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Wycombe Abbey International School Bangkok

SCHOOLS' SAFEGUARDING AND CHILD PROTECTION POLICY

October 2026

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SAFEGUARDING AND CHILD PROTECTION POLICY

1. The Policy Statement

1.1 Principles

- The welfare of each student is paramount. The School will always strive to keep its students safe from any form of harm or abuse.
- Any reference to 'Student' or 'student' in this policy includes any student aged 18 years or over.
- At Wycombe Abbey International School Bangkok, all members of the school community remain vigilant. We are never complacent about the safety and well-being of our students.
- It is a student's right to feel secure. It is the school's responsibility to provide such an environment. No student can flourish in any area of their development unless they feel safe.
- All members of staff at, Wycombe Abbey International School Bangkok, regardless of job description or status are equally responsible for the care of our students. All members of staff are responsible for acting immediately should they become concerned about any aspect of a student's safety or well-being. As such, it is the responsibility of all members of staff to keep themselves fully informed of the policy procedures to follow should such concerns arise.
- We engage in partnerships with all other relevant agencies in Bangkok that support the care and welfare of students. By engaging efficiently with all such other agencies, we further our commitment to ensuring effective and useful partnerships designed to protect and safeguard students.
- Whilst the school consistently aims to work in open and full communication with our parents, we reserve the right to contact the police or other authorized student-protection agencies without first notifying parents, where it is believed that this course of action is in the student's best interests.
- All references to student protection, well-being and safety include on-line safety for students.

1.2 Aims of the Policy

The aims of the policy are by necessity brief and direct. For further details you are guided to the 'Procedures' section that follows.

The aims of the School's Safeguarding policy are to demonstrate the school's commitment to safeguarding our students, our colleagues, parents and the wider community.

To safeguard any students who may be of concern through early identification of their level of need:

- those who are already identified as in need of any additional support.
- those who have suffered or are likely to suffer significant harm.
- those alleging abuse.

To raise and maintain the level of awareness of all members of Wycombe Abbey International School Bangkok staff members, regardless of job-description or rank of how to safeguard our students by identifying and reporting possible abuse through the correct procedural channels.

To maintain an easily accessible communication procedure that all members of the school community can follow to report any concerns of harm or abuse of students.

To ensure that all members of staff and members of the wider adult school community, who have immediate or substantial access to our students have been checked as to their suitability, including verification of their previous records, identity and qualifications, including any previous training and experience of student protection.

2. The Policy Procedure

2.1 Glossary of Terms

Abuse	is defined as a form of maltreatment of a child. Abuse may take the form of physical, emotional, or sexual abuse and includes neglect. This may involve inflicting harm or failing to act to prevent harm. Students may be abused by an adult or another student/student.
Student Protection	refers to the processes undertaken to protect students who have been identified as suffering or being at risk of suffering significant harm or abuse.
DSL	Designated Safeguarding Lead.
DDSL	Deputy Designated Safeguarding Lead.
KCSIE	'Keeping Children Safe in Education.' (A core U.K. guidance document on Safeguarding and Student Protection management).
Staff	Covers all staff on site, including ancillary supply and self-employed staff, contractors, Head Office and Board colleagues, and volunteers who work with our students. For the benefit of any doubt this group also includes part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, whether employed directly by the School or by other allied service-providing agencies.
WTSC	'Working Together to Safeguard Children.' (A core U.K. guidance document on Safeguarding and Child Protection management).

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2.2 The Difference between Safeguarding and Child Protection

Safeguarding is a broader term than child protection. It encompasses all the elements set out within this document and is what a School should do for all students; Child Protection is part of this definition and refers to activities undertaken to protect students who have been harmed/abused or at significant risk of being harmed/abused.

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of a child's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (gov.uk/KCSIE/WTSC)

The following section of the policy document is designed to supply more specific details on how the aims of the policy are put into practice.

