

## **11.0 CHILD PROTECTION**

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## **Mission Statement**

The International School Aberdeen (ISA) is committed to safeguarding the welfare of all children within the ISA community. We recognise our responsibility to take all reasonable steps to promote safe practice, to recognise and actively consider potential risks to children, and to protect children from all types of harm and abuse.

## 11.10 Scope

International School Aberdeen (ISA) works with children and families as part of its activities.

The purpose of this policy statement is:

- To protect children and young people who receive ISA services. This includes the children of adults who use our services;
- To provide parents, staff and volunteers with the overarching principles that guides our approach to child protection.

In this policy, the terms ‘child’ and ‘children’ shall refer to ISA students regardless of age, and other children who come on to the ISA campus including participants in activities, visitors from other schools and their siblings. Adults shall encompass all adults who come onto the ISA campus or participate in ISA activities.

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## 11.20 The Legal and Policy Framework

In attempting to fulfil its obligations and responsibilities in relation to child protection, ISA has taken into account the national practices amongst others: Getting it Right for Every Child (GIRFEC) and the Scottish Council of Independent Schools (SCIS) framework for the guidance and wellbeing on Child Protection. A summary of the key legislation and guidance we refer to is available from [www.nspcc.org.uk/childprotection](http://www.nspcc.org.uk/childprotection).

It is the responsibility of the Designated Child Protection Co-ordinator (DCPC) to inform the Head of School and the Board on policy and legislative updates that will affect this policy.

### 1. Duty of care

ISA follows the requirement of ‘The National Guidance for Child Protection in Scotland 2014 in relation to the Children and Young People (Scotland) Act 2014’ which states that “Child protection is the responsibility of all who work with children and families, regardless of whether that work brings them into direct contact with children. All workers should be fully informed of the impact of adult behaviour on children and of their responsibilities in respect of keeping children safe.”

### 2. Preventing unsuitable persons from working with children

Legislation on managing adults who may pose a risk to children is included in the Criminal Justice and Licensing (Scotland) Act 2010 & 2016 and The Protection of Vulnerable Groups (Scotland) Act 2007. ISA recognises the need to have recruitment and selection procedures for both staff and volunteers that will uphold the requirements of legislation. In addition, ISA will make further checks that it thinks appropriate so that any other relevant event that occurred outside the UK can be considered.

## **11.30 Recruitment and Selection of Paid Staff and Volunteers**

**11.30.1 Recommended Good Practice**

ISA is committed to the development of best practice in safeguarding children when recruiting paid staff, outside contractors, activity coaches, tutors and volunteers.

CROSS-REFERENCE: SECTION 5 PERSONNEL, Sub-section 5.20.1

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### **11.30.2 Recruitment and Checking of Future Staff and Volunteers**

The School requires PVG for all adults who are with children other than their own, on the ISA campus or during an ISA activity, either as part of paid employment or as a volunteer, and are not supervised by an ISA staff member. This includes ISA's own paid staff, staff who work for ISA contractors, such as bus drivers, activity coaches or tutors, as well as parent volunteers.

Where a position requires Disclosure Scotland PVG Membership, this will be made clear on all relevant documentation relating to the above posts.

The School will pay for PVG checks for its own, directly employed staff, and any for any other child protection checks that it requires. The School will require outside contractors and other outside providers to pay for PVG and other relevant checks as part of any contract with them. The school may pay for PVG and other relevant checks for unpaid volunteers.



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### **11.30.3 Retrospective Checking of Current Staff and Volunteers**

Disclosure Scotland continuously updates the collection of vetting information about an individual after the initial disclosure check has been made so that new information indicating that the person might be unsuitable can be acted upon.

If an employed member of staff or volunteer, who is by default a member of the PVG Scheme, is placed under consideration for listing or barred, both the individual and the School would be notified by Disclosure Scotland. Under these circumstances, it is no longer considered necessary for the School to carry out retrospective PVG record checking of staff and volunteers.

CROSS REFERENCE:       5.20.2 Disclosure Scotland PVG Scheme  
                              11.30.1 Recommended Good Practice  
                              11.30.2 Recruitment and Checking of Future Staff and Volunteers

**11.30.4 Managing the Recruitment and Vetting Process**

The Head of School is responsible for managing the recruitment and the vetting process for staff, contractors, other outside providers and groups, and volunteers.

