Child Protection and Safeguarding Policy

Policy Owner: Group Head of Operational Risk
Revised: September 2026

RATIONALE

At ISP we are committed to safeguarding and promoting the welfare of children and young people and we expect all our employees and volunteers and any contractors / consultants and partner agency staff in our schools to share this commitment. In line with this, we expect them to recognise where a student is at risk of, or is being harmed, and to do all they can to reduce further risk or harm.

Our schools are particularly important in protecting our students; our school colleagues are in the best position to identify concerns early and to provide or recommend support for students as well as helping to prevent these concerns from escalating.

At ISP we adhere to the following basic child protection and safeguarding principles:

- A child's welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender, or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to enable them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'.
- All students have the same equal rights to protection, but we recognise that we need to do more for some because of their special educational needs, disability, gender, religion, or sexual orientation.

POLICY AIMS AND OBJECTIVES

We will:

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

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POLICY SCOPE

The Child Protection and Safeguarding Policy is endorsed by the ISP Executive Committee and adopted by all levels throughout our group and schools. The policy will also be applied to any partner agency with unsupervised access to children and young people and any contractors working on any ISP school site.

DEFINITIONS

Safeguarding and promoting the welfare of children:

- 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.

Child Protection:

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

Note: If the preventative work around safeguarding issues is not appropriate or extensive enough, students identified as being a concern may move to being identified as being at risk of significant harm. Although other factors outside of the schools' control may also influence this, the purpose of the policy is to ensure that at ISP we take whatever measures are possible to avoid this from happening.

PRINCIPLES

This policy sets out our principles and expectations, as well as the procedures and processes, which must be adopted by all our schools and across our group. The policy also describes the steps that must be taken in meeting our commitment to safeguarding students, at both school, regional and group level.

Given our international context, we recognise and accept our responsibility to safeguard all students under the UN Convention on the Rights of the Child (1989). We recognise our obligation to protect our students from harm and in particular, the obligation on us and our regions and schools under the following Articles of the UN convention:

- Article 3: which states that the best interests of children must be the primary concern in decision making about them.
- Article 13: which states that children have the right to get and share information as long as it is not damaging to them or another child.
- Article 14: which states that children have the right to think and believe what they want and to practise their religion.
- Article 19: which states children have the right to be protected from hurt and mistreatment, physically and mentally.
- Article 34: which states that Governments should protect children from sexual exploitation and abuse.
- Article 35: which states that Governments should take all measures to ensure that children are not abducted, sold or trafficked.
- Article 36: which states that children should be protected from any activity that takes advantage of them or could harm their welfare and development.
- Article 37: which states that no one is allowed to punish children in a cruel or harmful way.

All member states of the UN have signed up to the 1989 convention (except for the United States of America) and can be found at the following link: Convention on the Rights of the Child | UNICEF

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RESPONSIBILITIES

Executive Committee (ExCo) and Senior Management Team (SMT) at ISP

Our ExCo and SMT recognise their ultimate responsibility to ensure that the group and all regions and schools understand and follow the guidance provided by this and all other safeguarding related documents.

Principals / Heads of School and Senior Leadership Teams

The Principals / Heads of School and Senior Leadership Team in each school will:

- Ensure that the policy is implemented across their school and followed by all employees and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and any deputy Designated Safeguarding Lead to carry out their role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum ensuring that children throughout the school are taught about keeping themselves safe, including online safety.
- Ensure the school site is secure.
- Ensure there are clear roles, responsibilities and strategies for delivering and maintaining an effective filtering and monitoring system.
- Customise this policy for their school.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's customised version of this policy.
- Only deploy employees who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by employees in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy.

Designated Safeguarding Lead (DSL) or Deputy Safeguarding Lead (DDSL) in a school

Every school will identify a named person designated as the Safeguarding Lead (DSL), to support the Principal / Head of School on each site. This means that schools with split sites may have Deputy Designated Leads on each site for safeguarding with the DSL having an overview. This person/people will: receive appropriate safeguarding training to equip them to undertake their role; be given sufficient time in the working day to undertake the role; and be able to prioritise safeguarding when necessary.

The Designated Safeguarding Lead may be the Principal if appropriate, but he/she will be subject to the same training and processes as every other Designated Safeguarding Lead. Schools are therefore advised to give careful consideration before choosing the Principal to act as the Designated Lead for Safeguarding.

The DSL role is guided by two principles:

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

Being guided by these principles the Designated Safeguarding Lead will:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the Principal, make sure that all employees, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.

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- Have appropriate training in addition to the basic training that all other employees receive. This includes completing ISP Designated Safeguarding Lead training at least every two years and actively participating in their DSL Regional Networking meetings to ensure they stay updated on safeguarding issues.
- Collate and keep accurate and confidential records of any concerns about children, this should include ensuring robust action plans are implemented at the earliest opportunity which are captured in writing and are reviewed regularly.
- Take a lead role in reviewing the filtering and monitoring of schools' online access.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL/ DSL Team is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

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

All employees (including employees of partner organisations and contractors having unsupervised contact with children).