2.3 Method

- All aspects of this document are advised and made with reference to UK Gov, DfE, 'Keeping Children Safe in Education', (KCSIE) September 2026, Keeping children safe in education - GOV.UK (www.gov.uk), and from 'Working Together to Safeguard Children', 2023, Working together to safeguard Children 2023: statutory guidance (publishing.service.gov.uk). Also from advice made available by the Thai Ministry of Education (Office of the Private Education Commission) and from all relevant information and advice made available by other allied agencies in Thailand.
- All members of staff are required to read KCSIE, Part 1 annually as part of their annual Child Protection and Safeguarding training.
- This policy is always easily accessible to all members of staff via the school electronic administration system.
- All members of the school staff will have satisfied local government requirements in terms of police and Ministry of Education checks against any prior convictions or concerns that may exist in Thailand or abroad, regarding each person's suitability to work with students. To this end the school maintains centralized records of all members of staff, this comprehensive document collection is maintained electronically by the school's HR Manager and records all such checks and any updates.
- In the event of any concern arising over data protection during a student protection concern, the school, giving due consideration to the laws of its host nation, will take the line that child protection outranks data protection and will proceed accordingly.
- All members of staff are trained and receive regular refresher courses on on-line safety for children.
- All members of staff and adults who are associated with the school, who have direct contact with students, are regularly trained and updated in Child Protection.
- The school has appointed Mrs Rachel Ibbotson, as the Designated Safeguarding Lead (Student Protection Officer). This colleague is responsible for administering and ensuring the safeguarding of all students in the school's care.
- Any external letting arrangements of the school's facilities will include assessing the suitability of adults working with students on the school site.

- The school will take all reasonable precautions to ensure that any contractors or visitors to the school are assessed or that their contact with students is risk assessed and that they are accompanied whilst on our site.

2.4 Roles and Responsibilities

2.4.1 The Executive Headteacher

The Executive Headteacher will ensure:

- that a rigorous and correct safeguarding policy is maintained and administered, in that the policy is adhered to by all members of staff and any other adults who may come into contact with the students at the school.
- that all adult members of the school community are aware of how to access the Safeguarding Policy at any time and that colleagues are consistently aware of the core aspects of the policy, as incidents of concern over a student can arise quickly and unexpectedly.
- that the school communicates and cooperates with all student protection inter-agency activities across Thailand and internationally, (where applicable), to ensure the safety of our students.
- that a suitably qualified DSL is permanently in the post and that the post-holder is sufficiently trained and supported in practical terms in order to offer the fullest level of care and protection to our students. Such provision will include a clear job description, consideration of confidentiality issues, administrative support, training, time and staffing support. The full details of the DSL's job-description are given below under the heading 'Designated Safeguarding Lead".
- Lead and model a culture of safeguarding awareness across the school community.
- Together with the DSL ensure that where there is a safeguarding concern, the student's wishes and feelings are considered when determining the next steps and future actions.
- Together with the DSL ensure that all safeguarding procedures are effectively communicated across the school community.
- that all members of staff are fully aware of their responsibilities regarding raising concerns about students, colleagues or unsafe practices (whistleblowing).
- That via the curriculum, all students are made aware of how to keep themselves safe, including being safe online.
- Ensure that all allegations or concerns raised about any member of staff are dealt with according to the school's Safeguarding Policy and the local Thai legal requirements in such cases.

2.4.2 The Designated Senior Lead (Student Protection Officer)

The DSL at Wycombe Abbey International School Bangkok is:

Mrs Rachel Ibbotson

The Deputy DSLs are:

Victoria Saunders – Head of Senior School

Juliet Staples – Head of Junior School

Note Sugar – Social and Emotional Counsellor

Amy Church – Head of Learning Support

Jay Leroy – Teacher of PE

Pierce Brown – Boarding Houseparent

Orala Siriwattaprayoon – PA to SLT

- Holds the responsibility for safeguarding and Student protection, including online safety across the school. A specific letter of appointment for this role, separate from any other letter of appointment is to be signed by the DSL on appointment. The designated responsibility of the DSL may not be delegated.
- Will liaise with local Student safeguarding agencies and authorities in order to support the best practice of safeguarding at the school.
- In keeping with the laws and police procedures of Thailand, ensure that members of staff are aware of and alert to identifying possible indications of radicalisation of students at school.
- Will understand and support the School's delivery with regards to radicalization and PREVENT training within the local national context.
- Will remain fully informed of the developing risks associated with on-line safety for students both at home and at school.
- Maintains a school-wide culture of awareness that student abuse can happen anywhere – including at our school.
- Will liaise with external case managers and any designated authorities in any safeguarding matter which may include concerns over a member staff at the school. The DSL will also be responsible for any cases of staff or volunteer dismissal stemming from a concern of risk or harm to a student.
- Will be the lead authority at the school on any matter relating to peer-on-peer abuse at the school.
- Be available during term time, school hours for staff to discuss any safeguarding concerns or issues with. Together with the Executive Head, will arrange and communicate contact cover arrangements for out-of-hours times.
- Will act as the initial source of support and expertise in all safeguarding matters for all members of the school.

