



Child Protection Policy

Sendelta International Academy Shenzhen

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A. Introduction

Policy

The Governance Board of Sendelta International Academy Shenzhen considers child safeguarding to be of serious importance and is committed to the protection of all students in school.

The Principal will ensure:

- every member of staff at the school understands their responsibility for contributing to the safety and well-being of students at school and in all school-related buildings
- the Child Protection Policy and Procedures are fully implemented consistently throughout the school, including prevention and intervention strategies
- the Child Protection Policies and Procedures are carried out appropriately for all reports and/or suspicions of child protection violations
- the Child Protection Policies and Procedures will be presented to the board and reviewed on an annual basis.

The Child Protection Policy and Procedures shall be regularly communicated to all community stakeholders.

This policy is binding for any and all individuals on the Sendelta campus, including all staff, students, parents, guests on campus, contractors, consultants, associates or any other category of a visitor to Sendelta.

Child Protection Philosophy

Children and youth have legal and moral rights to their individuality that, when protected, will develop into the ability to meet the needs of the family, community and global society. Child protection standards defined by the Sendelta International Academy Shenzhen "Sendelta or School" in this policy adhere to international laws as stated below. When given reasonable cause to believe that these rights or standards are violated, Sendelta will seek all available resources to restore those rights.

Schools fill a special institutional role in society as protectors of children. Schools need to ensure that all children in their care are afforded a safe and secure environment in which to grow and develop. Educators, having the opportunity to observe and interact with children over time, are in a unique position to identify children who need help and protection. As such, educators have a professional, ethical, and legal obligation to identify these children to ensure their safety.

Sendelta endorses the work of China's Protection Law for Juvenile and adheres to the UN Convention on the Rights of the Child, of which our host country, P.R. China is a signatory. The specific statements most relevant to Sendelta include:

- The best interests of the child must be a top priority in all decisions and actions that affect children.
- Every child has the right to express their views, feelings, and wishes in all matters affecting them, and to have their views considered and taken seriously.
- must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them.
- Children who have experienced neglect, abuse, exploitation, torture must receive special support to help them recover their health, dignity, self-respect and social life.

The School seeks to be a safe haven for students who may be experiencing abuse or neglect in any aspect of their lives. The Sendelta International Academy Shenzhen will share this policy with all Sendelta parents, students, as well as provide annual training for all staff.

B. The Sendelta Child Protection Code of Conduct

The Sendelta International Academy Shenzhen is committed to safeguarding and promoting the welfare, both physical and emotional, of every student both inside and outside the school premises. Any allegations of risk to child welfare will be handled (in partnership with the relevant authorities, if appropriate), in line with the Sendelta Child Protection Policy.

1. Overview

Purpose

The purpose of the Code of Conduct is to:

- confirm and reinforce the professional responsibilities of all employees and adults who interact with children in the care of Sendelta,
- clarify the legal and moral position in relation to sensitive aspects of teacher/student relationships and communication including the use of social media,
- set out the expectations of standards and behavior to be maintained within Sendelta,
- help adults establish safe practices and reduce the risk of false accusations or improper conduct.

Guiding Principles

- Adults are responsible for their own actions and behavior and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Employees should make a disclosure promptly to their Principal, over any incident which may give rise to concern about their own behavior/interaction.

- Records should be made of any such incident and of decisions made/further actions agreed, in accordance with the Sendelta's Governance & Policy Manual, Staff Handbook, Student/Parent Hand book, Staff Handbook and the relevant guidance documents.
- Employees should be familiar with the Child Protection Policy and procedures outlined in the Sendelta International Academy Shenzhen Anti-Bullying Policy and understand their responsibilities to safeguard and protect children.
- The safeguarding and child protection policies and Anti-Bullying Policy outline the School's responsibilities and procedures for reporting to external agencies allegations of practices or behavior which have put (or may have put) children at risk of significant harm.
- Employees should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

2. Safeguarding Responsibilities

2.1 Duty of Care

- Employees are accountable for the way in which they: exercise authority, manage risk, use resources, and safeguard children.
- Employees of a school are mandatory reporters and must follow procedures detailed in the Child Protection Policy and Anti-Bullying Policy and as required by the Act on Counteracting
- China's Protection Law for Juvenile which imposes on employees of various services, including education, the duty to respond when there is a suspicion of abuse against a child.
- All employees have a responsibility to keep children safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns.
- Children have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.
- The safeguarding culture of a school is, in part, exercised through the development of respectful, caring and professional relationships between adults and children and behavior by the adult that demonstrates integrity, maturity, and good judgment.
- When individuals accept a role working in an education setting they should understand and acknowledge the responsibilities and trust involved in that role.

2.2 Making Professional Judgements

- This code of conduct cannot provide a complete checklist of what is or is not appropriate behavior. It does highlight, however, behavior which is illegal, inappropriate, or inadvisable.

- There will be occasions and circumstances in which employees have to make decisions or take action in the best interest of a child which could contravene this code of conduct or where no guidance exists. Individuals are expected to make judgments about their behavior in order to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably. These judgments should always be recorded and shared with the Principal or appropriate direct supervisor.
- Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.

2.3 Power and Positions of Trust and Authority

- As a result of their knowledge, position and/or the authority invested in their role, all those working with children in a school or education setting are in a position of trust in relation to all students.
- The relationship between a person working with a child/ren is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.
- The potential for exploitation and harm of children, especially those considered vulnerable (determined by age, disability, or other measures that promote power imbalance) means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- Employees should always maintain appropriate professional boundaries, avoid behavior which could be misinterpreted by others and report and record any such incident.

2.4 Confidentiality

- The storing and processing of personal information is informed by China's Protection Law for Juvenile and the Sendelta's data protection policy. Sendelta will provide clear guidance to employees through policies and procedures on data protection about their responsibilities under this legislation so that, when considering sharing confidential information, those principles should apply.
- Employees who have access to confidential information about students and their families must keep this information confidential at all times and only share when legally permissible to do so and in the interest of the child.
- Records should only be shared with those who have a legitimate professional need to see them.
- Employees should never use confidential or personal information about a student or student's family for their own, or other's advantage (including that of partners, friends, relatives or other organizations).

- Information must never be used to intimidate, humiliate, or embarrass the child.
- Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis.
- In circumstances where the child's identity does not need to be disclosed the information should be used anonymously.
- There are some circumstances in which an employee may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass the information on without delay, but only to a designated Child Protection Officer ("CPO") and/or the Principal.
- If a child – or their parent/guardian – make a disclosure regarding abuse or neglect, the employee should follow the procedures outlined in the relevant safeguarding and child protection Policies. The adult should not promise confidentiality to a child or parent but should give reassurance that the information will be treated sensitively.
- If an employee is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the CPO.
- Student photos, films or other student information should not be shared on any form of personal social media unless prior permission has been granted by the student's parents and/or the Communications and Marketing Department.
- Any legal inquiries regarding the release of personal information should be directed to the Principal.
- Employees are expected to maintain a positive climate of respectful communication and not engage in 'gossip' which could be damaging to individuals or the school.
- Employees have a responsibility to be aware of their surroundings and ensure that confidential conversations take place in an appropriate environment.

