GREEN OASIS SCHOOL

CHILD PROTECTION AND SAFEGUARDING POLICY 2026-27

Policy Number	4.5
Effective date	August 2026
Review date	August 2027 (or sooner if law, guidance or circumstances change)
Policy owner	Designated Safeguarding Leads (DSLs)
Primary DSL	Carel West | Carel.West@greenoasis.org.cn
Secondary DSL	Melissa Fitzgerald | Melissa.Fitzgerald@greenoasis.org.cn
Approved by	GOS SLT and Board
Applies to	All students; all staff, leaders, board members, volunteers, interns, contractors, consultants, visitors and other adults working for or on behalf of GOS

Document status and use

This policy sets the minimum safeguarding requirements for Green Oasis School (GOS). Where another GOS policy sets a higher standard, the higher standard applies. Where local law imposes a requirement, local law prevails.

Contents

- 1. Purpose, commitment and principles
- 2. Scope and key definitions
- 3. Safeguarding governance and responsibilities
- 4. Prevention and a safer organisation
- 5. Recognising concerns
- 6. Responding to a concern or disclosure
- 7. Decision-making, external reporting and support
- 8. Concerns or allegations about adults
- 9. Child-on-child abuse
- 10. Online safety and digital safeguarding
- 11. Information sharing, records, transfer and retention
- 12. Training, assurance and policy review
- Appendices A-H

1. Purpose, commitment and principles

GOS believes every child has the right to learn and develop in an environment that is safe, inclusive and conducive to wellbeing. Safeguarding is integral to the school vision, “Educate, Nurture, Inspire Excellence”. This policy explains how GOS prevents harm, identifies concerns, responds promptly, and supports children.

1.1 Objectives

- Place the best interests, safety, dignity and voice of the child at the centre of decisions.
- Prevent abuse, neglect, exploitation and avoidable harm arising in person or online, at school or beyond school.
- Give every adult a clear, immediate and accessible reporting route.
- Respond in a timely, child-centred and trauma-informed manner without prejudicing external enquiries.
- Meet applicable laws and regulations of the People’s Republic of China and draw on recognised international safeguarding practice.
- Promote an open culture in which concerns, mistakes and low-level boundary issues are reported and addressed.

1.2 Guiding principles

- Safeguarding is everyone’s responsibility.
- The child’s welfare and best interests are the primary consideration.
- Children are listened to, taken seriously and kept appropriately informed.
- All children have equal rights to protection; responses consider age, development, disability, language, culture, identity and other vulnerabilities.
- A concern does not need proof. Staff report reasonable concerns; trained leaders decide next steps.
- Information is shared on a need-to-know basis when necessary and proportionate to protect a child.
- No concern is dismissed as “banter”, “part of growing up” or merely an online matter.

The policy is informed by the United Nations Convention on the Rights of the Child, particularly the rights to protection from violence, abuse, neglect and sexual exploitation, and by international child-safeguarding standards.

2. Scope and key definitions

2.1 Scope

This policy applies whenever GOS has a duty of care or a safeguarding interest, including on campus, transport, educational visits, sports and activities, online learning, school communications, and concerns arising outside school that affect a student's safety or school community.

2.2 Definitions

Term	Meaning
Child	Any person under 18. GOS applies this policy to all enrolled students even if local legal terminology differs.
Safeguarding	The preventive and responsive actions taken to promote children's welfare and protect them from maltreatment, impaired health or development, exploitation and unsafe care.
Child protection	The part of safeguarding concerned with a child who is suffering, or may be at risk of, abuse or significant harm.
Concern	Any information, observation, disclosure, change, pattern, incident or intuition that suggests a child may need help or may be at risk. Proof is not required.
Abuse	A form of maltreatment by an adult or another child. It may be a single act or a pattern; deliberate or arising through failure to act; in person or online.
Child-on-child abuse	Abuse by one or more children against another child, including physical, sexual, emotional or financial abuse, coercive control, bullying, harassment, exploitation, hazing and online abuse.
Allegation	A claim or report that a person who works or volunteers with children may have harmed a child, committed an offence against a child, or behaved in a way that indicates they may pose a risk to children. An allegation is not proof of wrongdoing and must be handled fairly, confidentially and in accordance with the school's safeguarding procedures.
Adult conduct concern	Any concern that an adult may have acted inconsistently with the staff code of conduct or professional boundaries, even if the behaviour does not meet the threshold for an allegation. *(Formerly commonly known as a "Low-Level Concern")*