- Will encourage and support a school-wide culture of paying due deference and respect to the student's point of view, of listening to students and being alert to their feelings and sensitivities in such difficult situations.
- Will be the lead practitioner in all student protection and safeguarding matters. Accordingly, the DSL will be responsible for ensuring their own training remains current as befits a lead practitioner. Equally the DSL will be responsible for maintaining the high profile of safeguarding training for all other members of staff and volunteers. The DSL will be responsible for maintaining all records pertaining to staff and volunteer safeguarding training and ensuring that all colleagues remain within agreed timeframes of such training.
- Together with the Head of Learning Support, the DSL will be attuned to the needs of students with any Special Educational Needs and/or Disabilities (SEND).
- Will maintain a register of all/any students who have been identified as being at risk/of concern. The Register of Concerns will be supported by full records of all concerns, incidents, actions and outcomes. Such records to be kept securely by the DSL on CPOMS. These records will include all concerns about a student even if there is no need to make an immediate referral, as well as the rationale for decisions made and action taken.
- Will access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Will liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the Head of Learning Support) on matters of safety and safeguarding.
- Will be alert to the specific needs of students in need, those with SEND and young carers.
- Will understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep students safe whilst they are online at school and understand the additional risks that students with SEND face online and the associated and appropriate support they require.
- Will ensure that when a student transfers school, their student protection file is passed to the new school as soon as possible, and within any statutory timescales (separately from the main student file and ensuring secure transit) and that confirmation of receipt is received. In addition the DSL will consider whether it is appropriate to share any information with the student's new setting in advance of that student leaving the School.
- Will ensure that where a student transfers school and is on a student protection plan or is a child looked after, their information is passed to the new school immediately.
- Will ensure a decision in the case of a transfer whether a copy of the Student Protection file is retained or destroyed in line with best practice.
- Will report to the Executive Head any significant issues in terms of student protection practice.
- Will ensure that all staff sign to say they have read, understood and agree to work within the School's Safeguarding Policy, the Online Safety Policy, the Staff Code of Conduct and the Behaviour Policy (students).
- Will organize Student Protection and Safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership, the Safeguarding Policy is reviewed annually and that the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made where applicable and the role of the School in this.

- Will ensure that the name of the designated members of staff for Student Protection, the Designated Safeguarding Lead and deputies are clearly advertised in the School, with a statement explaining the School's role in referring and monitoring cases of suspected abuse.

2.5 Definition of Child Abuse

Abuse and neglect are forms of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm, or by failing to act to prevent harm. students may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another student or students. The following definitions are taken from The British document entitled 'Working Together to Safeguard Children' (2023).

2.5.1 Physical Abuse

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

2.5.2 Emotional Abuse

The persistent emotional maltreatment of a child, such as causes severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child's participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

2.5.3 Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact; they may also include non-contact activities. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

2.5.4 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

• provide adequate food, clothing and shelter (including exclusion from home or abandonment).

• protect a child from physical and emotional harm or danger.

• ensure adequate supervision (including the use of inadequate caregivers).

• ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2.6 Student-on-Student Abuse, Sexual Violence and Sexual Harassment

The Group recognise that students are capable of abusing their peers either face to face or online. There are many different forms of student-on-student abuse including, but not limited to:

- Bullying (including cyberbullying).
- Physical abuse, such as kicking, hitting, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence, such as sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be standalone or part of a broader pattern of abuse.
- Harmful sexual behaviour, referring to any student, who demonstrates behaviour outside of their normative parameters of development including, but not limited to, abusive or violent behaviours.
- Sharing of nudes and semi-nude images and/or videos
- Initiation/hazing type violence and ritual.
- Upskirting.

Student-on-Student abuse should never be tolerated or passed off as "banter" or "part of growing up," nor will harmful sexual behaviours be dismissed as "the same" or "just having a laugh". The victim and perpetrator will be offered appropriate support and reassured that matters will be taken seriously. The Group takes a zero-tolerance approach to reports of sexual violence, sexual harassment, sexism, misogyny/misandry, homophobia and biphobic behaviours The Group will support students where the incident has occurred outside of the School or online, and these incidents will be treated equally seriously.

While bullying between students is not a separate category of abuse, it is a very serious issue that can cause considerable anxiety and distress. The School recognises that students with special educational needs and disabilities (SEND), health conditions, or those who identify as LGBTQ+ or are perceived to identify as LGBTQ+, can be more prone to peer on peer group isolation than other students and will

consider extra pastoral support for those students. All incidents of bullying should be reported and managed in accordance with the School's Anti Bullying Strategy.

2.6.1 Sexual Violence and Sexual Harassment between Students

Sexual violence and sexual harassment can occur between students of any age and sex. It can also occur through a group of students and young people sexually assaulting or sexually harassing a single student or group of students.