3. Behavioral Expectations

In addition to the expectations outlined in the Sendelta job description and faculty handbook, all faculty/staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work. Conduct applies to environments within the workplace, outside of the workplace, and online.

3.1 Discrimination

- No employee or student may be discriminated against, favored, harassed or ostracized as a result of race, skin color, nationality, parentage, creed, gender, age, sexual orientation, physical constitution or appearance. Any such behavior in the workplace or place of training is not tolerated by Sendelta.

3.2 Bullying

- Bullying, without a sexual element, can be described as repeated psychological or physical harassment with the intent to harm the victim. Bullying can often involve a difference in power and therefore employees must pay special attention to their own interactions as well as student interactions that could be construed as bullying;
- All validated cases of such behavior will lead to disciplinary action. The Board members, principals, teachers, and other employees are called on to participate actively in measures to hinder and prevent bullying.

3.3 Sexual Harassment and / or Abuse

- Sexual harassment and/or abuse is strictly prohibited. No one's position or role gives them the right to abuse it by pursuing personal interests of a sexual, emotional or professional nature;
- Sexual harassment is an infringement of personal integrity and the individual's right to privacy;
- Sexual harassment in the workplace or place of training is not tolerated at Sendelta;
- Sexual harassment can take the form of words, gestures, and actions. This might mean:
 - insinuating and suggestive remarks about the appearance of a person;
 - sexist comments and jokes about sexual characteristics, sexual behavior and the sexuality of women and men;
 - showing or displaying pornographic material;
 - issuing unwanted invitations with unmistakable intent;
 - unwanted bodily contact;
 - stalking in or outside the school (including online);
 - attempting to get close in a way that involves promises of advantage or threat of disadvantage; sexual assault, coercion or rape.

3.4 Sexual Conduct

- Any sexual behavior by an employee with or towards a student is strictly prohibited;
- It is a violation for a member of faculty/staff and those contractually obligated to adhere to this policy to engage in sexual activity with a student at the school (regardless of age) or any young person under 18 years of age;
- Sexual activity can involve physical contact, including penetrative and non-penetrative acts, however, it can also include non-contact activities, such as causing students to engage in online discussions of a sexual nature or watch sexual activity or the production of pornographic material;
- There are occasions when adults embark on a course of behavior known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the

relationship so sexual activity can take place. All employees will undertake the provided introductory training so that they are fully aware of those behaviors that may constitute 'grooming' and of their responsibility to always report concerns to CPO. If concerns pertain to an employee this should be reported to the Principal or Board Director;

- Sexual activity with a student will result in criminal and/or disciplinary procedures.

3.5 Physical Contact

There are occasions when it is entirely appropriate and proper for faculty/staff to have physical contact with children, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the student's individual needs. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one student, in one environment, may be inappropriate in another, or with a different student. Therefore, employees should use their professional judgment based on the following:

- Physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age and stage of development;
- Physical contact should take place only when it is necessary in relation to a particular activity;
- Physical contact should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary;
- Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority;
- If an employee believes that action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported to their direct supervisor.

3.6 Physical Intervention / Physical Restraint

Physical intervention/restraint can be an appropriate measure/action in extreme situations. However, great care must be exercised in order that adults do not physically intervene in a manner that could be considered unlawful.

- Adults may reasonably intervene to prevent a child from:
 - committing a criminal offense;
 - injuring themselves or others;
 - putting themselves at risk.
- Adults should:
 - always seek to defuse situations and avoid the use of physical intervention wherever possible;
 - remove others from potential harm, send for support;

- where physical intervention is necessary, only use minimum force and for the shortest time needed.

3.7 Communication with Students (the use of technology)

In order to make the best use of the many educational and social benefits of new and emerging technologies, students need opportunities to use and explore the digital world. E-safety risks are posed more by behaviors and values than the technology itself.

- Faculty/staff should ensure that they establish safe and responsible online behaviors, adhering to the Sendelta International Academy Shenzhen Anti-Bullying Policy.
- Communication with students both in the 'real' world and interactions online should take place within explicit professional boundaries and maintain the standards of a traditional student-teacher relationship.
 - faculty/staff should not request or respond to any personal information from students other than which may be necessary for their professional role;
 - faculty/staff should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behavior';
 - faculty/staff should not seek to communicate/make contact or respond to contact with students outside of the purposes of their work;
 - faculty/staff should not give out their personal details unless pre-agreed for work purposes;
 - faculty/staff should only use communication platforms approved by the school.

3.8 Use of Images, Videos, and Other Media

Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Whilst images are regularly used for very positive purposes adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. This means that adults should:

- adhere to the Sendelta rules on usage of electronic communication and information media,
- only retain images when there is a clear and agreed purpose for doing so,
- store images in an appropriately secure place defined by the school and then delete from any personal device,
- avoid making images in one to one situations. This means that adults should not:
 - take images of students for their personal use,
 - display or distribute images of students unless they are sure that they have parental consent to do so,
 - take images of children which could be considered sexually suggestive,

demeaning, or otherwise inappropriate in any way.

3.9 Exposure to Inappropriate Images

Adults should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images.

This means that employees should:

- abide by the Sendelta International Academy Shenzhen Anti-Bullying Policy on usage of electronic communication and information media,
- only show films or material that have ratings appropriate for the ages of the children intended to view (it is important to also consider the diverse nature of our school the varying values and belief systems represented in it. If there is a question about whether a film or material would be appropriate, employees should seek permission from their direct supervisor),
- under no circumstances should any adult-use school setting or equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace.

3.10 One to One Situations

Adults working in one to one situations with students, including visiting adults from external organizations can be more vulnerable to allegations or complaints. To safeguard both children and adults, a risk assessment in relation to the specific nature and implications of one to one work should always be undertaken.

This means that adults should:

- ensure that wherever possible there is visual access via an open door or see-through window in one to one situations,
- always report any situation where a pupil becomes distressed or angry,
- consider the needs and circumstances of the student involved,
- only enter student designated bathrooms or locker rooms when adult intervention is considered necessary.

3.11 Transporting Students

In certain situations, employees or volunteers may be required to or offer to transport students as part of their work. As for any other activity undertaken at work, the adult has a duty to keep young people safe and to protect them from physical and emotional harm.

- The general policy of the school is that private vehicles may not be used for school purposes.
- Employees should not offer to transport students unless the need for this has been agreed by a direct supervisor, the student, and their parent/guardian.
- Employees should ensure that their behavior is safe and that the transport arrangements and the vehicle meet all legal requirements.

