out in this policy.

4.7 Confidentiality and sharing information

When making decisions on what information to share and when, the most important consideration is whether information sharing is likely to safeguard and protect the child. Staff must consider if the information shared is necessary for the purpose for which it is being shared, ensure it is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, a DDSL or the Head. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The College will co-operate with police and any other authorities to ensure that all relevant information is shared for the purposes of child protection investigations

Where allegations have been made against staff, the College will consult with the CEO and BCI/BCUK to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

All written information will be stored in a locked facility and any electronic information will be kept in a password-protected area.

SECTION FIVE: ROLES AND RESPONSIBILITIES AT BRIGHTON COLLEGE VIETNAM

Roles and responsibilities in Managing Safeguarding & Child Protection

5.1 All Staff

All staff, which includes the Heads, teaching and support staff, including temporary staff and all volunteers who do not fall under visitor procedures, (hereafter 'staff'), have a statutory responsibility to:

- read this Safeguarding Policy
- teaching staff must read Part One, Part Five and Annex A of Keeping Children Safe in Education 2026 (members of the CLT are required to read the entire guidance).
- have read the College's Behaviour policy and the staff Code of Conduct.
- understand the role of the DSL and be able to identify the DSLs and DDSLs.
- provide a safe environment in which children can learn.
- be aware of systems, policies and procedures within the College which support safeguarding, including those processes relating to child-on-child abuse and reports of sexual violence or harassment.
- be aware of the indicators of abuse and neglect so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, harm and in such circumstances to take appropriate action, working with other services as needed.
- know what to do if a child tells them he/she is being abused, exploited or neglected; in particular, be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.
- attend appropriate safeguarding and child protection training on appointment and subsequent refresher training at least annually.
- know local expectations for Child Protection which are:
<https://childhelplineinternational.org/vietnam-national-hotline-for-child-protection-111/>
The Vietnamese National Hotline for Child Protection is run by the Department of Child Affairs, part of the Ministry of Labour, Invalids and Social Affairs. While the hotline deals primarily with information, reports and denunciations on risks and acts of child abuse, it also provides counselling to children.
- expect to support internal staff action, any child protection workers or other agencies following any referral.
- staff should keep in mind that cases should be kept under review and consideration given to a referral for assessment if the child's situation does not appear to be improving or is getting worse – staff should follow local escalation procedures to ensure concerns have been addressed and most importantly that the child's situation improves.

Staff should not assume that a colleague or another professional will take action and should be mindful that early information sharing is vital for effective support being put in place.

5. 2 Designated Safeguarding Lead

The DSLs and DDSLs are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSLs serve on the College Leadership Team.

The broad areas of responsibility for each of the DSLs are as follows and taken from Annex B of

KCSIE; should a DSL be unavailable, a DDSL will fulfil these roles in the first instance.

The DSLs or DDSLs should always be available to discuss safeguarding concerns. If the DSLs or Deputies are not available, this should not delay appropriate action being taken.

5.2.1 Managing Referrals

The CDSL will

- Ensure all cases of suspected abuse are reported to:
 - the Vietnamese Children's Social Care.
 - The Head of College.
 - the International Team at Brighton College UK for concerns relating to a staff member, including supply staff.
 - World Academy leadership for support with legal issues and communication with stakeholders.
 - Disclosure and Barring Service in the UK (cases where a person is dismissed or left due to risk/harm to a child) and/or
 - Police (cases where a crime may have been committed under Vietnamese law.) Liaise with the Heads, as appropriate, to inform him/her of safeguarding issues especially ongoing enquiries under Vietnamese Laws and police investigations.
- Keep written records of concerns, discussions, decisions and reasons for decisions taken.
- Contact pupils' previous schools to request safeguarding information.
- Be aware of pupils who have, or have previously had, a social worker.

5.2.2 Training requirements: DSL and DDSL

The DSLs and DDSLs will receive updated training carried out at least every two years, but maintain up-to-date understanding at least annually, in order to:

- Understand the assessment process for providing Early Help and intervention.
- Work together to build knowledge of locally agreed procedures for child protection and multi-agency working, in particular how Vietnamese authorities conduct a child protection case assessment and how child protection work is conducted. The DSLs will always be authorised to attend and contribute to these effectively when required to do so.
- Ensure a good understanding Prevent duties, of harmful sexual behaviour, to aid in planning education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole College approach to safeguarding.
- Ensure each member of staff has access to and understands the Safeguarding and Child Protection Policy and procedures and the Staff Code of Conduct, with particular induction and check-ins for new and part time staff who may require this additional training support.
- Be alert to and support the specific needs of more vulnerable children, those with special educational needs and young carers.
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school.
- Recognise the additional risks that children with Additional Needs and disabilities face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support these children to stay safe online.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to and seek out resources and attend any relevant or refresher training

courses.