Students and young people who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Members of staff should be aware that some groups are potentially more at risk. Evidence shows girls, students with SEND and LGBTQ+ or perceived LGBTQ+ students are at greater risk of student-on-student abuse.

Those students identifying as LGBTQ+ will have additional pastoral support available should they require this to ensure they have a trusted adult who they can be open with. Our Group acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and students are supported to understand how to treat others with respect. We also have a duty to report and record any of the above incidents.

Members of staff should be aware of the importance of:

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

Dismissing or tolerating such behaviours risks normalising them.

2.7 Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of student-on-student sexual harassment. Sexual harassment is likely to: violate a student's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual "jokes" or taunting.
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes (the school will consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim), and displaying pictures, photos or drawings of a sexual nature.

2.7.1 Online Sexual Harassment

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos.
- sexualised online bullying.
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

2.7.2 Responding to a Report of Sexual Violence or Sexual Harassment

The initial response to a report from a student is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a student or a student makes a report to them, they should follow the Group referral process for reporting a concern and speak to a member of the DSL team.

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2.8 Disclosure

In the event that one student makes a disclosure about another student, the general principles of listening and reporting to the DSL remains the same. Each disclosure will be treated purely on the facts, and no-one prescribed solution can be seen as a best fit. The reporting arrangements are the same as for any case of abuse. All students involved, whether perpetrator or victim, are treated as "at risk" and will be supported.

The victim must always be reassured that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor would a victim ever be made to feel ashamed for making a report.

Where there has been a report of sexual violence between peers, the DSL will make an immediate risk and needs assessment, considering:

- The victim.
- The alleged perpetrator.
- The other students (and, if appropriate, staff) at the School.
- Proximity of the victim and alleged perpetrator.
- Shared classes, bedrooms, and boarding houses.

Risk assessments will be recorded and kept under review.

All concerns, discussions and decisions will be recorded in writing. At the end of the investigation, a review will be held to determine whether there is a pattern of concern, problematic or inappropriate behaviour. Where a report is known to be malicious, the School will consider what disciplinary action is appropriate.

As a boarding school, staff must be particularly alert to safeguarding students against the risk of student-on-student abuse. Students may be particularly vulnerable in residential settings. In reflection of that, there are additional requirements for boarding Schools that are set out in the National Minimum Standards for Boarding Schools which can be found at www.gov.uk/government/publications/boarding-schools-national-minimum-standards.

All members of staff should understand that, just because there are no reports of student-on-student abuse within a particular House, Tutor Group or Year Group, that it does not mean that it is not happening; it may simply mean that it is not being reported. Therefore, it is vital that staff report any concerns relating to student-on-student abuse to the DSL or DDSL immediately.

The School will ensure that students are aware of how they can report student-on-student abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well-promoted, and in a format that is easily accessible and easily understood.

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2.9 Abuse of Trust

All staff are made aware that inappropriate behaviour with or towards students is unacceptable. Staff should note that it is an offence for a member of staff, an auxiliary/contracted member of staff, a volunteer or anyone else in a position of trust with our students to:

- intentionally touch a student in a sexual way.
- have a sexual relationship with a student, even if the relationship is consensual.
- cause or incite a student to engage in sexual activity.
- intentionally engage in sexual activity in the presence of a student; or for the purposes of sexual gratification cause a student to watch a third person engaging in a sexual activity or look at an image of any person engaging in sexual activity.

A position of trust exists between a staff member and a student, even if the member of staff does not directly teach the student or have any other form of direct contact with the student.

2.10 One to One Teaching

Members of staff working in one-to-one situations with students present a higher level of safeguarding risk. Teachers and others should recognise this possibility and plan and conduct such meetings/lessons/tutorials to ensure that they are transparent and open to scrutiny.

All members of staff receive training during the Annual Safeguarding Training in August of each year and at Induction relating to one-to-one situations. Line managers should ensure that each member of their teams have read and understood this policy.

Where an individual meeting or lesson needs to take place, members of staff should consider their environment carefully to minimise the risk of misunderstanding. Any space in which private meetings take place should have visual access to the room or a door left open, or the member of staff must inform a colleague that a meeting, lesson or interview is taking place.

Members of staff should not arrange meetings with students in remote, secluded areas of the school. They should ensure that there is visual access and/or an open door in one-to-one situations. Should a student become distressed, anxious or angry during such a meeting, or should anything happen which could be misinterpreted or give rise to a concern, this must be reported to the DSL as soon as possible.

Late evening individual meetings in quiet places present significant risk and should be avoided.

2.11 Reporting Concerns about Safeguarding and/or Student Protection

All/any concerns about Safeguarding or Student Protection must be reported immediately to the DSL or one of the deputy DSLs in the DSL's absence.

