



REIGATE GRAMMAR SCHOOL VIETNAM

Safeguarding and Child Protection Policy Including Early Years Stage

Policy Owner:	Education Director / Whole-School Designated Safeguarding Lead - Safeguarding & Child Protection
Policy Contributors:	Safeguarding & Child Protection Team
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Review Cycle:	Following the school's established cycle or sooner if significant legislative, regulatory, organisational or safeguarding change.

Concerned about a child? Act immediately.

If you have a concern about the safety, welfare or wellbeing of any registered RGSV student:

1. Report the concern immediately to the appropriate section Designated Safeguarding Lead (DSL), or to the Whole-School Designated Safeguarding Lead - Safeguarding & Child Protection.
2. Record the concern promptly and factually using the School's approved safeguarding reporting system/form. Do not delay reporting while completing the written record.
3. If the appropriate DSL is unavailable and there is an immediate safeguarding risk, contact another member of the Safeguarding & Child Protection Team or the Education Director.
4. Where a concern meets a legal reporting threshold, RGSV will notify the competent Vietnamese authority in accordance with Vietnamese law.
5. For child-protection concerns concerning a person legally defined as a child under Vietnamese law, the National Child Protection Hotline 111 – Tổng đài Quốc gia Bảo vệ Trẻ em – is also available.

In an immediate emergency, prioritise the student's safety and urgent medical or police assistance as appropriate.

Reigate Grammar School Vietnam (RGSV) Key Staff Contact Details (Tel: 02435 409 183)

Role	Name	Contact Details
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Primary Designated Safeguarding Lead / Whole-School Deputy Designated Safeguarding Lead	Brendan FINN	brendan.finn@reigategrammar.edu.vn
Secondary & Sixth Form Designated Safeguarding Lead / Whole-School Deputy Designated Safeguarding Lead	Darren JONES	darren.jones@reigategrammar.edu.vn
Whole-School Deputy Designated Safeguarding Lead	Ly TRAN	ly.tran@reigategrammar.edu.vn
Pastoral Care & Student Wellbeing	See approved Safeguarding & Pastoral staff list on the school's website	Pastoral staff support students and refer safeguarding concerns to the formal safeguarding leadership structure.

Board Members Responsible for Child Protection and Safeguarding at RGSV

Role	Name	Contact Details
The Chair/Executive Director	Thuy Bich MAI	maibichthuy@reigategrammar.edu.vn
Designated Governor for Safeguarding	Alice BROOKING	ACB@reigategrammar.org

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Safeguarding Statement: *It could happen here*

This policy applies to all registered students of Reigate Grammar School Vietnam (RGSV), regardless of age. RGSV students may include students aged 18 or 19; they remain fully within the School's safeguarding, welfare and student-protection framework for as long as they are registered students. Vietnamese legislation applies different statutory age definitions for particular purposes. In particular, Article 1 Luật Trẻ em số (Law on Children) 102/2016/QH13 defines “trẻ em (children)” as a person under 16 years of age. Other legal provisions may apply to persons under 18. These statutory age thresholds determine the application of particular legal duties; they do not limit RGSV's wider safeguarding responsibilities to its registered students. RGSV applies Vietnamese law as the governing legal framework and supplements this with safeguarding practice informed by the Reigate Grammar School Group, COBIS standards, IB and Cambridge International expectations and other appropriate international safeguarding guidance.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the School's safeguarding responsibilities.

The purpose of this policy is to provide staff, volunteers, contractors, external providers and Board members with a clear framework for safeguarding every registered RGSV student. It also explains to students, parents and carers how the School will prevent harm, respond to concerns, provide pastoral and wellbeing support, and meet applicable Vietnamese reporting and information-sharing requirements.

Terminology

Safeguarding is the School's broader responsibility to protect students from harm, promote their welfare and wellbeing, provide a safe educational environment and respond appropriately to concerns. It includes child protection, pastoral care and student wellbeing, online safeguarding, safer recruitment, professional conduct, operational safety and effective reporting and referral systems.

- taking action to enable all children/young people to have the best outcomes.

Child Protection is the element of safeguarding concerned particularly with preventing and responding to abuse, violence, exploitation, neglect and other significant harm. Where Vietnamese child-protection legislation applies, RGSV will meet the specific legal duties and reporting requirements attached to that legislation.

Staff refers to all those working for or on behalf of the School, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Student means any person registered as a student of RGSV, regardless of age. Unless a provision expressly states otherwise, RGSV safeguarding procedures apply to all registered students.

Child / trẻ em has the meaning applicable under the relevant law. For the purposes of Luật Trẻ em số (Law on Children) 102/2016/QH13, “trẻ em (children)” means a person under 16 years of age.

Young person / person under 18 may be used where a particular legal, safeguarding or international framework applies to persons below 18 years of age.

Parents refers to birth parents and other adults who are in a parenting role, for example, step-parents, foster carers and adoptive parents.

Early Help means providing support as soon as any needs emerge or are identified at any point in a child's life.

A child in need is a child/young person who is unlikely to achieve or maintain a reasonable level of health or development; or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child/young person who is disabled.

RGSV also applies safeguarding expectations and good practice arising from the Reigate Grammar School Group, COBIS, IB and other recognised international safeguarding frameworks where these strengthen student protection and do not conflict with Vietnamese law. Where requirements differ, Vietnamese law prevails.

International and School Standards & Legal and Regulatory Framework

- applicable current directions of UBND thành phố Hà Nội and Sở Giáo dục và Đào tạo Hà Nội (Hanoi People's Committee and the Hanoi Department of Education and Training), including current measures concerning child protection, violence and abuse prevention, and online child protection.
- Thông tư số 18/2023/TT-BGDĐT ngày 26/10/2023 của Bộ Giáo dục và Đào tạo về xây dựng trường học an toàn, phòng, chống tai nạn thương tích (Circular No. 18/2023/TT-BGDĐT dated 26 October 2023 of the Ministry of Education and Training providing guidance on building safe schools and preventing accidents and injuries);
- Thông tư số 06/2019/TT-BGDĐT ngày 12/4/2019 của Bộ Giáo dục và Đào tạo về quy tắc ứng xử trong cơ sở giáo dục (Circular No. 06/2019/TT-BGDĐT dated 12 April 2019 of the Ministry of Education and Training regulating codes of conduct in educational institutions);
- Nghị định số 80/2017/NĐ-CP ngày 17/7/2017 của Chính phủ quy định về môi trường giáo dục an toàn, lành mạnh, thân thiện, phòng, chống bạo lực học đường (Government Decree No. 80/2017/NĐ-CP dated 17 July 2017 on a safe, healthy and friendly educational environment and the prevention and combating of school violence);
- Luật Giáo dục số 43/2019/QH14 ngày 14/6/2019 (Law on Education No. 43/2019/QH14 dated 14 June 2019) as amended and consolidated, including Văn bản hợp nhất số 72/VBHN-VPQH ngày 25/3/2026 (Consolidated Document No. 72/VBHN-VPQH dated 25 March 2026);
- Nghị định số 56/2017/NĐ-CP ngày 09/5/2017 của Chính phủ quy định chi tiết một số điều của Luật Trẻ em (Government Decree No. 56/2017/NĐ-CP dated 9 May 2017 detailing the implementation of a number of articles of the Law on Children);
- Luật Trẻ em số 102/2016/QH13 ngày 05/4/2016 (Law on Children No. 102/2016/QH13 dated 5 April 2016) as amended and consolidated, including Văn bản hợp nhất số 108/VBHN-VPQH ngày 27/8/2025 (Consolidated Document No. 108/VBHN-VPQH dated 27 August 2025);

RGSV operates in accordance with applicable Vietnamese law and Hanoi requirements. Relevant instruments include, but are not limited to:

I. Introduction

- I.1. The Board of Management, Chair, Education Director and safeguarding leaders take seriously their collective responsibility to provide effective whole-school safeguarding governance, leadership and oversight. The School will maintain robust arrangements to identify, assess, protect and support students who may be suffering harm or may be at risk of harm, and to meet applicable Vietnamese notification and reporting duties.

