



**COLEGIO MENOR  
SAMBORONDÓN**

A NORD ANGLIA EDUCATION SCHOOL

# Nord Anglia Education Policy on Safeguarding, Child Protection and Promoting the Welfare of Children in our Care.

October, 2020

## Section 1: Introduction and Context

### 1.1 Our Principles, Beliefs and Philosophy

Colegio Menor, as part of the NAE family, shares Nord Anglia Education's unique philosophy to 'Be Ambitious', which is underpinned by our belief and commitment that all of our students will be supported to realize their ambition by learning and thriving in the safest possible environment. Our students are empowered to make decisions for themselves and are supported in this by learning through specific elements of the curriculum, aimed at enabling students to keep themselves safe (e.g. through personal, social and health education, Wellness programs or similar).

Colegio Menor recognizes that having a safeguarding and child protection policy does not mean that any risk to our students is eliminated. Rather, we expect that all Nord Anglia Education staff, including all staff and volunteers in our school and any contractors or partner agency staff used by the school, recognize where a student is at risk of, or is actually being harmed, and do all they can to reduce further risk or further harm.

We recognize that our school is particularly important in protecting our students; we are in the best position to identify concerns early and provide or identify help for students as well as helping to prevent these concerns from escalating. Consequently, Nord Anglia Education and Colegio Menor accept and adhere to these basic 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 equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/caregivers 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 recognize that we need to do more for some students because of their special educational needs, disability, gender, religion or sexual orientation.

### 1.2 Aims and objectives

Nord Anglia Education and Colegio Menor aim to:

- Provide a world class, safe and happy environment to enable students to thrive and learn.
- Outline the systems and processes we all take to ensure that students remain safe at school.

- Raise awareness to all staff of safeguarding/child protection issues, and define their roles and responsibilities in reporting possible cases of abuse.
- Identify students who are suffering, or likely to suffer harm.
- Ensure effective communication between all staff on child protection/safeguarding issues.
- Set effective procedures for staff/volunteers or third party individuals who encounter any issues in relation to child protection/safeguarding to follow.
- Be clear with all parties, including students and their parents/caregivers, regarding our approach to safeguarding and child protection, through the provision of clear policies.

### 1.3 Accountability and Ownership

This policy will also be applied to any partner agency with unsupervised access to children and young people through their work with Colegio Menor, as well as any contracted organization.

### 1.4 Definitions

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

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

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

## Section 2: Rationale

This policy sets out the principles and expectations, as well as the procedures and processes, which must be adopted by the Colegio Menor Community. The policy also describes the steps that are taken in meeting our commitment to safeguarding students, at both school and organizational level.

The Colegio Menor Safeguarding and Child Safety and Protection Policy is based on international and Ecuadorian law as well as the **United Nations Convention on the Rights of the Child**, of which Ecuador is a signatory. The two key articles of the Convention are the following:

- *Article 19 – Protection from Abuse and Neglect*

The State shall protect the child from all forms of maltreatment by parents or others responsible for the care of the child and establish appropriate social programs for the prevention of abuse and the treatment of victims.

- *Article 34 – Sexual Exploitation*

The State shall protect children from sexual exploitation and abuse, including prostitution and involvement in pornography.

The **Ecuadorian laws** that guide our Child Safety and Protection Policy are the following:

- Ley Orgánica de Educación Intercultural (LOEI)
- Código de la Niñez y la Adolescencia
- Ministry of Education Mandate (MINEDUC-MINEDUC-2017-00055-A) states: “Emitir evidencias correspondientes de la prueba de evaluación psicométrica que la institución educativa utiliza dentro de los procesos de selección de personal docente”.

The mandate specifies that the school’s recruiting and selection process should cover the following:

- Create a manual of recruiting / selection policies and procedures.
- Create a Selection Committee that must include a Colegio Menor mother, a Colegio Menor father and the Legal Representative of the school.
- Have updated job descriptions for every position.
- Demonstrate that the position was shared internally and externally.
- Validate that the candidate’s information is legit.
- Apply psychological testing to selected candidates.
- Reference Checks.
- Require Background checks.
- For academic personnel: ask candidates to do demo lessons.
- Evaluate all personnel at least 2 times a year.

Ministry of Education Mandate (MINEDUC-2017-00098-A) states: “previo a la contratación del personal docente en las instituciones educativas particulares y fiscomisionales, la máxima autoridad del plantel educativo solicitará una declaración juramentada ante notario; en la que el aspirante exprese que no ha estado vinculado en algún sumario administrativo relacionado a hechos de abuso, acoso, violación o cualquier otro hecho de connotación sexual, así como no tener ningún proceso judicial planteado en su contra por los mismos hechos”. (English translation): “Prior to the recruitment of teaching staff at private and fiscomissional educational institutions, the highest authority of the educational establishment shall request a notarized declaration, in which the applicant expresses that he has not been linked in any administrative summary related to acts of abuse, harassment, rape or any other act of sexual connotation, as well as not having any judicial proceedings brought against him/her for the same acts.” At Colegio Menor we require all personnel to present a Declaración Juramentada, not only academic personnel.

In addition to Colegio Menor’s commitment to the UN convention on the rights of the child, as part of Nord Anglia Education, we have adopted the safeguarding standards set by the international safeguarding organization “Keeping Children Safe” to benchmark against; and the UK schools’ statutory guidance ‘Keeping Children Safe in Education’ (September 2016). The policy is also underpinned by the UK multi-agency guidance “Working together 2015” where relevant.

## 2.2 Related Documents

This overarching safeguarding/child protection policy should be read in conjunction with the Colegio Menor recruitment policy, whistleblowing policy, code of conduct for all employees, NAE guidance for

safe working practice, the Colegio Menor social media policy, and any other related policies.

## Section 3: Organizational and Individual Responsibilities

### 3.1 Nord Anglia Education Senior Management Responsibilities

EXCO, the Chief Executive Officer and the Education Director recognize their ultimate responsibility to ensure that the organization and all Nord Anglia Education schools understand and follow the guidance provided by this and all other safeguarding related policies.

### 3.2 General Director, Principals and Senior Management team (Teachers, Homerooms, Ombudsmans) in Schools Responsibilities

The General Director, Principals and Senior Management team in school must:

- Ensure that this policy and procedures are implemented across their school and followed by all staff and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and deputy Designated Safeguarding Lead (dDSL) to carry out their role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the school site is secure.
- Customize these procedures to fit their school and geographical location.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's customized version of this policy.
- Only deploy staff who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy.
- Ensure that during any outbreak of COVID-19 and/or provision of Virtual Education these procedures continue underpin our engagement with our students.

### 3.3 Responsibilities of the Designated Safeguarding Lead (or Deputy) in a school

According to Ecuador's Ministry of Education, the Colegio Menor Counseling Department (Departamento de Consejería Estudiantil - DECE) is responsible for the well being of every student and the community. That is why the Designated Safeguarding Leads in charge of this department and will intervene in all Safeguarding matters ([Modelo de Funcionamiento de los Departamentos de Consejería Estudiantil](#), 2016).

Colegio Menor will identify all counselors as the Safeguarding Leads (DSL), and the Coordinator of Counseling Department as the Deputy Designated Safeguarding Lead (dDSL) to support the Principal/Head Teachers on each site. 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 prioritize safeguarding when necessary.