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Once a staff member has reported a concern, they must not continue to investigate or pursue any other line of action, without a direct request to do so from the DSL or Executive Headteacher.

2.11.1 Student Protection Concerns

If you are concerned about the behaviour of a colleague towards a student or students, you may worry that you have misunderstood the situation or wonder whether a report could jeopardise a colleague's career. However, any concern about a member of staff must be raised immediately, (see section below), regardless of how unlikely there would be any substance to the concern. No further action may be necessary, but it is important that such information is brought to the School's attention as soon as possible. You must remember that in all situations the welfare of the student is paramount.

Our reporting procedures for managing concerns/allegations against staff, (including supply staff, volunteers or Head Office and contractors), apply when staff have, or are alleged to have:

- Behaved in a way that has harmed a student or may have harmed a student.

- Possibly committed a criminal offence against or related to a student.
- Behaved towards a student or students in a way that indicates that he or she may pose a risk of harm to students.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with students.

When you report a concern of this nature you can expect:

- The concern to be taken seriously.
- Your identity to remain confidential (if this is your wish) unless you are later required to function as a witness in court proceedings.
- To be protected as far as possible from victimisation or harassment.

2.12 Raising Concerns about a Member of Staff (including supply staff and contractors)

Allegations that meet the harms threshold may relate to a member of staff who has:

- Behaved in a way that has harmed a student or may have harmed a student.
- Possibly committed a criminal offence against or related to a student.
- Behaved towards a student/students in a way that indicates they may pose a risk of harm to students.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with students.

Allegations that do not meet the harms test will be dealt with as a low-level concern (see below).

Should a student disclose abuse by a member of staff, the situation will be reported to the Executive Head immediately.

Should the allegation be made against the Executive Head, the situation must be immediately reported to the Group Safeguarding Lead, Howard Tuckett at ht@be.co without informing the Executive Head.

The Staff Code of Conduct offers clear guidance to protect staff from allegations of abuse.

2.13 Low Level Concerns

Low level concerns about a member of staff should be reported to the Head of Senior School or the Head of Junior School, as appropriate, the DSL, or Executive Head.

The term “low-level concern” does not mean that it is insignificant, but that the behaviour towards a student does not meet the “harm threshold.” A low-level concern is any concern, no matter how small, and even if no more than causes a sense of unease or a “nagging doubt”, that an adult working

in or on behalf of the School may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate contact outside of School.

Examples of this behaviour could include, but is not limited to:

- Being over friendly with students.
- Having favourites.
- Taking photographs of students on their mobile phone.
- Engaging with a student on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate, intimidating, or offensive language making a student feel uncomfortable.

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

The School takes all concerns about safeguarding seriously and recognises that addressing low-level concerns is important in creating and embedding a culture of openness, trust and transparent in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff. The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers.

2.14 Neutral Notifications

A neutral notification is where a member of staff either self-reports or reports a concern regarding a situation they have found themselves in which could be misinterpreted, might appear compromising to others, and/or they believe they have behaved in such a way that they consider falls below the expected professional standards.

All neutral notifications should be communicated with the DSL, and the DSL will decide whether further action is required.

All low-level concerns and neutral notifications are stored on Staff Safe File for the duration of the individuals' employment with the School. Reports relating to supply staff and contractors are discussed directly with their employer.

The School will reflect and take steps to act on reported concerns in order to identify any patterns of concerning, problematic, inappropriate behaviour which may indicate an unacceptable culture, or weakness within the safeguarding system.

2.15 How to Deal with a Disclosure

A member of staff who is approached by a student should listen positively and try to reassure the student.

The member of staff cannot promise complete confidentiality and should explain that they may need to pass on information to other professionals to help keep the student or other students safe.

The degree of confidentiality should always be governed by the need to protect the student.

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

All members of staff should know who the DSL is and who to approach if the DSL is unavailable, (Deputy DSLs).

Guiding Principles:

The Seven Rs

Receive

- Listen to what is being said, without displaying shock or disbelief.

- Accept what is said and take it seriously.

- Make a note of what has been said as soon as practicable.

Reassure

- Reassure the student, but only so far as is honest and reliable.

- Don't make promises you may not be able to keep, e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential.'

- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help.'

Respond

- Respond to the student only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Do not ask 'leading' questions i.e. 'did he touch you?' or 'did she hurt you?' Such questions may invalidate your evidence, (and the Student's), in any later prosecution in court, ("leading the witness'').
- Do not ask the student why something has happened.

- Do not criticize the alleged perpetrator; the student may care about him/her, and reconciliation may be possible.
- Do not ask the student to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to.
- Reassure the student that it will be a senior member of staff.

