

# Child Protection Policy and Procedures

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## i. Policy Statement

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**The wellbeing of children and young people is important to GSF. We want to see children and young people thriving regardless of their gender, sexuality, ethnic grouping, faith, culture, family income, disability or any other defining feature. This is why we are committed to ensuring that all children and young people can access quality education.**

We recognise **it is the right of all children to have their welfare both safeguarded and promoted** as enshrined within the United Nations Convention on the Rights of the Child (UNCRC)<sup>1</sup>. We believe that **children and young people should never experience abuse** of any kind and we acknowledge that we have a responsibility to promote the welfare of all children and young people and to keep them safe.

We recognise that, as an organisation working within the education sector, our work has an impact on children. We want to be a global leader in improving non-state education and we recognise that the protection and wellbeing of children is a core tenet of quality improvements. **We want to ensure that our Members have the tools and resources to have robust practices** in place to prevent and respond to child abuse and that **we are following best practices** in our programme design, delivery and organisational development.

We recognise that **no organisation is exempt from the risk of child abuse occurring**; it is happening in organisations all over the world. It is therefore, paramount to us to ensure that we minimise the chance of this happening in or through our organisation.

**We are committed to working with our Staff, Volunteers, Members and Partners in order to safeguard and protect children** and recognise that it is essential to work in Partnership with children, young people, their parents, carers and other agencies when promoting children and young people's welfare.

While this policy focuses on Child Protection specifically, we recognise that we have a wider safeguarding responsibility to anyone who works with or for us and to anyone our work benefits. As well as having a zero tolerance for child abuse, we also have a zero tolerance for bullying, harassment, sexual exploitation and abuse of any person. We are committed to ensuring the safety and wellbeing of everyone involved with GSF. Our Code of Conduct, Complaints policy and Ark's Whistle-Blowing Policy support this commitment.

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<sup>1</sup> <https://ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

## ii. Definitions

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- 1 **Ark:** The Charity incubating GSF
- 2 **Ark Board:** The Board with legal and financial control and management of GSF
- 3 **Child/ren:** Any person under the age of 18
- 4 **Child Protection:** Ensuring that children are protected from abuse, sexual harassment and exploitation
- 5 **Designated Person:** The Child Protection/Safeguarding Lead in another organisation or a named individual for GSF to liaise with on Child Protection/Safeguarding issues
- 6 **Designated Safeguarding Lead (DSL):** A member of the GSF Board given specific strategic responsibility for ensuring Safeguarding and Child Protection policies and practices are considered in all aspects of GSF's work and for holding GSF accountable for responding appropriately to any concerns. Details of the current DSL can be found in [Appendix 4](#).
- 7 **Designated Safeguarding Officer (DSO):** A GSF team member appointed by the GSF Board to take responsibility for all aspects of the Safeguarding and Child Protection Policy and its implementation. Details of the current DSO can be found in [Appendix 4](#).
- 8 **GSF Board:** The people providing strategic oversight of GSF including financing, policies, procedures, staffing and operations.
- 9 **Host organisation:** Any organisation or Partner that GSF is visiting or spending time with which brings GSF Representatives into contact with children.
- 10 **Members:** Organisations that have passed GSF's due diligence process and have formally become Members of GSF.
- 11 **Partners:** Organisations and individuals with a formal or contractual relationship with GSF bringing them directly into contact with young people.
- 12 **Representative/s:** Anyone engaged in work with or on behalf of GSF that would bring them into contact with children or young people including but not limited to trustees, GSF Board Membership, employees, consultants, contracted parties, volunteers, interns and students working for or assisting GSF.
- 13 **Safeguarding:** Promoting the welfare of all children and protecting them from harm or abuse
- 14 **Senior Management Team (SMT):** Senior staff with responsibility for the day-to-day running of GSF and who have operational responsibility for the execution of the Child Protection Policy and Procedures
- 15 **Staff:** Anyone employed by GSF in a paid role.
- 16 **Volunteers:** Anyone who works on behalf of GSF in any capacity that is not compensated financially or in kind. This includes, but is not limited to, GSF Board, interns and fellows.
- 17 **Wider Network:** Other individuals and organisations that GSF works with who are not in any form of contractual relationship with GSF.

## Section A: Child Protection Policy

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GSF believes that a child or young person should never experience harm of any kind. While GSF does not work directly with children in either programmes or operations, GSF Representatives may come into contact with children as part of their work with or for GSF. This policy demonstrates our commitment to safeguarding children from harm and details the measures and structures GSF puts in place to prevent and respond to child abuse.

This policy applies to all Representatives working on behalf of GSF, makes clear to those within the organisation, and to Partners the behaviours and actions that are required in relation to the protection of children.

The purposes of this policy are to:

- Protect children and young people that GSF Representatives come into contact with
- Provide all GSF Representatives with the overarching principles that guide our approach to child protection

Legal framework

This policy is based on UK and international law and guidance that seeks to protect children, namely the Children Act, 1989, 2004; United Nations Convention on the Rights of the Child, 1989; Data Protection Act, 1998; Sexual Offences Act, 2003; Safeguarding Vulnerable Groups Act, 2006 as amended by the Protection of Freedoms Act, 2012; Equality Act 2010; Counter-terrorism and Security Act 2015; other relevant UK government guidance on safeguarding children including Working Together to Safeguard Children, 2015 and the Prevent Duty.

We recognise that:

- The welfare of children and young person is paramount, as enshrined in the Children Act 1989
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Some children are additionally vulnerable because of their level of dependency or their communication needs
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

We will maintain our commitment by:

- **Raising awareness** – we will ensure that GSF Representatives, Partners and Members are aware of the need to keep children safe
- **Prevention** - we will ensure that GSF Representatives minimise risks to children through awareness, good practice and appropriate training
- **Responding** - we will ensure that all GSF Representatives and Partners take action to keep children safe where concerns arise regarding possible abuse
- **Recording** - we will be consistent and clear in our recording and ensure that GSF Representatives and Partners record incidents they have been made aware of
- **Reporting** - we will ensure that all GSF Representatives and Partners understand GSF's procedure when concerns arise regarding the safety of children
- **Referring** – we will ensure that we make appropriate and timely referrals to statutory agencies in response to concerns arising regarding possible abuse

We will seek to keep children and young people safe by:

