

Student Safeguarding Policy

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1.0	Leslie Medema	All	Student Safeguarding Policy	Not recorded
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Student Safeguarding Policy

Policy Information

Policy owner: Designated Safeguarding Lead, Head of Campus and GSB Safeguarding Consultant

Approved by: GSB Governance Council (GovCo)

Review cycle: Detailed review every two years; annual review and update as required

Applies to: All staff, volunteers, contractors, visitors, vendors, Governors/Governing body members and other adults working in or on behalf of Green School Bali

This policy sets out Green School Bali's approach to safeguarding and child protection. It should be read alongside the safeguarding-related policies and procedures listed at the end of this document.

The policy and its appendices are available to staff through the relevant Learning Neighbourhood Intranet page. The policy is published for parents and the wider community through the Green School Bali (GSB) website and app.

The Head of Campus is responsible for ensuring that the policy is implemented effectively. The DSL is responsible for maintaining the operational safeguarding arrangements and advising the Head of Campus and wider school community.



1. INTRODUCTION, PURPOSE AND PRINCIPLES

1.1 Purpose

Safeguarding is everyone's responsibility, all the time. Child protection is the action taken when a child is at risk of harm or has experienced harm.

At Green School Bali, safeguarding and child protection are central to our responsibility to provide a safe, inclusive and nurturing environment in which every student can learn, develop and thrive.

We believe that:

- every student has the right to be safe from abuse, neglect, exploitation and other forms of harm;
- every student has dignity and should be treated with care, respect and compassion;
- students should be listened to and their views taken seriously;
- safeguarding is the responsibility of every adult in our community;
- concerns should be acted upon promptly and appropriately;
- prevention, early identification and effective support are essential;
- safeguarding responses should be child-centred, proportionate and informed by evidence;
- students who may be particularly vulnerable may require additional support or protection.

Our approach is informed by the United Nations Convention on the Rights of the Child, relevant Indonesian legislation and regulations, international safeguarding practice and the standards and expectations of Western Association of Schools and Colleges (WASC). UK-sourced definitions are used as international best-practice reference points for identifying and categorising behaviour, but Indonesian and Balinese law governs all legal reporting obligations and thresholds.



1.2 Our Commitment

GSB takes all reasonable steps to protect students from abuse, neglect, exploitation and other forms of harm.

Safeguarding is embedded across school life, including curriculum, relationships, recruitment, professional learning, student support, educational visits, online learning, behaviour, inclusion and decision-making.

“Safeguarding is placed firmly at the heart of everything we do at GSB. Every member of our community has a role to play in protecting our students, making it a safe place to explore, learn and develop.” *Karen Yung, Chair of Green School Bali*

1.3 Guiding Principles

Our safeguarding practice is based on the following principles:

- **Students first:** We place the safety, wellbeing, dignity and best interests of students at the centre of decisions and actions.
- **Student voice:** We listen to students and seek to involve them appropriately in decisions about their safety, support and wellbeing, taking account of their age, developmental stage, understanding and individual circumstances.
- **Shared responsibility:** Safeguarding is the responsibility of every adult in our community. No individual should assume that someone else will report a concern.
- **Prevention and early identification:** We aim to recognise concerns at the earliest possible stage and provide appropriate support before difficulties escalate.
- **Inclusion and additional vulnerability:** We recognise that some students may experience additional barriers to safety or disclosure and may require additional protection, advocacy or support.
- **Professional boundaries:** Adults working with students must maintain appropriate professional boundaries and act with integrity, accountability and sound professional judgement.
- **Appropriate information sharing:** Safeguarding information is shared on a need-to-know basis when this is necessary to protect a student. Confidentiality must never prevent reporting an appropriate safeguarding concern.



- **Action:** Concerns must be reported promptly. Adults should not investigate safeguarding concerns themselves.
- **Continuous learning:** We use training, supervision, audit, reflection and student voice to strengthen safeguarding practice.

1.4 Our Context

GSB is committed to sustainability, regeneration, whole-person education and a safe, inclusive community. Safeguarding is everyone's responsibility and is embedded in our values, relationships and daily practice. We aim to ensure every student feels safe, seen, heard and respected, while maintaining clear professional boundaries and taking appropriate action to protect children from harm.

Our safeguarding arrangements are designed to meet relevant Indonesian and local requirements and to reflect recognised international safeguarding practice.

Where there is uncertainty about a legal or regulatory requirement, advice should be sought from the appropriate GSB Legal and Compliance function and, where necessary, the GSB Safeguarding Consultant.

