Manthan School

Child Protection and Safeguarding Policy

AY 2025-26
(Revised in April)

COMMITMENT TO SAFEGUARDING AND PURPOSE

Manthan as a part of International School Partnership (ISP), recognizes the pivotal role of Safeguarding and Child Protection in fostering a positive and nurturing learning environment. Ensuring the well-being of our learners remains our utmost priority.

We are attuned to the unique and diverse needs of our learners to ensure they feel safe and protected within the school environment. Every conceivable measure will be implemented to uphold this commitment.

All staff members, contractors, partner agencies, attendants, and drivers are expected to prioritize the well-being and safety of learners. It is essential for everyone to remain vigilant, recognizing any signs of children at risk and promptly reporting such concerns without delay.

We believe:

- The welfare of every child is of utmost importance, and each student has the right to be shielded from harm and exploitation, irrespective of race, religion, ability, gender, or culture.
- Ensuring the safety and well-being of all students is a fundamental requirement within our school.
- Each student is entitled to a comprehensive and diverse curriculum that empowers them to safeguard themselves.
- Every adult in the school must demonstrate a firm commitment to protecting the students we serve.
- We actively collaborate with parents/carers and other professionals to ensure the safety of our students.
- Our guiding principle is always to act in the best interests of the students.
- While all students have equal rights to protection, we acknowledge the need for additional support for some due to special educational needs, disability, gender, religion, or sexual orientation.

AIMS AND OBJECTIVES

At Manthan, we aim to:

- Strive to create a secure and joyful environment conducive to student flourishing and learning.
- Streamline Systems and Processes for ensuring student safety
- Ensure staff awareness and roles in Safeguarding/Child Protection
- Educate all staff on safeguarding and child protection issues, defining their specific roles and responsibilities in promptly reporting any suspected cases of abuse.
- Identification of students at risk
- Implement measures to identify students who may be suffering or are at risk of harm, ensuring a proactive approach to their well-being.
- Effective communication among staff
- Facilitate open and effective communication among all staff members regarding child protection and safeguarding issues.
- Outline the procedures for reporting issues:
- Establish clear and effective procedures for staff, volunteers, or third-party individuals encountering child protection or safeguarding issues to follow.
- Encourage a transparent approach to 'Safeguarding'.
- Clearly communicate our approach to safeguarding and child protection to all parties, including students and their parents/carers, through well-defined and communicated policies.

POLICY'S SCOPE

The child protection and safeguarding policy applies to all students and staff members, including the support staff and parents.

DEFINITIONS

Safeguarding:

Safeguarding is promoting the welfare of children:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.

- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child Protection:

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

Note: If the preventative workaround safeguarding issues is not appropriate or extensive enough, students identified as being a concern may move to being identified as being at risk of significant harm. Although other factors outside the schools' control may also influence this, the purpose of the policy is to ensure that at ISP we take whatever measures are possible to avoid this from happening.

PRINCIPLES

"All children deserve a happy childhood and the opportunity to lead a dignified life safe from violence, exploitation, neglect, deprivation and discrimination."

Manthan in partnership with ISP is absolutely resolved and committed to safeguarding children against any kind of abuse or discrimination as well as their safety specified under the following Articles of the UN convention:

Article 3: which states that the best interests of children must be the primary concern in decision-making about them.
Article 13: which states that children have the right to get and share information as long as it is not damaging to them or another child.
Article 14: which states that children have the right to think and believe what they want and to practise their religion.
Article 19: which states children have the right to be protected from hurt and mistreatment, physically and mentally.
Article 34: which states that Governments should protect children from sexual exploitation and abuse.

Article 35: which states that Governments should take all measures to ensure that children are not abducted, sold or trafficked.
Article 36: which states that children should be protected from any activity that takes advantage of them or could harm their welfare and development.
Article 37: which states that no one is allowed to punish children in a cruel or harmful way.

INDIAN LAWS

Any offence against a child around abuse will be resolved as per POCSO regulation and Child Protection Guidelines generated by the Government of Bharat.