- Encourage a culture of listening to children and taking account of their wishes and feelings, in any measures the College may put in place to protect them.

Note: When a new DDSL is appointed, they will not take sole responsibility for a case until they have undertaken the required training, initially working in partnership with an experienced DSL/DDSL.

5.2.3 Training of Staff

The DSLs will ensure that:

- all CLT receive appropriate safeguarding and child protection (including online) training at induction, to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole College approach to safeguarding.
- training for CLT is regularly updated. All staff have received the required initial and annual safeguarding training, including the Safeguarding and Child Protection policy, the Staff Code of Conduct and have completed a questionnaire to show their understanding.
- all staff receive training to enable them to fulfil their responsibilities listed above, including having an understanding of early intervention, the importance of sharing information, how to manage a report of child-on-child sexual violence and sexual harassment, making a referral themselves and finding guidance on how to do this, as well as the role they might be expected to play in any assessment.
- all staff know what to do if a child tells them he/she is being abused/neglected, including maintaining an appropriate level of confidentiality and only involving those who need to be involved.
- all staff understand the difference between a 'child in need' and a 'child at risk'.
- all staff receive Prevent awareness training as part of the international standard safeguarding training; the DSL and DDSLs complete additional training.
- all staff are re-trained as and when required and that an accurate record of staff attendance of induction and refresher training is maintained.
- all staff complete a safeguarding questionnaire at least annually to demonstrate understanding of the core components of KCSIE and the College's Safeguarding policy.
- staff are given the chance to provide feedback or ideas relating to the safeguarding at Brighton College Vietnam.
- all staff receive safeguarding and child protection updates (for example via email and staff meetings) as required, and at least annually.

5.2.4 Raising Awareness

The DSLs will ensure the College's policies are known and used appropriately. The DSLs will:

- Ensure the Safeguarding and Child Protection Policy and the staff Code of Conduct are reviewed annually, and that procedures and implementation are updated and reviewed regularly in light of changes in local procedures and national statutory requirements and guidance, and work with the CLT regarding this.
- Provide Safeguarding updates and reminders at staff briefings/staff meetings.
- Ensure that all staff complete an annual Safeguarding questionnaire to assess

- understanding of the College's policy and practice.
- Carry out an annual 'audit' of College procedures in liaison with other Brighton College International Schools and the International Schools team.
 - Ensure the Safeguarding and Child Protection Policy is available publicly (through the College website) and parents know referrals about suspected abuse or neglect must be made and the role of the College in this.
 - Link where possible with the local Vietnamese Children's Services, to make sure relevant staff are aware of any training opportunities and the latest local policies on safeguarding.
 - Where children leave the College, ensure their safeguarding/ child protection file is transferred to the new school or college as soon as possible but transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt. Consider whether it would be appropriate to share any information with the new school in advance of a child beginning at their new school, for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when they arrive.
 - Promote educational outcomes by sharing information about welfare, safeguarding and child protection issues with teachers and the CLT, where appropriate.

In addition to the above responsibilities, the DSLs will:

- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Computing, RSHE or assemblies
- Ensure appropriate safeguarding responses are in place and are implemented to deal with pupils who go missing from the College.
- Understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.
- Liaise with other local Vietnamese agencies that support the pupil.
- Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement.
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

5.2.5 Liaison with Brighton College Family of Schools

The DSLs will liaise with the DSLs at other Brighton College schools. This will enable sharing of best practice and the co-ordination of training across the family of schools.

5.2.6 Liaison between the DSLs and CLT

When an issue arises which has potential Child Protection implications, the DSL will inform the HOC, as a senior and experienced leader.