This means that employees should:

- plan and agree to arrangements with all parties in advance and respond sensitively and flexibly where any concerns arise,
- take into account any specific or additional needs of the pupil,
- have an appropriate license/permit for the vehicle,
- ensure the driver is fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgment and/or ability to drive,
- ensure that if they need to be alone with a student this is for the minimum time,
- be aware that the safety and welfare of the student is their responsibility until they are safely passed over to a parent/carer,
- ensure that any impromptu or emergency arrangements of transportation are recorded and can be justified,
- ensure all passengers wear seatbelts,
- adhere to current legislation regarding the use of car seats for younger children,
- ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

3.12 Field Trips & Educational Visits

- Faculty/staff responsible for organizing educational visits should be familiar with the Sendelta Field Trip Policy.
- Trip leaders, with oversight from Divisional Principals, or Activities/Athletics Directors, are responsible for ensuring that all potential risks have been assessed, and appropriate precautions are taken, in line with the Sendelta Field Trip Policy.
- Faculty/staff should take particular care when supervising students in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, adults remain in a position of trust and need to ensure that their behavior cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

3.13 First Aid

- All faculty and staff with direct contact with students are obliged to maintain an up to date first aid qualification.
- Sendelta nurses will provide sufficient opportunities to fulfill this obligation by offering first aid courses throughout the school year.

C. Review Process

The Child Protection Policy is intended to be a living document that is used by all school community members to ensure consistent and supportive practices of Child Safeguarding, and as such review will occur regularly to ensure that it remains current and reflects the needs of the community and Sendelta's guiding statements.

The Child Protection Committee (defined later in this document) is responsible to conduct an annual review and provide oversight for the development of such document.

D. Scope, Definitions, and Framework

1. Scope of Sendelta's Safeguarding Measures

This policy enables Sendelta to devote resources and efforts to help create a positive and safe atmosphere where students can thrive and fully engage and grow from the learning opportunities we offer. To support these efforts, we have implemented preventative, protective, and supportive elements that include: safe recruitment practices and continued training for all staff employed by Sendelta, direct teaching and social-emotional supports to students, agreed-upon procedures to ensure appropriate response to Child Protection concerns, and support structures that are in place to help students who may have been abused.

2. Definitions of Abuse

The Sendelta International Academy Shenzhen has a diverse community with varied cultural beliefs, values, and practices. In order to represent this topic from a global perspective, we have chosen for the purposes of this policy to follow the World Health Organization's (WHO's) definition of abuse and neglect which states:

- *“Child abuse or maltreatment constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”*

In this document, 'child' refers to any Sendelta student (or non-Sendelta student visitor) of any age, on-campus or participating in school-sponsored activities.

It is important to note that certain populations of students (students that have developmental, behavioral, or learning disabilities), are more at risk for child abuse and neglect, and therefore should be given extra considerations when determining the need for support (Centers for Disease Control and Prevention).

Appendix 2 details the different types of child abuse, Appendix 3 details the signs and symptoms, as well as provide some symptoms often displayed by offenders.

3. Organizational Framework

Child Safeguarding is the responsibility of all adults (especially those working directly with students), however, at Sendelta there are three designated groups that directly support the execution of our Child Protection Policy. These three groups are:

1. The Child Protection Committee
2. The Child Protection Officer (CPO)
3. Crisis Team

Child Protection Committee

The Child Protection Committee has the task of ensuring the development and review of Sendelta's comprehensive Child Protection Program. Specifically, this committee works to:

- ensure there is a comprehensive Child Protection Program (including policy and Anti-Bullying Policy) in place at Sendelta,
- ensure/guide professional development and training related to Child Protection for all faculty, staff, volunteers, and contractors,
- ensure/guide parent education programs to support the understanding of the objectives and goals of the Child Protection Policy,
- oversee development and revisions to the Child Protection Operations Manual.

The Child Protection Committee will consist of representatives from the following groups:

- Designated Child Protection Officer (CPO)
- A Governance Board Member
- The Principal
- The Head of Department(s)
- Counselor(s) (one from each Grade)
- Nurse
- Psychological Consultant
- Additional members or invited guests as appropriate (assigned by Board)

The Child Protection Committee will meet at least twice annually to:

- plan and facilitate training for the school year (PD, external certifying agencies, etc.),
- conduct an internal audit of the relevant child protection policies, operational manuals, and processes,
- assess implementation and make recommendations for continued, new or revised

procedures for consideration by SLTs.

Additional meetings can be held as needed.

Designated Child Protection Officer (CPO)

The Designated Child Protection Officer is the member of the Child Protection Committee who are responsible for handling specific reports of concern, working with the student and/or family to ensure that the child's interests are protected, and directly responding to specific allegations that are brought forward with the goal of supporting all children. The CPO is responsible for calling together the crisis team who will evaluate the situation and determine the next steps. The CPO acts as a representative of the school for any external reporting processes.

Procedures taken when allegations are made are explained in [Appendix 1](#).

Crisis Team

In response to a potentially actionable disclosure, the Child Protection Officer will call a Crisis Team together in order to determine the next steps. This group will consist of the Child Protection Officer, the Board Director, the Principal, HOD(s), and Divisional Counselor(s). This team may call upon others when more information is needed. All members of the Crisis Team pay special attention to ensure only members on a "need to know" basis are involved to help protect the individual's confidentiality.

4. Reporting Disclosures

Any concerns about a child's wellbeing, no matter how small, must be reported. Most confirmed cases of reported abuse indicate that prior suspicions of abuse taking place existed, but were not acted upon. If you have concerns, it is your moral, professional, and legal duty of care to report this to the CPO.

It is not your responsibility to investigate; in fact, you must not investigate. There is an obligation to pass on disclosures, allegations or concerns to Sendelta's Designated Lead(s) so that they can act to protect a child should it be necessary.

Mandatory Reporting

All faculty and staff at the Sendelta International Academy Shenzhen are mandated to report incidents of, or concerns about any type of abuse or maltreatment of a child according to the procedures indicated in [Appendix 1](#). Reporting to a Designated Lead should be within 24 hours of a disclosure/suspicion.

As per our Reporting Flowchart ([Appendix 1](#)), concerns should be shared directly with the Child Protection Officer. Also, all information should be recorded on a *Record of Concern Form*, found in [Appendix 5](#).

Speak Up Policy

Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardize their colleague's career.

All staff must remember that the welfare of the child is paramount. All concerns of poor practice or possible child abuse by colleagues should be reported to their Direct Supervisor or a Designated Lead(s).

Handling a Disclosure

Any adult to whom a student makes a disclosure must:

- listen carefully and let the student tell the story in their own words. DO NOT prompt or interrupt,
- reassure the child that they are right to speak up. Be calm, attentive, non-judgmental and do not show any emotion other than sympathy,
- make it clear that this cannot be kept a secret and that you have a duty to report it to a Designated Lead who is properly trained to help students in this kind of situation,
- only ask questions to clarify something that was unclear such as where or when, do not ask leading questions,
- Following the meeting with the child, record the details on the Record of Concern Form (Appendix 5) using the child's words as far as possible to record the details of the disclosure. Do not fill in the form while the child is present, as it is best to be completely attentive to the student during this time,
- immediately contact the CPO (within 24 hours).

E. Prevention Strategies

1. Campus Security and Facilities Management

School leadership ensures that all facilities are secure and appropriate to respect the safety and wellbeing of students in accordance to Chinese national laws. All rooms into which students are permitted have a window in the door. Facilities are regularly reviewed in terms of safety and security. Crisis procedures (lockdown, evacuation, bomb/terrorist attacks, fire) are reviewed annually and drills are regularly conducted. Security guards are present on campus at the school gates and entrances for the entirety of the school day. Security guards are required to conduct regular daily sweeps of the school premises and direct surrounding areas.