### 11.30.5 Managing Disclosure Information

ISA will act in accordance with the Scottish Executive's Code of Practice for registered persons and other recipients of Disclosure Information, and thus:

- Disclosure Scotland PVG Membership applications will only be requested when necessary and relevant to a particular post/role and the information provided on a PVG Membership certificate will only be used for these purposes;
- ISA will ensure that an individual's consent is obtained before seeking and using Disclosure Scotland PVG Membership information;
- Disclosure Scotland PVG Membership information will only be shared with the ISA's personnel who are authorised to see it in the course of their duties;
- Where additional Disclosure Scotland PVG Membership information is provided to ISA, this will only be discussed with the applicant should the Disclosure information have a material impact on the outcome of the recruitment process;
- Disclosure Scotland PVG Membership Certificates will be stored securely for a maximum of six months and will be accessible only to ISA's authorised personnel. Thereafter, information will be thoroughly destroyed;
- No image or photocopy of the Disclosure information will be made, however the following details will be retained:
  1. Date of issue of PVG Membership Certificate
  2. Name of subject
  3. Position for which disclosure was requested
  4. Unique PVG Membership number and Disclosure number

### **11.30.6 Recruitment of Ex-Offenders**

Having a criminal record will not necessarily disbar an individual from working at ISA. ISA will assess applicants' suitability for positions of trust based upon the legislative guidelines as outlined in Policy 5.20.2.1.

At interview, an opportunity will be taken to discuss any issues related to offences. Failure to reveal information could adversely affect the possibility of being appointed to the position.

At interview or when receiving a Disclosure Scotland PVG Membership certificate which shows a conviction, consideration will be taken of:

- Whether the conviction is relevant to the position being offered;
- The seriousness of the offence revealed;
- The length of time since the offence took place;
- Whether the applicant has a pattern of offending behaviour;
- Whether the applicant's circumstances have changed since offending took place.

ISA will ensure that all staff involved in the recruitment process are aware of this Statement and receive appropriate guidance on the management of Disclosure Scotland PVG Membership information.

CROSS-REFERENCE:       Section 5.20.2.1 Recruitment of Ex-Offenders

## **11.40 Promoting Safe Practice**

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### **11.40.1 Policy Code of Conduct**

ISA believes it is the responsibility of all adults on campus and involved in ISA activities to conduct themselves in a way that promotes children's well-being. They should avoid any conduct which would lead any reasonable person to question their motivation and intentions. Their interaction with students should be transparent and they should be wary of allowing situations to develop which could lead to allegations of impropriety. [See SCIS guidance, page 11]

It is the responsibility of the Head of School to develop a detailed policy code of conduct for all those involved in the School. The code gives guidance on how to develop and maintain safe, supportive relationships between children and adults involved in ISA activities.

Staff will read and sign the code of conduct on first joining the school, and will re-sign at the beginning of each school year. A record will be kept.

Other adults including outside contractors, volunteers etc, will sign when first needed, and will re-sign at the beginning of each school year. A record will be kept.

### **11.40.2 Contact with Children**

Physical contact should only be for the purpose of care, instruction, health and safety, physical intervention or restraint. Adults should avoid physical horseplay or any actions that may be misinterpreted [SCIS page 13].

Staff and other adults should avoid being alone with a child in a private space. Where one-to-one situations are unavoidable, ISA follows SCIS advice which is:

- It should be officially timetabled and where possible held with others around or within earshot or view of others;
- Never have the door locked and, wherever possible, maintain a gap/barrier between you and the child;
- Another member of staff should be aware of any meeting and its purpose;
- If possible, doors should have built in windows;
- Staff should not arrange to meet with children off campus or outside of school hours without the knowledge of the school and their parents. Staff should follow the guidelines outlined in Section 11.40.8 in making contact through social media and other electronic methods;
- ISA students should not babysit staff members' children;
- Staff should consider carefully any direct physical contact with children, and, taking in consideration the age of the child, whether any such contact could be open to misinterpretation and can be wholly justified if necessary. Ideally, it should be within vision of another staff member.

**11.40.3 Accompanying Children Off Campus**

Staff should not accompany children off campus, one-to-one. In trips outside Aberdeen there should be a minimum of two authorised adults, one male and one female if the groups are mixed gender. Trips should keep to the ratio guidance outlined in Policy 6.50.9.2.



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#### **11.40.4 Overnight Trips**

The Board and the Head of School are responsible for ensuring that the School follows the relevant legislative guidelines for school trips (see *Going Out There – Scottish Framework for Safe Practice in Off Site Visits (2013)*). The Head of School is responsible for authorising all school trips. The Head of School, trip leaders and their deputies should be trained in child protection to the appropriate level.

