



Haileybury Almaty

Safeguarding & Child Protection Policy & Guidelines

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Chair of Governors:

Safeguarding Governor:

Headmaster:

Designated Safeguarding Lead:

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1. KEY CONTACTS

School Contacts	
Designated Safeguarding Leads (DSL)	Simon Mills Head smills@haileyburyalmaty.kz Darshak Pandya Deputy Head (Senior School) dpandya@haileyburyalmaty.kz
Deputy Designated Safeguarding Leads (DDSL)	Claire Boyle Junior School Phase Leader cboyle@haileyburyalmaty.kz Ashima Shrivastava Senior School Head of Computer Science ashrivastava@haileyburyalmaty.kz Elizabeth Kirton Assistant Head (Pastoral) ekirton@haileyburyalmaty.kz Matthew Hunt-Brown Head of Junior School mhunt-brown@haileyburyalmaty.kz Louise Cooke Junior School Teacher lcooke@haileyburyalmaty.kz Daniel Scott Deputy Head of Junior School dscott1@haileyburyalmaty.kz Shynar Sadykova Senior School Academic Officer ssadykova@haileyburyalmaty.kz Dina Amangeldiyeva SLT Administrative Support Officer damangeldiyeva@haileyburyalmaty.kz
E-Safety Lead	Ashima Shrivastava Senior School Head of Computer Science ashrivastava@haileyburyalmaty.kz
External Contacts	
Almaty Department for the Protection of Children's Rights	4, Republic Square, Almaty +7 (727) 264 0403 (hotline) +7 (727) 272 5037 (reception)

COBIS (Council of British International Schools): safeguarding resources and links	COBIS 55-56 Russell Square London WC1B 4HP UK +44 20 3826 7190 COBIS Safeguarding
Police	102 (emergency calls)
Embassies/Consulates	Depending on the pupil's nationality the embassy or consulate should be contacted as appropriate via websites
NSPCC (National Society for the Prevention of Cruelty to Children): UK	+44 800 800500
UNHCR Kazakhstan	67 Tole bi street, 050000 Almaty, Kazakhstan +7(7272)584598 kazal@unhcr.org Kazakhstan
Child Protection Committee at the Ministry of Education and Science: Astana (numbers subject to change without notice)	www.bala-kkk.kz +8 (7172)742528 or 150 +8 (7172)394289
Education department of Astana	+8 (7172)550162, +8(7782)550162
Social fund «Human Rights»	+8 (7172) 255725
Police Emergency Service Emergency/ Health Clinic (numbers subject to change without notice)	102 112 103
British Embassy Office Almaty	Rahat Palace Hotel Business Centre 29/6 Satpaev Street, 7th floor Almaty 050000 Kazakhstan +7 (7272) 506191 ukinkz@fco.gov.uk

2. POLICY STATEMENT AND PRINCIPLES

Key Points

- This policy applies to all pupils in the School and is aligned with the UN Convention of the Rights of a Child. Legally, pupils aged 18 years and over may be treated

differently by external agencies, i.e. as adults. Any pupil under the age of 18 will be regarded as a child for the purpose of this policy.

- All staff have a responsibility for the implementation of this policy;
- The Headmaster and DSL oversee responsibility of all concerns and matters relating to safeguarding and online safety in the school;
- All staff must know who the trained DSL and DDSLs are.
- Any concerns regarding safeguarding and/or child protection must be reported immediately to the Designated Safeguarding Lead (DSL) or in their absence to a Deputy Designated Safeguarding Lead (DDSL);
 - o Any concerns regarding safeguarding and/or child protection must be reported immediately to the Safeguarding Committee; either via My Concern or, at the very least, in person. Concerns, if urgent, can be marked accordingly on the system and this will highlight the need for a prompt response.

Staff must not immediately report to a member of staff (including the Pastoral Team and/or SLT) outside of the Safeguarding Committee. Often there are additional factors to consider when responding to a case that may not have been shared outside of the Safeguarding Committee. It is for this reason that no further actions should be taken until assigned.

Under normal circumstances, a DDSL (Administrative) will triage the case and assign a Case Owner as follows:

- Urgent (or involving a pupil at high risk for any reason): Darshak Pandya or Simon Mills
- Reception and Key Stage 1 DDSL
- Key Stage 2 DDSL
- Senior School DDSL

Staff may escalate concerns to Darshak Pandya or Simon Mills if cases seem high risk, involve siblings with families across the school or where issues are escalated and evolving. Thereafter, the assigned member of staff may coordinate the response themselves or, alternatively, select the most appropriate member of staff outside of the Safeguarding Committee depending on the level of need.