1.5 Safeguarding Competencies

Through induction, professional learning, supervision and ongoing dialogue, adults working at GSB are expected to develop the following competencies:

1. **Put students first**
Place student safety, dignity, wellbeing and best interests at the centre of decisions and actions.
2. **Build safe and respectful relationships**
Foster relationships based on trust, respect, empathy, inclusion and appropriate professional boundaries.
3. **Recognise risk and vulnerability**
Understand indicators of abuse, neglect, exploitation, harmful behaviour and factors that may increase vulnerability.
4. **Listen and respond effectively**
Create opportunities for students to be heard and respond calmly and appropriately when concerns are raised.

5. Act on concerns

Report safeguarding concerns promptly and follow established procedures.

6. Maintain professional boundaries

Demonstrate integrity, accountability and professional judgement in person and online.

7. Work collaboratively

Share information appropriately and work with colleagues, families and external agencies when this supports student safety.

8. Contribute to a safeguarding culture

Model the GSB values and contribute actively to a community where students and adults feel safe, respected, included and supported.

2. RECOGNISING SAFEGUARDING CONCERNS

2.1 What is Safeguarding?

Safeguarding is the broad responsibility of protecting students from harm and promoting their safety, wellbeing and development.

Child protection refers specifically to the actions taken when there is a concern that a student has experienced, or is at risk of experiencing, significant harm.

A safeguarding concern may relate to something happening:

- at school;
- at home;
- in the wider community;
- during a school trip or activity;
- online;
- between students;
- between a student and an adult;
- or through a combination of circumstances.

2.2 What is Child Abuse?

Child abuse may be physical, emotional or sexual, or may involve neglect, exploitation or harmful behaviour.



Abuse may be:

- caused by an adult or another student;
- a single incident or a pattern of behaviour;
- experienced in person or online;
- experienced directly or through witnessing the abuse of others;
- intentional or involve circumstances in which a child's needs have not been adequately met.

Exploitation occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a student for personal or other gain.

2.3 Categories of Abuse

GSB considers abuse under the following broad categories:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect, including circumstances sometimes described as affluent neglect

Further indicators and examples are provided in **Appendix A: Indicators of Abuse and Neglect**.

2.4 Peer-on-Peer Abuse

Peer-on-peer abuse is abuse or harmful behaviour between students. It may include physical, sexual, emotional or financial abuse, coercive or controlling behaviour, sexual harassment, harmful sexual behaviour, exploitation or other forms of abuse occurring within or between friendships, relationships or wider peer groups.

Peer-on-peer abuse may occur in person or online.

All concerns about peer-on-peer abuse must be reported and managed as safeguarding concerns.

Further guidance is provided in the **GSB Peer-on-Peer Abuse Policy (Appendix M)**.

2.5 Vulnerability and Additional Safeguarding Needs

Every student has an equal right to protection from harm.

Some students may face additional safeguarding risks or barriers to disclosure, including students who:

- have SEND or communication difficulties;
- have mental health or emotional wellbeing needs;
- have a Care Plan;
- have experienced previous trauma or safeguarding concerns;
- are particularly dependent on adults for care or communication;
- are experiencing family or environmental difficulties;
- are vulnerable to exploitation;
- are frequently absent or missing from education;
- are experiencing significant changes or instability.

Additional vulnerability does not mean that a student will necessarily experience harm. It means that their circumstances should be considered carefully when assessing risk and planning support.

2.6 Other Safeguarding Risks

Staff should remain alert to concerns including, but not limited to:

- domestic abuse;
- exploitation;
- trafficking;
- criminal exploitation;
- harmful sexual behaviour;
- sexual harassment;
- forced marriage;
- female genital mutilation;
- so-called honour-based abuse;
- substance misuse;



- online abuse;
- missing students;
- harmful or unsafe use of technology;
- financially motivated sexual extortion;
- AI-generated sexualised imagery;
- cyber-attacks that compromise safeguarding information.

Specific procedures and related policies should be followed where these concerns arise.

2.7 Safe, Seen and Heard

Students are encouraged and supported to speak out when they are worried about their own safety or the safety of another student.

Regular learning opportunities help students recognise, resist and report abuse and unsafe behaviour by adults or peers.

Students are encouraged to identify a *Trusted Adult* or *Trusted Adults* whom they can approach if they have a concern.

Posters and other communications around the School provide information about how students can seek help.

All adults working with students are expected to respond appropriately when a student raises a concern.

3. SAFEGUARDING LEADERSHIP AND GOVERNANCE

Safeguarding is the responsibility of all staff. Key safeguarding roles and responsibilities are listed below.