The School retains ultimate responsible for all its students' wellbeing, safety and protection on all trips, including exchange visits. In planning homestays and overnight trips, the School should follow both legislative requirements and the advice of SCIS. Being a host parent is a regulated activity with children as per Schedule 2 of the PVG Act, and therefore checks must be carried out accordingly. The Police Act regulations permit schools to carry out an Enhanced Disclosure Check on any adults over 16 who live with the host family.

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**11.40.5 Accompanying Children for Emergency Treatment**

If, during any ISA activity, there is an incident that requires emergency medical treatment and the child's parent is not present, an ambulance will be called. An appropriate adult, who will remain with the child until the parent/carer arrives, will accompany the student in the ambulance. In exceptional circumstances, a child may be taken to the hospital in a staff/volunteer's car, but at least one staff member and one first aider must accompany the child. In general, the School Nurse and one other staff member will accompany the child. Details of medical incidents must be recorded on an Incident Report Form and reported to the School Nurse, Health & Safety Officer, and Head of School.

Incidents of a non-medical nature should also be noted in the Incident Report Form. Such incidents may include where someone falls, rips their clothes, or individuals making physical contact with one another, i.e. pushing, hitting, etc.

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### **11.40.6 Managing Intimate Care Needs**

Intimate care commonly involves meeting toileting and medication needs.

#### **Toileting:**

It is ISA's policy that intimate care needs must normally be met by the child's parent and that all Pre-School children should be able to use the toilet without assistance before starting school; the exception being that any child who becomes ill or has an accident is appropriately cared for by the staff. Written consent is requested from the parents of Pre-School students before starting school. For all other students, if such an occasion arose, a telephone call would be placed to the parent. In the meantime, so that a child is not left in soiled clothing, the School Nurse, accompanied by a chaperone, would arrange a change of clothing and administer appropriate care.

**11.40.7 Physical Intervention and Restraint**

In cases of physical intervention and restraint, ISA follows SCIS advice. Staff and other adults should always be able to justify resorting to physical intervention, which should be limited and proportionate. Only the absolute minimum of force should be used, and is only permissible when certain that a child is in imminent risk of endangering themselves or others.

Initial responses should always be to de-escalate and divert. Where possible, another member of staff should be called to give assistance and provide witness. Avoid restraining by putting hands on joints, and as soon as the child is under control, cease physical contact.

A formal record should be kept of all incidents of physical intervention and restraint.

**11.40.8 Communication with Students via E-technology and Social Media**

Staff should only communicate with students via e-technology for educational and other established purposes of the School as approved by the School's senior leadership. Staff should never share information with students in any environment that they would not willingly or appropriately share in a school or school-related setting.

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**11.40.9 Online Child Safety**

New technologies, digital media and the Internet are an integral part of children's lives. Although this has enabled new forms of social interaction, these also bring a variety of risks from adults and peers; as examples, but not limited to:

- Exposure to obscene, violent or distressing material;
- Bullying, coercion or intimidation through email and online (cyber-bullying);
- Sexual exploitation by online predators (eg grooming).

All students in the School must read, understand, and sign an acceptable use policy before granted Internet access at the School. Misuse of technology at school or at home results in the loss of privilege and other consequences if the misuse relates to the code of conduct.

The School will actively promote safe and respectful online behaviour.

**11.40.10 Safe Use of Photographs and Images of Children**

The School must obtain explicit written consent from parent(s)/guardian(s) to photograph and make use of the images of children. This consent must be recorded. Where appropriate the child should also be asked their views.

The School will take all reasonable steps to safeguard students when they are being photographed or videoed. No photographs or videos are allowed to be taken in areas of personal privacy such as changing rooms, bathrooms or sleeping quarters.

If the School uses an external agency, it will ensure that the photographer has been appropriately checked and is accompanied by a member of school staff at all times.

All images and videos of students taken for school purposes belong to the School and must be compatible with the Data Protection Act 2018 (DPA 2018).

**11.40.11 Transport Issues**

Wherever possible and practical, private vehicles should not be used to transport students, and there should be at least one other adult in addition to the driver.



## **11.50 Managing Concerns/Allegations of Abuse**

It is the responsibility of all adults within ISA to work to prevent the neglect or physical, sexual, or emotional abuse of children. Their role will range from identifying and sharing wellbeing as well as child protection concerns about a child, to making an active contribution to supporting the child and their family.

All cases of alleged or suspected abuse must be taken seriously, and reported to the appropriate authority: no adult should ever promise absolute confidentiality, but have an obligation to be discreet.