3. Safeguarding governance and responsibilities

3.1 Named safeguarding team

Role	Secondary	Primary
Designated Board Safeguarding Member (DBSM)	Pauline Zhang	
Principal	Peter Garnhum	

Role	Secondary	Primary
Designated Safeguarding Lead (DSL)	Melissa Fitzgerald	Carel West
Child Protection Officers (CPOs)	Luke Sheridan; Dawn Yu	George Lourens; Dawn Yu
Counsellors	Emily Johnson; Tobey Guo	Fiona Castorina; Emily Hua

3.2 Responsibilities

The Board/Governing Body:

- approves this policy and holds the Principal accountable for implementation;
- appoints a Board safeguarding lead, receives at least termly assurance and ensures sufficient resources, independence and training;
- ensures a safe route exists for concerns about the Principal or a board member;
- reviews anonymised trends, audit findings and the safeguarding action plan without receiving unnecessary case details.

The Principal:

- creates an open safeguarding culture and ensures this policy is implemented across all functions;
- ensures allegations or low-level concerns about adults are managed through the correct safeguarding and employment procedures;
- ensures the safeguarding team can act, escalate, obtain specialist advice and contact external authorities without inappropriate delay.

The Lead DSL/DSLs:

- provide operational leadership and are available during school operations, with effective cover for absence and activities off site;
- triage concerns, determine immediate safety actions, coordinate referrals, record decisions and oversee support plans;
- maintain the local safeguarding resource map and professional contacts;
- monitor patterns across attendance, behaviour, health, counselling, online-safety and safeguarding information;
- ensure records are secure and transferred appropriately when a child changes school;
- lead training, annual review, audit, and the safeguarding action plan.

CPOs support the DSLs and may lead agreed case actions. Counsellors provide therapeutic or wellbeing support but do not replace the reporting and child-protection process. Where a safeguarding team member has a conflict of interest, the case is reassigned and access to the record is restricted.

All adults must:

- maintain professional boundaries and follow the Code of Conduct;
- notice, listen, record and report concerns immediately;
- never promise secrecy, conduct their own investigation, confront an alleged person, or delay while seeking certainty;
- preserve possible evidence and cooperate with authorised enquiries;
- challenge unsafe practice and use escalation or whistleblowing routes when necessary.

4. Prevention and a safer organisation

4.1 Safer recruitment and suitability

GOS applies safer recruitment to employees and other roles with access to children. The process must include role-specific risk assessment, identity and qualification checks, employment history and gap scrutiny, structured safeguarding questions, at least two references obtained directly (including the most recent relevant employer), appropriate criminal-record/police checks for countries lived or worked in, and documented decision-making. Checks are completed before unsupervised access unless a senior leader approves and records a tightly controlled risk assessment. The school maintains a central record of required checks and renewals. Further details are found in the *Safer Recruitment Policy (2.4)*.

Contracts with agencies and suppliers must require equivalent screening, safeguarding training, conduct standards, supervision, reporting and removal arrangements. GOS verifies compliance rather than relying solely on assurances.

4.2 Code of conduct and professional boundaries

All staff, regular volunteers and relevant contractors sign the GOS Safeguarding and Child Protection Code of Conduct on appointment and re-sign it annually. The Code addresses one-to-one working, communication, transport, gifts, favouritism, touch, intimate care, photography, personal devices, social media, tutoring, confidentiality, relationships and reporting of boundary concerns.

4.3 Visitors, volunteers and contractors

- Visitors sign in, display identification and receive concise safeguarding instructions and a reporting route.
- Occasional volunteers remain under direct supervision and have no unsupervised access to students.
- Regular volunteers and interns receive role-appropriate screening, induction, training and supervision.
- Contractors are risk-assessed; access is zoned and supervised unless full checks and training justify otherwise.
- Any adult may be refused access or removed when safety requirements are not met.

4.4 Education, participation and inclusion

Students receive age-appropriate, culturally responsive learning about healthy relationships, consent and bodily autonomy, bullying, online safety, exploitation, help-seeking and how to report concerns. Reporting routes are accessible in English and Chinese and adapted for younger students and students with communication or additional needs. GOS regularly seeks student feedback about safety and acts on patterns.