- Setting an organisational culture that prioritises safeguarding and acts transparently so that it is safe for those affected to come forward and report incidents and concerns with assurance that they will be handled sensitively and properly
- Valuing, listening to and respecting them
- Adopting Child Protection Policies and practices including a Code of Conduct for Representatives
- Requiring GSF Representatives to read the Child Protection Policy and Code of Conduct and sign that they understand and agree
- Providing effective management for GSF Representatives through supervision, support and ongoing training
- Recruiting GSF Representatives safely, ensuring all necessary checks are made
- Requiring our Members to confirm that they have the appropriate controls for Staff, including Child Protection policies and procedures, in place, and that they make GSF aware of any major<sup>2</sup> Child Protection incidents within their organisation during membership
- Requiring Partner organisations to confirm they have appropriate Child Protection policies in place and requiring that any Child Protection incidents prior to, or while undertaking work for GSF are reported to GSF
- Ensuring that our support to Members includes providing them with Child Protection and Safeguarding tools, resources and expertise
- Sharing information about child protection and good practice with Representatives as part of their induction and ongoing training
- Sharing child protection concerns with relevant agencies and organisations in the country where any abuse is suspected or alleged to have taken place;
- Dealing with all concerns and allegations of abuse seriously and responding appropriately, including informing the Police, children's services and the Disclosure and Barring Service in the UK and internationally as appropriate.
- Ensuring that any staff member found responsible for a breach of the child protection policy faces disciplinary action, including, in serious cases, dismissal.

GSF is committed to ensuring that Representatives apply high standards of behaviour towards children within both their professional and private lives. All GSF Representatives are responsible for upholding the Child Protection Policy and Code of Conduct both within and beyond their work.

GSF is aware of its wider safeguarding responsibilities including the safeguarding of Representatives of GSF. We are committed providing a safe and inclusive working environment for Representatives and we will achieve this by:

- The use of risk assessments to ensure that where potential risk to a Representative is identified, appropriate measures are put in place to mitigate such risk; and
- The implementation of policies and procedures designed to ensure the safety and well-being of representatives.

This policy and the procedures attached should be used in conjunction with Ark's Recruitment Policy, Complaints Policy, Whistle-blowing Policy and Disciplinary Policy.

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<sup>2</sup> A 'major' Child Protection incident is one that is considerable, noteworthy or important. Proportionality is key. It is unlikely that a single incident would be considered 'major', but a Child Protection incident that affects multiple children or happens over a period of time, where the abuse may be described as systematic or where the response of the senior leadership team and governance structures were deemed to be insufficient would be defined as 'major'

**This policy is approved and endorsed by the GSF Board who will review it annually.**

This policy was last reviewed in: November 2018

## Section B: Guidelines and Procedures in support of GSF's Child Protection Policy

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### Introduction

This procedure outlines what you should do if, in the course of your work for GSF, you are informed of a Child Protection allegation or suspect abuse.

The procedure should provide clear direction to the DSO, DSL, SMT, and GSF Board, who are called upon to deal with disclosures, suspicions and allegations and to manage investigations that may result from them.

This guidance takes account of the fact that the nature of GSF's work means that disclosures, abuse and allegations may take place outside of the UK, while GSF is registered in the UK<sup>3</sup>. These jurisdictions will have differing child protection policies and procedures and differing capabilities to deal with incidents. To this end, Representatives should always consider how statutory authorities in the country concerned and in the UK are involved.

This procedure recognises that although GSF Representatives will only come into contact with children within a host organisation, there is still the possibility that they may be made aware of abuse during that time. This means that the DSO will primarily liaise with the Designated Person at the host organisation and support them to follow their policy in responding to suspicions, allegations and disclosures.

### Aims of the procedure

The aims of this procedure are:

- To ensure that children, who come into contact with GSF Representatives, are protected and supported following a disclosure, suspicion or allegation of abuse.
- To ensure that there is a fair, consistent and robust response to any disclosure, suspicion or allegation made, so that the risk posed to other children by an abusive individual is managed effectively.
- To facilitate an appropriate level of investigation into the disclosure, suspicion or allegation, whether they are said to have taken place recently, at any time while someone has been working with or for GSF or prior to a person's involvement with the GSF.
- To ensure that GSF continues to fulfil its responsibilities towards its Representatives who may be subject to such investigations.
- To ensure that Representatives are able to continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin.

This procedure applies to:

- Any GSF Representative who receives a disclosure of abuse, suspects abuse or to whom an allegation of abuse has been made while in the course of their work for GSF
- Anyone in a managerial position (including the DSO, DSL, SMT and GSF Board) who may be required to deal with such allegations and manage investigations that result from them.

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<sup>3</sup> Global Schools Forum is incubated by Ark Ventures, part of the education charity Ark. Ark Ventures incubates, launches and supports organisations that have the potential to deliver widespread change in education and society. Ark is registered in England as Absolute Return for Kids (Ark) as a company limited by guarantee number 04589451 and charity number 1095322.

## 1. Serious Incident Reporting

As part of a registered charity, GSF has an obligation to report serious incidents to the Charities Commission. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant damage to the organisation such as:

- loss of the charity's money or assets
- damage to the charity's property
- harm to the charity's work, beneficiaries or reputation

Where the GSF Board, DSL, DSO or SMT determine that a serious incident has occurred it must be reported immediately to the Ark Board. The responsibility for reporting serious incidents rests with the Ark Board. The Charity Commission's [serious incident reporting framework](#) and published guidance should be followed to ensure that incidents are reported promptly and in sufficient detail.

Any serious incident, whether it occurs in the UK or overseas, or involves a UK or non-UK national, should be reported to the Charities Commission.

## 2. Incident identification and reporting guidelines

The guidance and procedures below, together with the forms provided in the appendices provide the framework and mechanism for incident identification and reporting. Guidance can also be sought from the DSO.

The simplest way to remember the procedure for Child Protection incidents, suspicions, concerns or disclosures is the 5R's: Recognise, Respond, Record, Report, Refer

### 2.1 Recognise

Child abuse occurs when adults of children inflict or fail to stop physical, psychological or other harm occurring to children.

It is not easy to categorise harm and this list is not exhaustive, but abuse can broadly be identified as:

**Physical Abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child, including by fabricating the symptoms of, or deliberately causing illness in a Child;

**Emotional Abuse:** Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children; or preventing the child participating in normal social interaction. It may involve the child seeing or hearing the ill-treatment of another. It may involve causing children to frequently feel frightened or in danger, or the exploitation or corruption of children;

**Sexual Abuse:** Sexual abuse involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or anal intercourse) or non-penetrative acts (e.g. oral sex). They may include involving children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways;

**Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the Child's health or development, such as failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Child Sexual Exploitation:** Child sexual exploitation is a type of sexual abuse in which children are exploited for money, power or status.