Role	Contact details
Chair	Karen Yung karen.yung@elevateed.com
Governance Council Safeguarding Representative	Nicole Assisi n.assisi@thrivesd.org

GSB Safeguarding Consultant	Kate Beith Kate.Beith@eimglobal.com kate.beith@greenschool.org
External Child Protection and Safeguarding Auditor (Conducts biannual safeguarding audits)	TBC
Head of Campus	Benjamin Freud benjamin.freud@greenschool.org
Designated Safeguarding Lead	Amanda Coates (DSL) amanda.coates@greenschool.org
Deputy (DSL /DDSL)	Satnam Kaur Harbhajan Singh (DDSL) satnam.kaur@greenschool.org
Child Protection Officers (CPOs)	Pana Asavatana pana.asavavatana@greenschool.org Daniel McCloy daniel.mccloy@greenschool.org Emily Beck emily.beck@greenschool.org Patrick Goodman patrick.goodman@greenschool.org Candra Parwati chandra@greenschool.org Krisna Diani krisna.diani@greenschool.org
Lead Trainer(s)	Amanda Coates amanda.coates@greenschool.org
E Safety Lead	I Kadek Wirya wirya@greenschool.org

Photos and contact details are also displayed on posters around GSB and can also be found by staff on the relevant Learning Neighbourhood Intranet site.

3.1 Key Safeguarding Roles and Responsibilities

Safeguarding is the responsibility of all staff, volunteers and members of our community. The following roles have specific responsibilities for safeguarding and child protection across GSB.



Detailed responsibilities are set out in **Appendix B: Key Safeguarding Roles and Responsibilities**.

Governance and External Oversight

Green School Bali Chair

The GSB Chair holds overall accountability for safeguarding across the Green School group and is accountable to the relevant external boards for safeguarding oversight and arrangements.

Governance Council Safeguarding Representative

The Governance Council Safeguarding Representative provides safeguarding oversight on behalf of the School Governance Council, supports appropriate escalation of serious safeguarding matters, and ensures that the Chairman is kept informed of significant safeguarding issues.

Green School Safeguarding Consultant

The GSB Safeguarding Consultant supports the GSB DSL in all aspects of safeguarding, including the development and review of policies, procedures and professional learning. They provide support and oversight in serious safeguarding cases, individual and group supervision for DSLs and CPOs, and meet annually with the School Safeguarding Committee to review safeguarding compliance.

External Auditor

The External Auditor conducts biannual safeguarding audits across schools and reviews safeguarding action plans as part of the audit cycle.

School Safeguarding Leadership

Head of Campus

The Head of Campus provides strategic leadership for safeguarding, ensuring that safeguarding is embedded across school development and practice. They oversee the implementation and review of safeguarding procedures, support appropriate information sharing and safer recruitment, respond to allegations against adults where appropriate, and ensure compliance with the school's safeguarding audit cycle.

Designated Safeguarding Lead (DSL)

The DSL has day-to-day responsibility for safeguarding and child protection. They provide guidance to staff, oversee reporting and secure record-keeping, lead safeguarding assessments, referrals and investigations, and ensure that responses are child-centred and evidence-based. The DSL leads safeguarding training and awareness, maintains up-to-date knowledge of relevant procedures and contacts, works closely with Learning Neighbourhoods and relevant leaders, and provides regular safeguarding updates to senior leadership and governance.



Deputy Designated Safeguarding Lead (DDSL)

The DDSL supports the DSL and Head of Campus in the implementation and oversight of safeguarding. They support safeguarding systems, documentation, audits, recruitment checks and the Single Central Record, promote clear communication of safeguarding procedures, support safeguarding training arrangements, and assist with the management of safeguarding concerns and allegations against adults where appropriate.

Child Protection Officers (CPOs)

CPOs support the DSL in responding to safeguarding and child protection concerns. They provide an accessible point of contact for students and staff, support the reporting and management of concerns, and undertake delegated safeguarding responsibilities in accordance with their training and the direction of the DSL.

The Child Protection Team is made up of the DSL (Head of Pastoral), Head of School (Lead CPO), Deputy Head (CPO), National Head (CPO) and the counsellor for each Learning Neighbourhood

Safeguarding Professional Learning and Specialist Roles

Lead Safeguarding Trainers

Lead Safeguarding Trainers oversee the quality and consistency of safeguarding training. They ensure recognised trainers use approved materials, participate in annual training and review, undertake peer observation, maintain current knowledge, and ensure any locally adapted materials are approved by the DSL.

Safeguarding Trainers

Safeguarding Trainers deliver safeguarding professional learning as required, participate in training planning, and contribute to peer review and observation to support consistent and effective safeguarding training across the school.

E-Safety Lead

The E-Safety Lead coordinates and promotes online safety across the school. They provide guidance on online safety concerns, support the development and review of relevant policies and procedures, contribute to staff and student education and parent awareness, monitor online safety incidents and emerging issues, and work with leadership to ensure learning and practice respond to identified risks.