- 1.2. This policy applies to all members of staff, board members, external providers, and visitors in the School.

2. Policy Principles and Values

The safety, welfare and best interests of students are central to RGSV's safeguarding arrangements. Where Vietnamese child-protection legislation applies, RGSV will additionally fulfil the specific statutory duties applicable to children under that legislation. We maintain an attitude of "It could happen here" and expect all adults to act promptly on concerns.

- 2.1. We believe, and actively promote:

- Children have a right to feel safe and secure: they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse, this means that all children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the School or in the community, taking into account contextual safeguarding (where we assess the risks and issues in the wider community surrounding a child), in accordance with statutory guidance.
- The School will normally work openly with parents and carers where it is safe and appropriate to do so. However, parental notification will not delay or prevent safeguarding action. Where Vietnamese law requires notification or reporting to a competent authority, the School will make that notification irrespective of parental consent. The School may also withhold prior notification from a parent where informing them could increase risk, prejudice a competent-authority investigation or otherwise conflict with the student's safety or applicable law.

3. Policy Aims

- 3.1. To demonstrate the School's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- 3.2. To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.
- 3.3. To provide robust school systems and procedures that are followed by all members of the school community in cases of suspected abuse.
- 3.4. To ensure that all staff working within our School who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and satisfactory Disclosure and Barring Service (DBS) and/or Police Checks and a single central record (SCR) is kept for audit. This is outlined in our *Recruitment* policy.

4. Supporting Children

- 4.1. We recognise that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.
- 4.2. We recognise that the School may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm.
- 4.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal for example, they might be aggressive or withdrawn.
- 4.4. Our School will support all children by:
 - Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
 - Promoting a caring, safe and positive environment within the School.
 - Responding sympathetically to any requests for time out to deal with distress and anxiety.
 - Offering details of pastoral support and **opportunities for children to be listened to** within school.
 - Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
 - We will provide continuing support to 'children of concern' who leave the School by ensuring that information is shared confidentially with the child's new setting. We will ensure the School records are forwarded as a matter of priority and within statutory timescales.

Pastoral Care & Student Wellbeing

Pastoral care forms an important part of RGSV's whole-school safeguarding and student-welfare arrangements but is not the same as formal child-protection leadership. Heads of Section and designated pastoral leaders provide day-to-day pastoral care and wellbeing support. Any concern that reaches a safeguarding threshold must be referred promptly through the School's safeguarding procedures. A student may speak to any trusted member of staff; staff must not require a student to identify the "correct" safeguarding person before a concern is heard and acted upon.

- 4.5. As part of a broad and balanced curriculum, children are taught about safeguarding, including online, through various teaching and learning opportunities. Children are taught to recognise when they are at risk and how to get help when they need it.

5. Prevention/Protection

- 5.1. We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- 5.2. In accordance with Article 47 Luật Trẻ em số (Law on Children) 102/2016/QH13, child-protection measures are organised at prevention, support and intervention levels. RGSV uses these principles alongside its broader safeguarding framework for all registered students.

- **Prevention** level includes measures applied to the community, family and all children/young people to raise awareness, equip knowledge about child safeguarding and protection, build a safe environment, and reduce risks for child abuse.
- **Support** level includes measures applied to children/young people at risk of violence, exploitation, and/or abandonment, or children/young people with special circumstances, in order to promptly detect, reduce or eliminate the risk of harm to children/young people.
- **Intervention** level includes measures applied to abused children/young people and their families for prevention from repetitive abuse; rehabilitation and community reintegration care for children with special circumstances.

5.3. The school community will therefore:

- Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with children e.g. through questionnaires, pupil councils and forums, participation in 'anti-bullying week', asking children to report whether they have had happy/sad lunchtimes/playtimes etc.
- Ensure that all children know there is an adult in the School whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular, this will include anti-bullying work and online safety.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

6. Safe School, Safe Staff

We will ensure that:

- 6.1. **The School operates safer recruitment procedures, including checks on staff suitability to work with children.** See our *Recruitment* policy.
- 6.2. All staff receive, read and adhere to the School's safeguarding arrangements, Safeguarding & Child Protection Policy, Staff Code of Conduct and reporting procedures. The School clearly identifies the Whole-School Designated Safeguarding Lead - Safeguarding & Child Protection, the DSL – Primary and the DSL – Secondary & Sixth Form, together with approved escalation routes.
- 6.3. All staff receive safeguarding and child-protection induction before or at the commencement of their duties and regular refresher training thereafter. Induction identifies the Whole-School Safeguarding Leader, section DSLs, reporting routes, staff conduct expectations, whistleblowing arrangements, online safety, one-to-one working, low-level concerns and allegations against adults. Training is appropriate to role and refreshed regularly.

In summary, we will follow the guidance as set out below.

Staff Induction – these are not intended to be exhaustive
Policies are all on the [school website](#)

Explain and discuss:	Provide:
Safeguarding policy	Safeguarding Policy
Safeguarding leadership structure and reporting routes – Whole-School Safeguarding Leader and section DSLs	Safeguarding leadership structure and reporting routes – Whole-School Safeguarding Leader and section DSLs
Explain <i>Staff Code of Conduct</i>	<i>Staff Code of Conduct</i> (including policies on whistleblowing, acceptable use of IT, staff/pupil relationships, low level concerns, comms including use of social media)
Explain <i>Behaviour Policy & Personal Technological Devices Policy, Whistle blowing Policy.</i>	<i>Behaviour Policy & Personal Technological Devices Policy</i> - including measures to prevent bullying, including cyber bullying, prejudice-based and discriminatory bullying

- 6.4. All members of staff are trained in and receive updates in online safety and reporting concerns.
- 6.5. All staff and board members have regular child protection awareness training, updated by the DSL as appropriate. At least annually.

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

- 6.6. This *Safeguarding & Child Protection Policy* is made available via the School website and parents/carers are made aware of this policy and their entitlement to have a copy. There is a printed copy held by each school office. All parents, guardians & carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the *Safeguarding & Child Protection Policy* on the school websites
- 6.7. Non-school staff or bodies who organise activities for children are aware of the School's *Safeguarding & Child Protection Policy*, guidelines and procedures.
- 6.8. The names and contact routes of the Whole-School Designated Safeguarding Lead - Safeguarding & Child Protection and the section DSLs are clearly advertised in the School and on the approved public safeguarding pages. Pastoral staff are identified separately so that pastoral support is visible without implying that all pastoral leaders hold formal DSL responsibilities.