All employees will:

- Ensure they are familiar with and follow the policy and all other safeguarding related documents e.g., Codes of Conduct, guidance for safe working practice.
- Be subject to safer recruitment processes and checks prior to starting at the school/organisation (in exceptional cases an action plan/risk assessment can be in place to ensure the employee is supervised until all checks are completed, this **must** be authorised by Regional Managing Director and Regional Head of HR before employment begins).
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children, knowing what to do if a child tells them he/she is being abused, exploited, or neglected.
- Know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and children's social care in their area. Employees should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- Be able to reassure victims 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 abuse. Nor should a victim ever be made to feel ashamed for making a report.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL) on the school's concern form or via the MyConcern (or equivalent) reporting system.
- Be aware of who the Designated Safeguarding Lead is in the school they are working in and how they can be contacted. Schools should include this information in the Appendix at the end of this policy.
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, employees or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by ISP).

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- All employees and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the ISP Code of Conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

All employees who have occasional or supervised contact with children (including employees from partner and contracted organisations) will:

- Undergo a safeguarding briefing/onboarding in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- Provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these employees, (appropriate to the role and contact they will have with children) before they commence their role in any ISP school. Where these employees or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the Principal/Designated Safeguarding Lead to assess this risk, not individual employees or partner organisations themselves.
- Where partners/contractors do not have their own safeguarding or child protection policy, the ISP Policy will be used, and partners/contractors asked to read and follow this. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in this document at all times.
- Be provided with guidance on appropriate safe working practice.

TRAINING AND SUPPORT

ISP will ensure that:

- All employees, volunteers and partner agencies in schools are provided with appropriate general safeguarding training on joining the organisation and then undertake annual refreshers. This training will be available through ISP authorised online courses e.g., Safeguarding Essentials on the Learning Hub or in-house training (following the ISP format within the DSL resources), whichever is appropriate, as well as face-to-face events which schools should secure the budget for each year.
- All employees receive safeguarding and child protection (including online safety) updates throughout the school year (for example, via email and e-bulletins) to provide them with relevant skills and knowledge to safeguard students effectively.
- Relevant documents are made available in a range of relevant languages.
- Employees and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up to date knowledge and that they access appropriate additional and specialist training (approved by the Group Head of Operational Risk). This will be refreshed every two years.
- All employees and volunteers are subject to a full onboarding, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate employees are trained in safe recruitment. This safer recruitment training must be renewed annually.
- Training for new starters must be complete before any new starter can have unsupervised contact with students.
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counsellors or external agency input. All ISP schools will hold information in relation to local, regional, or national bodies that may be able to offer direct support in these circumstances.

ISP recognise our duty of care to our employees and where employees have been involved in reporting and responding to abuse, we recognise that this can be very difficult to deal with in

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isolation. ISP will therefore be in a position to offer or broker appropriate external support or counselling for any employee affected by a safeguarding issue. ISP schools will keep a list of organisations (such as law firms, hospitals, and counsellors, which can be made available to employees on request).

FORMS OF ABUSE

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including weapon carrying or threats involving weapons), radicalisation and consensual and non-consensual making or sharing of nudes and semi-nudes (including AI-generated, digitally altered and manipulated images) can be signs that children are at risk.

Child-on-Child Abuse

We recognise that children are capable of abusing their peers. Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. This type of child-on-child behaviour will not be tolerated. It can happen both inside and outside of school and online. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence*, such as rape, assault by penetration and sexual assault.
- sexual harassment*, such as sexual comments, remarks, jokes and online sexual harassment.
- consensual and non-consensual making or sharing of nudes and semi-nudes (including AI-generated, digitally altered and manipulated images).
- 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.
- up-skirting, 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.

*Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All employees must maintain an attitude of 'it could happen here'. Any report of child-on-child abuse should be taken seriously it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

All employees should be aware of the importance of:

- challenging inappropriate behaviours.
- making clear that sexual violence and sexual harassment is not 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,

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- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Employees must report any incidents of child-on-child abuse via the school concern reporting system.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Making or Sharing Nudes and Semi-Nudes

Making or sharing nudes and semi-nudes is when a child or young person creates, sends or shares sexual, naked or semi-naked images, videos or live streams of themselves or others. This may also include images that have been digitally altered or generated using Artificial Intelligence (AI), including deepfakes and manipulated images. Young people may still refer to this behaviour as 'sexting', 'trading nudes', 'dirties' or 'pic for pic'.

- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent or has groomed the child to gain their trust.
- Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.

Students often do not realize that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling the sharing of nudes and semi-nude. Employees must report any incident involving the sharing of nudes or semi-nudes via the school concern reporting system.

Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. School employees, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that employees are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

If an employee has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by capturing the concern via the school's reporting system and speaking to the DSL or a DDSL.

Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to

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help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously.
The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving, or having relationship problems with family or friends. The feelings that these issues bring up can include low self-esteem, low confidence, loneliness, sadness, anger, numbness, and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

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

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

If an employee suspects that a student is self-harming this must be referred to the DSL who will consider the next steps. It is likely that this will require discussion with the student involved and their Parents/Carer's to agree a course of action or referral to an organisation that may be able to support the student.

Radicalisation and Extremism

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, employees should be alert to changes in children's behaviour, which could indicate that they may need help or protection.

ISP values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

Female Genital Mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with through the procedures set out in this document i.e., concerns and signs of FGM must be reported to the DSL.

FGM is potentially damaging to children both emotionally and in terms of health issues and is in breach of articles under the UN convention on the rights of the child. It is illegal in 26 countries across Africa and the Middle East, as well as in 33 other countries including the United States of America and the UK.

We recognise that this is cultural practice in some countries and not always seen as abusive. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the student's best interests. Signs of FGM must be reported to the DSL via the school concern reporting system.

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Forced Marriage (FM)

Forced marriage (FM) is a marriage in which one or both individuals are married without their freely given consent. This coercion can involve physical, emotional, or psychological pressure, and it often involves threats, deception, or abuse. Unlike arranged marriages, where both parties consent to the arrangement set up by families or intermediaries, forced marriages violate the individual's right to choose their partner and make their own decisions about marriage. This is very different to an arranged marriage where both parties give consent.

In 2013, the first United Nations Human Rights Council also adopted a resolution against child and forced marriages. This resolution recognises forced marriage as involving violations of human rights which "prevents individuals from living their lives free from all forms of violence and has adverse consequences on the enjoyment of human rights, such as the right to education."
As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests. However, the school procedures must be followed in the same way as for any other safeguarding or child protection matter.

Children who are absent from education for prolonged periods and/or repeated occasions.

All employees should be aware that children who are absent for prolonged periods and/or repeated occasions, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Employees should be aware of their school's attendance policy and unauthorised absence and children who have unexplainable and or/persistent absences from education procedures.

Domestic Abuse

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

Fabricated and Induced Illness

In fabricated illness the perpetrator (usually a parent or carer) does not directly harm the child but reports to doctors a clinical story which is eventually established to be fabricated. Whereas with induced illness the perpetrator inflicts direct (hands on) harm to the child. This can range from trivial injuries such as pricking the child to add blood to urine, through to suffocation. All schools must have a robust attendance policy to aid the monitoring of child illnesses. When a parent reports that a child has an illness which requires a health plan the school must work in collaboration with the medical practitioner treating the child.

Note: *The above is not an exhaustive list of all the potential forms of abuse which employees may have to deal with on occasions. For information, please see "Keeping Children Safe in Education" 2026. Annex B. This is a UK publication, but the types of abuse discussed are valid and can apply to any country around the world.* ***All employees based in the UK are required to read and acknowledge receipt of Part 1 of the document.***

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PREVENTATIVE MEASURES AND LINKED POLICIES FOR SAFEGUARDING CHILDREN

E-Safety

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

- Inappropriate content.
- Deepfakes – images, video or audio.
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or running up debts.
- Cyber Bullying.
- Inappropriate use of AI chatrooms / Chatbots.

ISP believes the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. Each school's curriculum should include appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies, and language they need to take appropriate action.

Mobile phones and Camera images

It is our policy that practitioners, teachers, and visitors to our Early Years settings should not use personal mobile phones to take images of children. In our primary and secondary schools, if personal equipment is used to capture child images, these images should be uploaded to the schools' system as soon as possible and immediately deleted from personal equipment. These measures must be completed before an employee leaves the school premises at the end of a school day. Permission to capture images, videos or audio recordings should be sought from the Designated Safeguarding Lead or Principal for the school.

At the beginning of school events parents should be reminded of the restriction of taking photos and videos on school site and that they must not take images of any child other than their own.

Publication of school activities on digital platforms

We are aware that the use of digital platforms and social media can make children particularly vulnerable to 'grooming' and the growing threat of deepfake manipulation where an existing image or video is replaced with a likeness. Therefore, all ISP employees will ensure that when promoting school activity on these platforms they adhere to the following measures:

- Obtaining written consent from a child and their parents or carers before taking and using a child's image.
- Explaining what images will be used for and what potential risks are associated with sharing images of children.
- Making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published.
- Changing the names of children whose images are being used in school published material whenever possible (and only using first names if we do need to identify them).
- Never showing screen shots of video conferencing lessons or meetings that show children's faces and full names.
- Only using images of children in appropriate clothing.
- Avoiding full face and body shots of children taking part in activities such as swimming.
- Never publishing personal information about individual children and disguising any identifying information.