"The State Governments, the Child Welfare Committee, the Police, the Special Courts, all other Government functionaries as well as Non-Government

Organisations, and all professionals and experts assisting the child at the trial and pre-trial stages are bound to abide by these principles:

These principles are:

- Right to life and survival: Every child has the right to life and survival and to be shielded from any form of hardship, abuse or neglect.
- The best interests of the child: Every child has the right to protection and to a chance for harmonious development.
- The right to be treated with dignity and compassion.
- The right to be protected from discrimination.
- The right to special preventive measures.
- The right to be informed.
- The right to be heard and to express views and concerns: Every child has the right to be heard in respect of matters affecting him/her.
- The right to effective assistance: The child must receive the required assistance to address his/her needs and enable him/her to participate effectively at all stages of the justice process.
- The right to privacy.
- The right to safety.**"**

Refer to the following link for details:
https://www.nipccd.nic.in/file/reports/pocso12.pdf
https://ncpcr.gov.in/uploads/165650391762bc3e6d27f93_manual-on-safety-and-security-of-children-in-schools-sep-2021.pdf
https://nhrc.nic.in/sites/default/files/10_PROTECTION%20OF%20CHILDREN%20-%20SEXUAL%20OFFENCES.pdf

RESPONSIBILITIES

The Principal/ Vice Principal and Senior Management Team in each school will:

- Ensure that the safeguarding policy is implemented across the school and followed by all staff and volunteers.
- Support the Designated Safeguarding Lead (DSL) and any Deputy Designated Safeguarding Lead to carry out his /her role effectively.
- Promote the culture of raising concerns and handling them sensitively.
- Include safeguarding in school curriculum and activities.
- Ensure regular safeguarding and safety training, surveys across school.
- Allow staff who have passed all safeguarding procedures including safer recruitment process to participate in the teaching and learning process.
- Monitor all staff training in safeguarding and child protection.

Designated Safeguarding Lead (DSL) is a trained senior leadership team member of the school who should be informed of all safeguarding issues in the school. The DSL role is guided by two principles:

- The welfare of the child is always paramount.
- Confidentiality should be respected as far as is reasonably possible.
- Being guided by these principles the Designated Safeguarding Lead will:
- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the Principal, make sure that all employees, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Have appropriate training in addition to the basic training that all other employees receive. This includes completing ISP Designated Safeguarding

Lead training at least every two years and actively participating in their DSL Regional Networking meetings to ensure they stay updated on safeguarding issues.

- Collate and keep accurate and confidential records of any concerns about children, this should include ensuring robust action plans are implemented at the earliest opportunity which are captured in writing and are reviewed regularly.
- **Take a lead role in reviewing the filtering and monitoring of schools' online access.**
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL/ DSL Team is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.
- It is the DSLs (Designated Safeguarding Lead) area of responsibility to take necessary actions on all safeguarding and child protection concerns.
- The DSL will be responsible for training the Manthan team (Staff, Support Staff, volunteers) in addressing and reporting the safeguarding issues.
- The Designated Safeguarding Lead (DSL), seeking the support of the Deputy Designated Safeguarding Lead, will investigate and address the safeguarding concerns and escalate them to the ISP or external authorities or counsellors as deemed appropriate.
- **Deputy Designated Safeguarding Lead:** In carrying out the safeguarding measures, the DSL would be supported by the Deputy DSL Team. In Manthan, all Teacher Leaders function as the Deputy Designated Safeguarding Leads.
- The Deputy Designated Leads will ensure that concerns received in their segments are reported to the DSL
- Promote a culture of raising a concern form
- Support the DSL in implementing safeguarding measures and awareness of staff and students.

All employees (including employees of partner organisations and contractors having unsupervised contact with children)

- All employees are familiar with and follow the policy and all other safeguarding related documents, e.g., Codes of Conduct, guidance for safe working practice.
- Follow safer recruitment processes and checks prior to starting at the school/organisation (in exceptional cases an action plan/risk assessment can be in place to ensure the employee is supervised until all checks are completed, this must be authorised by **Regional Managing Director and Regional Head of HR** before employment begins).
- Be alert to signs and indicators of possible abuse.
- All employees, volunteers and partner agencies in schools will have to undergo appropriate general safeguarding training on joining the organisation and then undertake annual refreshers. This training will be available through ISP authorised online courses e.g., Safeguarding Essentials on the Learning Hub or in-house training (following the ISP format within the DSL resources), whichever is appropriate, as well as face-to-face events which schools should secure the budget for each year.
- Employees and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- They listen to and take seriously the issues and concerns of children,
- Know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy)
- Never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.
- Employees never create the impression that the victim is creating a problem by reporting abuse. Nor should a victim ever be made to feel ashamed for making a report.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL) on the school's concern form or via the MyConcern (or equivalent) reporting system.
- Employees know the Designated Safeguarding Lead is in the school and how they can be contacted. Schools should include this information in the Appendix at the end of this policy.