- o Once assigned, Case Owners are responsible for ensuring that the concern is followed up and that Tasks are set as required. When a Task is set, the responsibility for that concern is with the member of staff responsible for completing the Task; deadlines must be adhered to in order to prompt the Case Owner to proceed with next steps accordingly.
- If a crime has been committed, it should be reported to the DSL or Head immediately, who will then report it to the police;
- All staff must have read and will act in accordance with Part One and Annex A of

the DfE Statutory Guidance *Keeping Children Safe in Education 2026* (KCSIE). Whilst this policy is written in accordance with recent recommendations, it is important that it *reflects local circumstances* so as to allow the school to operate within the cultural and national context within which it is located.

Keeping Children Safe in Education (DfE, September 2026)

- All safeguarding and child protection concerns must be treated in the utmost confidence;
- The DSL or DDSL must report all concerns in line with the requirements of the Republic of Kazakhstan, and in line with best practice as defined in the UK and through organisations such as COBIS.
- The response to any allegation of abuse in relation to adults will be overseen by the Head, Chair of Governors and/or DSL in line with Haileybury Almaty's Allegations of Abuse against Staff Policy and procedures.

Introduction

Haileybury Almaty is committed to safeguarding and promoting the welfare of children and young people, and expects all staff and those connected to the school to share this commitment.

This policy applies to staff, volunteers, interns, Trainee Teachers and contractors who work with pupils on school premises or away from the school on an activity, visit or other educational pursuit.

This policy therefore complements and supports a range of other policies (e.g. those relating to Complaints, Behaviour, Trips, Health and Safety). The school will consider safeguarding aspects when undertaking development or planning of any kind. The school's safeguarding arrangements are inspected according to the standards of recognised accrediting bodies, e.g. Kazakh Department for Education, COBIS, FOBISIA.

The school's core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance;
- safeguarding children is everyone's responsibility. Everyone who comes into contact with children and families has a role to play in keeping children safe;
- listening to children and to all members of the community (local and national) is fundamental to safeguarding, and is in the best interests of each child;
- Haileybury Almaty is committed to a 'speak up' culture and believes in the notion that if you see something or sense something then you should say something – no concern is considered too small. If concerns are raised early then help can be provided at an early stage;
- early indication that a child may need help is critical and a crucial part of our 'speak up' culture;
- all staff must have the attitude that 'it could happen here' with regard to safeguarding;
- safer children make more successful learners;
- representatives of the whole school community, both local and expat staff, will be involved in safeguarding policy development and review;
- safeguarding and related policies will be reviewed annually unless an incident or

new legislation (Kazakh or British) or guidance suggests the need for an interim review.

Terminology
Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of 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.
Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering, significant harm.
Staff refers to all those working for or on behalf of the school, full time or part time, including contracted staff such as cleaners and kitchen staff, temporary or permanent, in either a paid or voluntary capacity.
Child includes everyone under the age of 18. Our duty to promote the welfare and health and safety applies to all pupils in our care, whether they are under or over the age of 18.
Parent refers to birth parents and other adults who are in a parenting role; for example, step-parents, guardians, foster carers and adoptive parents.
Throughout the policy, the terms “ must ” and “ should ” are used with specific definitions. “ Must ” will be used when the person in question is legally required to do something and “ should ” will be applied when the advice set out should be followed unless there is good reason not to.

Safeguarding at Haileybury Almaty



Safeguarding includes:

- ensuring pupil health and safety;
- referring concerns or allegations about a child to the appropriate bodies promptly;
- counter-bullying measures;
- actions to prevent and/or address all forms of abuse;
- actions to prevent and/or address harassment and discrimination;
- use of physical intervention;
- meeting the needs of pupils with medical conditions;
- providing first aid;
- drug and substance misuse;
- educational visits;
- intimate care;
- internet safety;
- issues which may be specific to a local area or population, for example gang activity;
- school security.

Child Protection Statement

Haileybury Almaty fully recognises its moral and statutory responsibility in Kazakhstan as well as meeting international standards to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

Policy Principles

Haileybury Almaty's principles are aligned with those of the United Nations Convention on the Rights of the Child (UNCRC). Central to this is the acknowledgment that every child has basic fundamental rights.