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- Making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information).
- Reducing the risk of images being copied and used inappropriately by using correct settings on digital platforms.
- Where possible reduce the risk of images being altered by using a digital watermark on them. This can discourage deepfake creators from using content since it makes their efforts more traceable.

Photographs for School publications and marketing

- Photographs of students being used by employees for marketing are only taken on school cameras/devices.
- Images should be saved on a secure server/database and printed copies only used within the school for purposes such as displays, records and learning journals. Images to be used for marketing need to be agreed with parents/carers before use.
- Visitors and parents/carers should be asked not to use mobiles devices within the school and/or early years setting, except where permission has been granted to capture images of their own child or children.
- All parents/carers must give permission for photographs to be used for publicity purposes and to sign a disclaimer if they do not wish their child's image to be used externally.

Failure of employees to adhere to the above measures to safeguard the children in our care will result in disciplinary action.

Guidance reducing identifiability in school published imagery

Where practical, schools are encouraged to consider whether a photograph needs to show a pupil's face clearly at all to achieve its purpose, for example, favouring distance shots, images taken from behind, or group shots, rather than front facing portraits, particularly for imagery published externally. This is a precaution against the growing risk of published photographs being taken and misused to generate AI deepfake or 'nude' images, and schools should apply this alongside, not instead of, the consent requirements above. Schools are also encouraged to periodically review previously published imagery on their websites and social media channels, not only at the point of upload.

Anti-Bullying

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Employees at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve either face-to-face or the misuse of social media or technology. Each school should have its own policy and approach to restorative practices, and all our schools will demonstrate a commitment to help resolve specific issues. ISP has a separate Anti-Bullying Policy Statement which must be referred to and fully referenced in relation to the bullying of any student.

Children with Special Educational Needs and/or Disabilities

All employees should recognise that children with Special Educational Needs and Disabilities can mean additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it is easy to assume that a child's mood, behaviour, or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted on by behaviours such as bullying but they may not show any outward signs. Communication difficulties can make it very difficult for a child to indicate what's happening and, therefore, may make it very difficult to overcome any such barrier. Employees should be extra vigilant and report all concerns, avoiding making

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assumptions about the causes of any injury or behaviour. ISP has a separate Group Inclusive Learning Policy.

Physical Intervention / Restraint

There may be times when adults in schools, during their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation. UK government guidance has been issued in relation to the use of reasonable force and can be used as best practice advice. (Schools may wish to add their own local best practice advice and guidance here if available).

https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

The Principal / Head of School should require any adult involved in any such incident to report the matter to him/her as soon as possible. The employee is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified where possible.

Where intervention has been required a senior employee should be asked to debrief the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept, and the student checked for any injuries.

Parents/carers should always be informed when an intervention has been necessary.

Intimate personal care

There may be times where students need support with intimate care tasks, each school should have a policy outlining procedures to keep children safe, the policy must include the requirements:

- Two staff are to be present during delivery of personal care.
- No mobile phones or cameras are to be present during delivery of personal care.

ISP has an Intimate Personal Care Policy template that schools can utilise in developing their own policy and guidance.

Weapons on Campus

All students, staff, parents, visitors, and contractors are strictly prohibited from possessing weapons on campus. All incidents involving weapons on ISP premises is a Child Protection (CP) issue and is a potential level 2 or 1 under the ISP Incident and Crisis Reporting Management Policy. The school should notify the Regional Managing Director (RMD) within 60 minutes of the incident occurring. The RMD will then notify the Divisional CEO and the Group Head of Operational Risk in line with the ISP Weapons on Campus Policy.

Safer Recruitment

We will do all we can to ensure that all those working with children in our regions and schools and across our whole group are suitable people. To do this, all employees who will work in an unsupervised capacity with children or young people will be recruited using safer recruitment procedures (see ISP's safer recruitment policy).

Safer Recruitment involves scrutinising applicants through the interview process and application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks.

All interview panel members at ISP, regional and school level, who are interviewing for a post or posts, will have undertaken safe recruitment training within the last twelve months. All schools will keep a central record of all the recruitment checks undertaken on all employees. This record will include details relating to all relevant criminal background checks covering the previous 10 years i.e., date completed and number, home country and international countries criminal records

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checks or certificates of good conduct, qualifications, prohibition order checks etc. International schools should be asking any potential employee who has lived or worked in the UK to obtain an International Child Protection Certificate (ICPC) and not a DBS. DBS (Disclosure and Barring Service) should only be used for potential employees currently resident in the UK.

Where information is disclosed as part of the criminal records checking process, whether this is information about cautions, convictions or soft information, any disclosure will lead to a risk assessment being completed prior to appointment. This risk assessment will be signed off by the Regional Head of HR and Regional Managing Director.