- Follow the procedures outlined in this document when/if concerned about any child

All employees who have occasional or supervised contact with children (including employees from partner and contracted organisations) will:

- undergo a safeguarding briefing/onboarding in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these employees, (appropriate to the role and contact they will have with children) before they commence their role in any ISP school. **Where these employees or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the Principal/ Designated Safeguarding Lead to assess this risk, not individual employees or partner organisations themselves.**
- follow the ISP Policy will be used partners/contractors do not have their own policy and will be asked to read and follow it strictly. These requirements will be part of any contractual arrangement.
- follow the guidance laid down in this document at all times.
- be provided with guidance on appropriate safe working practice.

FORMS OF ABUSE

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

The more commonly referred to types of abuse are:

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, or otherwise causing harm to a child.

Emotional abuse: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to

a child that they are worthless, unloved, or valued only in so far as they meet the needs of another person.

Sexual Abuse: Involves forcing or enticing a child to take part in sexual activities, whether the child is aware of what is happening. This form of abuse can involve direct contact activities, but also non-contact activities over social media or the internet.

Neglect: This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development. While the above are the broad four main areas of potential abuse, abuse itself can take many forms involving one or more of these areas. Organizational and school employees need to be aware of what to look for and what actions to take when concerned about any of these issues (or any other concerns).

Specific Safeguarding Issues

There are specific safeguarding issues that can put children at risk of harm (listed below), all areas are covered in ISP initial training courses and must be included in annual refresher training or during a safeguarding training programme delivered throughout the school year. This helps to ensure all employees are aware of the signs and indicators of these specific issues to enable early intervention support to be put in place within the school and what could be done to support and protect the children.

Child-on-Child Abuse

We recognise that children are capable of abusing their peers. Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. This type of child-on-child behaviour will not be tolerated. It can happen both inside and outside of school and online. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or
- otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi nudes images and/or videos (sexting);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without

their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and

- initiation/hazing type violence and rituals, this could include activities involving
- harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

Sexual violence and sexual harassment

This can occur between two children of any age and sex, from primary through to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never
acceptable. All employees must maintain an attitude of 'it could happen here'.
Any report of peer-on-peer abuse should be taken seriously it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

All employees should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and,
  challenging physical behaviours (potentially criminal in nature), such as grabbing
- bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

Dismissing or tolerating such behaviours risks normalizing them.
Employees must report any incidents of child-on-child abuse via the on the school concern reporting system.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of Exploitation. This includes:

Sexting

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

Sexting may also be referred to by students as trading nudes, dirties or pic for pic.There are many reasons why a student may want to send a naked or semi-naked picture, video, or message to someone else:

- They may find it difficult to say no if somebody asks them for an explicit image, especially
- if the person asking is persistent or has groomed the child to gain their trust.
- Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.

Students often do not realize that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting. Employees must report any incident of sexting to the DSL on the school concern form.

Mental Health

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. School employees; however, are well-placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that employees are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

If an employee has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by capturing the concern on the school's concern form and speaking **to the Designated Safeguarding Lead or a deputy.**

Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously.
The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving, or having

relationship problems with family or friends. The feelings that these issues bring up can include low self-esteem, low confidence, loneliness, sadness, anger, numbness, and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

There are some common themes that may help employees identify concerns including:

- Physical indicators such as cuts, bruises, burns, bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal.

If an employee suspects that a student is self-harming this must be referred to the Designated Safeguarding Lead who will consider the next steps. It is likely that this will require discussion with the student involved and their Parents/Carer's to agree a course of action or referral to an organisation that may be able to support the student.

Radicalisation and Extremism

Children can be vulnerable to extremist ideology and radicalisation. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, employees should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

ISP values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Free speech is not unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

Female Genital Mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with through the procedures set out in this document i.e., concerns and signs of FGM must be reported to the DSL.