These include the right to:

- **life, survival and development**
- **protection from violence, abuse or neglect**
- **an education** that enables children to **fulfil their potential**
- **be raised by**, or have a **relationship with, their parents**
- **express their opinions** and be **listened to**.

Therefore the welfare of the child is paramount:

- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- The school reserves the right to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. The school is also responsible for, and reserves the right to, ensuring reasonable adjustments for disabled children and young people.
- All members of staff have equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Children and staff involved in child protection issues will receive appropriate support.

Policy Aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities;
- To ensure consistent good practice;
- To demonstrate the school's commitment with regard to child protection to pupils, parents and other partners;
- To contribute to the school's portfolio of safeguarding policies.

The School's Commitment

There are seven main elements to our policy:

1. Establishing a safe environment in which pupils can learn and develop; include in the curriculum activities and opportunities which equip children with the skills

- needed to stay safe from abuse and which will develop resilience and realistic attitudes to the responsibilities of adult life;
2. Ensuring the governance of safeguarding and promotion of welfare is fully embedded within the school;
 3. Raising awareness of child protection issues and ensuring staff, volunteers, interns, Trainee Teachers and contractors working at the school are fully aware of the issues and how to act in the event of concerns being raised;
 4. Ensuring the implementation of safer recruitment practices in full accordance with the requirements of UK 'Keeping Children Safe in Education' (2026) standards together with Kazakh law so that the school makes sure that all appropriate checks and risk assessments are carried out on new staff and volunteers, interns, Trainee Teachers who will work with children;
 5. Supporting pupils who are in need of protection or require additional help to achieve good outcomes;
 6. Listening to the children in our care and ensuring that children know that there are adults in the school whom they can approach if they are worried or in difficulty, as the ethos is one where children feel secure and are encouraged to talk, and are listened to;
 7. Creating an open culture where staff feel confident to speak up whenever they have concerns about a child or an adult, and are aware of how and when to act on concerns that they have, and how to work in a safe and appropriate manner.
 8. Promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of their safeguarding responsibilities.

Confidentiality

Haileybury Almaty recognises that all matters relating to child protection are highly confidential. The Head or Designated Safeguarding Lead will share that information on a strict 'need to know' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the school unless in confidential meetings for that purpose.

Linked Documents

[KCSIE 2026](#)

[Early Years Foundation Stage Statutory Framework \(DfE, 2026\)](#)

Safeguarding and Child Protection Policy & Guidelines

Appendix 1 Safeguarding Code of Conduct for Staff

Code of Conduct Whistleblowing Policy

Social Media Policy

Whistleblowing Policy and Procedure

Supervision of Pupils Policy

Senior and Junior School Attendance Policies

Children who are absent from education for prolonged periods and/or repeated occasions Policy

Allegations of Abuse Against Staff Policy and Procedures

Video Conferencing Policy & Guidelines

[IT/Data Digital Policies](#)

3. SAFEGUARDING LEGISLATION AND GUIDANCE

Haileybury Almaty is committed to being compliant with all standards for safeguarding in Kazakhstan, in line with the UK and the standards of relevant accrediting bodies. Due to their day-to-day contact with pupils, members of staff in schools and colleges are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that members of school staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The school will act on identified concerns and provide early help to prevent concerns from escalating.

UK Legislation and Guidance

Section 94 of the Education and Skills Act 2008 requires the Secretary of State to prescribe standards for independent educational institutions to safeguard the welfare, health and safety of children. The relevant standards are set out in the Education (Independent School Standards) Regulations 2014 (the ISS Regulations 2014).

The statutory guidance '*Keeping Children Safe in Education*' (DfE, September 2026) is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise, such as possible conflict with the requirements of the Republic of Kazakhstan, or as a result of the differing social services provisions in Kazakhstan, compared to the UK.

All members of staff are required to have signed a safeguarding Code of Conduct, which includes a clause to confirm that they have read and understood at least Part One of the KCSIE 2026 guidance. This guidance underpins Haileybury Almaty's commitment to safeguarding.

The *Teacher Standards 2012* state that teachers, including headteachers, should safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties.

Teachers' Standards

The statutory guidance *Working Together to Safeguard Children* (DfE, March 2015) covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children.