LOW-LEVEL CONCERNS

Employees are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Its purpose is to help create and embed a culture of openness and trust in which the clear values and expected behaviour set out in both our Child Protection and Safeguarding policy and ISP Code of Conduct are lived, monitored, and reinforced.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the ISP Code of Conduct and / or school's Staff Behaviour policy, and
- does not meet a level of concern where staff feel they should report under the Safeguarding and Child Protection Policy,

Examples of low-level concerns include, <u>but is not limited to</u>:

- being over friendly with children.
- having favourites.
- communicating with pupils on social media.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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.

Note: low-level concerns will normally be addressed by the Head of School, Principal or Executive Principal however if this is a repeat of a low-level concern or the concern escalates then it should be referred to the RMD and Regional Head of HR for review.

PROFESSIONAL BOUNDARIES AND STAFF/STUDENT RELATIONSHIPS

All employees, volunteers, contractors and any other adults working on behalf of the school are responsible for maintaining appropriate professional boundaries with students at all times. Relationships between adults and students must remain professional, transparent and capable of scrutiny, both within and outside the school environment. Staff must avoid any conduct that could compromise their position of trust, create an actual or perceived conflict of interest, lead to allegations of misconduct, or place a student at risk of harm. The welfare and best interests of the student must always be the primary consideration.

Employees must not establish or seek personal relationships with students and must not engage in behaviour that could reasonably be interpreted as grooming, favouritism, emotional dependency or the development of an inappropriate attachment. Staff should avoid exclusive relationships with

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individual students and must not show favouritism or provide preferential treatment that cannot be objectively justified.

Communication with students must only take place through approved school systems and for legitimate educational or safeguarding purposes. Employees must not communicate with students through personal social media accounts, private messaging applications, personal email accounts or other non-school communication channels. Staff must not accept or initiate social media friend requests, follows, direct messages or similar online interactions with current students. Personal mobile telephone numbers, email addresses and social media account details must not be shared with students.

Employees should avoid one-to-one situations with students where they cannot be observed by others. Where individual meetings are necessary, they should take place in appropriate professional settings, be known to colleagues or line managers, and wherever possible be visible to others. Staff should be particularly mindful of situations occurring outside normal school activities or school premises.

Employees must not give gifts, money, loans, personal rewards or other items of value to individual students unless there is a clear educational or welfare rationale and prior approval has been obtained from the Principal or Designated Safeguarding Lead. Equally, staff should exercise caution when receiving gifts from students or families and must comply with the school's Gifts and Hospitality requirements. Any exchange that could be perceived as creating an obligation, favouritism or a special relationship must be avoided.

Staff must not transport students in personal vehicles, invite students to their homes, arrange private meetings or social activities, or maintain contact with students outside school without prior authorisation and appropriate safeguarding oversight. Any exceptional circumstance must be risk assessed and approved by the school leadership.

Employees must recognise that professional standards apply both inside and outside the workplace. Conduct that breaches this policy, the ISP Code of Conduct, or accepted safe working practices may be treated as a safeguarding concern, low-level concern, disciplinary matter, or where appropriate, a criminal matter.

Any employee who becomes aware of conduct, whether their own or that of another adult, that may be inconsistent with professional boundaries, could be perceived as inappropriate, or may constitute a low-level safeguarding concern, must report the matter promptly to the Principal.

If the concern involves the Principal, the matter must be reported promptly to the Regional Managing Director.

WHISTLEBLOWING

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

Malicious whistleblowing, however, will be seen as a potential disciplinary matter. ISP provides global whistleblowing guidance to support consistent practice across the group. Each region is required to maintain its own whistleblowing policy, developed in line with the ISP guidance, local legislation and best practice, which must be referred to and fully referenced in the event of such an incident.

ALLEGATIONS AGAINST EMPLOYEES AND VOLUNTEERS

An allegation can be made against an employee or volunteer at any point. It is important that any such allegations are treated seriously, and appropriate procedures followed.

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

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

In the event of an allegation being made against an employee (or a volunteer helper), it will always be investigated by the Head Teacher, Principal or Executive Principal who will notify the Regional Managing Director within 60 minutes of the incident occurring in line with the Incident and Crisis Management Policy.

The Regional Manager Director should assess the allegation against the Incident and Crisis Management Policy levels. For Crisis Level potentially level 3, 2 or 1, the RMD notifies the Senior Operational Risk Manager (SORM) and informs the Group Incident and Crisis Team. If a criminal act has been committed, the matter should be referred to the local authorities where appropriate.

If there is any doubt about the crisis level, the RMD should report to the Group Incident and Crisis Team to review and advise (via "Incident Team" incidentteam@ispschools.com).

If it is felt, after these initial consultations, that further enquiries are needed, then the employee may be suspended. Suspension is a neutral act, and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. **No decision to suspend should be taken without involving the relevant Regional Head of HR and the Group Head of People Operations** as individual countries will have specific legal guidance and processes that will need to be followed.

In cases of allegations against a Principal or school SLT member, it is expected that the Divisional CEO will notify the Group Incident and Crisis Team.