Report

- Share concerns with the DSL immediately.
- If you are not able to contact your DSL or Deputy DSLs, and the student is at risk of immediate harm, contact the Police, as appropriate, directly.

Record

- Make some very brief notes at the time and write them up as soon as possible.
- Record the date, time, place, person/s present and noticeable non-verbal behaviour, and the words used by the student. If the student uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- If appropriate, complete a body map to indicate the position of any noticeable bruising.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions.'

Remember

- Support the student: listen, reassure, and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues, (DSL and/or Deputy DSL).

Review (led by DSL)

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

Receiving a disclosure can be upsetting for a member of staff. As such, the school will seek to support a colleague who has experienced such a disclosure. Such support may include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately. In some cases additional counselling may be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

2.16 Online Safety, Monitoring & Filtering

Each school in the Group has its own Online Safety Policy, which should be read in conjunction with this policy and will include further detail. These individual school policies reinforce the importance of online safety, monitoring and filtering. Each school's Online Safety Policy will include the following online risks to students:

- **Disinformation:** the deliberate creation and spread of false or misleading content, such as fake news.
- **Misinformation:** the unintentional spread of this false or misleading content.
- **Conspiracy Theories:** the belief that some influential or controlling organization or group is secretly responsible for a notable event or phenomenon.

The use of technology has become a significant component of many safeguarding issues such as student sexual exploitation, radicalisation and sexual predation. Technology often provides the platform that facilitates such harm.

The Group has had due regard to the additional information and support set out in KCSIE and requires that each of our schools has a whole-school approach to online safety and has a clear policy on use of communications technology in school.

Online safety is a running theme when devising and implementing Group or school policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement.

It is essential that students are safeguarded from potentially harmful and inappropriate online material. The Group adopts a whole school approach to online safety to protect and educate students and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate. Online safety issues can be categorised into four areas of risk:

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Content:

being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact:

being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as Students or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct:

online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

Commerce:

Risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or students are at risk this should be reported to the DSL or a DDSL.

The Group ensures that each school has the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review these procedures periodically to keep up with evolving cyber-crime technologies. *Helpful guidance on cyber security including considerations can be found at the U.K's cyber security training for school staff - NCSC.GOV.UK and at https://www.gov.uk/guidance/plan-technology-for-your-school.*

Each school's online safety policy should outline the appropriate filtering and monitoring which take places on school devices and school networks. It also outlines the expectations, applicable roles and responsibilities in relation filtering and monitoring.

Mobile Technology

Many students have unlimited and unrestricted access to the internet via mobile phone networks. This access means some students, whilst at school or college can sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

With regard to students' 3G, 4G and 5G accessibility on our campuses, whilst the Group believes that young people need educating about the benefits, it also minimises risk by all students handing in mobile phones to their Form Tutor at 08:00 every morning, and receiving them back at 16:00 as they leave. Boarders hand in all devices 30 minutes before lights out, and devices are stored securely overnight. Further detail is set out in the Safeguarding Arrangements in Boarding.

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Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT. We recognise that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose students to harmful content. For example, in the form of 'deepfakes,' where AI is used to create images, audio or video hoaxes that look real. We will treat any use of AI to access harmful content or bully students in line with this policy and each schools' behaviour policy.

Members of staff should be aware of the risks of using AI tools whilst they are still being developed and should conduct risk assessments for any new AI tool being used by the school.

The WAI Schools Group takes active responsibility to safeguard privacy, data security and all other aspects of our student and staff engagement across the full breadth of our schools' provision, on our campuses and outside our campuses whilst on school business or activities.
Consequently, the use, wearing, display or possession of smart or AI-enabled recording or listening devices - including AI dongles (such as PLAUD), smart glasses, smart watches and/or similar wearable or portable technology capable of recording, transcribing, analysing or transmitting audio, images or video - is prohibited for students, parents, contractors, visitors and guests anywhere on campus, and beyond campus whilst on school business or activities, unless expressly authorised in writing by the School for a specific operational or accessibility purpose.
Members of staff may not use SMART/AI enabled devices whilst teaching or engaged in student-facing activities. Members of staff may use AI enabled devices as an administrative aid during inter-staff administrative work. Such use must be openly visible, declared and authorized by the most senior colleague present.
Similarly, all members of the school community, including pupils, staff and parents, engaged in online meetings on platforms such as Teams or Zoom must declare if their platform has recording, transcribing and analysing capability before the meeting starts.