Photos and contact details for key safeguarding personnel are displayed around the school and are available to staff through the GSB App. Visitors are directed to the school office/reception, who will direct any safeguarding concern to the appropriate member of the safeguarding team.



All Staff, Volunteers and Visitors

All adults working in or visiting GSB have a responsibility to act when they are concerned about a student's safety.

No adult should assume that another person will report a concern.

3.2 Safeguarding Committee

The Safeguarding Committee includes:

- Designated Safeguarding Lead;
- Director of Business Administration;
- Head of Health and Safety;
- Outdoor Learning Specialist;
- HR Manager;
- Legal and Compliance representative;
- E-Safety Lead;
- other colleagues as required.

The Committee meets at least once per term to:

- monitor safeguarding practice;
- review safeguarding risks and emerging issues;
- monitor actions arising from audits and compliance reviews;
- oversee safeguarding professional learning;
- review the Safeguarding Action Plan;
- review the safeguarding policy annually and recommend updates.

4. REPORTING AND RESPONDING TO CONCERNS

4.1 Immediate Danger or Emergency

If a student is in immediate danger or requires urgent medical attention, adults must prioritise the student's immediate safety and seek emergency assistance as appropriate.



The DSL or a member of the Child Protection Team must be informed as soon as possible.

The normal safeguarding reporting and recording process must then be followed.

4.2 Responding to a Disclosure

When a student raises a safeguarding concern, adults should:

- listen calmly and attentively;
- take the student seriously;
- allow them to explain in their own words;
- reassure them that they have done the right thing by speaking up;
- explain that the information may need to be shared with people who can help keep them safe;
- avoid promising confidentiality;
- avoid leading or unnecessary questions;
- avoid investigating the concern themselves;
- record the information accurately;
- report the concern immediately to the DSL or a member of the Child Protection Team.

Staff should not attempt to determine whether a disclosure is true or investigate the circumstances themselves.

4.3 Reporting and Recording Concerns

All adults working in, volunteering at or visiting GSB must report safeguarding concerns promptly.

Staff and volunteers must not investigate concerns themselves.

Concerns should be reported directly to the DSL, DDSL, CPO or another designated member of the Child Protection Team.

Where possible, significant concerns should be discussed face-to-face before being recorded.



CPOMS

CPOMS is the School's digital platform for recording and monitoring safeguarding concerns.

Staff with access to CPOMS should make a direct record when instructed to do so by the DSL or Child Protection Team, or where this forms part of the agreed reporting procedure.

Record of Concern

Adults who do not have access to CPOMS should complete a Record of Concern (RoC), using **Appendix C**.

The DSL or another member of the Child Protection Team will ensure that the information is transferred securely to CPOMS.

Records should be:

- factual;
- objective;
- dated and timed;
- written as soon as possible;
- clear about what was observed, heard or reported;
- separated from personal opinion or interpretation.

The original record should be retained and stored securely in accordance with the School's safeguarding record-keeping procedures.

4.4 Managing Concerns About a Student

The DSL is responsible for coordinating the response to child protection concerns.

The response will consider:

- the student's immediate safety;
- the student's age, developmental stage and individual circumstances;
- SEND and communication needs;
- mental health and emotional wellbeing;
- family and environmental factors;
- the nature and level of risk;



- previous safeguarding concerns;
- the views of the student;
- the roles and responsibilities of relevant adults;
- whether external advice or referral is required.

Where appropriate, the DSL may establish a **Team Around the Child/Student (TAC/TAS)** to coordinate support.

The composition of the team will depend on the student's circumstances and may include relevant school staff, family members, external professionals and other appropriate people.

The student's views should be sought and taken into account wherever appropriate.

4.5 Counselling and Specialist Support

School counsellors and other wellbeing professionals may be involved where this is appropriate to the student's needs.

Counselling is not automatically required following a safeguarding concern.

The DSL should work closely with relevant professionals to ensure that safeguarding and wellbeing support are appropriately coordinated.

Where external agencies are required, the DSL will coordinate referrals and information sharing in accordance with applicable requirements.

4.6 Legal and External Agency Reporting

GSB will comply with applicable Indonesian laws and regulations relating to safeguarding and child protection.

Where a concern may create a legal reporting obligation, immediate advice should be sought from the appropriate GSB Legal and Compliance function.

The School will cooperate with law enforcement and other relevant authorities in accordance with local requirements.



4.7 Confidentiality and Information Sharing

Safeguarding information must be handled carefully and shared appropriately.

Information should be shared on a *need-to-know basis* where this is necessary to protect a student.