7. Roles and Responsibilities

All school staff have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

- 7.1. Be aware of signs and indicators of maltreatment
- 7.2. Provide a safe environment in which children can learn.
- 7.3. Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- 7.4. Ensure children know that there are adults in the School whom they can approach if they are worried or have concerns.

- 7.5. 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. Staff are aware of how these children's experiences can impact their mental health, behaviour and education.
- 7.6. If staff have a mental-health or wellbeing concern about a student that is also a safeguarding concern, immediate safeguarding action will be taken in accordance with this policy and the concern will be reported promptly to the relevant section DSL or Whole-School Designated Safeguarding Lead.
- 7.7. Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- 7.8. Attend training in order to be aware of and alert to the signs of abuse.
- 7.9. Maintain an attitude of **"it could happen here"** with regards to safeguarding.
- 7.10. Know how to respond to a student who discloses harm or abuse: listen, record accurately, report immediately and avoid conducting an investigation.
- 7.11. Record concerns promptly and factually and report them immediately to the relevant section DSL or Whole-School Designated Safeguarding Lead. If that person is unavailable and there is an immediate risk, staff must escalate to another member of the Safeguarding & Child Protection Team or the Education Director.
- 7.12. Report concerns about any member of staff/supply staff or contractor (even low-level ones to the Education Director. If there is a concern about the Education Director, it should be reported to the Chair of the Board of Directors.
- 7.13. Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- 7.14. Treat information with confidentiality but never promise to "keep a secret".
- 7.15. Know who the Whole-School Designated Safeguarding Lead - Safeguarding & Child Protection and section DSLs are, how to contact them, and how to escalate if the appropriate safeguarding leader is unavailable or implicated.
- 7.16. Have an awareness of the role of the DSL, the School's *Safeguarding & Child Protection Policy*, *Behaviour Policies* and *Staff Code of Conduct*.
- 7.17. Be mindful that all teachers should safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties.
- 7.18. Assist the Board of Management, the Board of Directors and the Education Director in fulfilling their safeguarding responsibilities.

The Education Director / Whole-School Designated Safeguarding Lead - Safeguarding & Child Protection will ensure that:

- The Safeguarding & Child Protection Policy and procedures are implemented consistently across the School and all staff understand the whole-school safeguarding structure, section DSL responsibilities and escalation routes.
- The School has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.

- All children are supported to report concerns about harmful sexual behaviour freely. Those concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case. And that comprehensive records of all allegations are kept.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Child-centred systems and processes are in place for children to express views and give feedback.
- Sufficient time, training, support and resources, including cover arrangements where necessary, are allocated to the Whole-School Designated Safeguarding Lead and section DSLs so that safeguarding responsibilities can be discharged effectively.
- All formally designated safeguarding leaders receive role-appropriate safeguarding leadership training and regular updates. Pastoral leadership roles are not described as DSL roles unless formally appointed as such.
- Adequate safeguarding cover and escalation arrangements are in place for school hours, out-of-hours activities, trips and other School-organised provision.
- Systems are in place for children to express their views and give feedback which operate in the best interest of the child at heart.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively.
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff are dealt with in accordance with the school policy.
- Where Vietnamese law requires notification or reporting to a competent authority, the School will make the required notification promptly. A statutory reporting obligation must not be delayed pending Board approval. The Chair / Board of Management will be informed or involved in accordance with governance and incident-management procedures, subject to confidentiality and the requirements of any competent authority.

Heads of Section and approved pastoral leaders provide day-to-day pastoral care and wellbeing support. They are important safeguarding partners but are not presented as formal DSLs unless separately and formally appointed to that role. Any safeguarding concern identified through pastoral work must be referred promptly through the safeguarding structure.

Pastoral Care & Student Wellbeing

Leads operational safety, site security, facilities safety, emergency planning, operational risk, medical-safety systems and associated student-protection arrangements; supports safeguarding implementation and safer-recruitment/HR processes as delegated; and works with the Whole-School Designated Safeguarding Lead and DSLs. This role does not replace the section DSLs' child-protection decision-making responsibilities.

Whole-School Deputy Safeguarding Leader – Safety & Operations – Operations Team

Leads operational safeguarding and child-protection practice in Secondary and Sixth Form, including for registered students aged 18 or 19; receives and assesses concerns; ensures appropriate recording, immediate protective action and referral; coordinates support; and escalates significant matters to the Whole-School Designated Safeguarding Lead.

Designated Safeguarding Lead – Secondary & Sixth Form – Head of Secondary & Sixth Form

Leads operational safeguarding and child-protection practice in Primary; receives and assesses concerns; ensures appropriate recording, immediate protective action and referral; coordinates support; and escalates significant matters to the Whole-School Leader.

Designated Safeguarding Lead – Primary – Head of Primary

Provides whole-school strategic leadership and accountability for safeguarding and child protection; ensures effective arrangements operate across Primary, Secondary and Sixth Form; coordinates the section DSL structure; provides escalation, quality assurance and liaison with governance; and ensures that legal reporting requirements are understood and acted upon. This role does not remove the responsibility of each section DSL to act promptly on concerns within their area.

7.19 Safeguarding Leadership Structure

7.19. All members of The Board of Management and Board of Directors understand and fulfil their responsibilities to ensure that:

- There is a whole School approach to safeguarding.
- The School has effective safeguarding policies and procedures including a *Safeguarding & Child Protection Policy* and a *Staff Code of Conduct*. Ensure that the *Safeguarding & Child Protection Policy* is available on the school website.
- The School operates a safer recruitment procedure that includes checks on staff suitability to work with children and disqualification regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.
- The Single Central Record is in place and is kept up to date.
- At least one member of the board(s) has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities.
- All staff including temporary staff/supply staff, volunteers and contractors are provided with the School's *Safeguarding and Child Protection Policy* and, if applicable, the *Staff Code of Conduct*.
- The School has procedures for dealing with allegations of abuse against staff (including the Education Director), volunteers and against other children.
- The Board of Management confirms the School's safeguarding governance oversight arrangements and any Board safeguarding link role. Public and policy titles must reflect the formal appointment actually approved.

- The Board of Management approves the School's safeguarding leadership structure, including the Whole-School Designated Safeguarding Lead - of Safeguarding & Child Protection and section DSLs, and ensures that these responsibilities are explicit in role descriptions.
- Formally designated safeguarding leaders receive role-appropriate initial training and regular refreshers and updates sufficient to maintain current safeguarding knowledge and effective practice.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, and health education (PSHE) and relationship and sex education.
- Enhanced DBS, ICPC, or Vietnamese police checks, are in place for all board members.
- That any identified weaknesses in Safeguarding are remedied immediately.

8. Confidentiality, Sharing and Withholding Information

8.6 Safeguarding records will be stored securely with access restricted according to role and need.

8.5 Information required by competent Vietnamese authorities will be provided in accordance with applicable law.

8.4 For matters falling within Decree No. 56/2017/NĐ-CP, the School will have particular regard to Điều 24 concerning confidentiality during receipt and verification of child-protection information.

8.3 Confidentiality does not prevent RGSV from sharing information where necessary to protect a student or where disclosure is required or permitted by Vietnamese law.

8.2 Staff must never promise secrecy or absolute confidentiality to a student.

8.1 Safeguarding information is sensitive and will be handled securely and shared only with persons who need the information for safeguarding, welfare, legal, professional or operational purposes.

