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# NCBIS

Since 1978

NEW CAIRO BRITISH INTERNATIONAL SCHOOL



<b>Name of Policy:</b>	Child Protection - Raising Concerns
<b>Applicable to:</b>	Whole School
<b>Effective date:</b>	September 2022
<b>Date of next review:</b>	September 2023

## **Safeguarding Children: Raising Concerns**

### **NCBIS Mission Statement**

To provide a learning environment that supports academic achievement whilst promoting personal growth through the attributes of the IB Learner profile, within a caring international community committed to the traditional values of honesty, courtesy, respect, integrity and fair play.

### **Purpose and Scope of Policy**

NCBIS aims to provide a safe and happy environment for all of our students so that learning can take place in a safe and secure atmosphere. This Voicing Concerns (Raising Concerns) Guidance supports Article 3.1 of the Convention of the Rights of the Child, which states that “in all actions concerning children...the best interests of the child shall be a primary consideration”. We are committed to preventing child abuse and protecting children within the NCBIS community.

This guidance sets out to outline the actions that will be taken to ensure that all students are protected from all forms of abuse. It also explains the procedures that anyone working here should follow if he or she has concerns that the practice of any adult within NCBIS may be harming pupils. The guidance should be read in conjunction with the following school guidance and procedures:

- Safeguarding Children: Child Protection
- Staff Code of Conduct
- Disciplinary Policy
- Grievance Policy

### **Aims**

This guidance is written for staff working with children and young people at NCBIS. Staff must acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or the Designated Safeguarding Lead. Although this can be difficult, this is particularly important where the welfare of children may be at risk.

You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation. These feelings, however natural, must never result in a child or young person continuing to be unnecessarily at risk. Remember it is often the most vulnerable children or young persons who are targeted. These children need someone like you to safeguard their welfare.

### **Principles:**

We all have a duty to protect children/young people from harm.

- Adults working in a school are often the first to realise that the behaviour of someone is causing, or is likely to cause, harm to a child/student.
- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour in order to protect or reduce the risks to others, to prevent the problem worsening and to protect other staff and the school/college.
- We recognise that the decision to report a concern is difficult. We will not tolerate harassment or victimisation and will take all possible measures to protect anyone who raises concerns in good faith.
- If you raise concerns in good faith that are proved to be unfounded, no action will be taken against you.
- Where it is concluded that allegations have been made maliciously, disciplinary action may be taken.
- We recognise that Raising concerns can be difficult and stressful. Advice and support will be offered by the school management.

### **Don't think "what if I'm wrong?" – Think, "what if I'm right?"**

#### **Reasons for Raising concerns**

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour
- To prevent the problem worsening or widening
- To protect or reduce risks to others
- To prevent becoming implicated yourself

#### **What stops people from voicing concerns**

- Fear of starting a chain of events which spirals out of control
- Fear of getting it wrong
- Fear of escalation
- Fear of repercussions or damaging careers
- Fear of not being believed
- Fear of reprisal

### **NCBIS Procedural Guidelines in the Event of a Concern:**

#### **How to raise a concern**

- You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken.
- Try to pinpoint exactly what practice is concerning you and why.

- Let the facts speak for themselves. Communicate the concern in a professional, calm and factual manner. Think about the who, what, how, where and when.
- Approach your Designated Safeguarding Lead, Head Teacher or Principal with information about your concern on the “[Making a Report about a Member of Staff](#)” form and give this in a sealed envelope marked ‘Confidential’ to the DSL / Principal.
- If your concern is about your immediate manager/Head teacher, speak to the Designated Safeguarding Lead.
- Make sure you get a satisfactory response - don't let matters rest.
- Ideally, you should put your concerns in writing, outlining the background and history, giving names, dates and places wherever you can. Concerns that relate to a student should be recorded using the online “Safeguard” platform.

**A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.**

#### **What happens next?**

- You will be given information on the nature and progress of any enquiries.
- NCBIS has a responsibility to protect you from harassment or victimisation.
- No action will be taken against you if the concern proves to be unfounded and was raised in good faith.
- Malicious allegations may be considered as a disciplinary offence.

#### **Harm Threshold and Allegations Against Staff:**

In simple terms, a person surpasses the ‘harm threshold’ if they may harm a child or vulnerable adult or put them at risk of harm. In other words it is something a person may do to cause harm or pose a risk of harm to a child (a person aged under 18 years). This could include:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he / she may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. For example, an incident outside of school which did not involve children but could have an impact on their suitability to work with children (e.g. an incident of domestic abuse).