Security at School Entrances

The school maintains 24-hour perimeter security of the school campus, including the use of cameras and fencing sensors. All individuals will be checked against a pre-authorized guest list and guests are directed or escorted to the main entrance and main security desk/reception for visitor badges and escort to the appointment.

ID's for Adults on Campus

All parents and staff are required to wear identification badges visibly at all times on campus. Visitors and outside contractors are issued temporary badges at the main

entrance to the school after acknowledging and agreeing to adhere to Sendelta's Code of Conduct while on campus.

Badges are provided for staff of school service providers (e.g. cafeteria, grounds, etc.) on long term contract subject to contractual obligations to adhere to school policies.

Bathroom Designation

Bathrooms will be designated as necessary to assure compliance with general expectations for a safe environment and age-appropriate child protection.

Visible Spaces (Windows in Doors)

All spaces in the building provide for a line of sight and observation of the interior. Only selected and secured storage and equipment areas are exempt from this policy.

Facilities Use Contracts

Facility use contracts prescribe adherence to all school policies and procedures. As such, they accept the school's code of conduct and principles of child protection as otherwise described in this manual.

Cameras and CCTV

Cameras and CCTV equipment is provided and deployed according to safety and protection standards. The systems are periodically upgraded to provide for additional coverage where appropriate. All areas monitored are public and guidelines are in compliance with privacy stipulations of local law and ordinance.

2. Human Resources

The Human Resources department plays a significant role in ensuring Child Safeguarding at Sendelta by being committed to safer recruiting practices and ensuring induction training for all employees at Sendelta.

Safer Employment

As part of our hiring and employment process, Sendelta employees, including full time, part-time, substitutes and approved tutors are required to provide information about their background checks and past employment verification prior to their commencement of the initial contract. This safety measure is extended to service contractors that are contracted to provide services on the Sendelta campus as well as voluntary coaches, voluntary helpers, external private coaches and external tutors that are hired by Sendelta parents who are working with our students and/or using our facilities on campus.

The school is committed to following procedures that support safer recruitment and selection of all teaching and nonteaching staff. In order to do so, Sendelta has implemented a number of checks during the recruitment process with the aim to identify and deter candidates from applying when they have:

- a history of or tendency toward child molestation or abuse of power
- a criminal record

- had previous concerns related to their suitability of safely working with children.

Sendelta's Safer Recruitment Protocols are summarized below:

- **Job Postings:** All job postings for employment at Sendelta will be accompanied with a statement highlighting our commitment to Child Protection as well as links to our policies and procedures manuals.
- **Application:** During the application process, all potential employees will be asked about their previous record related to working with children and to indicate any previous or ongoing inquiries or investigations regarding their suitability to work with children.
- **Interview:** During each interview, candidates will be directly asked about their current and previous actions with children, including any possible previous or ongoing concerns, inquiries, or investigations.
- **Screening and Background Checks:** All offers of employment will only be recognized after all reference checks and require police background checks have been completed. The specifics related to the questions that must be asked and the details of require police background checks can be found in the Recruitment, Selection and Hiring Procedure Manual housed with Human Resources.
- **Contracts:** All employment contracts will include a statement that requires employees to agree to adhere to all of Sendelta's Child Protection Policies and Procedures. Employees will also be required to sign the Employee Code of Conduct for Child Protection, found in Appendix 6.

Confidentiality

Background check records will be received and maintained as part of a confidential file in Human Resources. Applicant information is confidential, personal information, and all parties having access to this information will treat it as confidential. Criminal history and other background records that are obtained by Sendelta for the purpose of conducting background checks shall be used only as permitted by law.

Training

All staff and faculty employed by Sendelta will be expected to undergo appropriate training on a regular basis, leveled depending on their degree of engagement with children in their roles. The Human Resources department in conjunction with the Child Protection Committee will oversee this process. Initial training will be provided in-house, normally during the orientation process. Continued or deeper training will come from a variety of sources which may include in-house, external workshops, or online training. It is the employee's responsibility to ensure documentation of training is kept on record with the HR department. Trainings should be refreshed after every 3rd year.

Training will also be given to volunteers and coaches who regularly interact with students on campus. The following is a guide for what is the minimum expectation depending on position and role in the school.

- **Level 1 training:**

- ◆ For Office Assistants, Teaching Assistants, Sendelta Staff and all adults who are regularly on campus, (including parents where possible).
- ◆ Policy is made available and highlighted in publications
- ◆ Induction training at the start of each year
- ◆ Training topics include:
 - General duty of care responsibilities
 - Sendelta's Child Protection Policies and Procedures
 - Sendelta's Reporting Procedures
 - Code of Conduct.
- Level 2 training:
 - ◆ For nurses, coaches, lifeguards, faculty, and staff that directly work with children
 - ◆ Sendelta "Child Protection in School" training when new and after the third year
 - ◆ Training topics include:
 - All Level 1 topics
 - Types and symptoms of abuse
 - How to handle disclosures.
 - Information sharing and documentation
 - Making a referral.
- Level 3 training:
 - ◆ Counselors and Child Protection Committee
 - ◆ Advanced Child Protection Training when new and every other year
 - ◆ Training topics include:
 - All Level 1 & 2 topics
 - As available/needed select members will complete training on the following:
 - Serious Case Reviews
 - Follow up referrals
 - Working with Students and Families
 - Any other trainings deemed necessary to carry out the role (as decided by the School Principal and/or Child Protection Committee).

3. Student Education and Community Communication

Curriculum for Students

Advisors, Counselors, and Health teachers are responsible for delivering age-appropriate curriculum to empower students to protect themselves and report behavior they feel uncomfortable with.

Engaging Parents

The Child Protection Committee is committed to engaging parents as partners in child protection. We strive toward this goal through clear and consistent communication about and access to our Child Protection Policies and Handbooks. Communication and training take place during events such as New Family Orientation, Back to School Nights, Parent meetings, and through our social media channels.

Volunteers/Staff/Contractors

We recognize the importance of educating all staff, visitors, volunteers and external contractors/service providers about our commitment to Child Protection and our expectations that come with having a relationship with Sendelta. Agreements to adherence with our Policies are included in contracts as well as provided as part of the Code of Conduct that must be signed in order to work with Sendelta Children.

Tutor Clearance Procedures

A parent should contact the divisional administration in order to request permission for an outside tutor to teach an Sendelta student at school.

- Parent fills out Facility Use Request for the tutoring, specifying the dates and times of the tutoring and the location of the tutoring. (If location of the tutoring is not known, the divisional administrator should work with the parent to determine an appropriate space for this tutoring).

Additionally:

- If the tutoring is related to the Performing and Visual Arts Program, the Performing and Visual Arts Coordinator should be informed
- If the tutoring is related to academic support, the divisional administrator should be informed and the support should be documented on the student's records

As part of the facility use process, the tutor is identified and the parent is directed to obtain security clearance for the tutor.