- At this stage, it may not be possible to make a clear judgement as to the seriousness of the issue, but it can be stated whether external agencies (local Children's Services/Medical professionals/Police) have been contacted.
- The DSL will outline the next steps and the HOC will continue to be made aware of actions and guidance in order to provide oversight of the College's response.
- In the event that allegations are made against the Head; the DSL must inform the CEO first

- of all, without informing the Head.
- If the allegations are against the DSL, the Head will be informed directly.

5.2.7 Record Keeping

The DSLs oversee CPOMs, the College's software for recording all information relating to safeguarding and child protection. This includes ensuring all staff feel confident to raise a concern and that appropriate staff can update a concern, noting concerns, decisions made and the reasons for those decisions. Staff are trained in good practice for record-keeping, so that records include:

- a clear, factual and comprehensive summary of the concern.
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached (including the rationale where appropriate) and the outcome.

When a pupil leaves BCVN, relevant safeguarding information should be transferred securely and without unnecessary delay to the receiving school, separately from the general pupil record where appropriate. The DSL should consider whether information needs to be shared in advance so that safeguarding support can be in place when the pupil arrives at the new setting.

5.2.8 Pupil Welfare Risk Assessment

Where a safeguarding or welfare concern is identified, the risks to the pupil's welfare should be assessed and proportionate action taken to reduce the identified risks. The assessment and actions should be recorded, monitored and reviewed. Relevant information should be shared, on a need-to-know basis, with staff, parents/carers and appropriate external professionals where this is necessary to safeguard and promote the pupil's welfare. Where appropriate, welfare risk assessments should be recorded on CPOMS and made accessible to staff who have a legitimate safeguarding role with the pupil.

5. 3 Deputy DSLs (DDSLs)

All DDSLs will undertake full Safeguarding and Child Protection training and will attend refresher training every two years. In the absence of the DSL the functions of the DSL will be carried out by a DDSL. Throughout this policy, reference to the DSL includes the possibility that a DDSL may stand in for the DSL if they are unavailable.

5.4 The role of BCI and World Academy

BCI and World Academy will ensure that:

- There is an effective and statutorily compliant Safeguarding and Child Protection policy and procedures in place, together with a Staff Code of Conduct and that these are provided with other required documentation to all staff (including temporary staff and volunteers) on induction.
- Committed staff are appointed to the Safeguarding team and that they have the appropriate authority and the time, funding, training, resources and support to fulfil the

role and responsibilities as outlined above.

- The College's safeguarding arrangements take into account the procedures and practice of Vietnam as part of the multi-agency safeguarding procedures, including understanding and reflecting local protocols for assessment.
- The College has statutorily compliant procedures for dealing with concerns/allegations made against members of staff including allegations made against the Head.
- The College has procedures in place to handle allegations against other children of child-on-child abuse.
- The College operates safer recruitment policies and procedures that include the requirement for at least one member of a recruitment panel to have undertaken safer recruitment training and for appropriate checks to be made in line with national guidance.
- The College operates an effective training strategy that ensures all staff, including the Head, receive safeguarding and child protection training.
- All staff undergo safeguarding and child protection training (including online safety) at induction and that all staff receive updates at least annually.
- Staff have the opportunity to contribute to safeguarding arrangements in school.
- The DSL and DDSs receive refresher training at two-yearly intervals as a minimum, with annual updates.
- An annual review of safeguarding (by BCI/BCUK) is instigated, carried out and approved.
- College policies reflect that some groups of children are potentially at greater risk of harm. Where necessary, an appropriately trained and informed teacher is appointed to promote the educational achievement of any child who is 'looked after' or previously looked after.
- Appropriate safeguarding responses are in place to deal with pupils who go missing from the College, in particular any pupils who go missing on repeat occasions. Appropriate online filters and monitoring systems are in place.
- Pupils are taught about safeguarding, including online safety.
- The child's wishes and feelings are taken into account when determining what action to take and what services and support to provide.
- The College has procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- Appropriate arrangements are in place to keep children safe where school facilities or premises are used by external organisations.

5.5 The Head of College

The Head will:

- Ensure that the Safeguarding and Child Protection policy and procedures adopted by the governing body are implemented and followed by all staff.
- Allocate sufficient time and resources to enable the DSLs and other DDSs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace, whether or not it involves the safeguarding and welfare of children.
- Provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith.
- Ensure that children's safety and welfare are addressed through the curriculum.
- Be able to understand safer recruitment procedures and processes and deal with concerns raised or allegations made against members of staff and others in line with this policy.