9. Child Protection Procedures

- 9.1. The following procedures apply to all staff working in the School and will be covered by training to enable staff to understand their role and responsibility.
- 9.2. The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.
- 9.3. The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.
- 9.4. All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.
- 9.5. There are also a number of specific safeguarding concerns that we recognise our pupils may experience, such as domestic abuse and these are covered further on in the policy in more detail.

10. If Staff are Concerned about a Child's Welfare

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them, or are concerned about a child/children being drawn into terrorism they must:

PROCEDURE

Make an initial record of the information related to the concern, this should be done on Wellbeing Manager in iSAMS or on a Safeguarding & Child Protection Concern Form. If you speak to the pupil then find a quiet space, keep the door open if possible and follow one-to-one procedures. Keep calm and allow the child to speak in their own time. Never promise confidentiality; if the pupil refuses to speak further then report your concern to the DSL. Never ask a pupil to show you anything on their body. Have them mark it on a Body Map sheet.

Report it immediately to the relevant section DSL or Whole-School Designated Safeguarding Lead (find in person, phone or lastly email), especially if it is an emergency. The safeguarding lead will assess the immediate safeguarding risk, record the concern, determine protective action and make or coordinate any required referral. Staff must not undertake a substantive investigation where this could prejudice action by a competent authority.

The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available (contact the relevant School Office for the Nurse to action).

Make an accurate record as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:

Dates and times of their observations

Dates and times of any discussions in which they were involved

Any injuries

Explanations/Facts given by the child/adult

Rationale for decision making and action taken

Any actual words or phrases used by the child

The records must be signed and dated by the author on the Safeguarding & Child Protection Concern Form.

Following a report of concerns the DSL must:

1. The relevant designated safeguarding lead will assess the concern using RGSV's approved safeguarding response and escalation framework, taking account of the student's immediate safety, the nature and severity of the concern, vulnerability, patterns of concern, relevant Vietnamese legal thresholds and any need for urgent external notification or intervention.
2. Normally the School should try to discuss any concerns about a child's welfare with the family. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be considered.
3. If there is not a risk of significant harm, the DSL will actively monitor the situation.

4. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Assistant should take the child to the accident and emergency unit at the nearest hospital and inform the local authorities/external agencies.

RGSV's internal safeguarding framework continues to protect all registered students, including students aged 16–19, even where a particular statutory child-protection provision uses a narrower age definition.

Depending on the circumstances, competent channels may include the Tổng đài Quốc gia Bảo vệ Trẻ em (National Child Protection Hotline) 111, the competent police authority or the competent local People's Committee. Staff must report internally immediately; the designated safeguarding leader will coordinate external reporting unless the urgency of the situation requires immediate direct action.

Where the School detects or receives information that a child has been abused or is at risk of abuse, violence, exploitation or neglect, RGSV will act in accordance with clause 1 Article 51 Luật Trẻ em số (Law on Children) 102/2016/QH13 and clause 1 Article 25 Decree No. 56/2017/NĐ-CP, including prompt notification to the appropriate competent channel where the statutory threshold applies.

External Notification and Reporting under Vietnamese Law

11. Early Support and Safeguarding Support

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who

- is disabled and has specific additional needs.
- has special educational needs (whether or not they have a statutory education, health and care plan).
- is a young carer.
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home.
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised or exploited.
- is a privately fostered child.

Early support means providing proportionate help as soon as a concern or need emerges. It may include pastoral, wellbeing, learning, family or external professional support and does not replace safeguarding referral where a safeguarding threshold is met.

In the first instance, staff who consider that a student may benefit from early support should discuss this with the relevant pastoral lead and, where there is any safeguarding dimension, the relevant section DSL or Whole-School Designated Safeguarding Lead.

You may find the following phrases helpful to start a conversation or encourage the pupil to talk honestly with you.

“I’m concerned about you. Is everything OK?”

“May I have a word with you? You seem to be... Is there anything I can do to help?”

“You seem to be upset and that’s not like you. Is there anything worrying you?”

12. Dealing with Disclosures

All staff

A member of staff who is approached by a child should listen positively and try to reassure them. **They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe.** The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. **Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.**

Guiding Principles: The Seven Rs

1. Receive

- Find a quiet place where your conversation will not be interrupted (follow the one-to-one conversation procedure).
- Be welcoming, even if the time isn’t convenient for you. It may have taken a great deal of courage for them to approach you and they may not do it again.
- Listen to what is being said, without displaying shock, anger, distaste, dismay or disbelief. It will be difficult for the pupil to be telling someone.
- Stay calm and listen carefully as the pupil tells it at their own pace.
- Accept what is said and take it seriously.
- Make a note of what has been said as soon as practicable.

2. Reassure

- Reassure the pupil, but only so far as is honest and reliable.
- Do not make promises you may not be able to keep e.g. ‘I’ll stay with you’ or ‘everything will be alright now’ or ‘I’ll keep this confidential’.
- Reassure, for example, you could say: ‘I believe you’, ‘I am glad you came to me’, ‘I am sorry this has happened’, ‘We are going to do something together to get help’.
- Remember if they refuse to say anything further then immediately report to the DSL.

3. Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Ask open questions (who, why what how, etc.) for clarification only, such as:
 - When did you do that?
 - How did that happen?
 - Where were you when you did it? Who were you with? What did the person do?
 - Have you told anybody else about this? What did the person say?

- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator (the pupil may care about him/her, and reconciliation may be possible).
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff.

4. Report

- Share concerns immediately with the relevant section DSL or Whole-School Designated Safeguarding Lead, especially where there may be immediate risk. The safeguarding lead will assess, protect, record and refer as appropriate; staff must not conduct a substantive investigation.
- If you cannot contact the relevant section DSL or Whole-School Designated Safeguarding Lead and there is an immediate risk, escalate to another member of the Safeguarding & Child Protection Team or the Education Director and obtain emergency assistance where necessary.
- If you are dissatisfied with the level of response you receive following your concerns, you should press for reconsideration.

5. Record

- If possible make some very brief notes at the time, and write them up as soon as possible onto the **Safeguarding & Child Protection Concern Form**.
- Be precise in your writing. Say exactly what you see, hear or know.
 - Instead of "Nicola was wearing inappropriate clothes for the weather."
 - Say exactly what you see, hear or know: "It was minus five degrees outside with a hard frost and Nicola was wearing a summer dress and open-toed sandals without socks or tights."
- Keep your original notes on file.
- Record the date, time, place, person/s present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- If appropriate, complete a **body map** to indicate the position of any noticeable concerns, e.g. bruising.
- Record facts and observable things, not your 'interpretations' or 'assumptions'.

6. Remember

- Support the child: listen, reassure, and be available.
- Maintain appropriate safeguarding confidentiality and share information only with those who need it for safeguarding, welfare or lawful purposes. Confidentiality must never prevent necessary protection or lawful information sharing.
- Get some support for yourself if you need it.

7. Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information they should seek it out. The DSL will usually keep you informed so that you can continue to support the child, although this is on a need-to-know basis.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Head of School or Safeguarding Board Member of the School.

Supporting Staff

We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties through internal supervision with the DSLs and/or to seek further support as appropriate.

The DSL will determine, and clearly convey in written form, the level of school involvement and support for families, especially if a parent or student tries to seek support from a staff member.