FGM is potentially damaging to children both emotionally and in terms of health issues and is in breach of a number of articles under the UN convention on the rights of the child. It is illegal in 26 countries across Africa and the Middle East, as well as in 33 other countries, including the United States of America and the UK.
We recognise that this is cultural practice in some countries and not always seen as abusive. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the student's best interests.

Forced marriages (FM)

A Forced marriage (FM) is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g., threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g., if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.
In 2013, the first United Nations Human Rights Council also adopted a resolution against child and forced marriages. This resolution recognises child, early, and forced marriage as involving violations of human rights which "prevents individuals from living their lives free from all forms of violence and has adverse consequences on the enjoyment of human rights, such as the right to education."
As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests. However, the school procedures must be followed in the same way as for any other safeguarding or child protection matter.

Children missing from education

All employees should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage.
Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Employees should be aware of their school's attendance policy and unauthorised absence and children missing from education procedures.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate

relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Fabricated & Induced Illness

In fabricated illness the perpetrator (usually a parent or carer) does not directly harm the child but reports to doctors a clinical story which is eventually established to be fabricated. **Whereas** with induced illness the perpetrator inflicts direct (hands on) harm to the child. This can range from trivial injuries such as pricking the child to add blood to urine, through to suffocation. All schools must have a robust attendance policy to aid the monitoring of child illnesses. When a parent reports that a child has an illness which requires a health plan the school must work in collaboration with the medical practitioner treating the child.

Note:
The above is not an exhaustive list of all the potential forms of abuse which employees may have to deal with on occasions.

Corporal Punishments

The use of corporal punishment in schools has been a topic of considerable debate and has evolved over time. Corporal punishment involves the intentional infliction of physical pain or discomfort as a form of discipline.

“Physical punishment” is any action that may causes pain, injury and discomfort to a child including causing physical harm to a child with hand or cane/ stick, making children assume an uncomfortable position e.g. standing on bench or holding ears through legs, detention in the classroom, library or any closed space in the school etc. T

Mental harassment is any non-physical treatment that is detrimental to the psychological wellbeing of a child e.g. sarcasm that hurts or lower the child’s dignity, calling names and scolding using humiliating adjectives, intimidation, using derogatory remarks on the child, ridiculing the child on background or status or parental occupation, belittling a child in classroom due to his/her inability to meet the teacher’s expectations of academic achievement”

E-Safety

E-safety for children is a critical aspect of parenting and education, focusing on protecting young individuals from potential risks and harms associated with digital technologies and the internet. Here are key considerations for ensuring e-safety in children:

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

- Inappropriate content.
- Deepfakes – images, video or audio.
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or running up debts.
- Cyberbullying.
- Inappropriate use of AI chatrooms / Chatbots.

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

ISP believes the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. Each school's curriculum should include appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies, and language they need to take appropriate action

Mobile phones and Camera images

At Manthan staff and visitors should not use personal mobile phones to take images of children. If personal equipment is used to capture child images, these images should be uploaded to the school's system as soon as possible and immediately deleted from personal equipment. These measures must be completed before an employee leaves the school premises at the end of a school day. Permission to capture images, videos or audio recordings should be sought from the Designated Safeguarding Lead or Principal for the school.

At the beginning of school events parents should be reminded of the restriction of taking photos and videos on school site and that they must not take images of any child other than their own.

Digital Platforms

Digital platforms and social media can make children particularly vulnerable to 'grooming' and the growing threat of deepfake manipulation where an existing image or video is replaced with a likeness. Therefore, all members are expected to adhere to the following measures:

- Obtaining written consent from a child and their parents or carers before taking and using a child's image.
- Explaining what images will be used for and what potential risks are associated with sharing images of children.
- Making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete image,
- Changing the names of children whose images are being used in school published material whenever possible (and only using first names if we do need to identify them).
- Never showing screen shots of video conferencing lessons or meetings that show children's faces and full names.
- Only using images of children in appropriate clothing.
- Avoiding full face and body shots of children taking part in activities such as swimming.
- Never publishing personal information about individual children and disguising any identifying information.
- Making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information).
- Reducing the risk of images being copied and used inappropriately by using correct settings on digital platforms.
- Where possible reduce the risk of images being altered by using a digital watermark on them. This can discourage deepfake creators from using content since it makes their efforts more traceable.
- Photographs of students being used by employees for marketing are only taken on school cameras/devices.
- Images should be saved on a secure server/database and printed copies only used within the school for purposes such as displays, records and learning journals. Images to be used for marketing need to be agreed with parents/carers before use.
- Visitors and parents/carers should be asked not to use mobiles devices within the school except where permission has been granted to capture images of their own child or children.
- All parents/carers must give permission for photographs to be used for publicity purposes and to sign a disclaimer if they do not wish their child's image to be used externally.