- Security collects a signed ID request form, tutor's background check, a photo, and a signed copy of the Child Protection Full Code of Conduct.
- Security and HR review the documentation and can recommend approval or denial of the request to the Principal. In all cases, the Principal has final authority over the issuance of a pass to any outside tutors.

The tutor is to present the pass each time at the Sendelta gate in order to gain access to or depart from the campus and is required to wear the pass visibly at all times while on campus. No matter the date of issuance, the pass is valid until the end of the school year in which it was issued.

The tutor is required to perform his/her duties only at the approved designated location unless otherwise approved by the divisional administrator. Any substantive changes to the Facility Use Contract must be submitted and approved.

4. Code of Conduct

Every employee automatically agrees to the expectations detailed in this policy and in particular the Code of Conduct - Long Form (Appendix 6) upon acceptance of their employment and signing of their contract. Employees will be reminded of these expectations on an annual basis or more frequently as may be required.

All visiting adults will be expected to acknowledge, agree to and sign the Code of Conduct as well. Short term visitors will be given instructions about how to access the details of the full Code of Conduct and will receive a shorter version highlighting their behavioral expectations while on campus. The highlights shared with short term visitors are found in Appendix 5.

5. Safe Interaction Reminders

Protect Against False Allegations

It is an expectation that interactions between adults and students at Sendelta are always appropriate. Teachers and community members should be aware however that in international schools around the world, there have been instances where real but also false allegations have been made. To protect against false allegations, the following tips are provided to supplement the Sendelta Code of Conduct:

- Avoid situations in which you are alone with a child. This includes not transporting a child alone in your car. When it is necessary to speak privately with a child, find a space out of earshot, but within sight of others for your conference.
- The privacy of children in situations such as toileting, showering and changing clothes should be respected.
- Minimal physical contact should be used only in the following situations: To prevent or treat an injury; to ensure safety; as a means of instruction; to meet the requirements of a sport or activity; to comfort a student in distress.
- Do not use corporal punishment in any form.
- Sexual jokes, comments of a personal sexual nature, inappropriate physical contact, sensual massages or sexual gestures are not appropriate behavior for an adult staff member or volunteer.
- When volunteering to supervise overnight activities, adults should not share sleeping quarters with children other than their own.
- Maintain your own strict privacy settings on personal online profiles and avoid contact with students on social media and in online forums, such as gaming. Follow the Social Media Policy as described below.

Social Media Policy

Communication with children is governed by the key safety concept of transparency. The following steps will reduce the risk of private or otherwise inappropriate communication between Sendelta parents, administration, teachers, personnel, volunteers, and minors:

- Communication via social media between employees of Sendelta (including volunteers) and minors for any purpose outside the role of the professional or volunteer relationship (teacher, coach, host, etc.) is prohibited and this remains in effect until after the student graduates.
- Where possible, email exchanges between a minor and a person acting on behalf of the school are to be made using a school email address.
- Electronic communication that takes place over a school network or platform may be subject to periodic monitoring.
- Faculty, staff, and volunteers who use any form of online communications including social media and text messaging to communicate with minors may only do so for activities involving school business. These groups should be created and only exist for the duration of the activity and should never be between just one adult and one student.

F. Field Trips and Student Travel

General Expectations

To ensure the safety of children on field trips and overnight travel on school-sponsored trips, the procedures must be adhered to Sendelta Field Trip Policy.

G. External Agencies

According to China's Protection Law for Juvenile, the local Education Bureau and the Public Security Bureau are the authorized support agencies for schools' Child Protection.

Contact Details:

1. The Education Bureau of Bao'an District, Shenzhen

Address: 1 Hongwen Rd, Xin'an Community, Bao'an District, Shenzhen

Tel: +86 755 2960 1185

2. Shenzhen Municipal Public Security Bureau – Tangtou Police Station

Address: 9 Tangtou Ave, Shiyan Community, Bao'an District, Shenzhen

Tel: +86 755 27624999

H. Sources Consulted

International Care for Missing & Exploited Child, Education Portal

<https://www.icmec.org/education%20portal/>

Association of International Schools in Africa. Child Protection Handbook for Teachers, Administrators, and Board Members.

<http://www.icmec.org/wp-content/uploads/2017/03/AISA-CP-Handbook-2016.pdf>

International Task Force on Child Protection, School Evaluation Committee Final Report and Recommendations

<https://www.icmec.org/wp-content/uploads/2016/08/New-Standards-for-Child-Protection-Adopted-by-School-Evaluation-Agencies-2.pdf>

American School of Warsaw Child Protection Policy

<https://www.aswarsaw.org/child-protection-policy>

Criminal Law of the People's Republic of China

<https://www.fmprc.gov.cn/ce/cgvienna/eng/dbtyw/jdwt/crimelaw/t209043.htm>

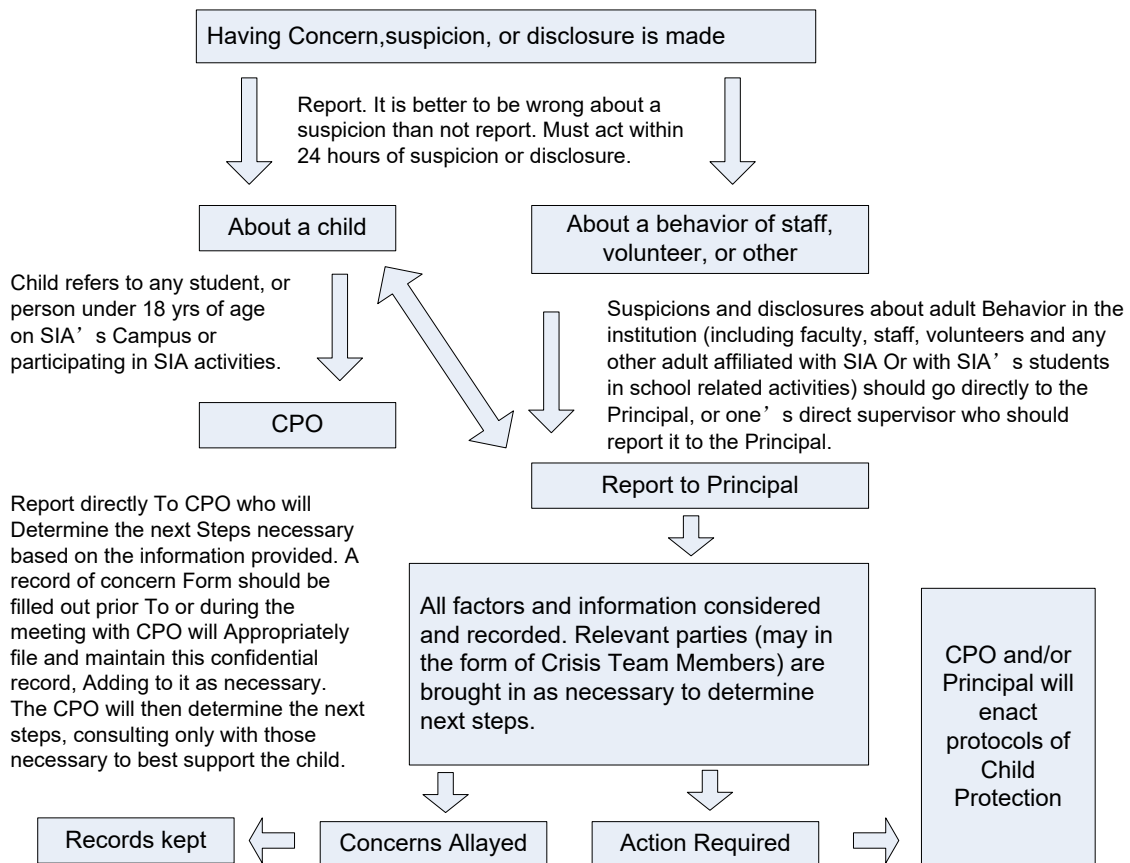
China National Child Protection Legislation (ICMEC)