Notifying Parents

The School will normally seek to discuss concerns with parents or carers where the student is a child and where doing so is safe, lawful and appropriate. Parent/carers contact must not delay protective action or mandatory reporting. For students aged 18 or over, the School will recognise their adult legal status when considering parental communication and consent. This does not remove RGSV's safeguarding responsibilities to the student. Information may still be shared without consent where lawful and necessary to protect the student or another person, respond to a serious safeguarding concern or comply with legal requirements.

13. Barriers to reporting abuse or harm

There are significant barriers to reporting abuse in all its forms, but especially where the abuse is sexual or exploitative in nature.

Children/Young people may:

- fear they won't be believed or that if they do report they will face retaliation.
- feel ashamed or embarrassed.
- have a lack of understanding about what is happening to them and whether or not it is abuse.
- fear local authorities becoming involved.
- worry that their parents will get into trouble.
- be concerned their parents find out for fear of bringing shame on the family.
- sexual activity, being unclean and unmarried.

Adults who need to respond to abuse either because they suspect it is happening or a child/young person has confided in them, face having to overcome very similar barriers.

One of the best ways to recognise abuse and be in a position to put a stop to it is to believe that it can and does happen; this will help you to remain alert to the possibility.

Abuse or suspicions of harm can be encountered in different ways.

This can be:

- **Accidental** – A statement made without intent to reveal abuse.
- **Purposeful** – A statement made to reveal the abuse.
- **Precipitant** – A disclosure when an event triggers a memory.

Or an adult may:

- actually observe an abusive act themselves.
- have abuse disclosed to them (direct disclosure).
- receive an allegation about someone else (indirect disclosure).
- see signs or signals that worry them, either about a child/young person or about the behaviour of a colleague.

14. What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, by failing to act to prevent harm, or violating their human and civil rights. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual

images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- protect a child from physical and emotional harm or danger.
- ensure adequate supervision (including the use of inadequate care-givers).
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

15. Indicators of Abuse

Neglect

Neglect is a lack of care, but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it may not pose a risk to the child. The duty to safeguard and promote the welfare of children would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns staff have should be discussed with the DSL.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter.
- protect a child from physical and emotional harm or danger.
- ensure adequate supervision or stimulation.
- ensure access to appropriate medical care or treatment.

The following are examples of the neglect of children under 12 years old (provided by research from the UK National Society for the Prevention of Cruelty to Children (NSPCC)):

- frequently going hungry.

- frequently having to go to school in dirty clothes.
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse.
- being abandoned or deserted.
- living at home in dangerous physical conditions.
- not being taken to the doctor when ill.
- not receiving dental care.

Indicators of Neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect:

- Constant hunger and stealing food.
- Poor personal hygiene - unkempt, dirty or smelly.
- Underweight.
- Dress unsuitable for weather.
- Poor state of clothing.
- Illness or injury untreated.

Behavioural indicators of neglect:

- Constant tiredness.
- Frequent absence from school or lateness.
- Missing medical appointments.
- Isolated among peers.
- Frequently unsupervised.
- Stealing or scavenging, especially food.
- Destructive tendencies.

Emotional/Psychological Abuse

It is sometimes possible to spot emotionally/psychologically-abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later

- Emotional/Psychological abuse is difficult to define, identify/recognise and/or prove.
- Emotional/Psychological abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional/psychological effects although emotional/psychological abuse can occur by itself.
- Children can be harmed by witnessing someone harming another person – as in domestic abuse.
- Most harm is produced in low warmth, high criticism homes, not from single incidents.

Indicators of Emotional/Psychological Abuse

Developmental observations/signs:

- Delays in physical, mental and emotional development.
- Poor school performance.
- Speech disorders, particularly sudden disorders or changes.

Behaviour observations/signs:

- Acceptance of punishment which appears excessive.
- Over-reaction to mistakes.
- Continual self-deprecation (“I’m stupid... ugly... worthless” etc.).
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking).
- Self-mutilation, self-harm.
- Suicide attempts.
- Drug/solvent abuse.
- Running away.
- Compulsive stealing, scavenging.
- Acting out.
- Poor trust in significant adults.
- Regressive behaviour e.g. wetting.
- Eating disorders.
- Destructive tendencies.
- Neurotic behaviour.
- Arriving early at school, leaving late.

Social observations/signs:

- Withdrawal from physical contact.
- Withdrawal from social interaction.
- Over-compliant behaviour.
- Insecure, clinging, reliance on others type behaviour.
- Distrust of kindness and consideration shown to them.
- Poor social relationships.

Emotional/Psychological observations/signs:

- Extreme fear of new situations.
- Inappropriate emotional responses to painful situations (“I deserve this”).
- Fear of parents being contacted.
- Self-disgust.
- Low self-esteem.
- Unusually fearful with adults.
- Lack of facial expression.
- Lack of concentration, restlessness, aimlessness.
- Extremes of passivity or aggression.

Misinformation, Disinformation, and Conspiracy Theories,

Emotional harm can also arise through misinformation, disinformation, and conspiracy theories, particularly when children are targeted online or through peer groups. Exposure to harmful or false narratives can:

- distort a child's understanding of the world,
- create fear, mistrust, or division,
- isolate them from family or community support, or
- increase vulnerability to extremist views and exploitation

Staff should remain alert to signs that children may be engaging with or being influenced by harmful information sources. This may present as sudden changes in beliefs or attitudes, withdrawal from trusted adults, hostility towards authority or peers, or increased anxiety about world events. Schools play an important role in teaching digital literacy, critical thinking, and resilience so that children can better identify and challenge harmful content. Where concerns arise, these should be treated with the same seriousness as other safeguarding risks and reported to the Designated Safeguarding Lead (DSL).

Physical Abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences e.g. knees, shins.

Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

All injuries need to be looked at in accordance with:

- the age of the child.
- Their stage of development.
- Their social background.
- Where the injuries are on their body and any explanation given.

A **body map** can assist in the clear recording and reporting of physical abuse. The **body map** should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the School.

Indicators of physical abuse/factors that should increase concern

- Multiple bruises or bruises and scratches (especially on the head and face) are various stages of healing, i.e. black/purple, brown and/or yellow.
- Clusters of bruises e.g. fingertip bruising (caused by being grasped).
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head.
- Bruises on the back, chest, buttocks, or on the inside of the thighs.
- Marks indicating injury by an instrument e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle.
- Bite marks.
- Deliberate burning may also be indicated by the pattern of an instrument or object e.g. electric fire, cooker, cigarette.
- Scalds with upward splash marks or tide marks.
- Untreated injuries.
- Recurrent injuries or burns.
- Bald patches.

In the context of the School, it is normal to ask about a noticeable injury. Concerns should be increased when:

- the explanation given does not match the injury.
- the explanation uses words or phrases that do not match the vocabulary of the child (adult words).
- no explanation is forthcoming.
- the child (or the parent/carer) is secretive or evasive.
- the injury is accompanied by allegations of abuse or assault.

You should be concerned with their behaviour if a child:

- is reluctant to have parents/carers contacted.
- runs away or shows fear of going home.
- is aggressive towards themselves or others.
- flinches when approached or touched.
- is reluctant to undress to change clothing for sport.
- wears long sleeves during hot weather.
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention.
- admits to a punishment that appears excessive.