The safeguarding team gives particular attention to children whose circumstances may increase vulnerability, including disability or additional needs, communication barriers, social isolation, frequent absence, care arrangements, family stress, discrimination, previous trauma, online exposure, or being new to the school or country. Vulnerability never reduces a child's credibility or right to participate in decisions.

4.5 Site, activities and risk management

Safeguarding is embedded in supervision, transport, toilets and changing rooms, educational visits, sports, performances, medical care, photography, facilities design, CCTV governance, third-party activities and emergency planning. Risk assessments consider adult access, privacy, communication, missing students, and online components. Appendix F provides the bathroom/changing-room response procedure.

5. Recognising concerns

Safeguarding concerns may arise from a disclosure, observation, injury, behaviour change, attendance pattern, online activity, information from another person, boundary concern, or a combination of small indicators. Indicators do not prove abuse and their absence does not rule it out. Staff should remain professionally curious and report patterns and intuition as well as incidents.

5.1 Main forms of harm

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse, harassment and exploitation
- Neglect
- Child-on-child abuse
- Bullying and cyberbullying
- Grooming and abuse of trust
- Online abuse, sexual coercion/extortion and creation or sharing of sexual images
- Commercial or criminal exploitation, trafficking and forced activity
- Domestic abuse and exposure to violence
- Hazing or initiation practices
- Discrimination-based abuse
- Self-harm, suicidal ideation or other serious welfare risks (managed as safeguarding concerns even when not caused by abuse)

Further descriptions and possible indicators are in Appendix A.

6. Responding to a concern or disclosure

Immediate danger: If a child needs urgent medical help or is in immediate danger, call the relevant emergency service (police 110; ambulance 120), ensure immediate safety, and notify a DSL as soon as possible. Do not delay emergency action to complete an internal process.

6.1 What every adult must do

1. Listen calmly and give the child time. Use the child's preferred language or an appropriate interpreter; do not use a family member or another child as interpreter for a sensitive disclosure.
2. Take the child seriously. Reassure them that they did the right thing by telling and that the abuse is not their fault.
3. Do not promise confidentiality. Explain that information will be shared only with people who need to help keep them safe.
4. Ask only minimal, open prompts needed to clarify immediate safety, such as "Tell me what happened" or "What happened next?". Do not use leading questions, press for detail, investigate, interview witnesses or confront the alleged person.
5. Do not photograph injuries unless specifically directed under an approved procedure. Preserve messages, images, devices or other possible evidence without forwarding, copying unnecessarily or viewing illegal content.
6. Make an accurate, contemporaneous record: date, time, location; who was present; the child's exact words; observations; questions asked; actions taken; and your name. Distinguish fact, observation and opinion.

7. Report immediately to a DSL/CPO through CPOMS. If CPOMS is unavailable or the reporter has no access, contact a DSL/CPO in person and complete the Record of Concern in Appendix C.
8. Continue reporting until you know an appropriate safeguarding leader has received the concern. Do not assume someone else has reported it.

6.2 If the normal route is unavailable or unsafe

- If no DSL/CPO can be reached and delay may place a child at risk, contact the Principal and take necessary emergency action.
- If the concern is about a DSL/CPO, report to the Principal.
- If the concern is about the Principal, report to the Designated Board Safeguarding Member (email)
- If a concern is not acted upon, or the reporter reasonably believes a child remains at risk, escalate to the Principal, Board Safeguarding Member or appropriate external authority.
- No person will suffer retaliation for raising a genuine concern in good faith. Deliberately false or malicious reports may be addressed under applicable procedures, but an unsubstantiated concern is not the same as a malicious one.

7. Decision-making, external reporting and support

7.1 DSL triage and safety planning

On receiving a concern, the DSL/CPO (in concert with representative members of the Safeguarding leadership team) records the report and promptly assesses immediate safety, medical needs, risk to other children, conflicts of interest, possible evidence, need for external reporting, parental communication and support. Actions, advice, decisions, rationale, owners and review dates are recorded on CPOMS. Fact-finding is limited to what is necessary for safety and decision-making and must not compromise police or other authorised enquiries.

7.2 Reporting under PRC law

GOS will comply with the Law of the People's Republic of China on the Protection of Minors, the Anti-Domestic Violence Law, the 2020 Opinions on Establishing a Mandatory Reporting System for Cases Involving Harm to Minors (Trial), and other applicable national and Shenzhen requirements. Organisations and workers in sectors with close contact with minors, including schools, have mandatory-reporting duties when they discover that a minor has suffered or is suspected of suffering unlawful harm, or faces a risk of unlawful harm, within the circumstances specified by law or official guidance. Reports are made promptly to the public security organ and, where required, to the competent authority for filing.