Failure of employees to adhere to the above measures to safeguard the children in our care will result in disciplinary action.

Safeguarding Students

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Employees at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve either face-to-face or the misuse of social media or technology. **All teachers and staff members should be aware of Manthan's Behaviour and Anti-bullying Policies. The copies can be availed from the DSL or HR.**

Safeguarding Special Needs Students

All employees should be aware that children with Special Educational Needs and Disabilities (SEND) may face additional safeguarding challenges. The nature of a child's needs or disability can create specific barriers that make it harder to detect signs of abuse. For instance, changes in a child's mood, behaviour, or the presence of an injury might be mistakenly attributed to their condition, rather than considered as potential indicators of abuse.

It is also important to understand that children with disabilities are often more vulnerable to behaviours such as bullying, yet they may not exhibit obvious signs. Communication difficulties can further complicate their ability to express what they are experiencing, making it harder for adults to identify concerns.

As such, staff must exercise heightened vigilance and report any concerns without making assumptions. All suspicions, no matter how small, should be taken seriously to ensure the safety and wellbeing of every child

Physical Intervention / Restraint

On occasion, school staff may need to physically intervene to restrain a student in order to prevent harm to the student or others. Any such intervention must always be reasonable, proportionate to the situation, and used only as a last resort. The level of force applied should be the minimum necessary to safely manage and resolve the incident. Parents/carers should always be informed when an

intervention has been necessary. **Read the Physical Intervention Policy for details.**

Safer Recruitment

Safer Recruitment involves scrutinising applicants through the interview process and application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks. At least 2 Reference checks and police verification is expected from employees of Manthan

Where information is disclosed as part of the criminal records checking process, whether this is information about cautions, convictions or soft information, any disclosure will lead to a risk assessment being completed prior to appointment. This risk assessment will be s**igned off by the Regional Head of HR and Regional Managing Director.**

LOW-LEVEL CONCERNS

Employees are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Its purpose is to help create and embed a culture of openness and trust in which the clear values and expected behaviour set out in both our Child Protection and Safeguarding policy and ISP Code of Conduct are lived, monitored, and reinforced.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that is inconsistent with the ISP Code of Conduct and / or school's Staff Behaviour policy, and does not meet a level of concern where staff feel they should report under the Safeguarding and Child Protection Policy,

Examples of low-level concerns includes, but is not limited to:

- being over friendly with children.
- having favourites.
- communicating with pupils on social media.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Note: low-level concerns will normally be addressed by the Head of School, Principal or Executive Principal however if this is a repeat of a low-level concern or the concern escalates then it should be referred to the RMD and Regional Head of HR for review.

ALLEGATION AGAINST EMPLOYEES AND VOLUNTEERS

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

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

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal offence against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.

In the event of an allegation being made against an employee (or a volunteer helper), it will always be investigated by the Head Teacher, Principal or Executive Principal who should immediately notify the Regional Managing Director as soon as possible and within 24 hours.

The Regional Manager Director should assess the allegation against the Crisis Communication Policy levels. For Crisis Level potentially level 3, 2 or 1, the RMD informs the Central Crisis Team. If a criminal act has been committed, the matter should be referred to the local authorities where appropriate.

If there is any doubt about the crisis level, the RMD should report to the Central Crisis Team to review and advise (via crisis@ispschools.com).

If it is felt, after these initial consultations, that further enquiries are needed, then the employee may be suspended. Suspension is a neutral act, and in no way implies that the person is guilty of

any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. No decision to suspend should be taken without involving the relevant Regional Head of HE and the Group Head of People Operations as individual countries will have specific legal guidance and processes that will need to be followed.

In cases of allegations against a Principal or school SLT member, it is expected that the Divisional CEO will notify the Central Crisis Management Team.

Employees will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the ISP Code of Conduct for employees and volunteers and the guidance for safe working practice, this includes the school Intimate Care policy.