Confidentiality does not mean secrecy. An adult who has a safeguarding concern must pass the information to the appropriate safeguarding person even where the student or another adult has asked them not to do so.

Staff must not discuss safeguarding concerns with colleagues who do not need the information, other students, parents of other students or members of the wider community.

All safeguarding records must be stored securely.

4.8 Parent and Carer Involvement

Parents and carers will normally be involved in safeguarding decisions and informed about concerns relating to their child where this is appropriate.

However, information may be delayed, limited or withheld where sharing it could:

- increase risk to the student or another person;
- compromise a safeguarding or criminal investigation;
- reveal confidential information about another person;
- otherwise not be in the student's best interests;
- be restricted by applicable law or professional advice.

Decisions regarding the sharing of safeguarding information with parents or carers should be made by the DSL in consultation with appropriate senior colleagues and, where necessary, Legal and Compliance or the GSB Safeguarding Consultant.

The rationale for significant decisions should be recorded.

4.9 Transfer of Safeguarding Information

When a student with an active safeguarding file moves to another school, GSB will consider whether relevant safeguarding information should be shared with the receiving school.

The first consideration must be the safety and best interests of the student.

Before transferring safeguarding information, the School will check the applicable legal and data protection requirements.

Where a significant concern exists, the DSL or Head of Campus should speak directly with the appropriate safeguarding lead or Head of the receiving school rather than relying solely on administrative channels.

Any significant safeguarding communication should be recorded.

4.10 Early Help and Resource Mapping

Staff should be alert to students who may benefit from early help before concerns reach a child protection threshold.

This may include students who:

- have SEND or additional needs;
- have mental health or emotional wellbeing needs;
- have a Care Plan;
- are young carers;
- are experiencing family difficulties;
- are experiencing domestic abuse;
- are at risk of exploitation;
- are frequently absent or missing;
- are experiencing repeated behavioural or disciplinary concerns;
- are at risk of criminal or antisocial behaviour;
- are misusing alcohol or other substances;
- may be at risk of forced marriage, FGM or other forms of honour-based abuse.



GSB maintains a local resource mapping tool to identify appropriate internal, local, national and international sources of support.

The DSL is responsible for ensuring that the resource mapping information remains current.

4.11 Risk Assessment

Safeguarding risks must be considered as part of risk assessments for educational visits, trips, events and other activities.

The **Educational Visits Policy** sets out the detailed requirements for trip planning and risk assessment.

Any safeguarding concern arising during a trip or activity must be reported immediately to the Trip Leader and DSL or appropriate senior leader.

5. SAFEGUARDING CONCERNS ABOUT ADULTS

5.1 Allegations Against Adults

An allegation may arise where an adult working in or on behalf of GSB is alleged to have:

- behaved in a way that may have harmed a student;
- behaved in a way that may indicate they pose a risk of harm;
- acted outside the law in relation to a student;
- behaved in a way that suggests they may be unsuitable to work with students;
- breached significant safeguarding expectations or professional boundaries.

This includes concerns relating to staff, volunteers, contractors, GovCo members and other adults working in or on behalf of the School.

All allegations must be managed in accordance with the **Management of Safeguarding Allegations Policy** and **Appendix I: Managing Allegations Flowchart**.

Staff must not investigate allegations themselves.

5.2 Low-Level Concerns

A low-level concern is a concern, however small, that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the Staff Safeguarding Code of Conduct or professional expectations but does not meet the threshold for a formal safeguarding allegation.

Examples may include:

- being unnecessarily overfamiliar with students;
- inappropriate favouritism;
- inappropriate or overly informal communication;
- negative or humiliating language;
- inappropriate use of photography or recording;
- unnecessary or inappropriate physical contact;
- inappropriate one-to-one situations;
- behaviour that causes a reasonable sense of unease.

Low-level concerns must be reported and recorded. They may be important in identifying patterns of behaviour.

Further guidance is provided in the **GSB Low-Level Concerns Policy (Appendix L)**.

5.3 Speak Up and Whistleblowing

All adults have a responsibility to raise concerns about unsafe, inappropriate or unacceptable practice.

Staff should not remain silent because of loyalty to a colleague, fear of embarrassment or concern about potential consequences.

Concerns should be raised as soon as possible.

The normal reporting route is through the Head of Campus and/or DSL, depending on the nature of the concern.



Where the concern relates to the Head of Campus, it should be referred to the GSB GovCo Safeguarding Representative or GovCo Chair.

Where a staff member believes that a concern has not been appropriately addressed, they should use the School's whistleblowing arrangements. Further information can be found in the **Whistleblowing and Reporting of Concerns Policy**

5.4 Self-Reporting

Staff should raise with their line manager any personal circumstances or professional difficulties that may affect their ability to maintain appropriate professional conduct or boundaries.