These can occur individually or together. The perpetrator of abuse is most often someone known to the child. This could, for example, be a member of school staff or a family member. There is further guidance on how to recognise abuse; the signs and symptoms in [Appendix 5](#).

You may become aware of abuse in any of the following ways:

- A child discloses to you that they are being or have been abused
- If you suspect that a child is being or has been abused or observe behaviour causes concern
- If you are concerned, or made aware, that a child is involved in extremist activity
- If a direct allegation of abuse is made against a GSF Representative, Partner or Member
- If GSF is informed by the police or another statutory authority, or other entity that a Representative or Partner is the subject of an investigation or allegations;
- Information emerging from the renewal of a DBS check or Barred List check that suggests that a Representative may have committed an offence or been involved in an activity that could compromise the safety of the children they come into contact with through GSF;
- A Representative, Partner or Member informing GSF that they have been the subject of allegations, have harmed a child, or committed an offence against (or related to) a child.

If you hear, or suspect, that a child is being abused or is at risk of being abused, even if the truth of the disclosure is uncertain, you must respond in accordance with these procedures and report it to the DSO.

## 2.2 Respond

For disclosures or allegations, stay calm and take time to listen do not interrogate the person reporting the abuse but accept what they have to say; offer reassurance that the person reporting the abuse has done the right thing; tell the person you will have to report it to the DSO. Do NOT promise secrecy. For further detail on how to respond, see [Appendix 5](#).

## 2.3 Record

Make careful notes of what was said by you and the other person as soon as possible after the event, and/or complete the form in [Appendix 2](#). This should be completed within 24 hours.

Recording should be kept factual, with no reference to subjective opinions. As much detail as possible should be recorded in writing on the form.

## 2.4 Report

Always report it, do not deal with it alone. Once recorded, submit the form to the DSO or a member of SMT if the DSO is not available. Again, this must be within 24 hours of the initial concern, suspicion or disclosure.

It is the duty of any GSF Representative who finds out about a possible case of abuse to report it to the DSO. It is the DSO's responsibility to ensure that appropriate referrals are made and that the

case is followed up adequately. It is not for you to decide whether or not a suspicion or allegation is true.

If the DSO is the subject of the suspicion/allegation, the report must be made to the DSL who will make decisions about to who to inform.

The reporting flowchart on Page 10 should be followed.

## 2.5 Refer

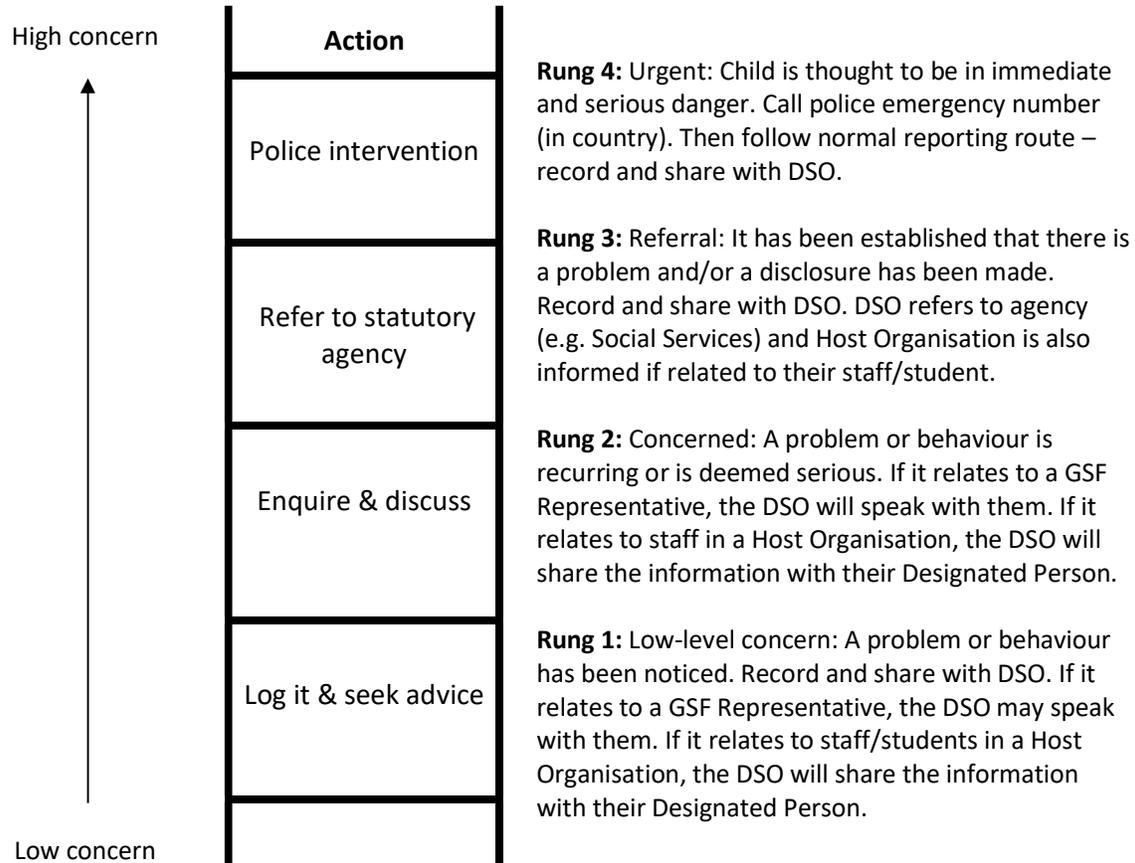
The Ladder of Concern below summarises GSF’s referral response depending on the level and seriousness of the concern. With the exception of when a child is in immediate danger when you may need to contact the emergency services, it is the DSO’s responsibility to act immediately on receipt of a report, and definitely within 24 hours of receiving it.

Referrals should be made in line with the relevant law and guidance in the country in which the abuse is said to have taken place. In addition, if the potential abuser is employed by an organisation registered in another country, it may be necessary to inform the authorities in that country as well.