WHISTLEBLOWING

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

Malicious whistleblowing, however, will be seen as a potential disciplinary matter. Whistleblowing Policy which must be referred to and fully referenced in the event of such an incident.

SAFEGUARDING PROCEDURES

If an employee suspects that any student in their care may be a victim of abuse or is at risk of abuse or other form of harm, they should not try to investigate

and instead, should inform the Designated Safeguarding Lead (DSL) about their concerns as soon as possible.

Employees must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm. In many cases a student will not make a direct disclosure, but employees will be concerned because of a physical or emotional indicator. In these circumstances employees should still use the record of concern form and the body map (if appropriate), to make a report to the Designated Safeguarding Lead.

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

Dealing with Disclosure

If a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Employees should always give this as a health warning before meeting with the child.

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

Receive

Where possible always stop and listen to a child who wishes to speak in confidence.

Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.

React

React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as… "is there

anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.

Record

Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date, and place as well (see the record of concern form).

Report

Where a child makes any disclosure, or where you have concerns for any reason, it is very important that the procedures outlined in this document are followed. A full written/typed account of the concern (ideally using the record of concern form) should be passed to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed body map.

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal / Head of School in the absence of the DSL), should be informed as soon as possible. The DSL will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The DSL will then consider and where necessary, consult on the information available. It is the role of the DSL to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

Local Safeguarding links

The school will be liaising and seeking advice with local Safeguarding and Child Protection authorities to ensure effective resolution of the concerns. The DSL will maintain a list of local officers and contact them as necessary.

Record Keeping

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept together securely and separately from the child's general school records. The information should only be shared

with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it should not be shared more widely than that.

Child protection records should be stored in a secure (i.e., locked) filing cabinet or in a secure electronic system such as MyConcern (its use must be authorised by the Group Head of Operational Risk). Safeguarding information must not be recorded on the schools MIS system. Files should be accessible through the Designated Safeguarding Lead (or their deputy) and other senior employees in larger schools to ensure reasonable access.

Records of any child disclosure should be clearly dated and filed without future amendment.

A child protection file (Electronic or otherwise) should be started for an individual child as soon as the school is aware of any child protection concerns about that child. This may arise in a number of ways e.g.:

- If an employee raises a concern about the welfare or well-being of a child – this should be recorded in writing (see below for guidance).
- If information is forwarded to the school by a previous school attended by the child.
- If the school is alerted by another agency of child protection concerns about that child.

In the case of disclosure, remember the record you make should include:

- As full an account as possible of what the child said (in their own words).
- An account of the questions put to the child.
- Time and place of disclosure.
- Who was present at the time of the disclosure.
- The demeanour of the child, where the child was taken and where returned to at the end of the disclosure.

Recording Concerns

Employees should make an account of any concern they have regarding the welfare or well-being of a child on **MyConcern Portal**. It is important to give as much detail as possible.

A concern raised may not progress further than a conversation with the Designated Safeguarding Lead but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.

Confidentiality

Schools should regard all information relating to individual Safeguarding/child protection issues as confidential and should treat it accordingly. Information should be passed on to appropriate persons only at the discretion of the Principal/Designated Safeguarding Lead and this should always be based on the need to know.

All records relating to child protection should be secured appropriately.

AUDITING, REPORTING AND REVIEW

Elements of safeguarding practice in schools will be audited during the Group Operational Risk Team's annual safety and safeguarding audits.

This policy will be reviewed annually.