- Check the SCR with the DSL and Head of HR termly.

5.6 Safeguarding Guidelines for all

To meet and maintain our responsibilities towards children, all members of the College community (staff, governors, pupils and parents) are expected to adhere to the following standards of good practice:

- When circumstances require, to read and understand the College's safeguarding and guidance documents on wider safeguarding issues in addition to this policy, including: the Code of Conduct, Anti-Bullying Policy, E-Safety Policy, Additional Educational Needs Policy.
- Treating all children with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving children in decision-making which affects them.
- Encouraging positive and safe behaviour among children.
- Being a good listener.
- Exercising professional curiosity and knowing what to look for, so that staff are able to identify cases of children who may be in need of help or protection.
- Being alert to changes in children's behaviour - maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Recognising that challenging behaviour may be an indicator of abuse.
- Recognising that the absence of reports (for example, of child-on-child abuse or sexual harassment) does not mean that it is not happening; therefore, being vigilant and raising any concerns in line with this policy.
- Asking the child's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding and discouraging the use of inappropriate sexualised or derogatory language.
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse.
- Be alert to the context in which safeguarding incidents and/or behaviours can occur, including association with factors outside the College. Staff should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- Promoting the College ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- Making clear to all pupils that if they have any problems or worries these can be taken to a Tutor, a class or subject teacher or any member of the Leadership Team (in particular, the Pastoral team). The School Nurses, as well as the School Psychologists and Pastoral Care Officers, are also available throughout the school day.
- Ensuring that the names and means of contacting the above people are displayed on prominent boards in both the Prep School and Senior School.

SECTION SIX: APPENDICES

Appendix 1: Dos and Don'ts when responding to a disclosure of abuse

If a Child Discloses Abuse to You...

DO:

- ✓ Stay calm and show no signs of shock;
- ✓ Listen and respond with empathy in a non-judgmental and open way;
- ✓ Consider the disclosure seriously;
- ✓ Remain calm, supportive, and reassuring;
- ✓ Validate the child's feelings;
- ✓ Mirror the child's language when appropriate (use and clarify the vocabulary that the child uses);
- ✓ Explain what you need to do (report to the director/counselor) and why;
- ✓ Allow the child control when feasible;
- ✓ Ask open-ended questions to gather information and detail;
- ✓ Consider the child's language needs and whether support in another language is necessary;
- ✓ Reassure the child that they have done the right thing in coming forward and that they are currently safe; and
- ✓ As soon as possible following the disclosure, make a written report and write notes from the conversation.

DON'T

- ✗ View images of children (rather ask for a brief description and secure a device as possible evidence for law enforcement);
- ✗ Take photos (if the child shares an injury, seek medical attention);
- ✗ Interview the child, ask leading or unnecessary questions, or provide language for the child;
- ✗ Take notes during the disclosure;
- ✗ Make promises that may not be able to be honored (such as promising you won't tell anyone or that this will never happen again);
- ✗ Suggest that the child may be to blame in any way for what happened; or
- ✗ Ask the child to wait until another person can be present to witness the disclosure.

Appendix 2: Accessing Local Agencies

1. National Hotline for Child Protection

[Child Protection Call Center 111](#)

Vietnam: National Hotline for Child Protection 111

The Vietnamese National Hotline for Child Protection is run by the Department of Child Affairs, part of the Ministry of Labour, Invalids and Social Affairs. While the hotline deals primarily with information, reports and denunciations on risks and acts of child abuse, it also provides counselling to children.





Services

The National Hotline offers:

- Phone
- SMS
- Webchat

Operating Information

The National Hotline provides service in:

- Vietnamese

Contact Details

[Website](#)

[111](#)

2. VN-COP - Reporting acts and content of child abuse in the online environment

[Infringement reports - Network for responding to and protecting children in the cyber environment](#)

Social Media Links  

 **VN-COP Network**
Không gian mạng an toàn, cộng dân số tương lai

Search

[HOME PAGE](#) [NETWORK](#) [DOCUMENT](#) [FAQ](#) [EXPRESSING ASPIRATIONS](#) [NEWS & EVENTS](#) [CHECK](#) [Report abuse](#)