The designated staff 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 / Deputy Designated Safeguarding Lead will:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- Make sure that all staff, both teaching and non- teaching, are aware of their responsibilities in relation to safeguarding and child protection, with the support of Principals and Head Teachers.
- Have appropriate training in addition to the basic training that all other staff receive. The expectations around appropriate training during COVID outbreaks are covered in section 8 of this document.
- Collate and keep accurate and confidential records of any concerns about children.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL is in their setting or, if being supported remotely during a COVID outbreak, who is providing this support and how to contact them.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All staff have the responsibility to report to Counselors as they are DSL or to Deputy 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.

Responsibilities on all staff, including partner organizations and contractors who have regular unsupervised contact with children (where 'regular' is defined as once a week or more).

### 3.4 All staff will:

- Ensure they are familiar with and follow this safeguarding policy and all other safeguarding related policies e.g., Codes of Conduct, guidance for safe working practice.
- Be subject to safe recruitment processes and checks prior to starting at the school/organization.
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL) from the corresponding section.
- In Colegio Menor Campus Samborondón, the **Designated Safeguarding Leads are the counselors:**

- Consuelo Mendoza - Early Childhood Counselor, [maria.mendoza@colegiomenor.edu.ec](mailto:maria.mendoza@colegiomenor.edu.ec)
- Ana Paula Villacis - Lower School Counselor - Extension 307, [ana.villacis@colegiomenor.edu.ec](mailto:ana.villacis@colegiomenor.edu.ec)
- María Sol Sánchez - Lower School Counselor - Extension 320, [maria.sanchez@colegiomenor.edu.ec](mailto:maria.sanchez@colegiomenor.edu.ec)
- Pamela Castro - Middle/High School Counselor, [pamela.castro@colegiomenor.edu.ec](mailto:pamela.castro@colegiomenor.edu.ec)
- Natali Zurita - Counseling Department coordinator - Extension - 332, [natali.zurita@colegiomenor.edu.ec](mailto:natali.zurita@colegiomenor.edu.ec) all are located according to each section.

**Deputy DSL:** Natali Zurita. Coordinator of Counseling Department - Extension - 332, [n.zurita@colegiomenor.edu.ec](mailto:n.zurita@colegiomenor.edu.ec)

- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by Nord Anglia Education).
- All staff and volunteers need to recognize that if their behavior inside or outside the workplace breaches the NAE and Colegio Menor code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

### 3.5 All staff who have occasional or supervised contact with children (including staff from partner and contracted organizations) will:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report. This is provided in dual language in English and Spanish.
- 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 staff, (appropriate to the role and contact they will have with children), before they commence their role at Colegio Menor. Where these staff or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the General Director, Principal/Head teacher/ Designated Safeguarding Lead to assess this risk, not individual members of staff or partner organizations themselves.
- Where partners/contractors do not have their own safeguarding or child protection policy, Colegio Menor/Nord Anglia Education will provide a copy of our own policy and ask partners/contractors to read and follow this. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in this policy at all times. This includes any specific guidance relating to the provision of virtual education.
- Be provided with guidance on appropriate safe working practice. Principles of this guidance also apply to the provision of virtual education.

## Section 4: Staff Code of Conduct for Child Safety and Protection

The intent of this Code of Conduct is to provide guidelines on adults' interactions with students (including employees and volunteers, or any adult that enters school grounds or participates in activities

with students).

These guidelines provide succinct and clear language. Having a common set of expectations also serves to protect adults (i.e., anyone 18 years of age or older) interacting with minors from invalid reports of inappropriate behavior. By putting these guidelines into place, an adult's interaction with a child is much more transparent to others and less likely to be interpreted incorrectly.

Adults assume the full responsibility of setting and maintaining clear, appropriate boundaries in all interactions with minors. The most effective way to prevent abuse of minors is to be vigilant. This Code of Conduct includes, but is not limited to, the following expectations of all Colegio Menor employees or volunteers.

**Within the work environment and other settings where children are present:**

In any situation with minors, we will use as many of these safeguards as possible with a minimum of at least one, which will reduce risk and demonstrate professionalism.

**1) Visibility:**

All interactions with minors will be planned in a way that minimizes risks as far as possible. This includes being visible to other adults when interacting with minors. This can be accomplished by planning activities in areas where other adults are present and at a time when other activities are occurring, and by keeping doors open when meeting one-to-one.

**2) Overcoming Isolation:**

An adequate number of adults will supervise activities, with at least two unrelated adults (i.e., not from the same family). In the case of youth activities, the genders represented by the children participating will be reflected in the adult supervision, especially for overnight activities. Isolation can also be overcome by avoiding being alone with a minor and by employing the principles of visibility (explained above) or accountability (explained below).

**3) Accountability:**

All staff members are responsible for giving and accepting feedback from others in order to maintain a high level of professionalism and integrity in interactions with children. When interaction with a minor involves one-on-one contact, the following procedures should be followed, as applicable:

- a. Always be accountable to other adults regarding your interactions with minors.
- b. Parents and/or supervisors are to be notified beforehand of any activities with minors.
- c. One-on-one services or other necessarily confidential meetings with minors should adhere to the principles of visibility and accountability (explained above).
- d. Meetings should be done only when another adult is aware that the meeting is occurring and willing to stay in the vicinity until it is completed.

**4) Supervision:**

Division administrators will regularly and randomly visit classrooms, offices, work areas, and



other areas where minors and adults are together.

#### **5) Differential Treatment:**

Adults must avoid favoring or showing differential treatment to particular minors to the exclusion of and in the presence of others.

#### **6) Technology:**

Technology and social media should be used appropriately, protecting children from abuse and exploitation. This includes technology and social media used on and off campus. Adhere to the Acceptable Use of Technology Policy.

#### **7) Discipline:**

Discipline actions must be conducted within a framework of respect and with the intention of fostering positive behaviors and taking responsibility for one's own actions. The following actions are unacceptable:

- a. Any forms of hostile or rejecting treatment;
- b. Any behavior that assaults a child;
- c. Holding a child against their will outside the goals of protecting them from danger and providing them medical care or keeping them from harming themselves or others.

#### **8) Touch:**

The following guidelines apply:

- a. Touch should be in response to the need of the child and not the need of the adult.
- b. Touch should be open rather than secretive. Affection toward children should not be conducted in isolated areas or when alone with a child.
- c. Touch should be age-appropriate. Resistance from the child should be respected.
- d. Touch should always communicate respect for the child. Adults should avoid doing things of a personal nature for children that they are able to do themselves, including dressing, bathing, etc., except in the case of medical and health care professionals who may engage in making contact with a child's private areas as part of a medical necessity. In these cases, when possible the medical professional will get verbal authorization from the legal guardian, and/or have another medical professional or teacher present during contact.
- e. Refrain from contact above the mid-thigh, including the abdomen and chest areas. In case of a medical emergency where on-site treatment is necessary, the medical professional will use the highest standards of professionalism if treatment is needed in these areas, having another adult present.
  - a. Avoid physical contact in stretching out a player. The coach or trainer may provide verbal instructions or instruct another player of the same gender on how to assist with stretching.
- f. The following signs of affection are generally appropriate: verbal praise, or shoulder-to-shoulder hugs. For lower elementary children, touching their hands, faces,

shoulders and arms.

- g. The following behaviors are inappropriate and unacceptable:
- Touching buttocks, chests, genital areas, private areas
  - Flirtatious or seductive looks
  - Any form of affection that is unwanted by the child
  - Any behavior that could be interpreted as sexual in nature

#### **9) Verbal Interaction:**

Adults should use words to support and encourage a minor, such as praise and positive reinforcement. Inappropriate verbal interaction includes the following: shaming; belittling; humiliating; name calling; using harsh language that may frighten, threaten or humiliate the minor; cursing or making derogatory remarks about the minor, their family, and/or their place of origin; comments that relate to physique or body development or any sexually suggestive comments.