Appendix 1

Manthan's Safeguarding Team

DSL (Designated Safeguarding Lead): Ms Kriti Chakraborty

kriti.chakraborty@manthanschool.org

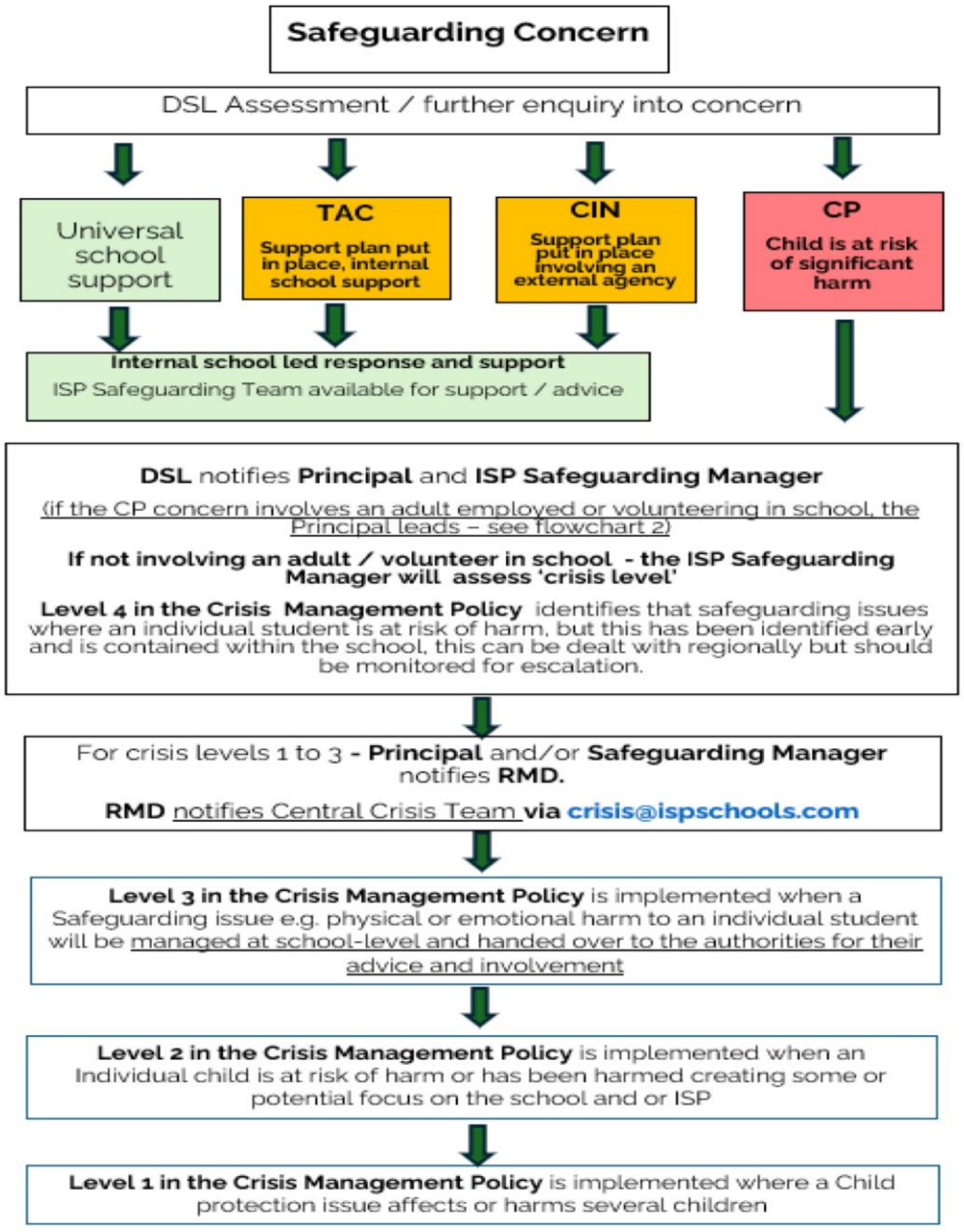
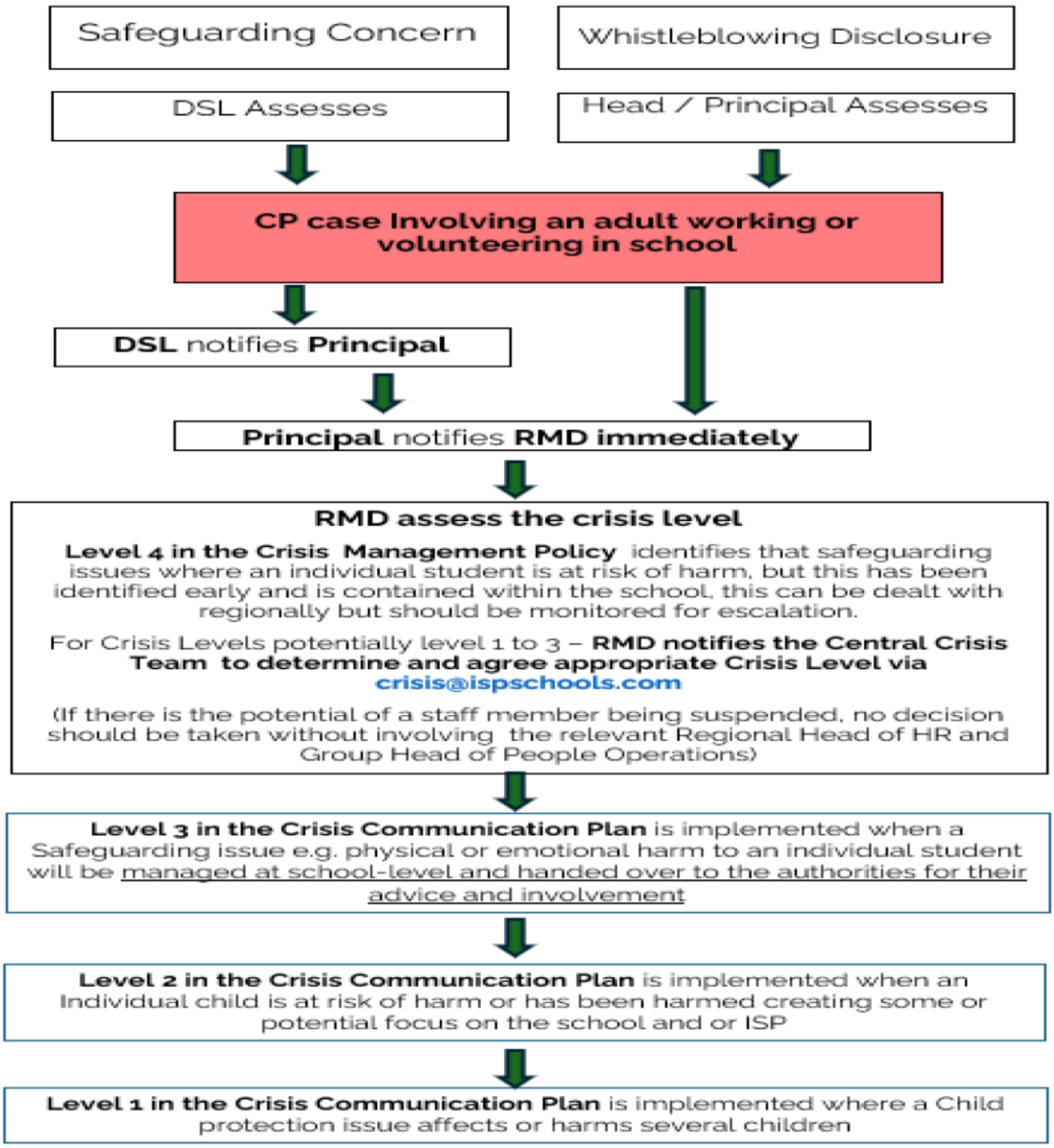
DDSL(Deputy Designated leads)