REPORTS ON ACTS AND CONTENTS OF CHILD ABUSE IN THE ONLINE ENVIRONMENT

Fill in your contact information

Full name

Address

Phone Number

Email

Select the content of the report *

☐ Acts of child abuse in the online environment

☐ Acts of sexual abuse child sex in the online environment

☐ Acts of harassing and seducing children in the online environment

☐ Acts of fraud and exploitation of children in the online environment

☐ Link Malicious websites affect children online

☐ Toxic groups affecting children in the online environment

☐ Child bullying (acts of defamation, humiliation, boycott...) in the online environment

☐ Disclosure of children's personal information in the online environment without consent

☐ Different

Other report contents (if any)

Fill in the specific content of the report (in the form of text, a malicious link or link to an image or video) *:

3. Emergency Numbers

Emergency Phone Numbers in Vietnam

Call police: 113

Call fire and rescue: 114

Call ambulance: 115

Call emergency rescue: 112

How to call 113?

- 113 is free and can be dialed with any phone. The phone call goes straight to the Information Command Center of Police 113.
- Dial 113 without area code, region code, country code. When there is the response signal, follow the instructions on the phone.
- Calm yourself and provide exact information.
- Provide the exact location. It is better to provide your personal information which is kept secret.
- Provide information about criminals, suspects, victims and people involving, weapons, vehicles' models, vehicles' plate numbers.
- All information you provide are kept secret.

4. SENIA Vietnam

[SENIA Vietnam - List of Professionals and Service Providers, expanded.xlsx - Google Sheets](#)

5. UNICEF Vietnam

[Child Protection System | UNICEF Viet Nam](#)

6. International Task Force on Child Protection (ITFCP)

[International Taskforce on Child Protection - CIS](#)

7. International Centre for Missing and Exploited Children

www.icmec.org

8. IWF -Internet Watch Foundation

[Eliminating Child Sexual Abuse Online | Internet Watch Foundation IWF](#)

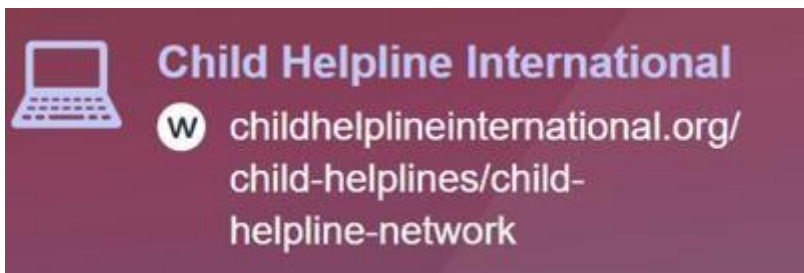
9. Portal to Report Child Sexual Abuse Material

[IWF-ICMEC reporting portal \(English\)](#)

10. UK National Crime Agency and International Liaison Officers



11. Child Helpline International



Appendix 3: Managing Allegations and Low-Level Concerns Against Adults (including volunteers, contractors and those from organisations or individuals using the College premises)

It is expected that all staff involved in the management of Allegations or Low Level Concerns raised against someone working in or on behalf of the College in a paid or unpaid capacity (which includes members of staff, supply teachers, volunteers and contractors) will comply at all times with the following guidance.

College staff, because of their daily contact with children in a variety of situations including the wider caring role, are particularly vulnerable to accusations of abuse. Their relationships with pupils may lead to allegations being made against them by pupils or adults with parental responsibilities. In any such case, these procedures need to be applied with common sense and judgement; a quick response and resolution is a priority.

The College's procedures

The College has procedures for dealing with allegations made against staff (which includes supply teachers, volunteers and contractors).

A3.1 Allegations that meet 'Harm Threshold'

The Harm Threshold has been reached where the member of staff is alleged to have:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (for example, if they have been involved in an incident outside school which did not involve children but could be regarded as relevant to their suitability to work with children).

All the above procedures relate to members of staff (including supply staff, volunteers and contractors) who are currently working in the College regardless of whether the College is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the College will be referred to the police, and to appropriate authorities.

If an allegation is made, the College's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

All staff are informed as part of their training that any member of staff can make a referral.

The following definitions are to be used when determining the outcome of allegation investigations:

- a. **Substantiated:** there is sufficient evidence to prove the allegation.
- b. **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- c. **False:** there is sufficient evidence to disprove the allegation.
- d. **Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- e. **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

A3.1.1 Reporting a concern or allegation

All allegations, complaints, concerns or suspicions against staff (which includes supply staff, volunteers or contractors) should be reported to the Head of College (or to the DSL who will inform the Head); in no case should an allegation, complaint, concern or suspicion be reported to the individual who is the subject of the concern, and neither should that individual be informed of the allegation, complaint, concern or suspicion at this stage.