Local verification required: Before approval, GOS should have qualified PRC counsel confirm the exact current thresholds, recipients, documentation, timelines, confidentiality protections and Shenzhen contacts. The school's local resource map must be reviewed at least annually.

All safeguarding concerns are reported internally. Internal reporting does not replace a legal duty to report externally and must not cause delay. In an emergency, contact police on 110 or ambulance on 120. The DSL documents who was consulted, who made the external report, the time, reference number and advice received. Adults must cooperate with lawful enquiries and preserve confidentiality.

7.3 Parents and the child

The DSL normally considers how and when to involve the child and parents/guardians. Parents are not informed before advice is obtained when doing so may increase risk, lead to loss of evidence, cause flight or

intimidation, conflict with a child's best interests, or be contrary to law or external-agency instructions. The child's views are heard and given appropriate weight, but the school may act without consent where necessary to protect the child or another person.

7.4 Support and review

A child-centred support and safety plan may include a trusted adult, medical or counselling support, academic adjustments, attendance monitoring, online-safety measures, separation or supervision arrangements, and review dates. Support is considered for all affected children, including a child alleged to have caused harm. Counselling is offered when appropriate but is not automatic and does not substitute for protective action.

8. Concerns or allegations about adults

This section applies to current or former staff, leaders, board members, volunteers, contractors and other adults connected with GOS, regardless of where the behaviour occurred. Concerns include behaviour that may have harmed a child, may constitute an offence, may indicate risk of harm, may show unsuitability to work with children, or may breach professional boundaries.

8.1 Reporting routes

- Report any concern about an adult immediately to the Principal through the confidential adult-concern route, not as an ordinary student case visible to unnecessary staff.
- A concern about the Principal goes directly to the Designated Board Safeguarding Member (DBSM).
- A concern about a board member goes to the Board Chair.
- If a child may be in immediate danger or a crime may have occurred, emergency and mandatory-reporting duties apply regardless of the person's position.

8.2 Managing allegations

The Principal or Board authority secures immediate safety, preserves evidence, restricts information to those who need it, obtains specialist safeguarding, legal and HR advice, and determines whether an external report is required. The school does not conduct a substantive internal investigation before police or other authorities have advised that it will not prejudice their work. Any precautionary change to duties or access is neutral, risk-based, regularly reviewed and not treated as proof. The welfare of the child is paramount; appropriate support and procedural fairness are provided to all parties.

8.3 Low-level concerns and self-reporting

Adults must report conduct that appears inconsistent with the Code of Conduct, including over-familiarity, favouritism, inappropriate one-to-one situations, inappropriate communication, humiliating language, unauthorised images, boundary crossings or behaviour that creates unease. Adults are encouraged to self-report accidental boundary breaches, situations that may be misinterpreted, or personal circumstances that may affect safe practice. Adult conduct concerns are recorded securely, reviewed for patterns and addressed proportionately. A series of adult conduct concerns may meet the allegation threshold.

8.4 Whistleblowing

Anyone who believes safeguarding practice is unsafe, concerns are being suppressed, or leaders have failed to act must use the escalation route in Appendix G. Reports may be made in good faith without fear of retaliation. Confidentiality will be protected as far as possible, but anonymity cannot always be guaranteed where action is required.

8.5 When an Employee Leaves GOS

GOS will not enter into a confidentiality, non-disclosure settlement, or separation agreement that prevents the school from completing a safeguarding inquiry, reporting concerns to appropriate authorities, maintaining necessary records or providing accurate safeguarding information in a professional reference.

9. Child-on-child abuse

GOS recognises that children can abuse other children and that it may occur inside or outside school and online. The absence of a report does not mean it is not happening. GOS maintains a zero-tolerance approach to abuse while avoiding labels that define children solely by an incident.

- Treat every report seriously, including single incidents and harmful sexual behaviour.
- Ensure immediate safety and consider risk to the reporting child, the alleged child, witnesses and the wider peer group.
- Record and refer through the normal safeguarding route; do not manage serious harm only as a behaviour matter.
- Avoid forced mediation, apology or restorative work where there is coercion, sexual harm, fear, significant power imbalance or continuing risk.
- Complete proportionate risk and needs assessments and consider supervision, timetable, transport, online and contact arrangements.
- Listen to each child separately and provide appropriate support. Do not promise a particular outcome.
- Consider external reporting duties and specialist advice.
- Address harmful group norms, retaliation, rumours and online redistribution without identifying children unnecessarily.