Employees will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the ISP Code of Conduct for employees and volunteers and the guidance for safe working practice, this includes the school Intimate Care policy.

SAFEGUARDING PROCEDURES

Adults concerned about a student

If an employee suspects that any student in their care may be a victim of abuse or is at risk of abuse or other form of harm, they should not try to investigate and instead should inform the Designated Safeguarding Lead (DSL) about their concerns as soon as possible.

Employees must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm. In many cases a student will not make a direct disclosure, but employees will be concerned because of a physical or emotional indicator. In these circumstances employees should still use the record of concern form and the body map (if appropriate), to make a report to the Designated Safeguarding Lead.

Where any student makes any form of direct disclosure, the guidelines under the heading '**Dealing with Disclosure**' below should be followed.

Dealing with Disclosure

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

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

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Receive

Where possible always stop and listen to a child who wishes to speak in confidence. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say, "I can't stop now but come and see me in my office at….". Where possible during any disclosure try to listen, allow silences, and try not to show shock or disbelief.

Reassure

Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.

React

React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as… "is there anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.

Record

Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date, and place as well (see the record of concern form).

Report

Where a child makes any disclosure, or where you have concerns for any reason, it is very important that the procedures outlined in this document are followed. A full written/typed account of the concern (ideally using the record of concern form) should be passed to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed body map.

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal / Head of School in the absence of the DSL), should be informed as soon as possible. The DSL will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The DSL will then consider and where necessary, consult on the information available. It is the role of the DSL to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

Working in an international context

ISP recognises the diverse and complex local contexts our schools operate in. Therefore, the following principles are considered when following the framework and procedure for disclosure, reporting and further action:

As International Schools we:

- Often reside in cities and countries that offer little external support.
- Recognise the limitations in the areas of child protection.
- Need to assess the quality and skills of counsellors and other support staff in dealing with children who have suffered harm or self-harm, in order to determine the boundaries of their work.
- Need to act in accordance with local legislation as well as the principles and practices outlined in this policy.

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Local Safeguarding Agencies / Advice

Each school MUST insert local arrangements and contact details for local agencies and bodies who can both advise or accept referrals in the Appendix at the end of this policy. Alternatively, schools are free to produce a separate document that outlines which, if any, agencies are contactable or available for the school to seek advice from or make referrals to. Names and contact details of the DSL should also be included.

Record Keeping

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

- Child protection records should be stored in a secure (i.e., locked) filing cabinet or in a secure electronic system such as MyConcern (its use must be authorised by the Group Head of Operational Risk). Safeguarding information must not be recorded on the schools MIS system. Files should be accessible through the Designated Safeguarding Lead (or their deputy) and other senior employees in larger schools to ensure reasonable access.
- Records of any child disclosure should be clearly dated and filed without future amendment.
- Expanded guidance in KCSIE 2026 emphasizes maintaining detailed records of concerns, discussions and decisions, including the rationale behind decision making.
- Child protection records should be separate to the general education file, but the child's general school record file should be marked to indicate that a child protection file exists (e.g., red star or similar). All employees who may need to consult a child's school file should be made aware of what the symbol means and who to consult if they see this symbol.
- A child protection file (Electronic or otherwise) should be started for an individual child as soon as the school is aware of any child protection concerns about that child. This may arise in a number of ways e.g.:
    - If an employee raises a concern about the welfare or well-being of a child – this should be recorded in writing (see below for guidance).
    - If information is forwarded to the school by a previous school attended by the child.
    - If the school is alerted by another agency of child protection concerns about that child.
- Employees should make a written account of any concern they have regarding the welfare or well-being of a child, using the schools pro forma. This record should be passed as soon as possible to the Designated Safeguarding Lead. Concerns, which initially seem trivial, may turn out to be vital pieces of information later. So, it is important to give as much detail as possible. A concern raised may not progress further than a conversation with the Designated Safeguarding Lead but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from a file for any reason, a dated note should be placed in the file indicating who has taken it, why and when.
- The record pro forma should include (see Record of Concern Form):
    - A record of the child's details: name, date of birth, address, and family details.
    - Date and time of the event/concern.
    - The nature of the concern raised.
    - The action taken and by whom: Name and position of the person making the record.

In the case of disclosure, remember the record you make should include:

- As full an account as possible of what the child said (in their own words).
- An account of the questions put to the child.

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- Time and place of disclosure.
- Who was present at the time of the disclosure.
- The demeanour of the child, where the child was taken and where returned to at the end of the disclosure.

Confidentiality

Schools should regard all information relating to individual Safeguarding/child protection issues as confidential and should treat it accordingly. Information should be passed on to appropriate persons only at the discretion of the Principal/Designated Safeguarding Lead and this should always be based on the need to know. All records relating to child protection should be secured appropriately.