- **Ms Sweety Seenuvass** (Pre-Primary): sweety.sv@manthanschool.org
- Ms Anuradha Naraveni (Primary 1-3): anuradha.g@manthanschool.org
- Ms Vijayalakshmiu (Primary 4-5): vijayalakshmi.j@manthanschool.org
- Ms Sunanda Choudhury (Middle): sunanda.choudhury@manthanschool.org
- Ms ..... (High School):

Local referrals and support

CHILDLINE helpline Number – (Child abuse, Child labour, etc)	1098
DCPU – District Child protection Officer – Mr. Ratnam	8008863425 dcpusangareddy@gmail.com
CPO- Mr Ramakrishna	9010893990
Child Helpline Coordinator	9502104619
Child Help Foundation- Mr. Srinivas Kiran Vadlamudi (Asst. Manager)	799799384
Bal Raksha Foundation- Mr Abhijeet	9910023486
	Abhijeet Nirmal | Deputy Director - Child Protection Mobile No: +91 9910023486 | [www.balrakshabharat.org]www.balrakshabharat.org

APPENDIX 2: FLOWCHART 1: REPORTING LINES FOR C



APPENDIX 2: FLOWCHART 2: REPORTING LINES FOR CP CASES INVOLVING AN ADULT WORKING OR VOLUNTEERING IN SCHOOL