10. Online safety and digital safeguarding

Online safety is a safeguarding responsibility, not solely an IT matter. GOS uses education, appropriate filtering and monitoring, secure systems, staff training, reporting routes and parental engagement to reduce risk while supporting children's rights and learning. Concerns may include cyberbullying, grooming, sexual exploitation, coerced or self-generated sexual images, sexual extortion, live-streaming, harmful content, impersonation, location exposure, privacy breaches and compulsive use.

Staff use school-approved accounts, platforms and devices in accordance with the Responsible Use of Technology Policy and Code of Conduct. They do not communicate with students through personal or disappearing-message accounts, store student images on personal devices beyond an expressly authorised temporary workflow, or share identifying student content without permission and a legitimate purpose.

When sexual images of a child may exist, staff must not ask the child to download, forward or display them and must not copy or distribute the content. The DSL seeks specialist/police advice, preserves contextual information safely and manages immediate risk. Online incidents are assessed for offline risk and vice versa.

11. Information sharing, records, transfer, and retention

11.1 Purpose, Oversight, and Confidentiality

Accurate safeguarding records enable GOS to protect children, identify patterns, coordinate support, monitor interventions and demonstrate appropriate decision-making. The Lead DSL oversees student safeguarding records; the Principal oversees records relating to adult conduct concerns and allegations.

Safeguarding information is confidential but not secret. It may be shared when necessary to protect a child or comply with law. Information sharing must be necessary, proportionate, relevant, adequate, accurate, timely and secure. Consent should be sought where appropriate, but is not required where seeking it could increase risk, impede an investigation or conflict with a legal or safeguarding duty.

11.2 Reporting and Recording

Access is restricted to those with a legitimate need to know. Decisions to share or withhold information must record what was shared, with whom, when, by what method and the reason for the decision. Uncertainty about data-protection requirements must not prevent necessary safeguarding action; appropriate legal or professional advice should be obtained where required.

CPOMS is the authorised system for student safeguarding records. Concerns should be appropriately categorised to support case management and analysis of patterns, including online, physical, emotional, sexual and identity-based abuse; neglect; child-on-child abuse; self-harm; mental-health concerns; and other relevant risks.

Concerns must be recorded promptly, even if some details are unavailable. The initial record should include, where known:

- the reporter's name, role and relationship to the child;
- the child's identifying details;
- the date, time and location of the incident, disclosure or observation;
- a concise factual account, using the child's own words wherever possible;
- the names of witnesses or others involved; and
- details of relevant supporting information.

Records must use clear, objective language and distinguish between fact, direct quotation, observation, professional opinion and third-party information. They must avoid speculation, euphemistic, blaming or discriminatory language. The original account must not be altered; corrections and later information must be added as separate, dated entries.

11.3 Evidence, Actions, and Case Management

Relevant emails, written accounts, body maps, drawings, screenshots, risk assessments and safety plans should be securely attached or linked to the record.

Staff must not search for, request, copy, download, print, forward, upload or retain nude or sexually explicit images of a child. The existence and nature of such material should be recorded without reproducing it, and the DSL must be informed immediately.

Each record must provide a clear chronology of:

- risk assessments and immediate protective action;
- decisions, actions and the reasons for them;
- consultation with the child and parents, where appropriate;
- internal support, external referrals and professional advice;
- monitoring or safety plans, responsible persons and review dates; and
- outcomes and the reason for closing the record or taking no further safeguarding action.

Cases must be reviewed at appropriate intervals. Closing a case means that current action or monitoring has ended; it does not mean that the record is deleted.

11.4 Security and Access

Safeguarding records must be separate from general academic, behaviour and personnel files. Access must be role-based, regularly reviewed and removed when no longer required. Systems must use secure

authentication, access logs and appropriate restrictions on editing, deleting, downloading, printing and exporting information.

Safeguarding information must not be stored on personal devices, personal accounts, unsecured drives or unauthorised platforms, nor entered into public or consumer artificial-intelligence systems. Paper records, where unavoidable, must be handed directly to the DSL or Principal and stored in a locked, access-controlled location.

Any loss, unauthorised access, disclosure or suspected data breach must be reported immediately to the Principal, DSL and the person responsible for data protection.