#### **10) Monitoring Child-to-Child Behavior:**

The following actions may involve abuse or inappropriate behavior of one child to another and are not to be permitted:

- bullying (refer to anti-bullying policy)
- hazing (i.e., harassing, humiliating tasks as a form of initiation into a group, playing rough practical jokes)
- derogatory name-calling, ridicule or humiliation
- publically singling out another child for negative treatment or exclusion
- child-to-child inappropriate sexual touch, showing of sexually explicit images, use of inappropriate sexually explicit language
- hitting or slapping, pushing, holding against their will or otherwise assaulting another child

#### **Acknowledgement Statement:**

Every employee and volunteer will sign an acknowledgement of this Code of Conduct for Child Safety and Protection on an annual basis before beginning their role at Colegio Menor. Every year, employees and volunteers are required to complete the Child Safety Training offered during Faculty Orientation. Non-compliance with the Code of Conduct will be reported directly to the Head of School, who will determine the appropriate consequences. It is the responsibility of the division leaders to ensure all staff sign this form and adhere to the expectations outlined in the Code of Conduct.

The acknowledgement states, *"I have read the Colegio Menor Child Safety and Protection Policy including the Code of Conduct, agree to abide by it, and have attended Colegio Menor's training in child safety awareness and prevention. I am aware that these documents constitute part of the school's policy and procedures for all employees and volunteers."*

## **Section 5: Training and Support**

Nord Anglia Education and Colegio Menor will ensure that:

- All staff and volunteers in school are provided with appropriate general safeguarding training on

joining the organization and then at least every three years. This training will be available through Nord Anglia University (NAU) or Educare, as well as face-to-face events. In addition, all staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins or staff meetings) to provide them with relevant up-to-date skills and knowledge to safeguard children effectively. As a minimum, this should be provided annually.

- Relevant policies are made available in a range of relevant languages.
- Staff and volunteers are supported and have the necessary skills to recognize students who are at risk or potentially at risk and take the appropriate action.
- The Designated Safeguarding Lead in schools has appropriate and up-to-date knowledge and access to additional training such as on-line safety and specialist (level 3) training, which is approved by the Education Director/Head of Safeguarding. This will be refreshed every two years.
- All staff and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate staff are trained in safe recruitment. This safe recruitment training must be renewed every five years.
- Training for new starters must be complete before any new 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 Nord Anglia Education schools will hold information in relation to local, regional or national bodies that may be able to offer direct support in these circumstances.

Nord Anglia Education and Colegio Menor recognize our duty of care to our employees and where staff have been involved in reporting and responding to abuse, we recognize that this can be very difficult to deal with in isolation. Nord Anglia Education's schools will therefore be in a position to offer or broker appropriate external support or counseling for any staff member affected by a safeguarding issue. Colegio Menor will keep a list of organizations (such as law firms, hospitals and counselors, which can be made available to staff on request).

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

## Section 6: Forms of abuse and additional safeguarding issues

### 6.1 Key Forms of Abuse

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

The more commonly referred to types of abuse are:

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

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

## 6.2 Prevention

In order to help ensure that all students are protected from abuse, Colegio Menor is committed to the following practices:

- Screening job candidates in a comprehensive manner:
  - Reference check
  - Credential verification (e.g. requesting formal transcript)
  - Criminal background check
  - Court background check
  - Internet check/search
  - "*Declaración Juramentada*" All new employees must bring a signed and notarized *Declaración Juramentada* stating that they have never had any charges for abuse, harassment, rape or any other sexual charge.
  - Personality Test Report
- Enforcing the **Acceptable Use of Technology Policy**.
- Enforcing the **Bullying Prevention and Intervention Procedures**.
- Informing all employees about the Safeguarding and Child Safety Protection Policy, including the Staff Code of Conduct for Child Safety, and requiring a signature of commitment to it.
- Training faculty and staff annually about child protection in order to prevent, recognize and report possible incidences of abuse.
- Training students and parents on abuse prevention strategies.
- Providing age appropriate lessons for students to help them understand personal safety, needs and rights.
- Informing parents about the school's Safeguarding and Child Safety and Protection Policy and their role in ensuring the safety of their children.
- Screening other adults (e.g. volunteers) who may have regular contact with students and informing them of the school's Safeguarding and Child Safety and Protection Policy.
- Applying internet content filters and controls on the student use of electronic devices.
- Asking parents for permission to publish student pictures.
- Ensuring that adults and students are visible to other adults at all times, both on campus and at other school-organized off-campus events or activities.
- Notifying other adults and/or parents when one-on-one meetings or work with students is necessary.
- Conducting random checks of classrooms and other areas of the campus.

## 6.3 Protocols

### PROTOCOLS FOR ABUSE CASES

#### Physical or verbal violence in the school or household:

1. The situation is detected and the area counselor and principal are informed.
2. The Counseling Department Chair is informed.
3. The Counseling Department Chair informs the General Director and keeps him updated, if he is not the aggressor.
4. Area counselor follows the case and prepares a report.
5. The area principal (and counselor if needed) communicates to the student's legal representatives, if they are not the aggressors.
6. File the complaint in the corresponding General Attorney Office (Fiscalía General del Estado).
7. Submit the report to the *"Dirección Distrital de Educación"* attaching the complaint made in the General Attorney Office.
8. For in-school violence cases, decisions will be made according to the *"Código de Convivencia/Coexistence Code."*
9. Provide care and protection for the victim: implement an initial safety plan to make sure that the alleged offender has no further access to or contact with the victim. The initial safety plan may include obtaining any needed medical attention and/or counseling to deal with the immediate physical and/or emotional needs.
10. The General Director guarantees compliance with protection measures, judicial decisions, and collaborates in the investigation process.
11. The Counseling Department Chair will guarantee that victim(s) receive counseling support in school and their families receive a list of referrals for external counseling services.
12. Abuse by school employees will result in immediate termination of the individual from the school, with no opportunity to re-apply for employment or volunteer service, or permission to be on school property.

#### Sexual Abuse:

1. The situation is detected.
2. The Counseling Department Chair is informed.
3. The Counselor Department Chair informs the General Director and keeps him/her updated, if he is not the aggressor.
4. The area counselor follows the case and prepares a report.
5. The principal (and counselor if needed) communicates to the student's legal representatives if they are not the aggressors.
6. Provide care and protection for the victim: implement an initial safety plan to make sure that the alleged offender has no further access to or contact with the victim. The initial safety plan may include obtaining any needed medical attention and/or counseling to deal with the immediate physical and/or emotional needs.
7. The report is filed in the Office of the General Attorney within 24 hours of the identification of the incident.
8. The corresponding judicial office coordinates the actions to guarantee the protection of the victim.
9. The Head of School guarantees compliance with protection measures and collaborates in the investigation process.
10. The Counseling Department Chair will guarantee that victim(s) receive counseling support in school and their families receive a list of referrals for external counseling services.
11. Confirmed abuse by a school employee will result in immediate termination of the individual's contract from the school, with no opportunity to re-apply for employment or volunteer service, or permission to be on school property.

According to Criminal Code Art. 171: The age of consent is 14. Criminal Code Art. 167: An adult who uses deceit to engage in sexual relations with an adolescent aged 14-18 is subject to criminal penalties Source.