Sexual Abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic.
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online).
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but women sexually abuse too.

Indicators of Sexual Abuse

Physical observations/signs:

- Damage to genitalia, anus or mouth.
- Sexually transmitted diseases.
- Unexpected pregnancy, especially in very young girls.
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching.
- Unexplained recurrent urinary tract infections and discharges or abdominal pain.
- Discomfort in walking or sitting.

Behavioural observations/signs:

- Sexual knowledge inappropriate for age.

- Sexualised behaviour or affection inappropriate for age.
- Sexually inappropriate behaviour.
- Hinting at sexual activity.
- Inexplicable decline in educational progress.
- Depression or other sudden apparent changes in personality as becoming insecure.
- Lack of concentration, restlessness, aimlessness.
- Socially isolated or withdrawn.
- Overly-compliant behaviour.
- Acting out, aggressive behaviour.
- Poor trust or fear concerning significant adults.
- Regressive behaviour.
- Onset of wetting, by day or night.
- Nightmares.
- Arriving early at school, leaving late, running away from home.
- Depression, suicide attempts, self-mutilation/self-harm.
- Suddenly drawing sexually explicit pictures.
- Eating disorders or sudden loss of appetite or compulsive eating.
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys.
- Become worried about clothing being removed.
- Trying to be 'ultra-good' or perfect; overreacting to criticism.
- Drug and/or alcohol abuse.
- Having unexplained amounts of money.
- Alluding to secrets that they cannot reveal.

Financial/material abuse

Consider financial or material abuse where there is:

- unexplained loss of possessions or money.
- stealing under coercion to give money to an abuser.
- bills not being paid (for example rent or utility bills).
- a lack of money to pay for basics such as food and clothes.

Discriminatory abuse

Consider discriminatory abuse where there is:

- racist or sexist comments or innuendo.
- verbal or physical abuse because of a disability.
- harassment because of a sexual orientation.

Behavioural observations/signs may include a young person:

- being worried or expressing concern about their race, religion or sexual orientation.
- reacting angrily to any attention paid to an area that they feel makes them different to others.
- being worried that they don't 'fit in'.
- not wanting to go out or socialise with others.

Domestic abuse

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on a child/young person. In some cases, they may blame themselves for the abuse or may have had to leave the family home as a result.

The abuse can encompass, but is not limited to:

- psychological.
- physical.
- sexual.
- financial.
- emotional.

Behavioural signs may include a child/young person

- being withdrawn.
- being angry.
- being anxious or depressed.
- having a fear of being abandoned.
- experiencing problems in college or at work.
- having speech problems, or difficulties with learning.
- suffering nightmares or poor sleep patterns.
- bed-wetting.
- using drugs or misusing alcohol.
- self-harming; for example, eating disorders, cutting.
- experiencing general poor health.

Children/Young people from affluent families

Children/Young people from affluent families are not immune to abuse. They can experience emotional neglect from parents who spend little time with them. They may be predominantly supervised by domestic workers whilst their parents are working or socialising and there may be inadequate supervision. A child's/young person's basic needs may not be met and this can result in physical signs and symptoms.

Children/Young people may begin risk-taking behaviour due to the lack of parental presence, lack of boundaries or due to the need for parental attention.

When dealing with this type of neglect professionals may encounter hostility from the parents.

Serious violence

Children and young people can become involved in many different forms of serious violence. They may feel peer pressure, a sense of belonging, that they are protected from harm, or fear retribution if they don't become involved.

Not every child or young person is affected by serious violence, but for those who are, the impact on them, their families and communities is significant.

Those involved in this type of activity can be at risk of criminal or sexual exploitation and violence.

Recognising changes in a young person's behaviour will help to identify a child that is being exploited and at risk of serious violence.

There are certain vulnerabilities and risk factors that can lead to criminal exploitation and consequent instances of serious youth violence. However, it is important to note that all young people are 'vulnerable' to forms of exploitation.

Signs to look for child criminal exploitation

A child/young person may:

- return home late, stay out all night or go missing.
- show certain patterns and trends when going missing.
- be found in areas away from home.
- have large amounts of drugs or money on them or possibly carrying weapons.
- be under the influence of drugs or alcohol.
- be secretive about who they are talking to and where they are going.
- have unexplained absences from school, college, training or work.
- have unexplained money, phone(s), clothes or jewellery.
- be disruptive or aggressive.
- use sexual, drug-related or violent language you wouldn't expect them to know.
- come home with injuries or look particularly dishevelled.
- have hotel cards or keys to unknown places.
- have unexplained injuries.

16. Safeguarding concerns and allegations (including non-recent) against RGSV adults who work with children, including Low-Level Concerns – referral process

Procedure

This procedure should be used in all cases in which it is alleged an RGSV member of staff, **including supply staff**, volunteers and contractors in the School, or another adult who works with children.

Allegations

It is an allegation if the person has:

- 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 or 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 (also includes behaviour outside the School).

Concerns about an adult outside RGSV staff must be reported immediately to the relevant section DSL or Whole-School Designated Safeguarding Lead. The School will assess immediate safety, preserve evidence, make any legally required notification and avoid conducting a substantive investigation that could prejudice action by a competent authority.

- Report any concerns to the DSL & Safeguarding Team for investigation.

Concerns or allegations about an RGSV staff member, volunteer, contractor or supply worker must be reported immediately through the School's adult-allegation escalation route. The person receiving the concern must ensure the Education Director / Whole-School Designated Safeguarding Lead and HR are involved as appropriate, except where either is the subject of the concern. If the concern involves a safeguarding leader, Head of Section, Education Director, Operations Director or Chair, the matter must be

escalated to the next independent authorised level identified in the School's approved safeguarding allegations matrix.

Safeguarding assessment and any employment/disciplinary investigation are distinct processes. Where a concern may meet a threshold for abuse, criminal conduct or mandatory external notification, RGSV will first consider immediate protective measures and any competent-authority requirements. A substantive internal investigation will not be started where doing so could compromise an external investigation. Temporary protective employment measures, including reassignment or suspension where lawfully authorised, are neutral measures and do not constitute a finding of misconduct. Information disclosed to the subject of an allegation will be limited to what is necessary for a fair and lawful process and need not identify the student or complainant where that is not required.

Low Level Concerns

The purpose of considering low-level concerns is to embed a culture of openness, trust and transparency in which our values and expected behaviours are consistently lived, monitored and reinforced by all staff.

Concerns may be graded low level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over-friendly with children.
- having favourites.
- taking photographs of children on their mobile phone (note: if photos are taken, they should be uploaded to the school online platform and deleted from their personal device as soon as possible).
- communicating with a pupil on social media.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously.
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be reported through the same approved adult-concern route. They should normally be referred to the Education Director / Whole-School Designated Safeguarding Lead with HR involvement as appropriate, unless that person is implicated, in which case the concern must be escalated to the next independent authorised level under the approved allegations matrix.

Low-level concerns should be recorded in writing, including:

- name of the individual sharing their concerns.
- details of the concern.
- context in which the concern arose.
- action taken.

Records, stored the **Safeguarding & Child Protection Concern Forms**, should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the Education Director.