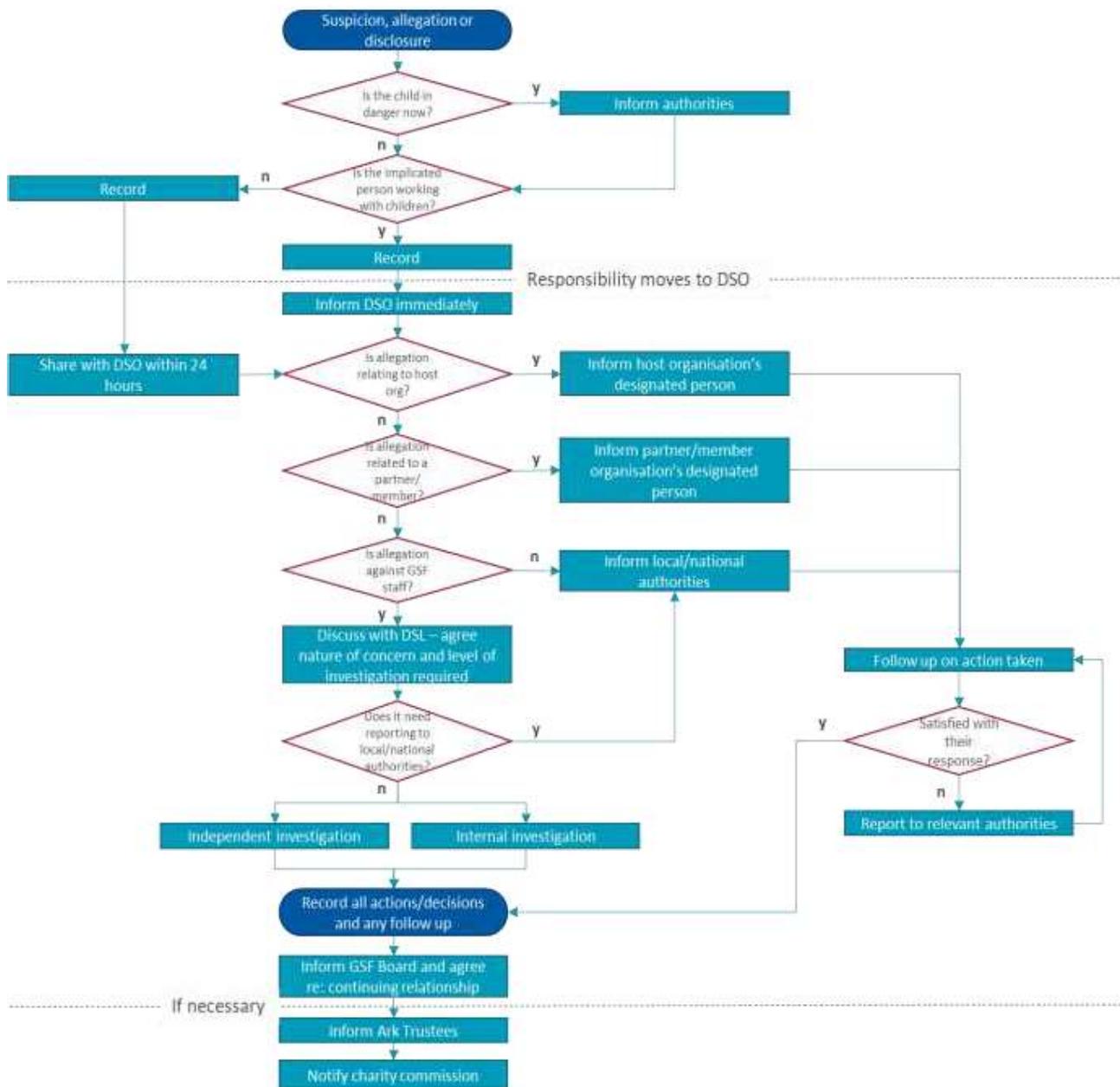
Any allegation involving a UK national (whether it occurred in this country or overseas) should be reported to the UK police. Incidents involving a non-UK national, which occur overseas, should be reported to local police if local laws have been contravened.

In most instances, GSF will become aware of abuse while in a Host Organisation and therefore the first referral GSF will make, will be to the Designated Person of the Host Organisation. Direct referrals to statutory authorities will be made if the response of the Host Organisation is not deemed adequate.

GSF will follow up on any referrals made and record the outcomes of any investigations by external agencies.



## 2.6 Child Protection Reporting Process



### 3. Allegation against a GSF Representative

Depending on the nature of the allegation, there may be three types of investigation:

1. A criminal investigation (external);
2. A child protection investigation (external);
3. A disciplinary or misconduct investigation (internal).

The results of any police or child protection investigation will influence and inform any disciplinary investigation, but all available information will be used to reach a decision.

#### 3.1 Possible suspension of Member of Staff

If the DSO is made aware of a child protection related complaint against a GSF Representative, they will ensure that they are sensitively removed from any situations where they may have direct contact with children.

It should then be explained to the person, in private, that there has been an allegation made against him/her, although the details of the allegation should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with children. It may be best, under the circumstances, for the person to return home on the understanding that the DSO will telephone him/her as soon as possible.

The information provided to him/her at this stage will need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved.

If the person is a member of a trade union or a professional organisation, he/she should be advised to make contact with that body. Arrangements should also be made for the Representative to receive ongoing support in line with the responsibilities the organisation has towards his or her welfare.

Where there is an accusation of abuse against a member of Staff or Volunteer, the member of Staff or Volunteer may be suspended whilst an investigation is conducted.

Circumstances in which suspension will be necessary are:

1. Where there is a potential or definite risk to a child/ren;
2. Where the allegations are so serious that dismissal for gross misconduct is possible;
3. Where a suspension is necessary to allow an investigation to happen.

Where suspension is being considered, SMT must arrange to speak with the Staff or Volunteer that same day. The Staff or Volunteer will be advised to seek the advice or assistance of a professional or friend. The Staff or Volunteer will be informed that an allegation has been made and that, at the conclusion of the interview, suspension might occur.

It must be made clear that the conversation is not a formal disciplinary hearing but is for the purpose of putting forward a serious matter, which may lead to suspension and further investigation. The Staff or Volunteer must be invited to respond.

Full notes must be taken of the interview and the Staff or Volunteer invited to read and sign them as a true record after the interview. A copy of the notes will be given to the Staff or Volunteer. The Staff or Volunteer must be invited to identify any persons who may have information relevant to the investigation. These names must be added to the list of those to be interviewed.

#### 3.2 Investigation into allegation

If, as a result of the conversation, SMT considers that suspension is necessary along with a full investigation of the allegation, the member of Staff or Volunteer must be advised that s/he is suspended from duty. Written confirmation of the suspension must be given within one working

day, giving reasons for the suspension. The SMT must inform the GSF Board and DSO of the likely course of action.

A decision will be made about whether an internal or independent investigation is necessary or whether to wait for the outcome of investigations by external agencies. Any internal investigation will be conducted by the SMT and DSL together.