CROSS-REFERENCE: Section 5.20.12

### 11.50.1 Reporting Concerns

Concerns about child abuse may arise in the following circumstances:

- Arising from observation of the child's behaviour, appearance or comments the child has made;
- A child tells a member of staff they have been abused or feel unsafe;
- A third party expresses concerns to a member of staff: this could be another student, parent/carer or member of the public;
- An anonymous allegation is received;
- Non-recent child abuse.

The School may also be asked to co-operate with an investigation initiated outside school.

If a staff member receives a concern, they are required to share this concern with an assistant principal, principal, Head of School or a Designated Child Protection Co-ordinator. If a staff member does not feel that their concern has been treated with sufficient seriousness they may report it directly to the Board.

The role of school staff is to recognise, respond, report and record. It is not to question or test evidence.

The Head of School and the Designated Child Protection Co-ordinators are responsible for providing training and supporting processes to guide staff.

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**11.50.2 Role of the Child Protection Co-ordinator(s)**

ISA's Designated Child Protection Co-ordinator (s) is(are) responsible for:

- Providing appropriate advice and guidance to staff/volunteers who have concerns about the care, protection and welfare of children (particularly where they suspect that a child is being abused or has disclosed alleged abuse);
- Ensuring that clear referral procedures are in place which facilitate effective referral to the statutory child protection agencies, and that all staff and volunteers who work with and support children understand the obligation to follow these procedures;
- Ensuring that staff and volunteers have access to, and are encouraged to attend, appropriate training in child protection issues which are pertinent to their roles and responsibilities;
- Monitoring the implementation and effectiveness of the Child Protection policy;
- Keeping up-to-date with child protection 'best practice' as it relates to the voluntary and non-statutory sectors;
- Liaising with relevant outside agencies.

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**11.50.3 Steps to be followed where there are concerns about a child's safety and well-being****Involvement of Outside Agencies.**

Where a child is felt to be in immediate danger the Head of School/Designated Child Protection Co-ordinator should report, without delay, directly to the police. Similarly, where a child is thought to require immediate medical assistance, this should be sought as a matter of urgency from the relevant health service.

The Head of School or a Designated Child Protection Co-ordinator must contact the relevant statutory child protection agency when, in their good judgement, the situation requires it. A Designated Child Protection Co-ordinator does not require other permission to do so, but must inform the Head of School or delegate, as soon as possible, that it has been done. Proper records of all reporting must be kept.

The Designated Child Protection Co-ordinators are responsible for keeping up-to-date contact information for referrals to the statutory child protection agencies

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**11.50.4 Allegations of Abuse made against ISA Staff**

Allegations of abuse should be addressed with common sense, proportionality and judgement. ISA recognises that employers have a duty of care to the employees. The School should provide effective support for anyone facing an allegation.

Allegations should be dealt with quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person subject to the allegation.

The Head of School and a Designated Child Protection Co-ordinator must be informed immediately. If the person is deemed an immediate risk, the police should be contacted for advice on the day before anyone is questioned to ensure best evidence is preserved. The Head of School should inform the Board Chair as soon as possible.

Concerns should be reported to a Designated Child Protection Co-ordinator, principal or Head of School. If the concern is about the Head of School, it should be reported to a Designated Child Protection Officer who will report it to the designated Board member.

**11.50.5 Protection of Staff who Report Concerns/Allegations of Abuse**

ISA will take all actions to protect staff and others who raise a concern. Reporting to an appropriate authority in response to a duty, whether legal, moral or social or in the protection of an interest is protected by qualified interest. However, this protection does not extend if the allegation is repeated to other persons, and/or it can be shown to motivated by malice.

**11.50.6 Data Protection and Storage of Confidential Records**

ISA recognises its responsibilities under the Data Protection Act 2018 (DPA 2018). Information relating to child protection issues (e.g. completed pro-forma of individual concerns/incidents and allegation forms) will be stored in a secure place. Access to this information will be restricted to those members of the School who have designated responsibility for child protection issues.

ISA is aware that the Data Protection Act 2018 (DPA 2018) allows for disclosure of information without the consent of the subject in certain conditions, including the purposes of the prevention or detection of crimes or the apprehension or prosecution of offenders. The need to safeguard children will always be considered within these parameters.

**11.50.7 Training and Staff Development**

ISA will take steps to ensure that staff and volunteers receive appropriate training in child protection issues. Any training will be designed to meet the needs of ISA.

CROSS REFERENCE: ISA Board Policy Section 5: Personnel



**11.50.8 Policy Review and Circulation**

This policy will be reviewed annually or as and when relevant legislation and national guidance is introduced/amended. The existence of ISA's Child Protection policy will be communicated to all parents and other stakeholders. Copies of the policy will be made available on request.