All allegations, complaints, concerns or suspicions about the Head of the Prep should be reported to the Head of College, those about the Head of College should be reported to the CEO without the Head of College being informed. If reporting to the Head may present a conflict of interest, the report should be made direct to the CEO, without the Head being informed.

Low level concerns which do not meet the 'harm' threshold will be dealt with in accordance with [A3.2] below. Allegations which meet the 'harm' threshold will be dealt with as below.

In borderline cases, or where there is room for doubt as to whether to make a referral, the case manager will still consult informally for advice before any investigation takes place and

- The case manager should take appropriate advice from BCI, police and children's social care services to agree the following: who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

A3.1.2 Action to be taken against the accused

The College has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. The individual concerned will be advised to contact a colleague or counselling services for support.

A3.1.3 Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- a. there is cause to suspect a child or other children at the College is or are at risk of harm or
- b. the allegation is so serious that it might be grounds for dismissal.

All options to avoid suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the College or providing an assistant when the individual has contact with children. The College will give due weight to the views of outside agencies, including BCI/BCUK when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

A3.1.4 Criminal proceedings

The College will consult with the authorities following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

A3.1.5 Return to work

If it is decided that the person who has been suspended should return to work, the College will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The College will also consider how to manage the contact with the child[ren] who made the allegation.

A3.1.6 DBS and TRA Referrals and Ceasing to use staff

There is a legal requirement for employers to make a referral to the Disclosure and Barring Service (DBS) where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. This will happen regardless of the fact that BCVN is an overseas jurisdiction to ensure cross border collaboration. If the College ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/ compromise agreement will not be used and a referral to the DBS will be made as soon as possible if the criteria are met, as per the guidance published by the DBS. Referrals should be made as soon as possible, and ordinarily, on conclusion, of an investigation, when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on GOV.UK.

If the accused person resigns or ceases to provide their services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. A referral to the DBS will be made as soon as possible, if the criteria are met, as per the guidance

published by the DBS.

Staff should be aware that the DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

There would automatically be a referral to the police and government departments within Vietnam in these circumstances. Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made: again in the interests of cross border collaboration. For information, the reasons for the TRA to consider whether a prohibition order might be appropriate are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. The College will follow the advice set out in the TRA's guidance, "Teacher misconduct - the prohibition of teachers" to make a judgement about whether a prohibition order may be appropriate and whether an early referral is advisable in order to consider an interim prohibition order. If in doubt, a referral will be made.

Any such incidents will be followed by a review of the safeguarding procedures within the College overseen by BCI/BCUK staff who have not been involved in any aspect of the process or case.

A3.1.7 Timescales

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases taking longer. If the nature of the allegation does not require formal disciplinary action, the Head should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

A3.1.8 Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head of College will consider whether to take disciplinary action in accordance with the College's Behaviour policy.

Brighton College may apply appropriate sanctions to pupils who are found to have made malicious allegations. This could include temporary or permanent exclusions or referral to the police if a criminal offence may have been committed.

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

A3.1.9 Record keeping and references

Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached

normal retirement age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The College will provide factual information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the College's safer recruitment procedures. In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation. The College's normal policies for data retention and destruction are therefore subject to these overriding responsibilities to cooperate with IICSA. Cases where allegations are found to be false, malicious, unsubstantiated, or unfounded, reference will not be made in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference.

A3.2 Low level concerns (LLC)

In addition, as part of a whole College approach to safeguarding, staff are encouraged to pass on any concerns they may have about all adults working with children, no matter how small, and even if no more than something causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the College may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider an external referral.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

A3.2.1 Reporting low level concerns (LLC)

Staff should report Low Level Concerns using the online link in Teams. In addition, staff may consult the DSL, in which case the DSL should inform the Head in a timely fashion according to the nature of each particular low level concern. The Head should be the ultimate decision maker in respect of all low level concerns, in consultation with the DSL.

Staff should also feel confident to self-refer, where, for example, they have found themselves in

a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

A3.2.2 Responding to reported low level concerns

Low level concerns will be recorded, dealt with effectively and sensitively.