### **3.3 Reinstating a Staff Member after suspension**

Based on the findings of any internal, independent or external investigations, GSF will decide whether the Staff Member or Volunteer should be reinstated and if so how this can be sensitively handled.

This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, GSF will reach a decision based upon the available information, which could suggest that on a balance of probability it is more likely than not that the allegation is true. The welfare of the child will remain of paramount importance throughout.

### **3.4 Allegations of previous abuse**

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of Staff who is still currently working with children). Where such an allegation is made, GSF will follow the same process as detailed above. This is because other children may be at risk from this person.

## **4. Concerns or allegations relating to Members or Partners**

Should GSF Representatives be made aware of allegations of current or historic abuse that relate to Members and Partners, they should follow the reporting process above and the DSO will contact the Member or Partner organisation to report the concern. GSF will record the steps the organisation will take (or has taken) to deal with the concern. GSF may decide to inform the relevant authorities directly depending on the nature and level of the concern. The GSF Board will discuss and agree what level of relationship to maintain with that organisation based on how they respond to the report.

Further information about GSF's relationship with Partner and Member organisations in terms of Child Protection can be found in [Section 9](#) and [Section 10](#) respectively.

## **5. Keeping an ongoing record**

Information about suspected abuse must be accurate and a detailed record should always be made at the time of the disclosure/concern using the reporting form in [Appendix 2](#).

Following the initial report, the notes section on the reporting form should be used to document clearly any actions and decisions taken, follow up, investigations and referrals together with the reasons for these.

These notes should be compiled as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside. It must be kept confidentially.

**The personal details (including address) of the alleged victim should never, under any circumstances, be given to the alleged perpetrator.**

The notes should be held on file for a 10-year period.

## **6. Support to deal with the aftermath of abuse**

As GSF has no direct professional role in the lives of children, GSF will work with others to ensure that children and parents affected by the abuse are able to access the support they need.

GSF Representatives affected will be supported through the GSF management structure and signposted to helplines, counselling<sup>4</sup>, support groups and open meetings.

Support and signposting will also be available for the alleged perpetrator, should the allegation prove false or should they continue to work with GSF after the allegation.

## 7. Confidentiality

**The welfare of the child is paramount.** Privacy and confidentiality should be respected where possible but if doing this leaves a child at risk of harm then the child's safety has to come first. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a **need to know** basis only.

This includes the following people: the DSO and DSL; the parents of the person who is alleged to have been abused (unless the allegation is against them); the person making the allegation; the relevant local/national authorities the GSF Board and the Ark Board.

Information will be stored in a secure place with access limited to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure)

## 8. Complaints Procedure

A complaint against a GSF Representative could relate to a Safeguarding or Child Protection concern or to something unrelated.

While a formal complaint with Child Protection implications will be dealt with through the processes in this policy, other formal complaints should be responded to in line with Ark's Complaints Policy and Procedures.

GSF Staff and Volunteers making formal complaints are protected by the Ark Whistleblowing policy.

**Complaints should be recorded on the form in [Appendix 3](#).**

If they relate to Child Protection, the complaint will be shared with the DSO who will investigate the matter. If the complaint relates to the DSO, it will be shared with the DSL.

The DSO/DSL will respond to the complainant with the outcome of the investigation within 2 weeks and detail the next steps should the complainant be unsatisfied with the response. If the complainant is unsatisfied, their complaint will be escalated to the GSF Board.

The GSF Board will have the final decision regarding complaints. All complaints escalated to the GSF Board will be reported to the Ark Board at the next meeting.

## 9. Safe recruitment

GSF recognises that safe recruitment forms a fundamental part of safeguarding and protecting children. While GSF Staff and Volunteers are very unlikely to be alone with children in the course of their work, GSF recognises its responsibility to Members and Host Organisations to be confident that the Staff and Volunteers employed by GSF are recruited safely. GSF follows Ark's recruitment policy and processes for both Staff and Volunteers.

For the recruitment of Staff, these include:

1. Detailing in all adverts that the applicant must be able to demonstrate a commitment to safeguarding and promoting the welfare of all children
2. Shortlisting and interviewing ensuring that applicants are suitable for the job and that they can explain any gaps in their employment history

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<sup>4</sup> The British Association for Counselling Directory is available from The British Association for Counselling ([www.bacp.co.uk](http://www.bacp.co.uk)).

3. Ensuring there are at least 2 interviewers in each interview
4. Requiring 2 references for successful applicants
5. Carrying out DBS checks on Staff that may come into contact with children and if necessary an overseas criminal record check
6. Seeing evidence of identity, address and right to work
7. Requiring a health check
8. Providing ID badges
9. Induction to include explanation of safeguarding and child protection procedures and agreement to adhere to these and requiring Staff to sign the Code of Conduct
10. Providing job descriptions
11. Probation period

For full details of GSF's recruitment policies and procedures, please refer to Ark's Recruitment Policy.

## 10. Training

All GSF Staff and Volunteers will have a full induction which will include Safeguarding and Child Protection if their role will take them into contact with children or young people in order to ensure they understand GSF's guidelines on contact with children, and how to behave appropriately at all times towards children, following the Code of Conduct. It will also ensure that they know how to respond to concerns, suspicions and allegations of abuse, what to record, who to report to and when to refer. GSF Staff and Volunteers will also be made aware of the Ark Whistle-Blowing Policy.

GSF will provide opportunities for the DSO and DSL to receive training on child protection and Prevent. The DSO will be responsible for ensuring that Staff are following the GSF Child Protection policy and for identifying when additional or refresher training is necessary.

The GSF Board will be provided with appropriate training to ensure they are able to carry out their responsibilities in relation to the governance of safeguarding and child protection. This may be led by the DSL where appropriate.

Any Staff or Volunteers who would like to gain further knowledge about Safeguarding and Child Protection, can request to attend additional training. GSF as part of their commitment to ensuring the welfare of all children will aim to meet these requests wherever possible within budget and need constraints.

## 11. Media and communications

### 11.1 Introduction

In a world where images of children are readily exploited and children are particularly vulnerable to trafficking and abuse, GSF is committed to protecting children in all areas of programme implementation including through our media and communications strategy.

This section sets out GSF's policy and practice around the gathering and publication of images, video footage and text referring to children as well as more general online safety. This is intended to ensure that the rights of children are respected, while allowing GSF to use stories and images (both still and moving) in communications and advocacy work.

We will strive to represent the diversity of children across our Members' work.