<https://cdn.icmec.org/wp-content/uploads/2020/08/ICMEC-China-National-Legislation-updated-8-2020.pdf>

Process for Creating Child Protection Policy (CIS)

<https://www.icmec.org/wp-content/uploads/2018/03/Process-for-Creating-Child-Protection-Policy.pdf>

Appendix 1: Reporting Flow Chart



Protocols enacted when action is required:

- Following a report to the designated lead or CPO, an inquiry into the situation will be made. If a definitive conclusion cannot be met regarding the ensured safety of the child, a report to an external agency must be made.
- To do so, the following procedures will occur:
 - A designated lead and or CPO they have determined is best fit based on the situation will fill out the Blue Card (translation is found in [Appendix 4](#)).
 - Where appropriate, the student will be informed about the likely next steps.
 - The school will host a meeting with the parent to express concerns and of the required next step to reach out to Social Services to enact the Blue Card Process.
 - Typically, a meeting and/or home visit will be conducted by a member of the Social Services Committee (translator may be necessary).
 - The school will continue to support the child and collaborate with Social Services.
 - A follow up meeting will be held with the child/family to ensure the child's continued safety and provide support for the family.

*The designated lead will serve as the main contact between Social Services and the family.

*For all concerns that rise to the level of being reported to external services, the school Principal will be informed before the report is made.

Appendix 2: Definitions and Forms of Abuse

Abuse: Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional, education or community setting by those known to them or, more rarely, by others unknown to them (eg via the internet). They may be abused by an adult or adults, or another child or children. Sendelta personnel partake in inductive training via Educare, who defines four main types of abuse: Physical, Emotional, Sexual, or Neglect.

Physical Abuse:

Physical abuse involves someone inflicting physical injury on a child by other than accidental means. This could include cruel or inhumane actions regardless if they result in observable injury, or omissions of action resulting in injury of a child.

Physical abuse may involve:

- hitting
- shaking
- throwing
- drowning
- burning or scalding
- poisoning
- suffocating
- otherwise causing physical harm to a child
- fabricated or induced injury by proxy
- non-contact abuse – such as stress positions.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or induces illness in a child.

- Inflicting physical injury on a child by other than accidental means, causing skin bruising, burns, disfigurement, impairment of physical or emotional health, or loss or impairment of any bodily function.
- Committing acts that are cruel or inhumane regardless of observable injury. Such acts may include, but are not limited to, instances of extreme discipline which demonstrate a disregard of the child's pain or mental suffering.
- Engaging in actions or omissions resulting in injury to, or creating substantial risk to the physical or mental health of a child.
- Failing to take reasonable steps to prevent any of the above.

Emotional Abuse:

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

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may also occur alone.

Emotional abuse may involve:

- rejecting or ignoring a child completely

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- using degrading language or behaviors towards them
- responding to their attempts to interact with emotional detachment
- making fun of them
- threatening them or encouraging them to develop behaviors that are self-destructive
- preventing the child from interacting socially with other children or adults
- experiences of bullying, including online bullying
- a child seeing or hearing the ill treatment of another causing them to feel frequently frightened or in danger, including domestic abuse, or serious bullying (including online bullying)
- the exploitation or corruption of children
- the constant pressure on children to achieve to a far higher level than they can attain
- high criticism and low warmth, shown at times in parent consultations where the parents only question the failures of the child.

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 misuse.

Neglect may involve a parent or carer failing to:

- provide adequate food, clothing or shelter (including exclusion from home or abandonment)
- provide appropriate supervision, such as leaving a child unsupervised at home for any extended period of time
- 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
- respond to a child's basic emotional needs
- withdrawing their interest in the child's education as they may feel they pay the school to educate their child and withdraw from input
- allowing childminders, maids, nannies, drivers and in some cultures extended family members; for example, grandparents to take over the parenting of the child and have very little input in the child's development
- allowing the child all the latest IT and 'gadgets' and abandoning them to these 'material' goods
- provide the love, care and attention children need from their parents.

A child who's neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious long-term damage - even death.

Sexual Abuse:

Sexual abuse involves someone forcing or enticing a child 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. Perpetrators of sexual abuse may be adult men or women, or other children (peer-on-peer abuse).

The activities may involve physical contact, including:

- intentionally touching either directly or through clothing the genitals, anus, or breasts

of a child for any purposes other than hygiene or childcare.

It may also include non-contact activities, such as:

- watching sexual activities
- encouraging children to behave in sexually inappropriate ways
- involving children in looking at, or in the production of, sexual images
- grooming a child in preparation for abuse (including via the internet).

Sexual abuse has some different characteristics than child abuse that warrant special attention. While physical abuse is often the result of immediate stress and not usually planned, sexual abuse requires planning with results that are more insidious.

Peer on Peer Abuse:

Of course, abuse is not limited to harmful behaviors perpetrated by adults – children and young people can abuse too and this is known as peer-on-peer abuse. This is likely to include behaviors such as online bullying, gender-based violence, sexual touching/assaults and sexting. Staff should follow the procedures outlined in their child protection/safeguarding/anti-bullying/behavior policies and discuss concerns with the designated Child Safeguarding Leads.

Grooming:

Grooming is befriending and establishing an emotional connection with a child, and sometimes the family, to lower the child's inhibitions with the objective of sexual abuse. Numerous offenders tend to 'groom' those around a child first, and build a high degree of trust with colleagues and peers. This can make it more difficult for a person to report suspicious behavior.

Appendix 3: Signs and Symptoms of Abuse

The following signs of abuse are not exhaustive and remember that a child may be experiencing more than one type of harm; for example, emotional abuse and neglect. Children regularly collect bumps and bruises in the course of their everyday social interaction, but it doesn't mean that they are being abused. All injuries need to be considered in the light of the age of the child, their stage of development, their social background, where the injuries are on their body and any explanation given.

Physical abuse

Physical signs include:

- fingermark bruising on cheeks or any other area of the body where bruises are unlikely to appear in everyday activity
- presence of injuries that are in several stages of healing suggesting that a child has experienced repeated maltreatment over time
- injuries to the soles of the feet
- bald patches on a child's head
- bite marks, black eyes or broken bones
- injuries that form a shape or pattern e.g. hit with a belt/strap/stick
- bruising to babies that are immobile because they are yet to reach the developmental milestone where they can sit without support, roll over, crawl or shuffle
- scald marks and burning, including cigarette marks and implements such as spoons and cooking utensils
- marks that might indicate a child has been restrained or strangled
- any injuries that are inconsistent with the explanation given.