The College will take the following actions in relation to low level concerns and/or allegations which do not meet the 'harm' threshold:

- If the concern has been raised by a third party, the Head of College will appoint an investigator to collect as much evidence as possible by speaking directly to the person who raised the concern (unless it has been raised anonymously) and to the individual involved and any witnesses.
- All low-level concerns will be recorded in writing.
- The record will include details of the concern, the context in which the concern arose, the investigation(s) carried out and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- The information collected will help to categorise the type of behaviour and determine what further action may need to be taken.
- These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- As part of the annual review of safeguarding, these records will be reviewed at least annually so that potential patterns of concerning, problematic or inappropriate behaviour can be identified – which will be addressed either through the College's disciplinary procedures or (where a pattern of behaviour moves from a concern to meeting the harms threshold) after referral.
- Consideration will also be given to whether there are wider cultural issues within the College that enabled the behaviour to occur. Amendments to policies and training will be considered to minimise the risk of it happening again.
- Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.
- Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

When appropriate, follow-up conversations will take place with the relevant member of staff. The Head has overall responsibility for handling concerns about staff, but in accordance with the local safeguarding guidance, he may delegate follow-up conversations to the DSL.

Diagram 1: Spectrum of behaviour

Allegation

Behaviour which indicates that an adult who works with children has:

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

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

Appendix 4: Guidance to staff on appropriate behaviour

The following safeguarding-related guidance is given to all staff to avoid putting themselves or pupils at risk of harm or allegations of harm to a pupil:

- One-on-one tuition or coaching should be approved by a senior member of staff and last-minute or informal arrangements for such tuition should be avoided. If you are on your own with a pupil in a classroom (e.g. music room, gym, office), ensure the door is always open if there is no visibility into the room. One-to-one tuition should be logged with the Deputy Head (Pastoral).
- Always inform a senior member of staff if in an emergency situation you must give a pupil a lift. Otherwise, avoid offering lifts to pupils. If you give a lift to a pupil and they are alone, they should sit in the back of the car. Any lift given to a pupil should be logged with the DSL. Staff must ensure that appropriate insurances are in place to carry pupils for the purposes of work and parents must give consent.
- Ensure that parents, carers and/or a senior member of staff authorise all out-of-school contact with pupils.
- Seek advice from the DSL or another member of staff if you don’t feel comfortable with a pupil’s request to speak to you. Speak to the DSL or a Deputy Head if you are concerned a pupil might be developing an infatuation of you.
- Recognise that bullying can develop into abuse (sexual, physical and emotional); also, be vigilant for early warning signs of abuse or neglect.
- Physical contact with pupils should be avoided. Innocent gestures can sometimes be misconstrued. This applies to all aspects of College life, whether in the classroom or House or during sporting or other extra-curricular activities. There are some exceptions to this, with regard to ensuring health and safety of pupils, or preventing damage to equipment (see Guidance on Physical Restraint 2.9).
- At events where alcohol is present, staff should drink sparingly.
- Members of staff should not be party to gossip about colleagues or pupils, nor should staff ever make sexual remarks to or about pupils.

- Avoid giving gifts to pupils, as this may encourage pupils to perceive that a special relationship exists. Exceptions to this include the provision of small prizes in competitive contexts, or the giving of a gift to a pupil in a pastoral tutor group, if this is done for all pupils in that group, with the approval of the Head of College.
- Avoid accepting gifts from pupils, except in the specific contexts described in the anti-corruption and bribery policy.
- Staff should avoid entering pupil changing areas without alerting pupils to their presence.
- Staff should notify the Head of College (via the DSL if preferred) of any arrests, cautions or convictions.

Electronic Communication

DO NOT:

- Give your personal contact details, including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with CLT and parents.
- Share or store personal mobile numbers of pupils on personal mobile phones where practicable.
- View photographs/videos on an electronic device you have confiscated from a pupil. If you feel it appropriate to confiscate a device, very clear directives are found in the Government document 'Searching, Screening and Confiscation, July 2022.'

It is important to note that if you suspect content may be a child protection matter, you must pass the device directly to a DSL or in their absence a Deputy DSL *without* viewing or forwarding any content.

DO:

- Keep phone contact and e-communication formal and copy in another member of staff if communication is not coursework-related.
- Use College email addresses, the College phone system when making contact with pupils. Use ISAMS/Teams to send messages, use school equipment for taking photographs and school forums (instead of public) for online discussion groups.