### 11.2 Photographs

If GSF Representatives wish to take photographs of children and young people they come into contact with in the course of their work with GSF, they must gain consent from both the child/ren and Staff at the Host Organisation to take the photographs. To use these photos in any marketing material, written confirmation that appropriate consent has been given by the child/ren and their parents must be received from the Host Organisation.

Appropriate consent means that the child and their parents have seen the images, understand how you are planning to use them and are happy for them to be used in that way. No payment or reward shall be given in order to gain consent.

GSF will only use images of children where we are confident that appropriate consent has been gained from the organisation sharing the photos with us or where the photos were taken.

When using photos from Members, GSF will request written confirmation from the Member that they have appropriate consent (as detailed above) for the images they are sharing to be used in marketing and publicity. Any images used shall respect each child's dignity and identity. This means that images will be anonymised in so much as the children will not be named or will be given pseudonyms, and their specific location will not be listed.

### **11.3 Interviewing Children**

It is rare that it will be necessary to interview children in the course of GSF's work. However, should a need arise, interviews should be conducted in an open space where the child and interviewer can be seen. Questions should be shared in advance with the Host Organisation and their approval gained for those questions. Questions should be chosen age appropriate and honour children's cultural values, interests and priorities. Children should be informed about how their answers will be used and given the opportunity to stop the interview at any time.

### **11.4 Online safety**

GSF's commitment to safeguarding children extends to our use of ICT systems, the internet, computers and phones. We use these regularly within our work and recognise that safeguards need to be in place to ensure that nothing we do causes harm to children or others.

Therefore, GSF Representatives will:

1. Be professional when choosing language to use in communications through any medium
2. Use the internet responsibly and productively
3. Ensure that any images of children shared with GSF are stored securely and only used for the agreed purposes
4. Promote tools and resources that support Members to implement policies that promote safe use of the internet in their schools where appropriate

GSF Representatives must not:

1. Do anything that compromises the safety or security of children and young people
2. Share confidential information with others outside of GSF
3. Disclose their usernames and passwords to anybody else
4. Do anything offensive that might bring GSF into disrepute – this includes accessing any form of inappropriate content such as material that could be considered offensive or illegal
5. Engage in any online activities that might compromise professional responsibilities
6. Communicate with children and young people through chat or social networking sites in the course of their work with or for GSF

If GSF is made aware of misuse of ICT or inappropriate behaviour online by a Representative that may compromise the safety of children, we will follow the procedure set out in [Section 4](#) above for suspicions, disclosures and allegations. Other misuse or inappropriate behaviour that does not compromise a child's safety, will be dealt with in line with the Ark Disciplinary Policy.

## Section C. Partner Child Protection Requirements

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As part of GSF's selection of a Partner organisation who will work directly with children, Partners are expected to confirm that they have:

- Child protection policies and procedures in place that are appropriate for the context in which the Partner operates
- A recruitment process for Partner Staff and other Representatives including appropriate background and reference checks
- Provided training on their organisation's Safeguarding/Child Protection Policy and procedures to all staff who are aware of the implications for their work

Alternatively, a Partner organisations without such policies can be contracted if:

- A representative from the Partner organisation confirms they have read and understood GSF's CP policy and signs GSF's Code of Conduct ([Appendix 1](#)) on behalf of their organisation and confirms that they have communicated the Code and its requirements to their staff

All partner organisations must:

- Disclose any Child Protection incidents that have taken place in the past and actions taken
- Report any safeguarding/Child Protection incidents that arise in relation to the work that the Partner is undertaking on behalf of GSF to the DSO
- Have identified a Designated Person with whom GSF would liaise in the event of a Child Protection incident.

These requirements have been informed by DFID's "[Smart Guide – Enhanced Due Diligence for – Safeguarding for External Partners](#)".

## Section D. Member Child Protection Requirements

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As part of GSF's approval of organisations to become Members, applicants are required to confirm that they have:

- Child protection policies and procedures in place that are appropriate for the context in which the Member operates
- A recruitment process for Member Staff and other Representatives including appropriate background and reference checks
- Provided training on their organisation's Safeguarding/Child Protection Policy and procedures to all staff who are aware of the implications for their work

Alternatively, Member organisations without existing policies and/or processes can be approved on the condition that they agree to write and implement these as a matter of utmost importance, at the latest, by the end of their first year of membership.

All Member organisations must:

- Identify a named person for GSF to liaise with on any Child Protection concerns
- Respond within 2 week to any concerns raised by GSF relating to current or historical Child Protection incidents detailing how they responded
- Disclose any major<sup>5</sup> Child Protection incidents that occur during their period of membership to GSF's Designated Safeguarding Officer

Member organisations are also required to share their Safeguarding/Child Protection policy with GSF prior to being a Member or within their first year of membership.

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<sup>5</sup> A 'major' Child Protection incident is one that is considerable, noteworthy or important. Proportionality is key. It is unlikely that a single incident would be considered 'major', but a Child Protection incident that affects multiple children or happens over a period of time, where the abuse may be described as systematic or where the response of the senior leadership team and governance structures were deemed to be insufficient would be defined as 'major'

## Appendix 1: Code of Conduct for Representatives and Partners

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This Code of Conduct outlines the behaviour expected of all Representatives of GSF, whose work for GSF brings them into contact with children. All GSF Staff and Volunteers will be expected to sign this Code of Conduct during their induction. For GSF organised activities that bring individuals into contact with children, those individuals will also be required to sign this Code of Conduct. Some Partners may also be required to sign this Code of Conduct.

This Code is to be interpreted in a spirit of transparency and common sense, with the best interests of the child as the primary consideration. This code will help protect children from abuse and inappropriate behaviour from adults. All GSF Representatives must display exemplary behaviour in order uphold the integrity and reputation of GSF and to protect themselves from allegations of misconduct. They must demonstrate good practice and create a positive culture and climate for children.

### 1 Upholding this Code of Conduct

All Representatives are expected to report any breaches of this code to the Designated Safeguarding Officer (DSO). GSF Staff and Volunteers reporting concerns are protected by Ark's Whistleblowing policy.

Representatives who breach this code may be subject to Ark's disciplinary procedures. Any breach of the code by Board Members may result in them being removed from their position and Volunteers may be asked to leave the charity.

Serious breaches may also result in a referral being made to a statutory agency such as the Police, Children's Social Care, the Disclosure & Barring Service and the Charity Commission.

### 2 Personal Conduct Outside of Work

GSF is committed to ensuring that our Representatives apply high standards of behaviour towards children within both their professional and their private lives.