Schools are advised to include the wording below onto the safeguarding guidelines published on staff and visitors' security cards

Draft Security Card Wording – for staff, parents, contractors and visitors
Do not:
Use or wear AI-enabled devices (e.g. PLAUD, smart glasses or smart watches) capable of recording, transcribing, analysing or transmitting audio, images or video.

2.17 Staff Induction and Training

All new members of staff undertake a set online safeguarding course, including Online Safety and the prevention from being drawn into terrorism, in addition to having a safeguarding briefing with the DSL or DDSL.

All new staff must read and be familiar with:

- Safeguarding and Child Protection Policies and Procedures
- Keeping Children Safe in Education KCSIE (Sept 2026) – Part One
- Staff Code of Conduct
- Acceptable use of ICT Policy – Staff
- Online Safety Policy and an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.
- Students' Behaviour Policy – Behaviour, Rewards and Sanctions Policy and Procedures
- Anti-Bullying Strategy
- Whistleblowing Procedure
- Data Protection and Codes of Practice for Confidentiality – Students
- Health and Safety Policy

All staff are required to:

- Attend regular safeguarding updates from the DSL at the beginning of every academic year.
- Confirm that they have read and understood Part One of KCSIE each time KCSIE is updated by the Department for Education. This understanding may be evaluated through questionnaires and discussions as appropriate.
- Undertake regular awareness training and receive updates to provide them with the relevant skills and knowledge to safeguard students effectively. The School provides these termly via, for example, e-bulletins, INSET days and staff meetings.
- Know where and how to contact the DSL or DDSLs.
- Recognise that students who are abused or witness violence may find it difficult to develop a sense of self- worth, may feel helplessness, humiliation and some sense of self-blame.
- Recognised that students can be vulnerable and exploited by others: staff must be alert to the signs of vulnerability and/or susceptibilities to sexual harassment, sexual violence, violent extremism or indoctrination.
- Know how to ensure that staff behaviour and actions do not place students or staff at risk of harm or allegations of harm to a student.
- Know that any concerns about a member of staff's behaviour towards a student(s) is reported appropriately.
- Compulsory annual safeguarding refresher training for all staff will take place. Records of all training are kept, including induction and ongoing training.

All contractors and visitors to the School receive, as a minimum, the identity badge and contact details of the DSL and guidance on what to do if they are concerned about a Student or safeguarding practice at the School.

2.18 Whistleblowing

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Students cannot be expected to raise concerns in an environment where staff fail to do so.

All members of staff must be clear regarding their compulsory duty to raise any concerns they may have about any issue over the management of Child Protection or Safeguarding, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.

All such concerns should be raised immediately directly to the Executive Head.

At Wycombe Abbey Bangkok, staff may also raise any whistleblowing matter directly by email to **whistleblowing@wycombeabbey.ac.th**.

Whistle-blowing concerns about the Executive Head should be made to:

BE Education Safeguarding Lead

Howard Tuckett

ht@be.co

3. Policy Appendices

DfE. National Minimum Standards for boarding schools, (2022).

Standard 8 – Safeguarding

8.1 The school should ensure that:

- arrangements are made to safeguard and promote the welfare of students at the school; and
- such arrangements have regard to any guidance issued by the Secretary of State

8.2 The school should ensure that all staff are aware that safeguarding and promoting the welfare of Students is everyone's responsibility throughout the school and the boarding facilities.

8.3 It is essential that Students are safeguarded from potentially harmful and inappropriate online material. The school's approach to online safety should be reflected in the Student protection policy, having regard to the Department's Keeping Students safe in education guidance.

8.4 Keeping Students safe in education sets out that boarding schools have additional factors to consider with regard to safeguarding. As such it will be important that the boarding school's Student protection policy (and/or other policies if appropriate) reflect:

- the school's policy on sexual relationships between Students (and importance of boarders understanding this policy).
- the school's approach to Student-on-Student abuse, reflecting the unique nature of boarding accommodation and the risks associated with Students sharing overnight accommodation.
- the approach to protecting Students where there is a significant gender imbalance in the school.
- the approach to harmful online content and how boarders' devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 3,4 and 5G that will bypass the school's filtering and monitoring systems.