**Violence by students, parents and/or legal representatives detected or committed towards school employees:**

1. The situation is detected.
2. The Counselor Department Chair is informed.
3. The Counselor Department Chair informs the Head of School and keeps him/her updated.
4. The Counselor Department Chair follows the case and prepares a report.
5. If the aggressor is a student, the Head of School communicates to the student's legal representatives the measures that are going to be taken.
6. Decisions will be made according to the Código de Convivencia of the School and the Head of School will guarantee the application of alternative measures of conflict resolution. Agreement 434-12.
7. If the aggressor is a student, the Head of School has to inform the *Dirección Distrital de Educación*.
8. The employee may file a complaint in a judicial office or at the General Attorney's Office.
9. The Head of School guarantees that the corresponding follow up and processing of the problem.
10. Offender(s) (students) will receive counseling support in school and mandated external counseling with follow-up on a regular basis.
11. If the aggressor is a student, the "*Dirección Distrital de Educación*" may issue disciplinary measures and guarantee their permanence in the Educational System.

#### 6.4 Female Genital Mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and we acknowledge the risk to our girls and always act in the best interest of the pupil.

We recognize 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 pupil's best interests.

#### 6.5 Forced marriages (FM)

A Forced marriage (FM) is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

According to the Civil Code of Ecuador, Title III of Marriage, Art. 83: Those who have not reached the age of eighteen may not marry without express consent of the person who exercises parental authority.

As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the pupils' best interests. However, the school procedures must be followed in the same

way as for any other safeguarding or child protection matter.

## 6.6 Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously. We are aware of the signs of this and ensure staff are trained to recognize these.

There are some common themes that may help staff 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 staff suspect that a student is self-harming this must be referred to the Designated Safeguarding Leads who will consider the next steps. It is likely that this will require discussion with the student involved and their parents/caregivers to agree upon a course of action or referral to an organization that may be able to support the student.

## 6.7 Child Sexual Exploitation (CSE)

The sexual exploitation of children and young people under 18 can involve exploitative relationships where young people receive something in return for performing sexual acts. Exploitation of any student can occur on a face-to-face level or through the use of technology such as mobile phones or computers. In these situations, a student could be encouraged to send or post indecent images of themselves.

In all cases, the person exploiting students does so by misusing the power they have over them. This power may come through virtue of age, physical strength and/or economic resources. Violence, intimidation and coercion are common in exploitative relationships.

## 6.8 Sexting / Banter

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.

Sexting may also be referred to by students as 'trading nudies', 'dirties' or 'pic for pic'.

There are many reasons why a pupil may want to send a naked or semi-naked picture, video or message to someone else:

- Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.

- To get attention and connect with new people on social media.
- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent.

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

## 6.9 Specific Safeguarding Issues

### 6.9.1 E safety -- [linked to E Safety Policy](#)

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

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

Cyber bullying is an increasingly common form of bullying behavior and is most often related to social networks and mobile phones.

Nord Anglia Education believes the best way to protect our pupils is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programs. The Colegio Menor Counseling Curriculum includes appropriate and frequent opportunities to teach children how to recognize when they and others are at risk and equips them with the skills, strategies and language they need to take appropriate action.

### 6.9.2 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. Permission to capture images, videos or audio recordings on personal equipment should be sought from the Designated Safeguarding Lead or Head Teacher for the school.

#### Photographs for School Publications:

- Photographs of students being used by staff for learning or marketing are only taken on school cameras/devices. Where school devices are not available and personal equipment is



used, this is permissible so long as the images are then only stored and shared through a school-based system and never a personal social media account or other medium.

- Images should be saved on a secure server/database. Images used for marketing or any other purpose need parental agreement before use.
- Generally, staff personal phones should not be used in classrooms and learning areas when students are present except where required as a response to emergency planning or as an interim support to learning as per the first bullet above.
- Visitors and parents/carers should be asked not to use mobile 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 sign a disclaimer if they do not wish for their child's image to be used externally.

### 6.9.3 Allegations against staff and volunteers

The full detail on handling allegations is set out in the [NAE Allegations Policy](#) available on NAU.

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

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

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal 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 a member of the school staff (or a volunteer helper), it will always be investigated by the Principal unless a criminal act has been committed, in which case the matter should be referred to the local authorities where appropriate.

If the Principal deems the allegation to be of a safeguarding nature (criminal or not) the Head of Safeguarding for Nord Anglia Education must be informed as soon as possible and within 24 hours as a minimum. HR must also be informed by contacting the regional HR Director and the Group HR Director as soon as possible. In the case of the allegation being against the Principal, the Regional HR Director, the Regional Managing Director, the Head of Safeguarding and the Group HR Director should be informed.

For serious allegations, the matter must always be reported to the Group Education Director, the Group HR Director and the Chief Executive Officer as soon as possible and the regional emergency plan should be deployed.

No action to investigate the concern should be taken before consultation with the Head of Safeguarding and HR, and agreement reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are needed, then the member of staff 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. The school will seek advice from the Regional HR Director/Head of Safeguarding (Barry Armstrong - [barry.armstrong@nae.com](mailto:barry.armstrong@nae.com)) before acting and will comply with national and locally agreed guidance on these matters. Each school is expected to have researched and mapped the local arrangements and guidance for dealing with allegations.

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the Nord Anglia Education code of conduct for staff and volunteers and the NAE guidance for safe working practice.

#### 6.9.4 Whistleblowing - [linked to Whistleblowing Policy](#)

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

Malicious whistleblowing however, will be seen as a potential disciplinary matter. See Nord Anglia Education's whistleblowing policy.

#### 6.9. 5 Anti-Bullying -- [link to Anti Bullying Policy](#)

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviors. Bullying may involve either face-to-face 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. Refer to Colegio Menor Anti - Bullying Policy.

#### 6.9.6 Children with Additional Support Needs or Disabilities

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

#### 6.9.7 Allegations made by a child about another child (Peer on peer abuse)

Nord Anglia Education and Colegio Menor recognize 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.

Staff in schools need to be able to identify concerning sexualised behaviour and know when to refer these concerns to the DSL. Schools need to ensure that staff know how allegations of peer on peer abuse will be recorded, investigated and dealt with in the same way as any other safeguarding or bullying concern.

There should be clear processes as to how victims, perpetrators and any other child affected by peer on peer abuse will be supported and a clear statement that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. All peer on peer abuse is unacceptable and will be taken seriously.

Staff in school need to understand the different forms that peer on peer abuse can take, such as:

- Sexual violence and sexual harassment
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexting

Schools may wish to use the [Brook Traffic Light Tool](#) when concerned about potential peer on peer abuse. This tool provides some basic guidance for staff on when to be concerned about the sexualised behaviour of a student.

#### 6.9.8 Safeguarding students who are vulnerable to extremism -- Prevent Duty

Nord Anglia Education Schools value 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.

#### 6.9.9 Domestic Abuse

The accepted definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to, psychological, physical, sexual, financial and emotional forms. Exposure to domestic abuse and/or violence can have serious and long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can occur within their personal relationships as well as in the context of their home life.

### 6.9.10 Safe Recruitment and Selection

Nord Anglia Education and Colegio Menor will do all they can to ensure that all those working with children in our schools and across the whole organization are suitable people. In order to do this, all staff who will work in an unsupervised capacity with children or young people will be recruited using safe recruitment procedures.

Safe Recruitment involves 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.