Unlawful, or other conduct by GSF Representatives or Partner Representatives that may jeopardise GSF's reputation or position, whether during or after business hours will not be permitted. Such conduct includes but is not limited to sexual abuse; sexual harassment, physically/verbally abusive behaviour; and public disorderly conduct.

### 3 Code of Conduct Standards

As a Representative of GSF, I will:

**Uphold the integrity and reputation of GSF, ensuring that my professional and personal conduct is consistent with GSF's values and standards by**

- Operating within GSF's principles and guidance, following any specific procedures
- Following GSF's Child Protection Policy
- Treating all people fairly with respect and dignity showing no discrimination for race, culture, age, gender, disability, religion, sexuality, or political persuasion
- Respecting the dignity of all people, including children, in any oral, written or visual communication about them
- Being observant of local laws and being sensitive to local customs
- Seeking to ensure that my conduct does not bring GSF into disrepute and does not undermine my role working with or for GSF
- Not working under the influence of illegal substances, or being in possession of them while working with or for GSF
- Not entering any environments with children whilst under the influence of alcohol and ensuring that I am not excessive in my alcohol consumption whilst working with or for GSF

#### Not engage in bullying, harassment, abusive or exploitative conduct by

- Ensuring the language I use is appropriate and not offensive or discriminatory
- Not engaging in sexual activity or sexually provocative games with children. I understand that mistaken belief in the age of a child is not a defence
- Not exchanging money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour
- Not engaging in any commercially exploitative activities with children or adults including child labour or trafficking
- Not physically assaulting a child or adult, this includes any form of physical chastisement or corporal punishment
- Not emotionally or psychologically abusing a child or adult
- Ensuring I am professionally appropriate in my physical contact with adults that I am in contact with through my work with or for GSF
- Ensuring that whenever possible, there is more than one adult present during activities with children or if this isn't possible, that I am within sight or hearing of other adults
- Not having a child/children, I am in contact with in a work-related context, stay overnight at my home or any other location
- Not initiating physical contact with children, and responding appropriately to physical contact initiated by a child
- Being aware of the power balance between adult and child, and avoiding taking any advantage this may provide
- Not taking photographs or video footage without the consent of children and/or their parents, caregivers or Host Organisation
- Not using computers, mobile phones, video and digital cameras or any such medium to exploit or harass children or to access child pornography
- Not forcing children to participate when they don't want to - if children feel uncomfortable during discussions or activities, they have a right to leave
- Not acting in any way that intends to embarrass, shame, humiliate, or degrade a child or adult
- Not communicating directly with children I have met through my work with GSF. In very rare cases where communicating with children is necessary, this will be done through an adult contact at the Host Organisation

#### Ensure the safety, health and welfare of all GSF Representative and Wider Network by

- Adhering to all legal and organisational health and safety requirements
- Complying with any local security guidelines and being pro-active in informing others of any changes to such guidelines
- Behaving in a manner that avoids any unnecessary risk to the safety, health and welfare of myself and others, including Host Organisations and communities with whom we work
- Challenging and reporting any behaviour of GSF Representatives that contravenes this Code of Conduct in line with GSF Guidelines

#### Be responsible for the information, assets and resources related to my work for or with GSF by

- Ensuring that I use GSF assets and resources entrusted to me in a responsible manner and accounting for all money and property
- Not using GSF IT equipment, software or email and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism
- Not using GSF devices to communicate with children

- Not using GSF IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse

**Perform my duties and conduct my private life to avoid conflicts of interest by**

- Declaring any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of GSF
- Not being involved in awarding benefits, contracts for goods or services, employment or promotion within GSF, to any person with whom I have a financial, personal, family (or close intimate relationship) interests
- Not accepting significant gifts or any remuneration from governments, communities with whom we work, donors, suppliers and other persons which have been offered to me as a result of my work with or for GSF

**Uphold confidentiality by**

- Exercising due care in all matters of official business, and not divulging any confidential information relating to GSF, colleagues, or any sensitive information unless legally required to do so, such as for the purpose of protecting children

**Declaration for Representatives**

As a GSF Representative, I have read this Code of Conduct and agree to adhere to it within my work with and/or for GSF.

I understand that I must raise any Child Protection concerns I have in a confidential manner with GSF's Designated Safeguarding Officer – Aashti Zaidi, [aashti.zaidi@globalschoolsforum.org](mailto:aashti.zaidi@globalschoolsforum.org).

I understand that this Code of Conduct is binding and that if I break it, GSF may take action – including the termination of any contract.

**Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Declaration for Partners**

As a Representative of \_\_\_\_\_ (Partner Organisation), I confirm that I have read GSF's Child Protection Policy and this Code of Conduct. I confirm that I am signing on behalf of my organisation and will ensure that staff and representatives from my organisation who are working with or/for GSF are aware of this code and adhere to it within their work.

I understand that we must raise any Child Protection concerns we have in a confidential manner with GSF's Designated Safeguarding Officer – Aashti Zaidi, [aashti.zaidi@globalschoolsforum.org](mailto:aashti.zaidi@globalschoolsforum.org) – and I will make my staff and representatives aware of this.

I understand that this Code of Conduct is binding and that if anyone from my organisation breaks it, GSF may take action – including the termination of any contract.

**Name:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## Appendix 2: GSF Child Protection Report

### CONFIDENTIAL

GSF Staff, Volunteers and Representatives are required to complete this form and pass it to GSF's Designated Safeguarding Officer if you receive a disclosure or allegation or suspect child abuse in relation to a child you have come into contact with through your work with or for GSF.

#### DETAILS OF CHILD

Name:

Age:

DOB:

Gender:

Address:

Telephone No.:

#### DETAILS OF PARENTS/CARERS (IF KNOWN)

Name(s):

Address:

Telephone No(s):

#### DETAILS OF PERSON MAKING DISCLOSURE/ALLEGATION

Name:

Address and phone number:

Relationship to the victim:

#### DETAILS OF INCIDENT

What is the reason for concern/suspicion? If you have received a disclosure or allegation, record what happened or what was seen and who was involved.

When and where did it occur?

Were there any obvious signs of abuse e.g. bruising, bleeding, changed behaviour?

Was anyone else involved? If yes who? How were they involved?

What was said by those involved?
Was the Child able to say what happened, if so, how did they describe it?
Who has been told about it and when?
Do the parents know (if any)?
Who are you passing this information to?