The records' review might identify that there are wider cultural issues within the School that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

17. Student-on-student abuse, including sexual violence and sexual harassment – zero-tolerance approach

Abuse

Context

Peer-on-peer abuse including sexual violence and sexual harassment can occur between two children of any age and sex and can happen online or off-line. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children e.g. sexual violence, sexual harassment, physical abuse (e.g. hitting, shaking, biting, hair pulling or otherwise causing physical harm), sharing nudes and semi-nudes (consensual and non-consensual), initiation/hazing type violence and rituals. It can also occur in intimate personal relationships between peers. It can be causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party. Bullying, including cyber-bullying, prejudice based and discriminatory bullying are also peer-on-peer abuse.

Incidents of peer-on-peer abuse, including sexual abuse, outside of school will be treated in the same way as incidents in school.

We understand that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.

We recognise that there can be a gendered nature of peer-on-peer abuse but that all peer-on-peer abuse is unacceptable and will be taken seriously.

Peer-on-peer concerns should be reported to the DSL.

Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment as well as their emotional wellbeing. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable.

It is important that all victims are taken seriously and offered appropriate support and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim should ever be made to feel ashamed for making a report.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children and staff are supported and protected as appropriate.

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school

We have a **zero-tolerance** approach to peer-on-peer abuse. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. **Peer-on-peer/child-on-child abuse is abuse and will not be tolerated or passed as mere ‘banter’ or ‘having a laugh’, or just ‘boys being boys’ and challenging behaviours such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.**

We recognise that it is more likely that girls will be victims and boys perpetrators, but all peer-on-peer abuse is unacceptable and we should be mindful that it can happen to anyone.

The threshold for dealing with an issue of pupil behaviour or bullying under the Safeguarding Policy is when ‘there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm’. In the event of disclosures about peer-on-peer abuse that all children involved whether perpetrator or victim are treated as being ‘at risk’.

We will minimise the risk of peer-on-peer/child-on-child abuse by:

1. Prevention

- Taking a whole school approach to safeguarding and child protection.
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by our behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

2. Responding to reports of sexual violence and sexual harassment

- Children can report concerns to any member of staff and are regularly reminded of key staff that they can go to e.g. Form Tutor, Pastoral Lead, DSL.
- Children making a report of sexual violence or sexual harassment, including upskirting, will be taken seriously, kept safe and be well supported.
- Staff taking the report will inform the relevant section DSL or Whole-School Designated Safeguarding Lead immediately.
- Staff taking a report will never promise confidentiality.
- Reports will be Logged on ISAMS and recorded on a **Safeguarding & Child Protection Concern Form.**
- Parents or carers should usually be informed (unless this would put the child at greater risk).

3. Risk Assessment

Following a report the DSL will make an immediate risk and needs assessment on a case-by-case basis. The Risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any disciplinary action.
- All other children at the School.
- The victim and the alleged perpetrator share classes and space at school.

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the School's approach to supporting and protecting pupils.

Action – The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

The DSL decision making regarding the issue with the following possible options:

Ongoing Response:

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the School will, if it has not already, consider any suitable sanctions in light of the section's *Behaviour Policy*, which may include consideration of removing the educational provision of the child. Where the perpetrator is going to remain at the School, the relevant Safeguarding Team member or Head of School should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other affected children and adults will receive appropriate support and safeguards on a case-by-case basis.

The School will take any disciplinary action against the alleged perpetrator in accordance with the section's specific *Behaviour Policy*.

The School recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Physical Abuse

While a clear focus of peer-on-peer/child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the *Anti-Bullying Policy* will be applied in these cases, with recognition that any police investigation will need to take priority.

Harmful Sexual Behaviour

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and it can be used to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour

The School recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

Please see Appendix I for RGSV's approach to current harmful sexual behaviour guidance.

18. Counter-Bullying/Cyberbullying

Our school policies on anti-bullying are set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

We keep a record of known bullying incidents which is shared with, and analysed by the governing body. All staff are aware that children with SEN and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse. Children with SEN or some medical conditions can be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. They can also be disproportionately impacted by behaviours such as bullying, without always showing outward signs and can sometimes experience more barriers and difficulties in managing or reporting these challenges.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Head of School and the DSL will also consider child protection procedures.

PSHE education provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

19. Online Safety

The School has an Online Safety Policy which explains how RGSV works to keep students safe online and how the School responds to online-safety incidents. RGSV's online-safeguarding arrangements also take account of current Hanoi child-protection direction, including Kế hoạch số (Plan No.) 2801/KH-SGDĐT of

Sở Giáo dục và Đào tạo Hà Nội (Hanoi Department of Education and Training) concerning protection and support for children in the online environment during 2026–2030.

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, Twitter, Instagram, Discord, Snapchat and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

There has also been a growing concern about cases of online kidnapping and scams, where offenders deceive children by pretending to be friends, police officers, teachers or other authorities in order to gain their trust, collect personal information, or cause emotional harm. In some cases, scammers pretend to be friends, even through online games, to build trust with children before manipulating or exploiting them. Pupils should be reminded never to share personal details, images, or their location with anyone online, and to report any suspicious contact immediately to a trusted adult or the Designated Safeguarding Lead (DSL).

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material.
- **contact:** being subjected to harmful online interaction with other users.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The School has online safety coordinators for each section.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into **cyber-dependent crime**.

Cybercrime is a criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school computer network to look for test paper answers or change grades awarded.
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring it to the local authorities.

Please note that during a period of remote learning i.e. during a lockdown, pupils will be reminded about keeping safe during online learning.

20. Sharing Nudes and Semi-Nudes

Students may create or share intimate or sexual images through messaging, social media or other digital services. Sexual imagery involving students, particularly minors, may constitute a serious safeguarding concern and may also engage Vietnamese criminal, child-protection, privacy or cyber-law provisions. Staff must not view, copy, forward or independently investigate such material and must immediately refer the matter through safeguarding procedures.

Sharing Nudes/Semi-Nudes refers to both images and videos where:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern.

Cases where 'sexual imagery of people under 18 has been shared by adults' and 'where sexual imagery of a person of any age has been shared by an adult to a child' is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving making or sharing nudes/semi-nudes, they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print the images..

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and be involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example, subject to child in need, child protection or early help plans, looked after, has a social worker, SEN.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The situation is isolated or if the image has been more widely distributed.
- There are other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth-produced imagery before.

The DSL will record all incidents of making, sharing and sending nudes and semi-nudes including the actions taken, the rationale for actions and the outcome.

21. Mobile Devices and Photography/Videos

Staff are aware that they must only use their personal mobile telephone or other electronic device to take photographs or videos of pupils in accordance with current school policy, upload any images/videos to the School's Google Drive and delete from their personal device. School devices should be used where possible

We recognise that many children now have considerable access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), which some of them may use to abuse their peers, to share indecent images consensually or non-consensually and view and share pornography and/or other harmful content.

We aim to educate pupils about the risks (and benefits) of new technologies to help them to manage these resources responsibly.

22. Racist Incidents

We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

Where this policy uses terminology or guidance derived from UK safeguarding practice, it is used as supplementary professional guidance and not as a statement of Vietnamese law unless expressly identified as such.