From July 2017, at least one member of every interview panel, who are interviewing for a post or posts that may have unsupervised contact with children, will have undertaken safe recruitment training. All schools will keep a central record of all the recruitment checks undertaken on all staff. This record will include details relating to the DBS (Disclosure and Barring Service check - for anyone who has lived or worked in the UK only), i.e. date completed and number, other countries criminal records checks or certificates of good conduct, qualifications, prohibition order checks etc.

Any disclosure from the criminal records checking process will lead to a risk assessment being completed prior to appointment including cautions, convictions or soft information. This risk assessment will be signed off by the Principal or Regional HR Manager.

## Section 7: The Provision of Virtual Education

### 7.1. Basic expectations:

During the COVID pandemic, the 3-month period between March to June 2020 saw a 45% increase in inappropriate images of children appearing online in the UK alone. There is nothing to suggest that the UK would be any different to any other country.

This increase can potentially be put down to the conditions being ideal: With more students at home for longer and increased on-line activity, the potential for being manipulated by someone is greater.

Staff should be aware that by spending long periods of time on-line, whether for virtual education purposes or not, students are exposed to an increased risk of abuse. Whilst every effort is made to educate both parents and students on keeping themselves safe on-line, staff also need to make sure that during engagement with students they leave nothing to question.

All staff engaging with students on-line should understand the need for professionalism and strict boundaries to ensure that their behaviour is not misinterpreted.

To this end, staff should be aware that:

- With virtual education provision, the ability to use both video and to be able to chat with students through remote platforms is important and may often involve one to one contact. This type of one to one contact is permissible to support an interactive learning experience, so long as

professionalism is always maintained and that some basic expectations are observed that will help to protect both staff and students. It is important to recognise that the NAE Code of Conduct and especially the [NAE Guidance for Safer Working Practice](#) should remain as the go-to guidance in all interactions with students. This guidance sets out the expectations on staff in a variety of situations, not just virtual education.

- During lessons, video calls or chat the activity should be managed appropriately, regardless of the device being used. For example, staff should ensure that any non- work-related applications, files and apps are closed and avoid the use of emojis and GIFs.
- The recording of a lesson/video call is permissible if parents of the students involved are aware and happy with the recording happening. Any recording should only be made on, and uploaded to, NAE business systems. The recording of sessions should only take place when necessary to meet specific learning objectives.
- Normal professional boundaries apply. Staff should dress appropriately and ensure that the environment they deliver lessons from is suitable to remain professional in all engagements with students and parents. When delivering virtual lessons, staff should ensure that the room used is fit for purpose.
- On-line contact with students should be planned and ideally timetabled, much like a physical school environment. Staff should avoid calls and lessons to students on an ad hoc basis. By timetabling contact with students and requesting approval from SLTs, staff avoid the potential for ad hoc contact and help to protect themselves and students.
- As much as possible parents should be made aware of the lesson/contact timetable so they can ensure that their children know when and how to join in. This is particularly important for the parents of younger students.
- The use of personal mobile phones should be avoided. Contact through school online platforms allows monitoring and therefore protects teachers. Where phone calls to students are necessary, these should be coordinated and agreed through SLT members and the reasons and objectives for the call shared.
- Where mobile phones have been used to contact students, colleagues should ensure that any student's personal numbers stored in their personal phones or other personal equipment are deleted when they are no longer required.
- The use of personal social media platforms to deliver or communicate with students should be avoided.
- Staff should not accept requests from or send any friend requests to students. All continued virtual contact should be through platforms that SLTs in schools have approved.
- Concerns about the safeguarding of any of our students should be dealt with in the same way as in the physical school environment. All concerns should be referred to the school's DSL or their deputy as soon as possible.
- A record of non-attendance should be kept for every lesson. Attendance at all lessons is important for continued learning but could also be a sign of a potential well being issue. Staff should follow up any absence in the same way as if they were in a physical environment.

#### For Students:

Attending lessons as part of the Nord Anglia Education virtual school should be as much of a positive experience for our students as any other form of learning we offer. We expect a professional approach to teaching from our staff and high standards of behaviour and engagement from all our students. This requires observance of the basic requirements for the safe, efficient and congenial running of the virtual school. This covers general behaviour, personal appearance, regular attendance, observance of boundaries and respect and co-operation with staff.

Below are some of the basic rules and expectations on students accessing virtual education:

- Use technology in appropriate ways.

- Never post anything related to other students or staff on social media (or any other platform) without permission from school staff.
- Do not share passwords and be careful of unexpected contact from unknown individuals.
- Follow any guidance and advice provided by NAE to keep safe while on-line.
- Report to parents or school staff any concerning on-line contact.
- Bullying or discrimination of any form will not be tolerated and will be addressed through the school's behaviour policy.
- There is no expectation that students will wear a uniform to attend virtual lessons but all students should join lessons properly dressed and ready to learn.
- All virtual lessons should be appropriately time tabled and all students made aware of this timetable. It is the student and their parent's responsibility to ensure that they join these lessons on time and ready to learn.
- Sickness and other absences should be reported to tutors at the earliest stage possible and ideally on day one of any absence. The reporting of illness should be through parents to tutors directly.
- The NAE virtual school will monitor all student's attendance. Where a student does not join a lesson as expected this will require follow up. Tutors would need to contact the parent/carer and a reason for absence identified. In the case of consistent patterns of absence, this will be escalated to appropriate SLT members for further consideration.
- All forms of misdemeanor from students will be dealt with in line with the school's behaviour policy.

It should be recognised that repeated or extreme behaviours can be a symptom of a student experiencing emotional difficulties and, where this is the case, every effort should be made to support the student.

Nord Anglia Education will:

- Provide guidance through our schools to parents and students about cyber-security and staying safe on-line as part of our virtual education offer.

Nord Anglia Schools will:

- Ensure that they have acceptable user guidance in place for all students and staff.

## Section 8: Reporting Procedures

### 8.1 Procedures to be followed by any staff member or volunteer who is concerned about any student

When any adult in the school has reasonable suspicion, observes, is given a report of child abuse, or has knowledge, which gives reason to suspect child abuse or neglect, he or she has the responsibility to report the suspicion to a counselor. The adult should **NOT**:

- Make promises of confidentiality that may endanger the health and safety of someone else.
- Discuss the case beyond the steps outlined in this policy.

If staff suspect that any student in their care may be a victim of abuse, or is at risk of abuse or other form of harm, they should not try to investigate, and inform the Designated Safeguarding Leads (DSL) (counselors of the corresponding section) about their concerns as soon as possible. The counselor who receives the report will immediately inform the corresponding area principal. The counselor and/or the

principal will inform the General Director and Counseling Department Chair of the suspected case of child abuse. The **Counseling Department Coordinator** is designated as the school's **Deputy DSL** and all counselors are the **DSL** for each section. This means that all the Counseling Department is the **Designated Safeguarding Lead**.

The DSL will organize a small team made up of the DSL, the Area Principal, the area counselor and a maximum of one additional person. The DSL will provide the General Director with daily updates regarding the incident follow-up of the case.

The team will gather information to assess the reliability of the reporter and the credibility of the incident report. Methods may include but are not limited to:

- Conversations between the child and the counselor
- Observations of the child by the counselor or other members of the team
- Review of the child's history at the school
- Interview with the alleged offender
- Meeting with the child's legal guardians
- Consultation with local authorities and/or the school's lawyer
- Meeting with other staff members as necessary

The Team will determine whether this is a case warranting immediate notification to the General Attorney Office

- The General Attorney Office will be notified immediately by the CPO through the submission of the incident report within 24 hours of being informed of the suspicion especially in cases of sexual violence.
- The Counseling Department will ensure that Colegio Menor adheres to the directives of the General Attorney Office regarding the case.