11.5 Adult Conduct Concerns and Anonymous Reports

Adult conduct concerns and allegations must be reported directly to the Principal and maintained in a separate, highly restricted record. Records must include the concern, decisions, reasons, actions, advice and outcome. A student's safeguarding record may note that the student raised an adult-related concern but must not contain unnecessary identifying or employment information about the adult.

Anonymous reports must be taken seriously, risk-assessed and responded to as far as the available information permits. Anonymous-reporting systems must clearly explain how reports are handled, restrict access, maintain appropriate security and provide instructions for obtaining urgent help.

11.6 Transfer of Records

When a child leaves GOS, the DSL must review the safeguarding record and determine what information should lawfully and appropriately be shared with the receiving school.

Where transfer is necessary:

- records must be sent securely and separately from the academic file;
- information should be sent directly to the receiving school's DSL or equivalent;
- urgent risks should be communicated through direct professional contact;
- receipt must be confirmed; and
- the date, recipient, method and reason for transfer must be documented.

The child and parents should be informed where appropriate, unless doing so could increase risk, impede an investigation or conflict with law or official advice.

11.7 Analysis, Governance, Retention, and Disposal

The safeguarding team will periodically review anonymised and aggregated data to identify trends, repeated concerns, emerging risks, gaps in provision and training or resource needs. The Lead DSL will provide the Board with an annual safeguarding report containing anonymised information about safeguarding activity, trends, risks, training and development priorities. Relevant findings will inform the safeguarding risk register and improvement planning.

GOS will maintain a written retention schedule, informed by appropriate PRC legal, employment and data-protection advice, covering student safeguarding records, adult conduct concerns and allegations, anonymous reports, transferred records and access logs.

Records will be retained only for as long as required by safeguarding, evidential, insurance or legal considerations. A blanket rule of indefinite retention will not be applied without a lawful basis. At the end of the applicable retention period, disposal must be authorised, secure and documented.

12. Training, assurance and policy review

12.1 Training

- All new staff complete face-to-face induction and required online safeguarding training before receiving normal access/lanyard privileges.
- All staff complete an annual refresher and regular scenario-based updates, including disclosure response, child-on-child abuse, online harm, adult concerns and local reporting.
- DSLs/CPOs receive advanced role training at least every two years and update knowledge throughout each year.
- Recruiting leaders receive safer-recruitment training at least every two years.
- Board members receive governance-level safeguarding training; the Board safeguarding lead receives enhanced training.
- Contractors, outsourced staff, volunteers and visitors receive training or briefing proportionate to their role and access.
- Training completion, understanding and impact are recorded and evaluated in English and Chinese as needed.

12.2 Assurance and review

The safeguarding team meets at least termly to review practice, themes, training, the resource map, and the safeguarding action plan. The Board receives anonymised assurance at least termly. GOS completes an annual self-review and periodic independent review, tests reporting routes, audits safer-recruitment records and samples case records for quality and timeliness. The policy is reviewed annually and sooner after a serious incident, audit finding, legal change, organisational change or learning review.

Appendix A - Categories and possible indicators of abuse

Indicators are not proof and must be considered in context. A child may show no obvious signs. Report concerns rather than attempting to diagnose or investigate.

Category	Description	Possible indicators
Physical abuse	Hitting, shaking, burning, poisoning, suffocating, inappropriate restraint, fabricated or induced illness, or failure to prevent physical injury.	Unexplained or patterned injuries; inconsistent accounts; repeated injuries after absence; fear of particular adults; flinching; reluctance to change clothes; medically unexplained symptoms.
Emotional abuse	Persistent emotional maltreatment, rejection, humiliation, threats, coercive control, isolation, discrimination, exposure to domestic abuse, or developmentally inappropriate expectations.	Marked anxiety, withdrawal or aggression; low self-worth; excessive compliance; developmental delay; sudden behaviour or attainment changes; self-harm; extreme fear of failure.
Sexual abuse/exploitation	Involving a child in sexual activity or sexualised conduct, whether or not the child understands; contact or non-contact acts; grooming; sexual images; sexual harassment; coercion or exchange. A child cannot consent to abuse.	Sexual knowledge or behaviour not expected for development; pain/injury; pregnancy or STI; unexplained gifts; secrecy; fear of a person/place; sudden online secrecy; distress linked to devices; running away.
Neglect	Persistent failure to meet basic physical, medical, emotional, educational or supervisory needs, including unsafe caregivers or prolonged lack of responsible care.	Hunger, poor hygiene, unsuitable clothing, untreated medical needs, fatigue, frequent absence, being left alone, caring responsibilities, unreachable caregivers, poor growth or development.