AUDITING, REPORTING AND REVIEW

Elements of safeguarding practice in schools will be audited during the Group Operational Risk Team's annual safety and safeguarding audits.

This policy will be reviewed annually to ensure updates to KCSIE are incorporated by the Group Head of Operational Risk, Group Head of People Operations and ExCo.

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Appendix 1 Template for DSL contacts and Local agencies

Schools should include names and contact details of the DSL and Deputy here.

Each school MUST also insert local arrangements and contact details for local agencies and bodies who can both advise or accept referrals. Alternatively, schools are free to produce a separate document that outlines which, if any, agencies are contactable or available for the school to seek advice from or make referrals to.

DSL contact details

Name of School: Instituto Thomas Jefferson Palomar

Designated Safeguarding Lead(s)

Name of DSL: Eustolia Martínez Rodríguez

Contact email: emartinezr@itjgdl.edu.mx

Contact telephone: 33 12 53 33 50

Deputy DSL(s)

Name of DDSL: Jorge A Saavedra Guitiérrez

Contact email: jsaavedrag@itjgdl.edu.mx

Contact telephone: 33 12 53 33 50

Local referrals and support

Local safeguarding agency:

Local safeguarding advice:

Charlotte Crossland

Charlotte Crossland (21 sept.. 2026 14:17:43 MDT)

Directora General del Instituto Thomas Jefferson Palomar

Eustolia Martinez Rodriguez

Eustolia Martinez Rodriguez (21 sept.. 2026 14:15:23 MDT)