In the event that the abuse allegation involves a Colegio Menor faculty or staff member, the school may place the employee on immediate administrative leave pending full internal and/or external investigation. Depending on the outcome of the investigation, the employee may be terminated, and the incident may be referred to local law enforcement for processing.

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

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

## 8.2 Dealing with Disclosure, Reporting and Further Action

### General Principles:

If a child asks to speak to someone in confidence about a problem, staff should be clear that they cannot promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.



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

**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.

**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 written/typed account of the concern (ideally using the form in Appendix 1) should be passed to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed Body Map (which can be found at Appendix 2).

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or dDSL in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then review and where necessary consult on the information available. It is the role of the Designated Safeguarding Lead 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. Use ‘Informe de Hecho de Violencia’ from the Ministry of Education to record any situation described earlier.

As an International Schools organization, Nord Anglia recognizes the diverse and complex local contexts our schools operate in. Therefore, the following principles are taken into account 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.
- Recognize the limitations in the areas of child protection.



- Need to assess the quality and skills of counselors and other support staff in dealing with children. In Ecuador, it is mandatory that every counselor has a Psychology degree.
- Need to act in accordance with local legislation as well as the principles and practices outlined in this policy.

### Local Safeguarding Agencies/Advice

#### Social Services / Police

- District of Education - +593 (04) 2024301, +593 (04) 2024333
- DINAPEN - +593 (09)8 9809499
- Junta de Protección de Derechos de los niños, niñas y adolescentes - (04) 2024089
- Fiscalía General del Estado - Guayas - (+593) 04 2321 220

Schools are reminded that they can seek advice or guidance from the Head of Safeguarding for NAE: Barry Armstrong; [barry.armstrong@nordanglia.com](mailto:barry.armstrong@nordanglia.com) Phone: +44 (0)1235 355848 or mobile+44 (0)7710 086737.

## Section 9: Record Keeping and Confidentiality

### 9.1 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, accessible through the Designated Safeguarding Lead (or their deputy) and other senior staff in larger schools to ensure reasonable access.
- Records of any child disclosure should be clearly dated and filed without future amendment.
- 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 staff who may need to consult a child's school file should be made aware of what the symbol means and who to consult if they see this symbol.
- A child protection file (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 a member of staff 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.
- Members of staff should make an entry of any concern they have regarding the welfare or well-being of a child, using the school's pro forma (see Appendix I). This will then immediately be sent 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 (electronic or otherwise) 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:
  - 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.
  - 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.

**9.2 Confidentiality** Our 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/Head teacher/Designated Safeguarding Lead and this should always be based on the need to know.

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

## Section 10: Safeguarding in times of Coronavirus

### 10.1. Points to think about and reinforce:

COVID-19 has had a major impact on all schools around the globe with many being closed and having to adapt to virtual education provision as an alternative. As schools slowly begin to reopen, they need to be conscious that the threat from COVID has not gone away. There have already been and are likely to continue to be subsequent waves, albeit that these may be more localised. The implications of this are significant across the whole school environment, including the safeguarding and child protection arena.

In addressing concerns around COVID, it may be helpful to consider the following:

- The continued importance of all staff, contractors and any volunteers acting immediately on any safeguarding concerns, especially new concerns where students are returning after a long period away.
- The importance of ensuring relevant safeguarding and welfare information held on all students (including returning students) remains accurate and up to date. Where possible schools should seek any additional information from parents.

- DSL (and deputy) arrangements. We would expect all schools to have at least one NAE level 3 trained staff member on each school site. When a lockdown due to the pandemic impacts these arrangements and there are displacements of staff from schools, this expectation can be relaxed due to the exceptional circumstances. However, schools should make arrangements for a trained DSL (or deputy) from the school or another school in the group to be contactable via phone or online video should concerns about a child be reported. The Head of Safeguarding, Barry Armstrong, is happy to act remotely in this role for any school.
- Where a trained DSL (or deputy) is not on site, a senior leader should take responsibility for coordinating safeguarding on site, in addition to one of the above options.
- Whatever the scenario, it is important that all schools, staff, contractors or volunteers have access to a level 3 trained DSL (or deputy) and know, on any given day, who that person is and how to speak to them.
- As a result of the travel restrictions during the COVID outbreak, access to the NAE face to face level 3 training is restricted. For the foreseeable future, we are revising the need for all DSLs to access face to face training every 2 years and instead moving this to every 3 years. In making this change, we now require DSL's, their deputies and any new DSL or deputies in post to undertake the NAU training courses on: 'Role of the DSL', 'Safeguarding for Recruiters' and 'Introduction to Safeguarding'.
- A revised process may be required for managing any report of Peer on Peer abuse given the different circumstances schools may be operating in.
- Any changes to what staff, contractors and/or volunteers should do if they have concerns about another staff member or volunteer.
- What arrangements are in place to keep students not physically attending the school safe, and how concerns about these students should be progressed.
- It is important that all staff and volunteers are aware of the additions or changes to the Safeguarding/Child Protection statement and procedures and are kept up to date as it is revised. The revised documentation should continue to be made available to all.

## Section 11: Auditing, Reporting, Review and Sign off

To support the implementation of the Safeguarding and Child Protection Procedures and to enable schools to undertake a 'Safeguarding Self Evaluation', schools will be provided with a self-assessment tool. It is expected that all schools will undertake and submit this assessment to the Head of Safeguarding every year. A random selection of schools will be reviewed in more depth. Schools may be supported by the Head of Safeguarding to both complete the assessment and put in place strengthened practice.

Elements of safeguarding practice in schools will also: be included in the Education Team's more general quality assurance framework; will continue to be an element of the school's Health and Safety review; and continue to be part of NAE's audit process.

Our Child Protection Statement and procedures are owned by all our schools and are made available to students and parents/carers alike through the school's own website and the Nord Anglia Education website, as well as in hard copy where requested. The procedures will be translated into key languages through schools.

These procedures will be reviewed and updated on a regular basis and at least every two years.

Senior staff in schools should adopt and sign the updated procedure document after each update. A copy of the revised procedures should be made available to all staff, volunteers, parents/carers and students.

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Signed and dated by the CEO (or delegate) on  
behalf of Nord Anglia Education

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Cristina Cortez  
Head of School Colegio Menor  
Campus Samborondón

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Natali Zurita  
Designated Lead for Safeguarding  
Colegio Menor Campus Samborondón

## Appendix 1: Record of Concern Form

<b>Pupil's Name:</b>			
<b>Pupil's Address:</b>			
<b>DOB:</b>			
<b>Is the Pupil aware this form is being completed</b>	Yes	No	
	<input type="checkbox"/>	<input type="checkbox"/>	
<b>If not, why not?</b>			
<b>If yes, pupil reaction</b>			
<b>Your Name:</b>			
<b>Date:</b>			
<b>Time:</b>			
<b>Signature:</b>			
Concern:	Date:		
Signed:	Date:		

Initial Actions:	Date:	
Signed:	Date:	
Follow up:	Date:	
Signed:	Date:	
Conclusions/Outcome:	Date:	

Signed:	Date:	
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## Appendix 2: [\(Format of violence fact\)](#)

## Appendix 3: [\(Format of follow up\)](#)

## Appendix 4: Body Map Guidance for Schools

Body Maps should be used to document and illustrate visible signs of harm and physical injuries. These should be drawn up and sent to the Designated Safeguarding Lead at the same time as completing the Record of Concern Form in Appendix 1. Even if the injury to the child has a plausible explanation, a completed body map helps track a history or pattern of repeated injuries. A copy of the body map should be kept on the child's concern/confidential file.