23. Domestic Abuse

Domestic abuse represents one-quarter of all violent crimes. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

Domestic abuse is defined as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse.
- violent or threatening behaviour.
- controlling or coercive behaviour.
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services.
- psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or are relatives.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

24. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (UK DFE 2017)

All staff are aware of the link between online safety and vulnerability to CSE.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang association and/or isolation from peers/social networks.
- Exclusion or unexplained absences from school, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of the internet or other social media.
- Increasing secretiveness around behaviours.
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Sexual identity.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The School is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies/assistants) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

The School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

25. Child Abduction

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. If there is any suspicion of this having happened, then staff should immediately contact the DSL. The School will immediately contact the local authorities.

26. School Attendance and Behaviour

Additional policies and procedures are in place regarding school attendance and behaviour.

The School recognises that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

27. Restrictive Physical Intervention

Any restrictive physical intervention must be exceptional, necessary, proportionate and consistent with the School's approved Physical Intervention / Restraint procedure and applicable Vietnamese legal and HR requirements. This safeguarding policy does not itself authorise restraint. Any use of physical intervention must be recorded, reviewed and considered for safeguarding implications.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEN the School will consider the risks, given the additional vulnerabilities of these children.

28. Students who may be particularly vulnerable to safeguarding harm

RGSV recognises that some students may be more vulnerable to abuse, exploitation, neglect or other safeguarding harm and that barriers to recognition or disclosure may arise from age, disability, language, culture, living arrangements, relationships, online activity, mental-health or wellbeing needs, or other circumstances. This section applies to all registered students, including students aged 18 or 19.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture, meaning that assumptions might be made about the indicators of possible abuse (e.g. behaviour, mood, injury) related to the child's condition rather than considering that abuse may have taken place.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

To ensure that all of our pupils receive equal protection we will give special consideration to children who are:

- Disabled or have special educational needs.
- Young carers.
- Orphans.
- Abandoned / Homeless children.
- Affected by substance misuse, domestic abuse or mental health needs (may be at risk of self-harming as a coping mechanism).
- Adverse childhood experiences (ACEs).
- Having a social worker can mean they are more vulnerable to risk.
- Immigrants, Refugees, Asylum seekers.
- Living away from home.
- Vulnerable to being bullied, undue peer pressure or engaged in bullying.
- Have experienced traumatic or adverse emotional events, e.g. bereavement or family break-up.
- Already viewed as a 'problem'.
- Living in temporary accommodation.
- Live transient lifestyles.
- Living in chaotic and unsupportive home situations.
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality.
- At risk of exploitation (including sexual).
- At risk of being trafficked.
- At risk of female genital mutilation.
- At risk of forced marriage.
- At risk of being drawn into extremism.
- Living independently or away from parents/carers.
- International students whose family is outside Vietnam.
- Experiencing coercive or controlling relationships.
- Experiencing significant mental-health or wellbeing concerns.

- Vulnerable to online exploitation, scams, grooming or image-based abuse.
- Facing age, language, cultural or legal-status barriers to reporting.

Appendix I: Harmful Sexual Behaviour Guidance

RGSV uses current, age- and developmentally-appropriate professional guidance when assessing harmful sexual behaviour. The School will maintain the current approved professional guidance separately from this policy so that it can be updated without waiting for a full policy revision. Any tool used must be current, suitable for the age and developmental context, and applied alongside professional safeguarding judgement and applicable Vietnamese law.

Appendix 2: RGSV Safeguarding Response and Escalation Framework

1. Receive or identify a concern – listen, reassure and record facts.
2. Immediate safety – obtain urgent medical, police or emergency assistance where necessary.
3. Internal reporting – notify the relevant section DSL or Whole-School Designated Safeguarding Lead immediately.
4. Safeguarding assessment – consider immediate risk, vulnerability, patterns, student wishes/voice, age and legal thresholds.
5. Protective action – implement proportionate in-school safeguarding and pastoral measures.
6. External notification – where required by Vietnamese law, notify the appropriate competent channel promptly; do not wait for Board approval.
7. Recording – document the concern, decisions, rationale, actions, information sharing and any external notification securely.
8. Follow-up and review – monitor safety, wellbeing and educational impact; review risk and effectiveness of actions; escalate if concerns persist.

Appendix 3: Safeguarding & Child Protection Concerns Form (if you cannot log onto iSAMS Wellbeing Manager)

SAFEGUARDING & CHILD PROTECTION CONCERNS FORM

Please complete this form and return it to the Designated Safeguarding Lead (DSL) if you have a concern about a pupil

Body Chart Attached	Yes	No	
Student informed of information sharing	Yes	No	Consent obtained where required: Yes / No / Not required

Pupil's Full Name			
Date		Time	
Observer's Full Name, Role, Email & Mobile Phone Number			Observer's Signature

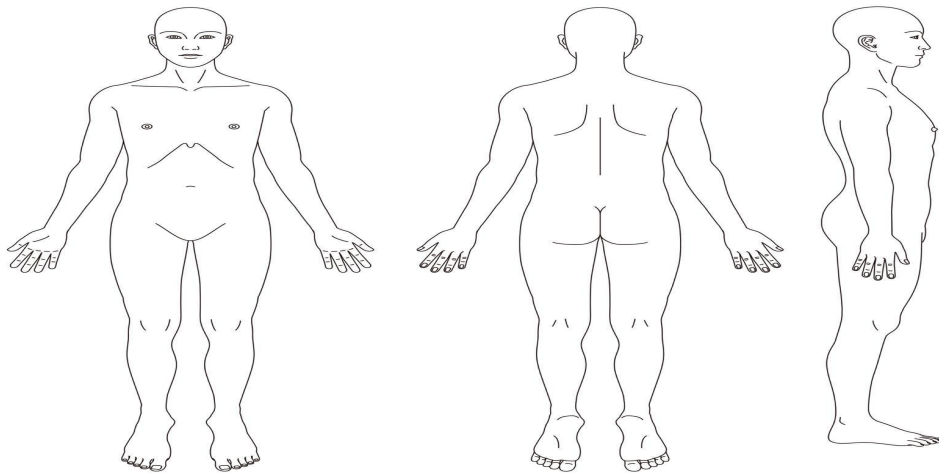
Concern (Provide as much factual detail as possible) - what you have been told/observed yourself, with dates if possible (distinguishing the facts from your opinion as the Safeguarding Team will investigate) - any action taken so far - who has been told, why and when	
Signed	Date

Safeguarding Team to complete:

Further action required	Date of action	Action taken by	Signature

Date given to DSL		Time given to DSL	
Name of DSL		DSL Signature	
Pupil's Name Address Date of Birth		Observations made by	
Observer's signature		Date	

This chart must be attached to the concerns form. Clearly mark the location of your concern and label each concern with a number for referencing purposes.



Legal / safeguarding basis or rationale: _____

Person making notification: _____

Date and time: _____

Authority / service: _____

External authority notified: Yes / No

Appendix 4: Safeguarding Policy Declaration (this will be in a Google Form)

I confirm that I have received or accessed the current Reigate Grammar School Vietnam Safeguarding & Child Protection Policy, have read and understood it, know how to report a safeguarding concern, know the identity of the relevant safeguarding leads and understand the escalation route if a safeguarding leader is unavailable or implicated.

I agree to comply with the School's safeguarding procedures, Staff Code of Conduct, confidentiality and information-sharing requirements, and duty to act immediately on safeguarding concerns.

Signed:

Print Full Name:

Date:

(Please print this sheet and return a signed copy to HR)