Please be aware that some children are born with birthmarks that may, on first inspection, be viewed as bruising.

Behavioral signs include:

- flinching when touched
- inability to recall how injuries occurred
- avoiding getting changed for sporting or other activity
- reluctance to go home
- wearing trousers and shirts or blouses with long sleeves even on hot sunny days, although remember to consider this in the light of the individual child (e.g. some children are dressed modestly for religious or cultural reasons)
- excessively eager to please
- very aggressive or withdrawn
- attempts to run away
- sad, frequently cries
- drug or alcohol misuse
- any behavior that is not consistent with a child's stage of development.

Emotional abuse

Physical signs include:

- self-harm marks
- erratic weight or growth patterns delayed development, either physically or emotionally

- erratic behavior
- nervous tics
- estranged parents
- frozen watchfulness (staring, appearing over conscious of a particular adult or adults).

Behavioral signs include:

- difficulty in forming relationships
- inappropriate attention-seeking
- withdrawn
- unexplained underachievement at school
- self-harming
- bed-wetting
- disturbed sleep
- concerns around parents being informed of performance at school.
-

Neglect

Physical signs include:

- poor personal hygiene/unwashed clothing
- inadequate clothing (for example, not having warm clothes in winter)
- lack of energy due to inadequate food intake and/or poor nutrition
- untreated skin or hair problems (such as rashes, sores, flea bites, head lice)
- unattended medical or dental problems
- consistent hunger/big appetite – can't seem to eat enough
- lack of muscle tone (such as, bones appearing to stick out)
- very thin or swollen stomach
- underweight/overweight
- lack of parental involvement
- strong attachment to 'nanny' or driver.

Behavioral signs include:

- difficulty in making friends
- missing or irregularly attending school or nursery
- anti-social behavior
- withdrawn
- steals food or begs it from others
- developmental delay (weight, language, social skills)
- demands constant attention and affection
- alcohol or substance misuse.

Sexual abuse

Physical signs include:

- stomach pains
- genital soreness, bleeding or discharge
- recurring genital-urinary infections
- discomfort in walking or sitting
- sexually transmitted infections
- weight loss or gain
- no signs at all
- Pregnancy.

Behavioral signs include:

- a change in behavior
- not wanting to undress for physical education or sporting activities
- sexual knowledge, language and behaviors beyond their age
- eating disorders
- fear or avoidance of being with a person or a group of people
- withdrawn
- self-harming
- unexplained amounts of money
- disturbed sleep
- sexualized drawings
- going missing from school
- the types of questions asked (do they suggest sexual knowledge that a child should not have)
- being picked up from school by taxis or cars and people who are not known to be the child's family
- sexualized play
- having a fixation with faeces
- enuresis (bed wetting).
-

Some Signs of Offenders

Students

- Unusual interest in sex, sexualizing inanimate objects and activities
- Does not stop sexual misbehavior when told to stop
- Uses force and coercion in social situations
- Unusual intensity when discussing sex and sexuality
- Socializes with children much younger
- Gives gifts, requires secrecy in relationships
- Aggressive language or behaviors toward others
- Continued unwelcome comments towards or about others

Adults

- Has "favorite" student or child
- Attempts to find ways to be alone with children
- Inappropriate language, jokes and discussions about students/children
- Sexualized talk in the presence of students/children
- Gives private gifts or has private chats on social media/internet
- Aggressive behaviors or language towards children

Appendix 4: Record of Action

Please fill this out immediately when a suspicion develops or a disclosure is directly made by a child. Be as specific as possible using direct or paraphrased quotes for disclosures when possible. Please do not fill out this form during a disclosure meeting, as all attention should be given to the child

CHILD PROTECTION RECORD OF ACTION (INITIAL)

Child's Name & Grade: _____

Date and Time of Disclosure/ Concern	
Place of Disclosure/ Concern	

Your Name: _____

Your professional role: _____

PLEASE RECORD WITH AS MUCH DETAIL AS YOU CAN RECALL, YOUR INTERACTIONS, STUDENT STATEMENTS, AND YOUR ACTIONS REGARDING THE CHILD PROTECTION CONCERNS:

When did incident take place:

Description of disclosure/concern:

Name/relationship of alleged perpetrator:

Details:

(Record ctd...)

PLEASE IDENTIFY ANY OTHER PROFESSIONALS WHO MAY VERIFY YOUR STATEMENT:

WHO DID YOU REPORT YOUR ACTIONS/OBSERVATIONS TO, WHEN:

Signed: _____

Dated: _____

Child Protection Officer and/or Principal

Appendix 5: Code of Conduct for Short Term Visitors

KEY REMINDERS Regarding the Sendelta Code of Conduct

All adults on our campus must comply with ALL our regulations regarding child protection/safeguarding. Listed below are reminders of a few items from our full code of conduct that are most applicable to short term visitors.

The Sendelta International Academy Shenzhen is committed to safeguarding and promoting the welfare, both physical and emotional, of every student both inside and outside the school premises.

DO

- Do avoid behavior that might be misinterpreted by others;
- Do be aware of and comply with policies regarding designated bathrooms;
- Do engage with students/children only in open visible areas;
- Do report individuals without badges or engaging in suspicious behavior to security.

DO NOT

- Do not engage in the unauthorized photography of students on campus;
- Do not use bathrooms or locker rooms designated for student use only;
- Do not engage in any behavior that could be interpreted as harassment or bullying;
- Do not engage in any physical contact with a student/child other than your own.

Appendix 6: Code of Conduct Long Form

Sendelta Code of Conduct

In addition to the expectations outlined in the Sendelta job description and staff handbooks, all adults who work with and around students have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work. Conduct applies to environments within the workplace, outside of the workplace, and in the 'virtual' world.

I will not engage in Discrimination

- No employee or student may be discriminated against, favored, harassed or ostracized as a result of race, skin color, nationality, parentage, creed, gender, age, sexual orientation, physical constitution or appearance. Any such behavior in the workplace or place of training is not tolerated by Sendelta.

I will not engage in Bullying

- Bullying, without a sexual element, can be described as repeated emotional or physical harassment with the intent to harm the victim. Bullying can often involve a difference in power and therefore employees must pay special attention to their own interactions as well as student interactions that could be construed as bullying;
- All validated cases of such behavior will lead to disciplinary action. The Board members, principals, teachers and other employees are called on to participate actively in measures to hinder and prevent bullying.

I will not engage in Sexual Harassment or Abuse

- Sexual harassment or abuse are completely and absolutely prohibited. No one's position or role gives them the right to abuse it by pursuing personal interests of a sexual, emotional or professional nature;
- Sexual harassment is an infringement of personal integrity and the individual's right to privacy. Sexual harassment in the workplace or place of training is not tolerated at Sendelta;
- Sexual harassment can take the form of words, gestures and deeds. This might mean:
 - insinuating and suggestive remarks about the appearance of a person;
 - sexist comments and jokes about sexual characteristics, sexual behavior and the sexuality of women and men;
 - showing or displaying pornographic material;
 - issuing unwanted invitations with unmistakable intent;
 - unwanted bodily contact;
 - stalking in or outside the school (including online);
 - attempting to get close in a way which involves promises of advantage or threat of disadvantage; sexual assault, coercion or rape.