Always use a pen (never a pencil) or type the document and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment. At no time should staff seek to record injuries on photographic equipment. Body maps such as those shown below should be used. If you notice an injury to a child, try to record as much of the following as possible in respect of all the injuries you can see:

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted because of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly, the date of the recording must be noted as well as the name and designation of the person making the record. Add any further comments as required.

Where any child has any form of injury that requires attention please ensure that first aid is applied where necessary.

Name of the person completing the body map:

.....

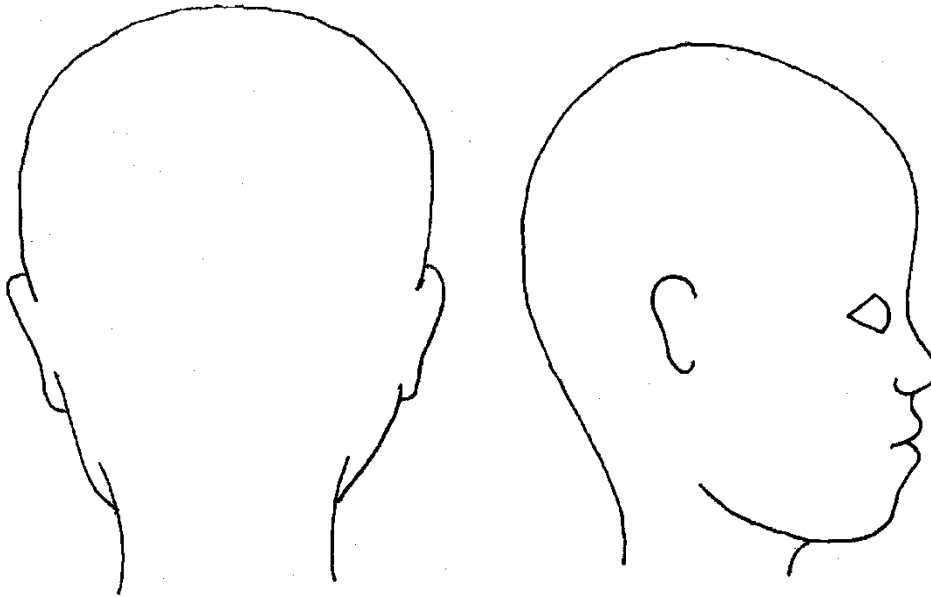
Role of the person completing the body map:

.....

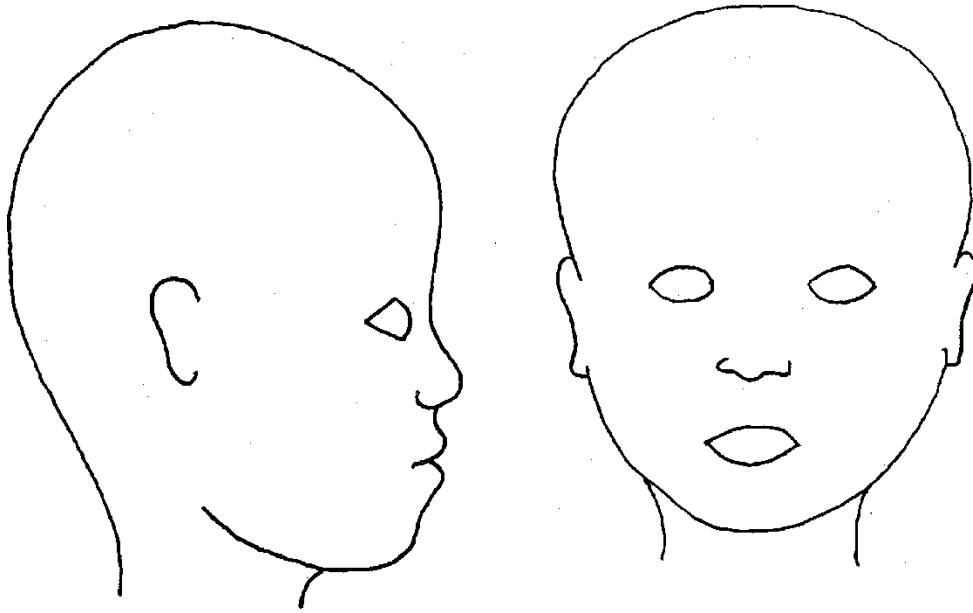
Date of injury and form being completed:

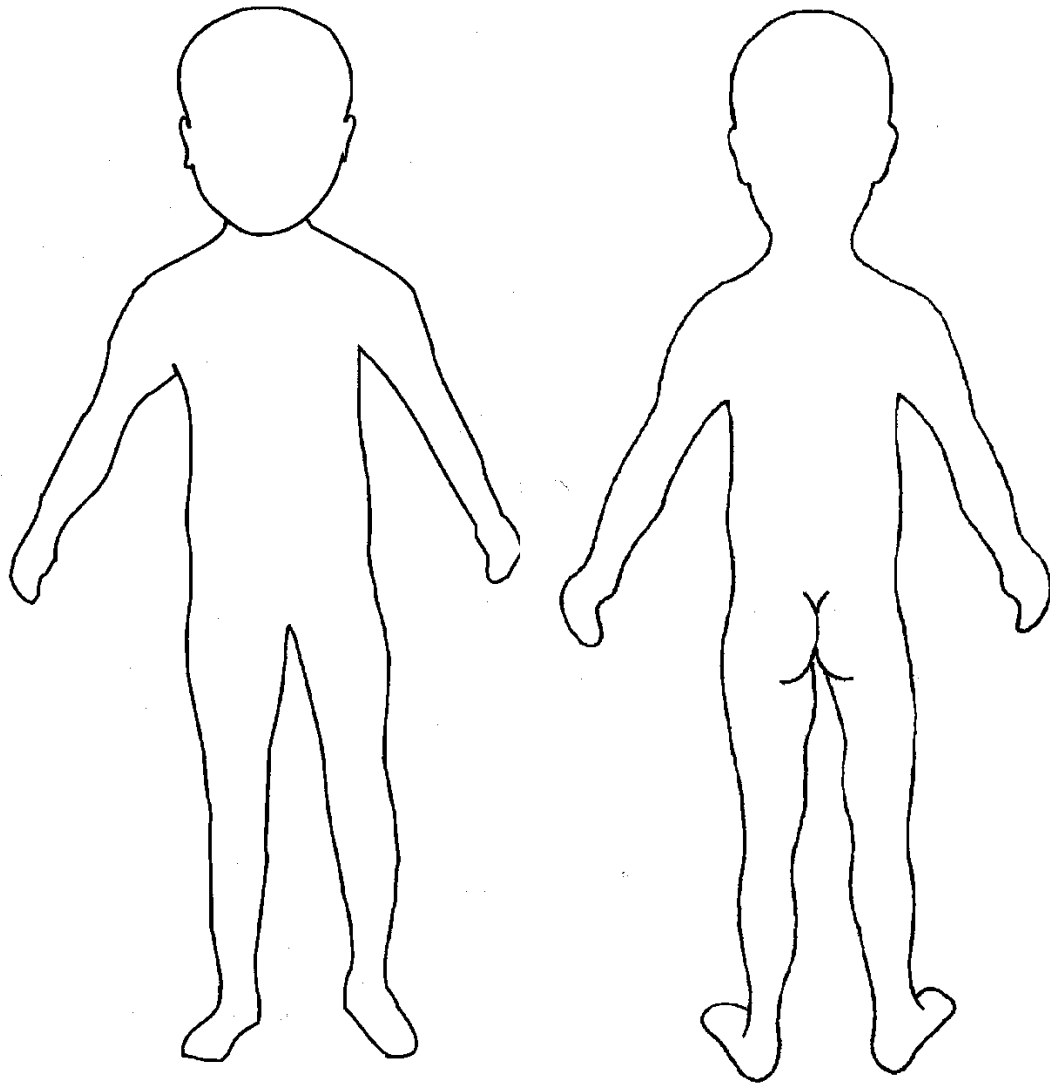
.....