When using a social networking site, ensure that details are not shared with children and young people and that privacy settings are set at maximum. (Do not, for example, be friends with a pupil on Facebook.) Staff should not befriend former pupils until at least a year after they leave, and even then they should consider carefully whether this would be wise.

See the full Staff Code of Conduct on MyBCVN.

Appendix 5: Missing Child Procedure

Action to be taken by Staff if a pupil goes missing from a School Trip:

1. Take an immediate head count to ensure that all other pupils are present. All adults and pupils should be asked to calmly explain when they last remember seeing the missing pupil.
2. An adult would search the immediate vicinity and if at a venue, the venue manager should be informed to arrange a search and potentially securing the venue.
3. Other pupils and staff might phone the pupil's mobile number (staff leading the trip will have a full list of contact details for the pupils on the trip). They should be told not to use their phones for any other purposes in case the missing pupil tries to make contact. Pupils and staff must refrain from telling anyone else what has happened (especially by posting on social media)

as this can cause panic and misinformation.

4. The Deputy Head Pastoral (DSL) should be informed if the pupil is still missing.
5. A strategy would be agreed with the Deputy Head Pastoral, which may involve returning the rest of the group to the College, or moving to a different location (if outside, for example) where the rest of the group can be safely supervised and ideally kept occupied.
6. A Deputy Head will phone the pupil's parents to explain what has happened and what steps have been taken. Depending on where the trip is, it may be appropriate for them to go to the venue, or to come to the College.
7. Depending on the precise circumstances, either the Deputy Head or the staff with the group would call the police to notify them of a missing pupil. Precise information, timings and descriptions should be readily available before making this call.
8. The CLT member will inform the Head of College if the pupil is not quickly found.
9. A full record of all activities taken up to the stage at which the pupil was found would be made for the incident report.

NB: In either the Prep School or Senior School, the Deputy Head (Pastoral) who is also the DSL may need to undertake further action/referrals under the College's Safeguarding policy. The College will co-operate fully with any Police investigation and any Safeguarding investigation. In the case of an investigation, the Head of College and CEO would be informed.

Action to be taken by staff once the pupil is found:

1. Talk to and take care of the pupil, as necessary.
2. Speak to the other pupils to ensure that they understand what has happened and what will now happen.
3. A senior member of the Pastoral staff will speak to the pupil's parents to explain what happened and what action was taken.
4. It may be necessary for an investigation or review to take place. This should always involve taking written statements from those involved. Specific details should be given: date, time, place, numbers of staff and pupils, the purpose of the visit, length of time the pupil was missing, any lessons for the future.

All media queries should be referred to the Head of College.

Action to be taken by Staff if a pupil goes missing from the College:

The following step-by-step guidance should be followed if a pupil is considered to be missing from a school session:

1. Take a register to ensure that all other pupils are present. In the Senior School, mark the pupil as missing on ISAMS which will trigger an alert.
2. Ask all the adults and children calmly if they can tell us when they last remember seeing the pupil.
3. Inform a member of the CLT (initially The DH Pastoral (DSL).
4. Member of CLT, with the help of the Pastoral Care Officer, to ascertain whether the pupil has a music lesson or other approved arrangement, is in the Medical Centre or with a School Psychologist.
5. Occupy all the other pupils in their classroom.
6. One or more adults will search everywhere, both inside and out, carefully checking all spaces, cupboards, washrooms where a pupil might be.
7. Security will be contacted to confirm times of entry/ exit of the pupil. Security will be asked

for CCTV to be reviewed.

If the pupil is still missing, the following steps should be taken:

8. The Head of College/ Head of Prep to be informed.
9. Deputy Head Pastoral to contact the pupil's parents and explain the situation once it is confirmed the pupil is not on site. Following this, confirm what steps have been taken/are in place. Reassure them as much as possible and confirm they will be kept updated throughout.
10. If additional support is required all members of CLT will be contacted.
11. The DSL/ Deputy Head Pastoral or Head of College/ Prep will contact the Police.
12. The Deputy Head Pastoral will co-ordinate other staff searching the rest of the school premises and grounds.
13. If the pupil's home is within walking distance, a member of staff may set out on foot to attempt to catch up with them.

All media queries should be referred to the Head of College.