If any member of NCBIS staff is concerned about the actions or behaviour of a member of staff and what that behaviour indicates about their suitability to work with children, should be reported through the normal ‘Raising Concerns’ procedure.

### **Self-Reporting:**

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

### **Initial Response To An Immediate Risk of Harm Allegation:**

Where the school identifies a child has been harmed or that they may be in immediate risk of harm, it is the school's responsibility to immediately remove the potential threat to the child's safety and consider the involvement of the police. This applies to any staff, visitor, contractor or governor. If there is sufficient reason to believe that a child has been harmed or that they may be in immediate risk of harm then the following exit procedure should apply:

1. Ensure the safety of the child(ren) first
2. Evidence regarding the allegation is collected / considered by the Principal, EBD and DSL(s).
3. If the police are to be involved they should be informed immediately and the person in question should be escorted to them by the school's Security staff. If not, then they will be escorted off the premises.
4. If a decision is made to remove a staff member for reasons of suspension then the following should happen:
  - a. The staff member should be sensitively and (where possible) confidentially informed that:
    - i. An allegation has been made and supporting evidence has been collected.
    - ii. A decision has been made to suspend them from the school until further investigation can be carried out.
    - iii. Ask the staff member to leave the school immediately and discreetly and that they will be informed of the next stage / likely course of action.
    - iv. Inform the staff member they will not be allowed back on the school site until further notice.
  - b. The staff member should then be escorted by the Principal and/or EBD with member(s) of security to the school exit. The staff member should not be allowed on site until further notice.
  - c. The Principal / EBD and (if relevant) DSL carry out a formal investigation into the allegation and appropriate action is taken in line with the disciplinary procedure of the school.
  - d. Depending on the action taken the staff member has the right to appeal a decision taken by the school in line with the grievance procedure.

### **Supporting Those Involved:**

When an allegation or safeguarding concern is being investigated it is likely to be very stressful for the adult subject of the investigation and potentially their family members. It is important that NCBIS offer appropriate welfare support at such a time and recognises the sensitivity of the situation. The school has a duty to keep the member of staff informed of progress (not necessarily details) during and at the end of the investigation. It is important to note that all information is confidential and should not be shared with any adult, child or parents who are not directly involved in the investigation. Employers have a duty of care to employees and should:

- Manage and minimise the stress caused by the allegation
- Inform the individual as soon as possible, explaining the likely course of action the school is taking.
- Appoint a named representative of the school to keep the person informed about progress of the case
- Provide information where counselling and / or medical advice can be sought, where appropriate.
- Not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence. This will be communicated to any relevant member of staff by the Principal / EBD or investigating member of staff (E.g. DSL) at the earliest opportunity.

### **Allegation Outcomes:**

The definitions that should be used by NCBIS to determine the outcome of an allegation are set out below:

- **Substantiated:** There is sufficient evidence to prove the allegation
- **Malicious:** There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- **False:** There is sufficient evidence to disprove the allegation
- **Unsubstantiated:** There is sufficient evidence to either prove or disprove the allegations. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** To reflect cases where there is no evidence or proper basis which supports the allegation being made.

### **Substantiated Allegations:**

The actions taken by the school after the outcome has been decided range from no further action, to dismissal or a decision not to use the person's services in the future. If the allegation is substantiated and:

- The person is dismissed, resigns or otherwise ceases to provide their services; or
- The employer ceases to use the person's services

The employer has a duty to consider whether to refer the outcome to the ICPC and/or Teaching Regulatory Body in that country, for the consideration of prohibition.

### **Unsubstantiated, Unfounded, False or Malicious Allegations:**

If an allegation is determined to be unsubstantiated, unfounded, false or malicious then the DSL should consider whether the child and/or adult who made the allegation is in need of help or may have been abused by someone else and this is a cry for help.

### **Untrue and Malicious Allegations:**

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you. If malicious intent can be evidenced and / or action is to be taken this will be done in discussion with Board of Directors and / or Appointed Safeguarding Lead Board Member.

### **Returning To Work:**

Where it is decided at the conclusion of an investigation that a person who has been suspended can return to work, the case manager (normally the Principal or EBD) should consider how best to facilitate that. Most people will require additional support. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate.

### **Further Advice and Support:**

It is recognised that raising concerns can be difficult and stressful. Advice and support will be available from the school counsellor or mentoring team.