Your signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Role: \_\_\_\_\_

Date: \_\_\_\_\_

**Report received by DSO**

DSO signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date received: \_\_\_\_\_

**ACTIONS, OUTCOMES LOG**

DATE	NOTES/ACTIONS	NAME	SIGNATURE

*\*Insert more rows as needed*

## Appendix 3: GSF Complaint Form

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### CONFIDENTIAL

#### DETAILS OF COMPLAINANT

Name:  
Address:  
Telephone No.:

#### DETAILS OF REPRESENTATIVE(S) TO WHOM COMPLAIN IS MADE

Name(s):  
Address:  
Telephone No(s):

Name(s):  
Address:  
Telephone No(s):

#### DETAILS OF COMPLAINT

Details of incident and person being complained about:

Details of any Third Parties who may have witnessed the incident (if relevant):

#### COMPLAINANT'S EXPECTATIONS

What would the Complainant like to happen?

When by:

(Attach any relevant documents)

#### Signed by:

Complainant: \_\_\_\_\_

Representative taking complaint: \_\_\_\_\_

Date: \_\_\_\_\_

**COMPLAINT ACTIONS, OUTCOMES LOG**

DATE	NOTES/ACTIONS	NAME	SIGNATURE

*\*Insert more rows as needed*

## Appendix 4: Contacts List

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### Designated Safeguarding Officer (DSO)

**Name:** Aashti Zaidi  
**Title:** Director  
**Address:** 65 Kingsway, London WC2B 6TD  
**Tel:** +44 (0) 7453 313556  
**E-mail:** Aashti.zaidi@globalschoolsforum.org

### Designated Safeguarding Lead (DSL)

**Name:**  
**Title:**  
**Address:**  
**Tel:**  
**E-mail:**

## Appendix 5: Further information

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### Appendix 5.1 How to Recognise Abuse or Exploitation

Listed below are a number of indicators that will help identify whether a child has or is being abused or exploited. However, they may vary by cultural and economic context. This is not exhaustive but is a guideline to help establish whether some form of child abuse or exploitation has taken place.

#### 1 Indicators of possible Physical Abuse

- Any injuries not consistent with the explanation given to them
- Injuries, which occur to the body in places, which are not normally exposed to, falls, rough games etc.
- Injuries which have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Repeated urinary infections or unexplained tummy pains
- Bruises, bites, burns, fractures etc. which do not have a reasonable explanation
- Cuts/scratches/substance abuse
- Infections and/or symptoms of sexually transmitted diseases

#### 2 Indicators of possible Emotional Abuse

These should be considered in comparison to behaviour based on the culture of the community.

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging. Also, depression/aggression/extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/stealing/lying

#### 3 Indicators of possible Sexual Abuse

- Any allegations made by a child concerning child abuse
- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play
- Sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
- Inappropriate bed sharing arrangements at home
- Severe sleep disturbance, with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations

#### 4 Indicators of possible Neglect

As poverty is often the cause of the following points, we need to look at it contextually and in comparison, to the community average.

- Under nourishment and failure to grow
- Constant hunger, stealing or gorging food
- Untreated illnesses
- Inadequate care

## Appendix 5.2 How to respond to a Suspicion or Disclosure

Becoming aware of abuse can cause a multitude of emotional reactions, which are personal to the individual. Whatever the reaction, it must be responded to in the correct manner, outlined below.

- Stay calm
- Listen, hear and believe
- Give time for the person to say what they want
- Reassure them and explain that they have done the right thing in telling you
- Do not promise secrecy. Inform the person that you may have a duty to report the incident or inappropriate behaviour as it is in the best interest of the child, but be clear that only the people who need to know will be informed
- Act immediately in accordance with the procedure in this document
- Record in writing as soon as possible using the form in [Appendix 2](#). Always make a clear distinction between what the person disclosing actually said and what you may have inferred. Accuracy is paramount in this stage of the procedure
- Never permit personal doubt to prevent you from reporting the behaviour/allegation to the DSO
- Always let the person or child who discloses know what you are going to do next and that you will let them know what happens.

## Appendix 5.3 Two questions to ask yourself

There are potentially two issues that need to be dealt with as a matter of urgency when you become aware of abuse or suspect abuse:

### 1 Is a child in immediate danger or does she/he need emergency medical attention?

- If a child is in immediate danger and is with you, remain with him/her and call the police.
- If the child is elsewhere, contact the police and explain the situation to them.
- If the child needs emergency medical attention, call an ambulance.
- If the child is in need of emergency medical attention, the child's family should be informed that an incident has occurred, that the child has been injured and that immediate steps have been taken to get help, unless the abuse allegations are against them.
- Contact the GSF DSO and if you are in a host organisation, make their Designated Person aware of what is happening.

### 2 Is the person at the centre of the allegation working with children now?

- If this is the case, the concern needs to be discussed immediately with the DSO and/or DSL. They will agree how to handle the situation and how best to ensure the safety of children. This may include contacting the Police or sensitively removing the Staff Member or Volunteer from contact with children.
- If the allegation is against a GSF Staff or Volunteer, the DSO and DSL will follow the procedure in [Section 4](#).
- If the allegation is against someone from another organisation, the process in [Section 4](#) will be followed. The Designated Person at that organisation should be informed and should explain how they will address the situation. If there are still concerns, GSF's DSO will contact the Police directly.

## Appendix 5.4 How to report a suspicion or disclosure

**It is the duty of anyone who finds out about a possible case of abuse to report it.**

It is not for you to decide whether or not a suspicion or allegation is true. You should never try to deal with a suspicion, allegation or actual incident of abuse yourself. It may sometimes be difficult to accept that something disclosed in confidence should be passed onto someone else, but the welfare of the child must be paramount and you therefore have a duty to report suspicions, allegations or actual incidents to the DSO.

No matter what happens to a suspicion, allegation or actual incident of abuse, all details must be recorded using the form in [Appendix 2](#).

Important information to record includes:

- Date and time of disclosure, suspicion, allegation or actual abuse incident
- Details given to you about the above e.g. date & time of when things occurred
- Details of what action has been taken

Recording should be kept factual, with no reference to subjective opinions. When an accusation is made, as much detail as possible should be recorded in writing on the form which you will share with the DSO.

As the person recording/reporting the abuse, once you have shared that with the DSO, they are responsible for ensuring that appropriate referrals are made and that the case is followed up appropriately.

If you feel you need support to process the situation, please inform the DSO who will ensure it is made available for you.

If the DSO is the subject of the suspicion/allegation, the report must be made directly to the DSL who will follow the process on Page 10 including making any necessary referrals.