Staff must also report situations in which they believe their professional judgement or competency has been compromised in a way that may affect student safety.

Confidentiality will be maintained wherever possible but cannot be guaranteed where student safety is involved.

Appropriate professional support should be offered where required.

5.5 Student–Adult Infatuation

Students may sometimes develop strong feelings or an infatuation towards an adult working with them.

Any adult who becomes aware of such a situation must report it to their line manager and DSL.

The School will consider appropriate professional boundaries, safeguarding risks and support for both the student and adult.

Staff must not respond to or encourage an infatuation in a way that breaches professional boundaries.

6. SAFER WORKING PRACTICE

6.1 Safer Recruitment

GSB is committed to safer recruitment.



All staff will be appropriately selected, screened and checked before working with students, in accordance with the GSB Recruitment Policy and applicable requirements.

Recruitment processes may include:

- identity verification;
- qualification and employment checks;
- appropriate criminal record or police checks;
- references;
- safeguarding-related questions;
- appropriate screening of online or publicly available professional information;
- assessment of suitability to work with children.

All required checks must be completed and recorded before an individual undertakes unsupervised work with students, unless an explicitly authorised risk-managed arrangement is in place.

6.2 Professional Learning

All staff receive safeguarding training appropriate to their role.

Training includes:

- recognising signs of abuse and neglect;
- responding to disclosures;
- reporting and recording concerns;
- professional boundaries;
- child-on-child abuse;
- online safety;
- safeguarding responsibilities;
- local and international safeguarding requirements;
- relevant GSB policies and procedures.

GSB maintains a Safeguarding Training Team consisting of Lead Safeguarding Trainers and Safeguarding Trainers.



Training is delivered through face-to-face learning, supplemented by online learning where appropriate.

Training requirements are set out in the **GSB Competency and Safeguarding Training Framework (Appendix E)**.

Safeguarding training is evaluated and reviewed regularly.

6.3 Staff Safeguarding Code of Conduct

All adults working with students must maintain appropriate professional boundaries.

Staff receive induction on the Safeguarding Code of Conduct and are required to sign it.

The Code of Conduct is reviewed and re-signed annually.

Professional boundaries apply both in person and online and include communication, social media, physical contact, photography, confidentiality, one-to-one situations and personal relationships with students.

6.4 Volunteers

Volunteers may include:

- class helpers;
- trip volunteers;
- mentors;
- parent volunteers;
- interns;
- other adults supporting school activities.

The School will undertake appropriate checks and risk assessments before regular volunteering begins.

Regular volunteers must:

- complete required safeguarding checks;
- receive appropriate safeguarding training;
- sign the Safeguarding Code of Conduct;



- complete any required self-declaration;
- be recorded on the Single Central Record where applicable.

Where a required check cannot be obtained, the School will undertake an appropriate risk assessment and determine whether the individual can volunteer and under what conditions.

Occasional volunteers must remain under the direct supervision of a staff member and must not have unsupervised contact with students.

6.5 Visitors

Visitors are adults who attend the School for a short-term purpose.

Visitors must:

- sign in appropriately;
- follow the School's visitor safeguarding guidance;
- comply with instructions from staff;
- wear the required visitor identification;
- report safeguarding concerns immediately.

Visitors must not have unsupervised contact with students unless this has been explicitly authorised and the appropriate checks have been completed.

6.6 Contractors and External Service Providers

Contractors and service providers working with or around students must meet GSB safeguarding expectations.

Where appropriate, contracts will require service providers to:

- undertake appropriate personnel checks;
- ensure personnel are suitable to work around children;
- provide appropriate supervision;
- provide relevant safeguarding training;
- sign required safeguarding declarations or codes of conduct;



- comply with GSB safeguarding requirements.

Short-term contractors who are not appropriately checked must be treated as visitors and supervised accordingly.

The School will review contractor safeguarding arrangements as appropriate.

6.7 Safe Touch and Physical Intervention

Physical contact with students can be appropriate in some circumstances, including:

- providing comfort to a distressed student;
- supporting a young student where appropriate;
- first aid;
- demonstrating an activity or technique;
- appropriate congratulatory contact.

Adults must always consider the student's age, needs, context and wishes.

Staff should use non-physical de-escalation strategies wherever reasonably possible.

Where physical intervention is necessary to prevent injury or significant harm, staff must use the least restrictive and proportionate approach and only the minimum force necessary.

Any physical intervention must be recorded and reported in accordance with the **GSB Safe Touch and Physical Contact Policy**.

Only appropriately trained staff may use planned physical intervention as part of an individual care plan.