Category	Description	Possible indicators
Grooming/exploitation	Building trust, dependency, secrecy or leverage to facilitate abuse or exploitation; may be by adults or children and occur online or offline.	Secret relationships, unexplained money/devices, multiple accounts, older associates, missing episodes, coded communication, isolation, threats, debt, transport or accommodation controlled by others.

Child-on-child and online indicators

- Fear of peers, avoidance of areas or transport, damaged belongings, social exclusion, sexualised rumours, coercion, controlling relationships, unexplained injuries or money.
- Changes in device use, panic when messages arrive, account deletion, sleep disruption, secret contacts, requests for money, threats to share images, or content being circulated.
- Harm may be reciprocal, group-based or difficult to separate from friendship or dating. Power imbalance can arise from age, status, popularity, disability, knowledge, images, money or social control.

Appendix B - Reporting a concern about a student

- Immediate danger or urgent medical need? Call 110/120 and ensure safety.
- Listen, reassure and explain that you must share the concern.
- Ask only minimal open questions. Do not investigate or confront anyone.
- Record facts and the child's exact words as soon as possible.
- Report immediately to a DSL/CPO through CPOMS (in person if CPOMS if not available)
- DSL triages immediate safety, mandatory/external reporting, parental communication, support and risk to others.
- Record decisions, rationale, actions, owners and review dates. Continue monitoring and escalate if the child remains at risk.

If the concern involves an adult: Use Appendix E and the confidential adult-concern route directly to the Principal. If the concern involves the Principal, contact the Designated Board Safeguarding Member (DBSM).

Appendix C - Record of Concern (if CPOMS is unavailable)

Child's full name / ID / year group
Date, time and place of concern or disclosure
Reporter's name, role and contact
How the concern arose
Child's exact words (use quotation marks)
What was directly observed
Open questions asked and responses
Immediate safety or medical action taken

Other people present or aware
Possible evidence preserved and where
Person reported to, date and exact time
Reporter signature/date
DSL/CPO actions, decisions, rationale and review date

Submit securely to a DSL/CPO immediately. Do not keep a personal copy or send through an unapproved channel.

Appendix D - Detailed safeguarding roles

Role	Core responsibilities
Designated Board Safeguarding Member (DBSM)	Provides independent oversight; receives concerns about the Principal as designated; checks assurance, resources, audit and action-plan progress; does not manage routine cases.
Principal	Accountable executive; culture, resources and implementation; manages adult allegations with Board/external advice; ensures no conflict or improper delay.
Primary/Secondary DSLs	School-wide operational authority; triage, referrals, case oversight, records, support, transfer, training, audit, resource map and Board assurance.
CPOs	Accessible first contacts; manage delegated case actions; communicate across sections; ensure continuity and escalation.
Counsellors/medical staff	Report safeguarding information; provide support within competence; maintain appropriate records and share relevant risk information with the DSL.
HR/Operations/IT/Trips leads	Embed safeguarding into recruitment, contractors, site access, technology, data, transport, trips and facilities; report relevant concerns and trends.
All adults	Maintain boundaries; notice, listen, record, report and escalate; do not investigate; cooperate with authorised action.

Appendix E - Concern or allegation about an adult

- Ensure immediate child safety and emergency/medical action.
- Report immediately to the Principal. If about the Principal, report to the Board safeguarding lead/Chair.
- Do not question the adult, conduct a substantive investigation, seek witness statements or alert others unless directed.
- Secure records and possible evidence; restrict information to need-to-know recipients.
- Principal/Board authority obtains safeguarding, legal and HR advice and decides external reporting without delay.
- Implement neutral, proportionate risk controls and support for affected child(ren).
- Coordinate with external authorities before any internal investigation.
- Record decisions and rationale; communicate appropriately; review risk and support through to outcome.
- Consider referral information, recruitment records, regulatory/employment action and learning review, regardless of whether a criminal threshold is met.

Appendix F - Bathroom or changing-room response

This procedure applies where staff must locate, support or remove a student because of a welfare, behavioural or emergency concern. Immediate threats to life override the normal sequence; staff act proportionately and call emergency services.