I will not engage in Sexual Conduct with students

- Any sexual behavior by an employee with or towards a student is unacceptable;
- It is an offence for a member of faculty/staff in a position of trust to engage in sexual activity with a student at the school or a young person under 18 years of age and sexual activity with a student will result in criminal and/or disciplinary procedures;
- Sexual activity involves physical contact, including penetrative and non-penetrative acts, however it also includes non-contact activities, such as causing students to engage in online discussions of a sexual nature or watch sexual activity or the production of pornographic material.

I will not have Physical Contact with students except under the following guidelines:

- There are occasions when it is entirely appropriate and proper for faculty/staff to have physical contact with children, however, it is crucial that they only do so in ways appropriate to their

professional role and in relation to the student's individual needs. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one student, in one environment, may be inappropriate in another, or with a different student. Therefore, employees should use their professional judgement based on the following:

- Physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development;
- Physical contact should take place only when it is necessary in relation to a particular activity;
- Physical contact should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary;
- Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority;
- If an employee believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to their direct supervisor.

I will not use Physical Intervention or Physical Restraint except under the following guidelines:

- Physical intervention/restraint can be an appropriate measure/action in extreme situations. However, great care must be exercised in order that adults do not physically intervene in a manner which could be considered unlawful.
- Adults may reasonably intervene to prevent a child from:
 - committing a criminal offence;
 - injuring themselves or others.
- Adults should:
 - always seek to defuse situations and avoid the use of physical intervention wherever possible
 - remove others from potential harm, send for support;
 - seek to have a restraint trained professional intervene if possible;
 - where physical intervention is necessary, only use minimum force and for the shortest time needed.

I will limit my Communication with Students using technology according to the following guidelines:

- In order to make best use of the many educational and social benefits of new and emerging technologies, students need opportunities to use and explore the digital world. E-safety risks are posed more by behaviors and values than the technology itself.
- Faculty/staff should ensure that they establish safe and responsible online behaviors, adhering to the Sendelta International Academy Shenzhen Anti-Bullying Policy.
- Communication with students both in the 'real' world and interactions in the 'virtual' world should take place within explicit professional boundaries and maintain the standards of a traditional student-teacher relationship.
 - faculty/staff should not request or respond to any personal information from students other than which may be necessary in their professional role;
 - faculty/staff should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behavior';
 - faculty/staff should not seek to communicate/make contact or respond to contact with students outside of the purposes of their work;
 - faculty/staff should not give out their personal details unless pre-agreed for work purposes;
 - faculty/staff should only use communication platforms approved by the school.

I will manage all use of Images, Videos, and Other Media according to the following guidelines:

- Many educational activities involve recording images. These may be undertaken for displays,

publicity, to celebrate achievement and to provide records of evidence of the activity. Whilst images are regularly used for very positive purposes adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. This means that adults should:

- adhere to the Sendelta Rules on Usage of Electronic Communication and Information Media;
 - only retain images when there is a clear and agreed purpose for doing so;
 - store images in an appropriate secure place defined by the school and then delete from any personal device;
 - avoid making images in one to one situations.
- This means that adults should not:
 - take images of students for their personal use;
 - display or distribute images of students unless they are sure that they have parental consent to do so;
 - take images of children which could be considered sexually suggestive, demeaning, or otherwise inappropriate in anyway.

I will not Expose Children to Inappropriate Images

- Adults should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images.
- This means that employees should:
 - abide by the Sendelta International Academy Shenzhen Anti-Bullying Policy;
 - only show films or material that have ratings appropriate for the ages of the children intended to view (it is important to also consider the diverse nature of our school and the varying values and belief systems represented in it. If there is a question whether a film or material would be appropriate, employees should seek permission from their direct supervisor);
 - under no circumstances should any adult use school setting or equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace.

I will work in One to One Situations according to the following guidelines:

- Adults working in one to one situations with students, including visiting adults from external organizations, can be more vulnerable to allegations or complaints. To safeguard both children and adults, a risk assessment in relation to the specific nature and implications of one to one work should always be undertaken.
- This means that adults should:
 - ensure that wherever possible there is visual access and/or an open door/see through window in one to one situations;
 - always report (to a direct supervisor) any situation where a pupil becomes distressed or angry;
 - consider the needs and circumstances of the student involved.
- This means adults should not:
 - enter or use student only designated bathrooms or locker rooms.

I will not Transport Students except in accordance with the following guidelines:

- In certain situations, employees or volunteers may be required to or offer to transport students as part of their work. As for any other activity undertaken at work, the adult has a duty to keep young people safe and to protect them from physical and emotional harm.
 - Employees should not offer to transport students unless the need for this has been agreed by a direct supervisor, the student and their parent/guardian.
 - Employees should ensure that their behavior is safe and that the transport arrangements, driver and the vehicle meet all legal requirements.
- Employees should never offer to transport students outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their line manager and the child's

parent(s).

- This means that employees should:
 - plan and agree arrangements with all parties in advance respond sensitively and flexibly where any concerns arise
 - take into account any specific or additional needs of the pupil
 - have an appropriate license/permit for the vehicle
 - ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive
 - ensure that if they need to be alone with a student this is for the minimum time
 - be aware that the safety and welfare of the student is their responsibility until this is safely passed over to a parent/carer
 - ensure that any impromptu or emergency arrangements of transportation are recorded and can be justified
 - ensure all passengers wear seatbelts
 - adhere to current legislation regarding the use of car seats for younger children
 - ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

I will follow the guidelines for Field Trips & Educational Visits

- Faculty/staff responsible for organizing educational visits should be familiar with the Sendelta Field Trip Risk Management Procedures.
- Trip leaders, with oversight from Divisional Principals or Activities/Athletics Directors, are responsible for ensuring that all potential risks have been assessed, and appropriate precautions taken, in line with the Sendelta Field Trip Risk Management Procedures.
- Faculty/staff should take particular care when supervising students in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. However, adults remain in a position of trust and need to ensure that their behavior cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

I will follow the guidelines for Reporting all disclosures and suspicions as outlined

- All faculty and staff at the Sendelta International Academy Shenzhen are mandated to report incidents of, or concerns about any type of abuse or maltreatment of a child according to the procedures. The reporting must be done within the next school day, or at most within 24 hours.

I will follow all guidelines related to security

- Faculty and Staff must wear visible ID badges at all times when in the school building and on school grounds.
- Sendelta has designated bathrooms for students and adults. All faculty and staff are expected to only use those identified for adults.
- All spaces in the building provide for line of sight, including windows in doors. All faculty and staff must maintain this line of sight at all times.

I will assure that I am prepared to offer First Aid to students

- All faculty and staff with direct contact with students, are obliged to maintain an up to date first aid qualification.
- Sendelta nurses will provide sufficient opportunities to fulfil this obligation by offering first aid courses throughout the school year.

Signature

Date