Volunteers, contractors, and visitors must never initiate physical intervention unless there is an immediate need to prevent serious harm and no safer alternative exists.

The full requirements are set out in the **GSB Safe Touch and Physical Contact Policy**.

6.8 Alumni

For two years after a student leaves GSB and becomes an alumnus, staff should maintain professional contact through official School channels only.



Any safeguarding concern arising from contact with alumni must be reported through the appropriate safeguarding route.

7. ONLINE SAFEGUARDING

7.1 Online Safety

GSB is committed to creating a safe digital learning community.

Online safeguarding is supported through:

- curriculum learning;
- professional learning;
- appropriate use of technology;
- monitoring and review of online risks;
- parent education;
- clear expectations for students and adults;
- appropriate policies and procedures.

Students and adults are expected to use technology, applications, social media and online communication responsibly.

7.2 Artificial Intelligence and Sexualised Imagery

The creation, possession or sharing of AI-generated sexualised images involving students is a serious safeguarding concern and must be reported immediately.

This includes AI-generated nude or semi-nude images and other manipulated imagery intended to sexualise or exploit a student.

7.3 Financially Motivated Sexual Extortion

Financially Motivated Sexual Extortion (FMSE) involves threats to share intimate or sexualised material unless a demand is met.

Any report or indication of FMSE involving a student must be treated as a safeguarding concern and reported immediately to the DSL or Child Protection Team.



Staff must not investigate or attempt to negotiate with the person making the threat.

7.4 Cyber Security and Safeguarding Information

A cyber-attack or data breach that compromises sensitive student or child protection information may create a safeguarding risk.

The DSL must be informed immediately where a cyber incident may affect student safety or safeguarding information.

The School's relevant IT, data protection and incident response procedures must also be followed.

7.5 Online Learning, Social Media and Photography

Online learning should take place through GSB-approved platforms.

Staff must maintain professional boundaries during online learning and follow the same safeguarding expectations that apply in person.

Staff, students, parents, visitors and volunteers are expected to use social media responsibly.

Parents and visitors should be mindful when taking or sharing photographs or videos at School events, particularly where other students are visible.

Where parents have indicated that their child should not appear in School publicity or official materials, GSB will respect that request in accordance with the relevant School procedures.

Staff should use School devices when taking photographs or videos of students for educational purposes wherever possible. Where a personal device is used in an exceptional circumstance, images must be transferred to the approved School system and deleted from the personal device as soon as practicable.

8. MONITORING, AUDIT AND REVIEW

8.1 Safeguarding Compliance Review

The GSB Safeguarding Team will undertake regular safeguarding compliance reviews.

The review will consider:

- safeguarding practice;
- training;
- safer recruitment;
- recording and reporting;
- policy implementation;
- student voice;
- professional learning;
- safeguarding risks;
- actions arising from previous reviews and audits.

Findings will inform the Safeguarding Action Plan.

8.2 Internal and External Audit

GSB will operate a two-year safeguarding audit cycle, with internal and external review undertaken in accordance with the agreed GSB audit arrangements.

The internal audit will use the **GSB Internal Audit Protocol (Appendix K)**.

External audits will be conducted by an appropriately independent safeguarding auditor.

Audit findings will result in a documented action plan.

8.3 Safeguarding Action Plan

The Safeguarding Action Plan will identify:

- areas requiring development;

- actions required;
- responsible individuals;
- timescales;
- evidence of completion;
- progress and outstanding actions.

The Safeguarding Working Party, chaired by the DSL, will review progress at least three times each year.

The Head of Campus will provide appropriate safeguarding updates to senior leadership and governance.

8.4 Supervision

Safeguarding staff should have access to regular professional supervision.

Additional supervision should be available following serious or complex safeguarding cases.

Supervision should provide opportunities to:

- reflect on safeguarding practice;
- consider professional decision-making;
- identify support needs;
- manage the impact of safeguarding work;
- maintain professional standards.

8.5 Policy Review

This policy will be reviewed annually and updated where required to reflect:

- changes in law or regulation;
- changes in GSB requirements;
- safeguarding incidents and learning;
- audit findings;
- emerging safeguarding risks;
- changes in best practice.

A detailed review will be undertaken every two years.

Final approval rests with GSB GovCo.