Date this form was completed and returned to DSL (if different): .....

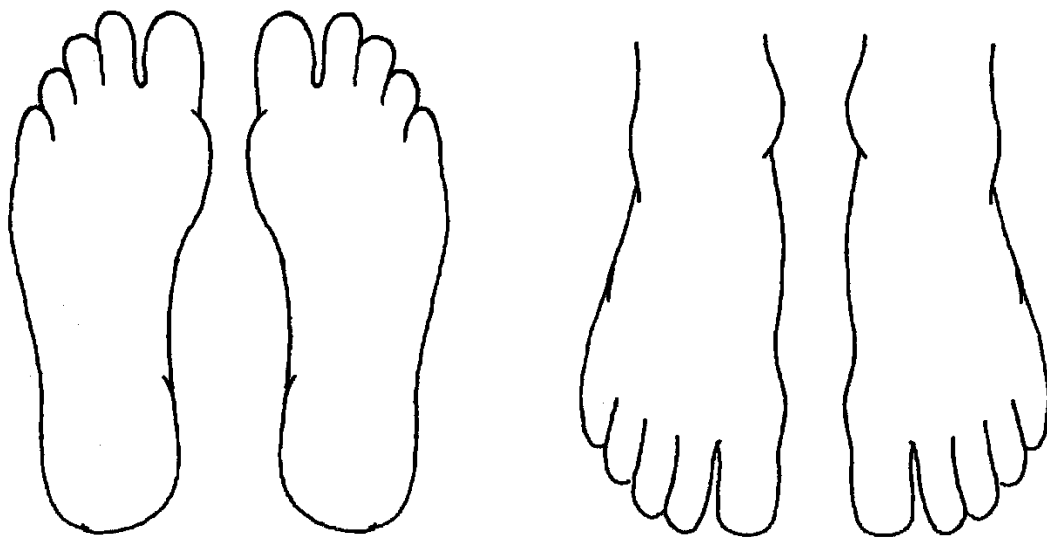




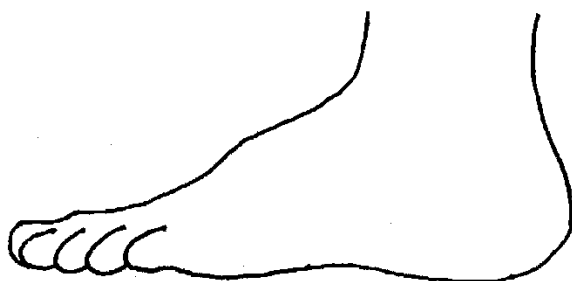




Sole of Feet



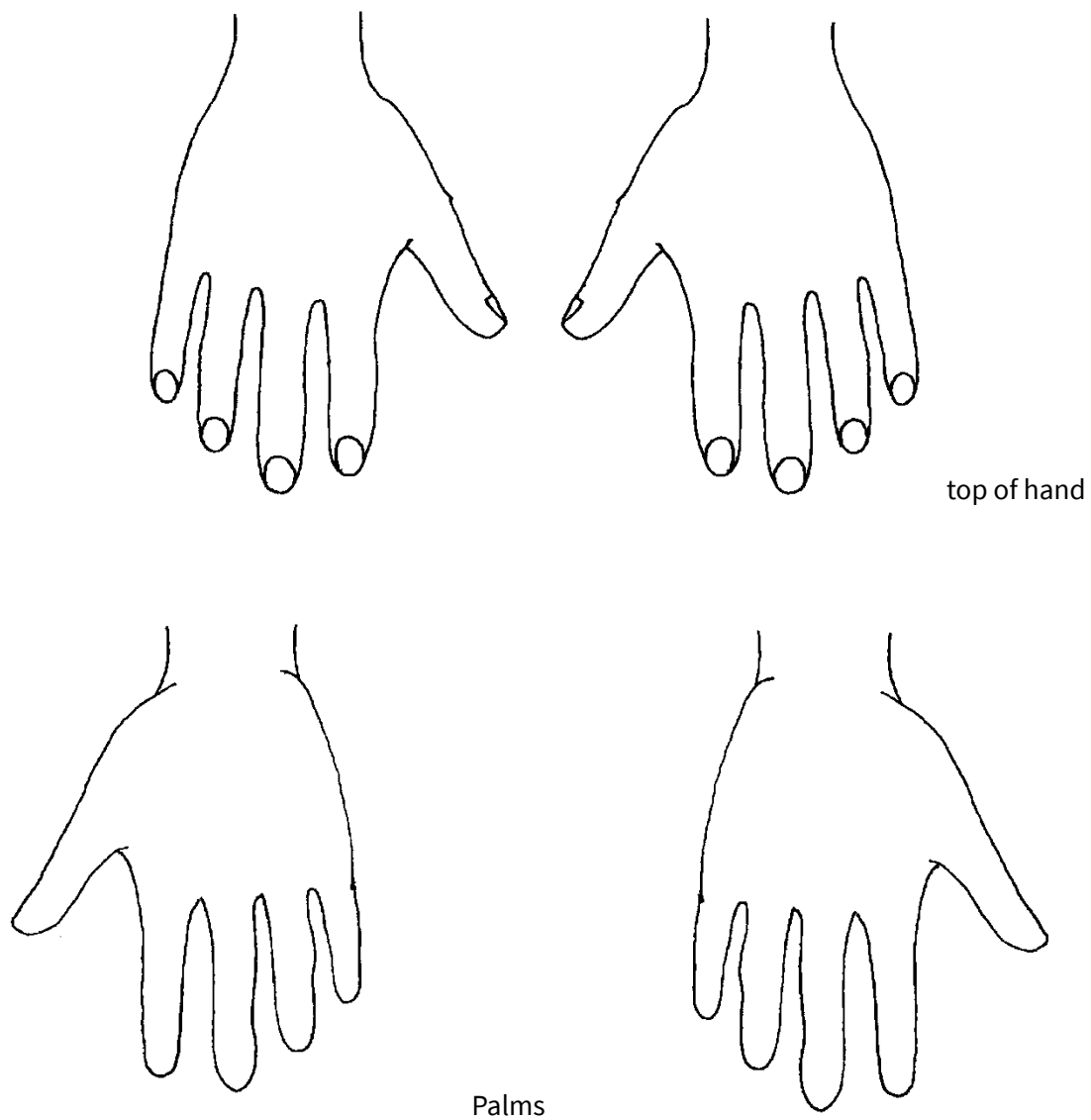
Top of the Feet



Left Foot



Right Foot



**Appendix 5: Rutas de actuación en caso de violencia.**