### **Confidentiality:**

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

### **Record Keeping:**

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for the retention of the information. However, for all other allegations, it is important that the following information is kept on file of the person accused:

- A clear comprehensive summary of the allegation
- Details of how this was followed up and resolved
- Notes on any further actions taken
- A copy provided to the person concerned
- A declaration on whether the information will be referred to in any future reference

The school should retain records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA). All other records should be retained for 10 years.

### **Low Level Concerns:**

As part of our whole school approach to Safeguarding we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. This encourages:

- An open and transparent working culture
- The identification of concerning, problematic or inappropriate behaviour early
- Minimisation of the risk of abuse
- All adults working in or on behalf of the school are clear about professional boundaries and to work within these boundaries
- All stakeholders to be in line with the values and ethos of NCBIS.

### **Low Level Concerns about Staff:**

The term 'low-level' concern does not mean that it is insignificant, it means that a behaviour towards a child does not meet the threshold. Unlike 'abusive' behaviours which would warrant allegations against staff through the 'Raising Concerns' procedure. Low level concerns include in their spectrum of behaviour the following:

- Inadvertent or thoughtless behaviour
- Behaviour that may appear appropriate, but not be in other circumstances
- Behaviour which could enable abuse (e.g. lead to grooming)
- Behaving in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work. For example:
  - Being over friendly with children
  - Having favourites
  - Taking photographs of children on their mobile phone
  - Engaging with a child in on a one-to-one basis in a secluded area
  - Inappropriate sexualised, intimidating or offensive language

### **Sharing Low Level Concerns:**

In all cases low-level concerns should be reported to the Principal, who may ask the DSL to further monitor and investigate using the [Appendix 1: Making a Report about a Member of Staff](#) form and indicate that the concern is 'low-level'. The process should involve addressing the behaviour with the member of staff, identifying any ongoing patterns or further incidents and then acting upon this if the concerns persist, as per the procedures outlined in this policy. All staff should be aware of the above and ensure they have read supporting policies (such as Code of Conduct) to ensure there are protections in place against false accusations and misunderstandings. NCBIS encourages staff to self-refer, if they have found themselves in a situation that could be misinterpreted, might appear compromising to others and/or on reflection they have behaved in such a way that they consider falls below the expected professional standards of the school.



### **Responding to Low-Level Concerns:**

NCBIS sets out the following procedure for responding to reports of low-level concerns:

- If the concern is raised via a third party the Principal or appointed person will:
  - a. Speak directly to the person making the report (unless it has been raised anonymously) to gain further information regarding the concern
  - b. Speak to the individual concerned to gain further information
  - c. Speak to any supporting witnesses to gain further information
  - d. Use the information gathered to categorise the type of behaviour and determine what (if any) further action may need to be taken.
  - e. Keep a record of all of the above along with a rationale of their decisions and any actions taken

The Principal or EBD should ensure any other low-level concerns about the same individual and/or repeating patterns of behaviour are triangulated against the above to look for any emerging concerns. If a concern emerges from this the concerns procedure outlined in this policy then applies.

### **References:**

In all cases of low-level concerns and/or formal investigations into safeguarding allegations, if the outcome is unsubstantiated, unfounded, false or malicious the school **will not** include this information on any reference for future employment. Only substantiated investigations should be included on references to future employers.

**Appendix 1: Making a Report about a Member of Staff**

Concerns regarding staff must be filled in on the form below and handed in an envelope for urgent attention of the Principal.

<p><b>NCBIS - Raising Concerns for Child Protection Form</b>  <b>CONFIDENTIAL</b></p>	
Staff Member's Name :	
Date and time of concern :	
Type of Concern: (Low-level / raising concern)	
Your account of the concern : (what was said, observed, reported and by whom)	
Additional information : (your opinion, context of concern/disclosure)	
Your response : (what did you do/say following the concern)	
Your name:	Your signature :



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Your position in school :	Date and time of this recording :
<b>REPORTING STAFF MEMBER DOES NOT NEED TO FILL OUT SECTIONS BELOW THIS POINT</b>	
Action and response of DSL (for internal use only) :	
Feedback given to member of staff reporting concern:	Outcome of action taken by DSL/Principal ( e.g. what was parental response? outcome of professional consultation/referral? etc.)
Information shared with any other staff? If so, what? Information was shared and what was the rationale for this?	
Name: .....	Date:.....