Prepare

- Notify a safeguarding/pastoral leader where practicable.

- Use two suitable staff to enter, considering the student's privacy, gender, age, needs, and the risk assessment. A third adult remains at the entrance where available. Do not delay urgent action solely to match gender.

Secure privacy

- Redirect others to another facility and prevent filming or unnecessary observation.
- Announce presence and purpose before entry unless doing so would increase immediate risk.

Communicate

- Use calm, respectful, non-confrontational language.
- Explain the concern, offer choices and time where safe, and seek voluntary cooperation.
- Avoid physical contact unless necessary and proportionate to prevent imminent harm and permitted by school procedure/training.

Afterwards

- Move to an appropriate private but observable space and address medical or safeguarding needs.
- Each involved adult records the incident promptly, including reason, timing, staff present, communication, any contact or force, injury, student account and follow-up.
- DSL/pastoral leader reviews the response, informs parents when appropriate and considers a debrief and support.

Appendix G - Local contacts, escalation and resource map

Complete before approval: This appendix must contain verified names, monitored contact methods and current local services. Test the routes at least annually and whenever personnel change.

Route	Contact	Use
Immediate police emergency	110	Any immediate danger or suspected serious unlawful harm
Medical emergency	120	Urgent medical need
Primary DSL	Carel West (Head of Primary) Carel.West@greenoasis.org.cn	All student safeguarding concerns, but specifically concerning Primary
Secondary DSL	Mel Fitzgerald Melissa.Fitzgerald@greenoasis.org.cn	All student safeguarding concerns, but specifically concerning Secondary
Principal	Peter Garnhum Peter.Garnhum@greenoasis.org.cn	Concerns about a DSL/CPO; escalation; allegation concerning an adult
Designated Board Safeguarding Member (DBSM)	Pauline Zhang wtsy@vip.163.com	Concerns about Principal; unresolved escalation
Local legal adviser	Chen Dong Yin	PRC legal advice
International safeguarding specialist	Jonah Rosenfield	Complex case consultation

Route	Contact	Use
	Jonah@globalsafeguardingcollaborative.org	

Appendix H - Related policies and references

GOS policies and procedures

- 4.5.1 Safeguarding and Child Protection Code of Conduct
- 2.2 Staff Professional Code of Conduct
- 2.4 Safer Recruitment Policy and central-checks procedure
- 2.9 Whistleblowing Policy
- 2.10 Management of Allegations against Staff and Adult Conduct Concerns Procedure
- 4.6 Anti-Bullying and 4.2 Behaviour Policies
- 4.8 Responsible Use of Technology Policy
- 4.9 Excursions and Trips Policy (including Risk Assessments)
- 4.14 Attendance Policy
- 4.15 Supervision Policy
- 5.1 Health and Safety, 5.5 Medical, and 5.4 Critical Incident Policies
- 5.6 Data Protection, Confidentiality and Records Retention Policies
- Safe Touch / Physical Intervention procedures
- 5.8 Visitor Policy, as well as Volunteer, Contractor and Supplier procedures

External references

Source	Reference
United Nations	Convention on the Rights of the Child (1989). https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child
Keeping Children Safe	International Child Safeguarding Standards. https://www.keepingchildrensafe.global/international-child-safeguarding-standards/
International Centre for Missing & Exploited Children (ICMEC)	Comprehensive Child Safeguarding and Protection Handbook for schools (2023) and EdPortal resources. https://www.icmec.org/
UK Department for Education	Keeping Children Safe in Education 2025; 2026 edition considered for the 2026-27 academic year. https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
People's Republic of China	Law on the Protection of Minors (revised law effective 1 June 2021); Anti-Domestic Violence Law; Opinions on Establishing a Mandatory Reporting System for Cases Involving Harm to Minors (Trial), 2020.
State Council of the PRC	Regulations on the Protection of Minors in Cyberspace (effective 1 January 2024). https://english.www.gov.cn/policies/latestreleases/202310/24/content_WS6537a5d2c6d0868f4e8e095e.html

Revision notes for approvers

This draft incorporates: explicit governance roles, safer recruitment, visitor/contractor controls, adult allegations, whistleblowing, self-reporting, safe touch, online safety, transfer/retention, resource mapping and assurance. It also corrects or strengthens the former GOS text by separating reporting from investigation,

replacing the sexual-abuse definition, adding adult conduct (aka low-level) concerns and child-on-child procedures, and qualifying external-reporting requirements.