This policy should be read with reference to the following other Key Policies

- Wycombe Abbey Bangkok Anti-Bullying Policy
- Wycombe Abbey Bangkok Technology Acceptable Use Policy and Online Safety Policy
- Wycombe Abbey Bangkok Safeguarding Arrangements in Boarding
- Wycombe Abbey Bangkok Staff Handbook
- Wycombe Abbey Bangkok Attendance Policy (including students missing from education)

- Wycombe Abbey Bangkok Learning Support Policy
- Wycombe Abbey Bangkok Whistle Blowing Policy
- Wycombe Abbey Bangkok Mental Health Policy (including self-harm and suicide)
- Wycombe Abbey Bangkok Visitor Policy
- WAIS Group Policy, Safer Recruitment
- WAIS Group Policy, Appropriate Touch
- WAIS Group Policy, Intimate Care
- WAIS Group Policy, Raising Concerns and Whistleblowing
- WAIS Group Policy, Reasonable Force
- WAIS Group Policy, Students Use of Social Media
- WAIS Group Policy, Staff Use of Social Media
- WAIS Group Policy, Teachers Code of Conduct
- WAIS Group Policy, Use of Alcohol by Staff in the Presence of Students

Each of the above policies should be readily available at your school. For immediate access to any of the WAIS Group policies, please contact Howard Tuckett at ht@be.co.

Further Information Specific to this School

Thai law and guidance

- **UN Convention on the Rights of the Child**, of which Thailand is a signatory: Article 19 (protection from abuse and neglect) and Article 34 (protection from sexual exploitation and abuse).
- **Thai Child Protection Act 2003:** Article 29 places a duty on teachers and other professionals to report a child in need of protection to a competent official or the police immediately, with legal protection for reports made in good faith. Articles 25 and 26 set out what parents, carers and others are forbidden to do. Article 63 requires schools to provide guidance, counselling and safety education.
- **Thai Civil and Commercial Code, Article 1567(2):** permits parents 'reasonable' punishment. The School regards corporal punishment as physical abuse and does not condone its use in the home.
- **UK guidance** (KCSIE and Working Together to Safeguard Children) informs the School's practice but is not statutory in Thailand.

Local agencies and contacts

Agency	Contact	When to use
Royal Thai Police	191	Emergency – a student is at risk of immediate harm
Childline Thailand	1387	Child helpline and support
Ministry of Social Development and Human Security (OSCC)	1300	Reporting a child protection concern
Bang Phli Police Station	+66 2 337 3377	Non-emergency referrals

- Where contact with Thai authorities is required, the DSL is supported with translation by the PA to SLT or the Social and Emotional Counsellor.

Local context

- Many students at Wycombe Abbey Bangkok live with guardians while parents are overseas, or are cared for by domestic staff or other family members. Parents must inform the School of any guardianship arrangement, and the guardian must be over 18.

Reporting a concern

- Concerns are reported to the DSL or a Deputy DSL and by email to **safeguarding@wycombeabbey.ac.th** and all records are held on **CPOMS**.
- Staff can raise whistleblowing matters directly by email to: **whistleblowing@wycombeabbey.ac.th**.

Transport

- School-authorised transport, including school buses, airport transfers and educational visits, forms part of the School's safeguarding responsibility.
- Drivers, escorts and contracted transport providers must maintain professional boundaries. The School seeks assurance that contractors have appropriate vetting and safeguarding arrangements in place.
- Any concern arising during transport is reported to the DSL.

Arrangements for the safeguarding of SEND students

- The DSL works with the Head of Learning Support, who is also a Deputy DSL, to stay attuned to the needs of students with SEND.
- Staff consider whether changes in behaviour, mood or injury may indicate abuse, rather than assuming they relate to a student's SEND.
- Further detail is set out in the Learning Support Policy.

Arrangements for students missing from education

- Poor attendance, persistent absence, patterns of lateness or unexplained absence may indicate a safeguarding concern and are escalated to the DSL.
- Any incident in which a student's whereabouts are unknown is treated as a safeguarding concern. The procedure is set out in the Attendance Policy / Missing Student Procedure.

Arrangements for maintaining students' awareness of safeguarding

- Students learn about personal safety, healthy relationships, online safety and emotional wellbeing through the Wellbeing curriculum.
- The names of the DSL team are displayed around the School, and students are encouraged to identify trusted adults they can speak to.

Further reading

- Childline Thailand: www.childlinethailand.org
- Global Safeguarding Collaborative: www.globalsafeguardingcollaborative.org

- Council of International Schools child protection resources: www.cois.org/about-cis/child-protection/resources

Addendums

There are currently no addendums to this policy.

4. Record of Reviews and Updates

This policy was created by:

Howard Tuckett Safeguarding Lead, BE Education

On 28 March 2024

Last reviewed by:

Howard Tuckett Safeguarding Lead, BE Education.

On 20 June 2024

Last Updated by

Howard Tuckett Safeguarding Lead, BE Education.

on 26th June 2026

Next Review Date 24th September 2026

Localised for Wycombe Abbey International School Bangkok by Rachel Ibbotson, Designated Safeguarding Lead, October 2026. Next Bangkok review: [August 2027].

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