Líder de safeguarding del Instituto Thomas Jefferson Palomar

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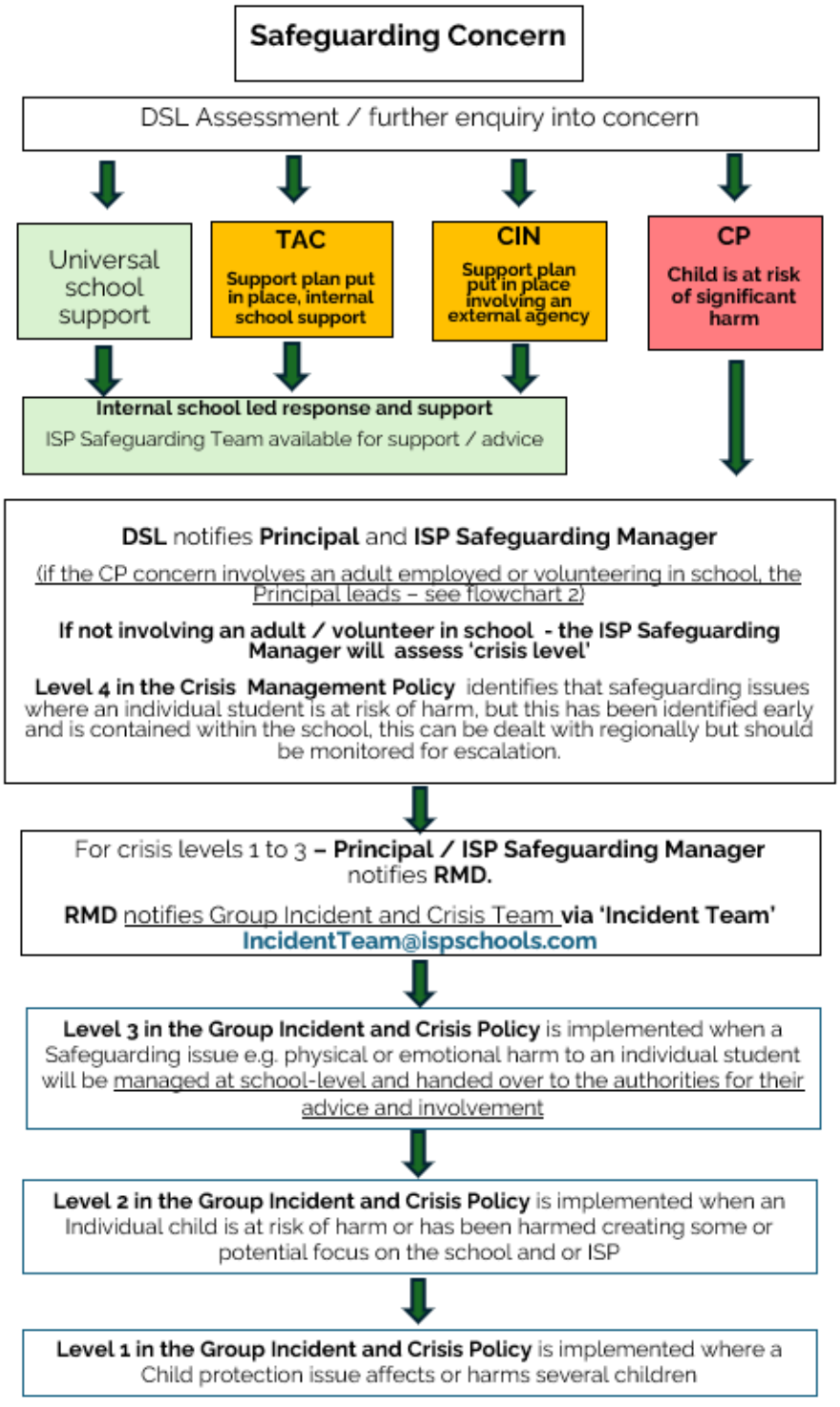
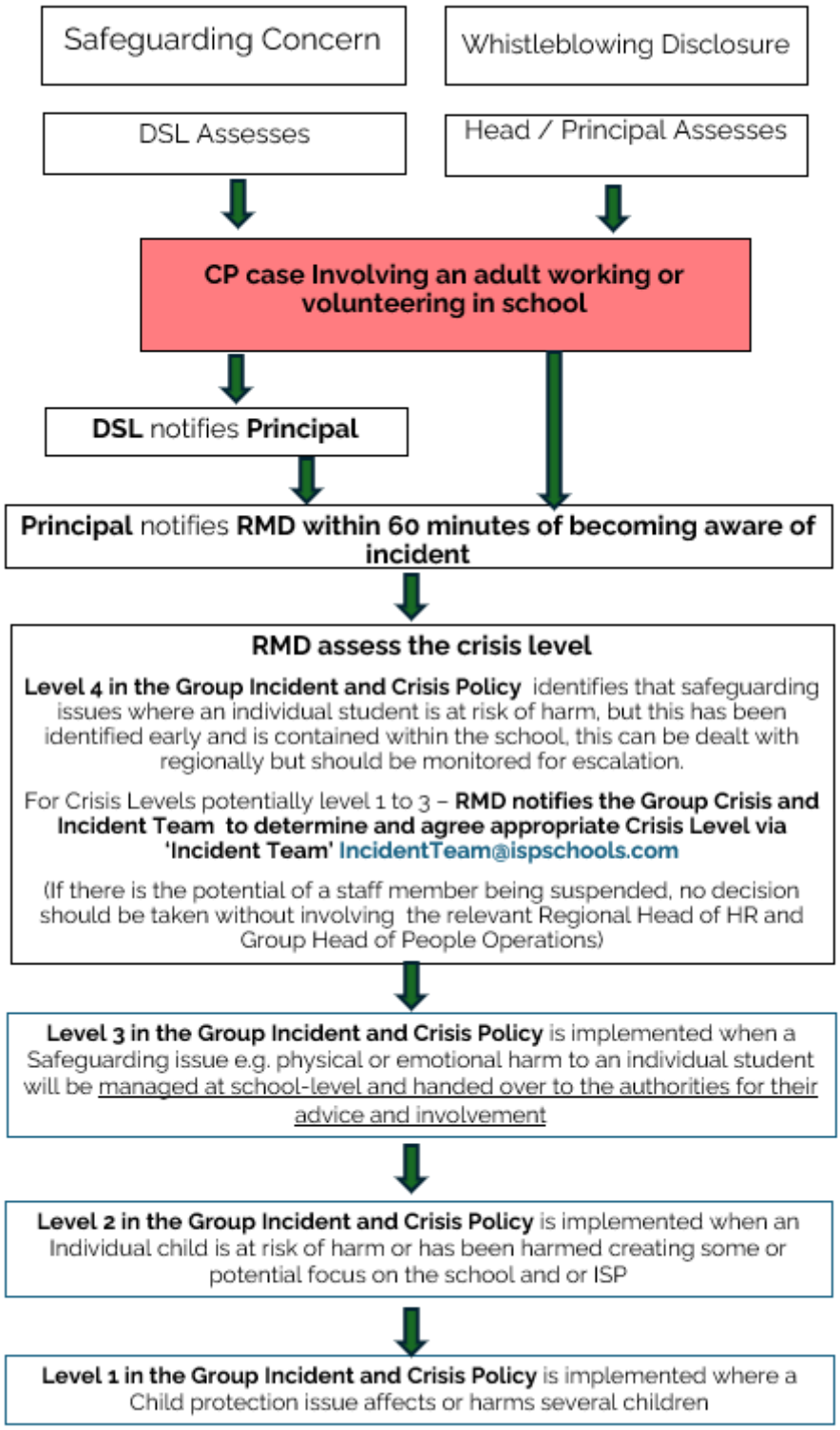
APPENDIX 2: FLOWCHART 1: REPORTING LINES FOR CP CASES



If there is any doubt about the crisis level the RMD should refer to the Group Incident and Crisis Team.

APPENDIX 3: FLOWCHART 2: REPORTING LINES FOR CP CASES INVOLVING AN ADULT WORKING OR VOLUNTEERING IN SCHOOL



If there is any doubt about the crisis level the RMD should refer to the Group Incident and Crisis Team.