APPENDICES

- Appendix A:** Indicators of Abuse and Neglect
- Appendix B:** Key Safeguarding Roles and Responsibilities
- Appendix C:** Confidential Record of Concern (RoC)
- Appendix D:** GSB Safeguarding Code of Conduct
- Appendix E:** GSB Competency and Safeguarding Training Framework
- Appendix F:** Volunteer Safeguarding Statement
- Appendix G:** Visitor Safeguarding Statement
- Appendix H:** Flowchart – Reporting a Concern About a Student
- Appendix I:** Flowchart – Managing an Allegation About an Adult
- Appendix J:** GSB Safeguarding Compliance Review
- Appendix K:** GSB Internal Audit Protocol
- Appendix L:** GSB Low-Level Concerns Policy
- Appendix M:** GSB Peer-on-Peer Abuse Policy

SAFEGUARDING-RELATED POLICIES

This policy should be read alongside the following documents:

- Management of Safeguarding Allegations Policy
- Safe Touch and Physical Contact Policy
- Educational Visits Policy
- E-Safety Policy
- Speak Out Stay Safe Learning Framework
- GSB Recruitment Policy
- School Mapping / Local Resource Mapping Document
- GSB AI Policy

- Data Protection Policy
- Staff Safeguarding Code of Conduct

SAFEGUARDING GLOSSARY

Term	Definition
Safeguarding	The broad responsibility for protecting students from harm and promoting their safety, wellbeing and development.
Child protection	The actions taken when there is a concern that a student has experienced or is at risk of significant harm.
Child abuse	Physical, emotional or sexual abuse, neglect, exploitation or other harmful behaviour towards a student.
Physical abuse	Deliberately causing physical harm to a student.
Emotional abuse	Persistent or significant behaviour that negatively affects a student's emotional development or sense of safety and worth.
Sexual abuse	Sexual activity or behaviour involving a student that they cannot consent to, are not able to understand or that is otherwise exploitative or harmful.
Neglect	Persistent failure to meet a student's basic physical or emotional needs, resulting in or creating a risk of harm.
Peer-on-peer abuse	Abuse or harmful behaviour between students.
Exploitation	Taking advantage of an imbalance of power to coerce, manipulate or deceive a student for personal or other gain.
Vulnerable student	A student whose circumstances may create additional safeguarding risks or barriers to safety, support or disclosure.



Trusted Adult	An adult whom a student feels able to approach for help, support or advice.
Safeguarding concern	Information, observation, disclosure or behaviour that indicates a student may be at risk of harm or may require safeguarding support.
DSL	Designated Safeguarding Lead.
DDSL	Deputy Designated Safeguarding Lead.
CPO	Child Protection Officer.
CPOMS	The School's digital system for recording and monitoring safeguarding concerns and information.
Record of Concern (RoC)	The approved form used to record a safeguarding concern where CPOMS is not available.
Early help	Support provided when a student or family would benefit from additional assistance before concerns escalate to a child protection threshold.
Allegation	A concern that an adult working with or on behalf of students may have harmed a student, may pose a risk of harm or may be unsuitable to work with students.
Low-level concern	A concern about adult behaviour that is inconsistent with professional expectations but does not meet the threshold for a formal allegation.
Harm threshold	The level of concern at which behaviour or circumstances require management under the formal allegations procedure.
Whistleblowing	Raising concerns about unsafe, unlawful or inappropriate practice where normal reporting routes may not be appropriate or have not resolved the concern.
Self-reporting	Informing an appropriate colleague about circumstances that may affect one's professional conduct, judgement or ability to safeguard students.



Safe touch	Appropriate physical contact that is necessary, proportionate and consistent with professional expectations and the student's needs.
Single Central Record (SCR)	The School's central record of required recruitment and safeguarding checks.
TAC/TAS	Team Around the Child/Student; a coordinated group of people working together to support a student's safety and wellbeing.
Safeguarding Action Plan	The documented plan used to monitor improvements and actions arising from safeguarding reviews and audits.
Supervision	Professional support and reflection for staff with safeguarding responsibilities.
FMSE	Financially Motivated Sexual Extortion.
Deepfake	Digitally manipulated or AI-generated media that may falsely depict a person, including sexualised imagery.
Cyber-attack	An intentional attempt to gain unauthorised access to, damage or disrupt digital systems or information.
Alumni	A former student who has left GSB.
Care Plan	An individual plan identifying a student's specific care, health, wellbeing or support needs.
Self-declaration	A formal declaration made by an adult confirming relevant information required for safeguarding purposes.
Safeguarding Committee	The group responsible for monitoring and supporting safeguarding practice, compliance and improvement at GSB.
Safeguarding Working Party	The group responsible for reviewing safeguarding actions, developments and implementation.
Resource Mapping	The process of identifying available internal and external services and sources of support for students and families.



Risk Assessment	A structured process for identifying safeguarding or safety risks and determining appropriate control measures.
Safer Recruitment	Recruitment processes designed to assess the suitability of adults to work with children and reduce safeguarding risks.
Professional boundaries	The expectations governing appropriate relationships and interactions between adults and students.