Working Together to Safeguard Children 2018

Prevent Duty Guidance 2015: With effect from 1 July 2015, all UK schools became subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 in exercising their functions "to have due regard to the need to prevent people from being drawn into terrorism". The school recognises that "safeguarding susceptible people from radicalisation is no different from safeguarding them from other forms of harm." Preventative education is most effective in the context of a whole-school or college approach that prepares pupils for life in a globalising world and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a

planned programme of evidence-based PSHE delivered regularly via, and throughout, the curriculum.

The Prevent Duty

The NSPCC estimates that over half a million children are abused in the UK each year. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event, and it can increasingly happen online.

The Republic of Kazakhstan Legislation and Guidance

In the area of protection of the rights of the child and childhood, work is being carried out in the Republic of Kazakhstan in order to secure the social and legal guarantees of children's quality of life, in harmony with international standards. An important step in the implementation of international standards for the quality of life of children was the ratification of the UN Convention "On the Rights of the Child" by Kazakhstan in 1994.

The general principles of the Convention On the Rights of the Child were implemented in many laws of Kazakhstan, including: "On the Rights of the Child in the Republic of Kazakhstan," "On Marriage and Family," "On Children's Villages of Family Style and Youth Homes," "On Health Protection of the Citizens of the Republic of Kazakhstan," "On Social, Medical, Pedagogical, and Correctional Support for Children with Disabilities," "On Juvenile Crime Prevention and Prevention of Child Neglect and Homelessness," and others.

Violence against children, neglect, dysfunctional families, homelessness and various forms of child exploitation (including child labour and prostitution) are urgent social problems.

4. CHILD PROTECTION PROCEDURES

Providing early help is more effective in promoting the welfare of children than reacting later. All our members of staff have a responsibility in school to identify the symptoms and triggers of abuse and neglect, to share information, and work together to provide children and young people with the help they need.

KCSIE states: "Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others."

Sometimes a single traumatic event may constitute 'significant harm', such as poisoning or a violent assault. However, more often it is a compilation of significant events, both acute and long-standing, which can change or damage a child's physical and psychological development. Some children live in families or social circumstances where their health and development are neglected. Such neglect may cause impairment to the extent of constituting significant harm, as may emotional, physical and/or sexual abuse. Ultimately, it is important to remain aware that children may be susceptible to multiple harms including

(but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Training

All staff attend and complete Child Protection training at the beginning of each academic year followed by sessions and/or courses thereafter. Usually this training is led by the Safeguarding Committee with the support of external providers and/or resources.

The training and induction process for new staff is covered within the Safer Recruitment Policy and the school now trains any member of staff that returns after an extended absence (for example when they have not already had an opportunity to participate in the usual suite of training) in the same way as anyone new.

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.

Recognising abuse

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse.

Child abuse means the maltreatment of a child by *inflicting* harm (for example, by hitting a child), or by *failing to act to prevent* harm (for example, by leaving a small child at home alone, or leaving knives or matches within reach of an unattended toddler). Abuse may be committed by adult men or women, by other children, and by adolescents. Children may be abused in a family or in an institutional or community setting by those known to them, or by people they do not know (e.g. via the internet). Online abuse is a growing concern and staff should be aware of its existence and vigilant for signs that it is taking place.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse, and neglect. All staff should be aware that abuse, or safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Physical Abuse

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

Emotional Abuse and Mental Health

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's psychological state and 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 ridiculing what they say or how they communicate.

Emotional abuse may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

A child's mental health can be a sign or symptom that they may be at risk of a safeguarding concern or potential harm. As a school, Haileybury Almaty understands that our community plays an important role in supporting the mental health and well being of our pupils. To that end, we are reviewing our current systems and processes to identify any such needs, and determine whether they may be linked to a safeguarding concern, so that we are absolutely best placed to support pupils as necessary.

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

All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). It is important to be aware that sexual abuse can be perpetrated by men, women **and children**.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or

- abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The above categories are identified by the NSPCC, and definitions have been taken from *Working Together to Safeguard Children* (DfE, July 2015) and *Keeping Children Safe in Education* (DfE, September 2026).

In response to long term cases of Neglect and Affluent Neglect, the school may request agreement to specific expectations from Parents or Carers and/or temporarily suspend a child's place until the necessary conditions have been met.

Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues, some of which are listed below:

- bullying, including online bullying (see below)
- children missing education—and Annex A
- child missing from home or care
- child sexual exploitation (CSE) ([Child Sexual Exploitation, DfE](#))
 - CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media
- county lines
- seeing, hearing or experiencing the impact of domestic abuse
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) or so-called honour based abuse
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls
- hate
- homelessness
- mental health
- missing children and adults strategy
- private fostering
- preventing radicalisation
- relationship abuse
- sexting (making or sharing of nudes or semi-nudes)
- trafficking
- upskirting (as defined in the Voyeurism (Offences) Act 2019)

Annex A of KCSIE 2026 contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff that work directly with children should read the annex.

Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting (making or sharing of nudes or semi-nudes) put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse (including harassment and violence). This is most likely to include bullying (including online bullying), gender-based violence/sexual assaults, and sexting (making or sharing of nudes or semi-nudes), but is not limited to these manifestations.

Staff should be clear as to Haileybury Almaty's policy and procedures with regards to child-on-child abuse (including harassment and violence).

Online Safety

The School is committed to ensuring that our pupils and community are safe whilst working online and digitally. Through our strong and through pastoral teams, together with the recently introduced Head of Digital Learning, IT Department and expanded Safeguarding Committee, the school is going through the process of developing and implementing robust safeguards to protect against the onset of novel risks. As part of this, the school commits to including online safety as part of all regular training and ensuring that procedures are updated on an annual basis.

Lead responsibility for filtering and monitoring lies with the DSL

Governors responsible for filtering and monitoring (through IT Department)

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in rare cases has resulted in suicide.

All incidences of bullying, including online bullying and prejudice-based bullying, should be reported and will be managed through our anti-bullying procedures. Heads of Key Stages should keep records of bullying-type behaviour, which should be submitted termly to the DSL. The school's Anti-Bullying Policy is reviewed annually and published at the start of each academic year.

The subject of bullying is addressed at regular intervals via the school's policies and curriculum for Personal Social and Health Education (PSHE); UK guidance pertaining to the safeguarding concerns that may arise in this area of the curriculum is available within [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education guidance](#). If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Head and the DSL may consider implementing child protection procedures.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with

any degree of certainty. For these reasons, it is vital that members of staff are also aware of the range of *behavioural* indicators of abuse and report any concerns to the DSL.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- lose interest in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; or
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a larger picture, and each small piece of information will help the DSL to decide how to proceed. It is therefore essential that staff report their concerns. Staff do not need 'absolute proof' that a child is at risk, but should act on any hunches or worries in the knowledge that they will be supported in their safeguarding role. Reports made in good faith will always be dealt with in accordance with the school's Whistleblowing Policy, regardless of outcome.

Impact of abuse

The impact of child abuse should not be underestimated. Survivors of child abuse may experience anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships, and long-term medical or psychiatric difficulties. Many children do recover and go on to lead healthy, happy and productive lives, although most adult survivors agree that emotional scars remain, however well buried.

Taking action

Any child, in any family, in any school, could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". Key points for staff to remember are:

- in an emergency, take the action necessary to immediately help the child;
- report your concern to the DSL as soon as possible;
- do not start your own investigation;

- share information on a 'need to know' basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern; and
- seek support for yourself, if you are distressed.

If you are concerned about a child's welfare

There will be occasions when a member of staff may suspect that a child may be at risk, but have no concrete evidence. For example, the child's behaviour may have changed; his or her actions may reveal confusion or distress; physical but inconclusive signs may have been noticed. In these circumstances, the member of staff must try to give the child an opportunity to talk. The signs they have noticed may be due to a variety of factors; for example, a parent has moved out, a close friend or relative has died, a grandparent is ill. It is fine for staff to ask the child if they are OK or if they can help in any way.

Staff may discuss their concerns with the Senior Leadership Team in each school. If a child does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with the DSL.

If a child discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened them with dire consequences if they tell anyone; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a child talks to a member of staff about any risks to their safety or well-being, the staff member will need to let the child know that they must pass the information on – staff are not allowed to keep secrets and must never promise to do so. The point at which you tell the child this is a matter for your professional judgement. If done immediately, the pupil may think that you do not want to listen. If left until the end of the conversation, the child may feel that s/he has been misled into revealing more than they would otherwise have done.

During such conversations with children, staff should:

- allow them to speak freely;
- remain calm, and not overreact – the child may stop talking if they feel they are upsetting the listener;
- give reassuring nods or words of comfort ("I'm so sorry this has happened to you"; "I want to help"; "This isn't your fault"; "You are doing the right thing in talking to me", etc.);
- not be afraid of silences – members of staff must remember how hard this must be for the child;
- under no circumstances ask investigative questions (such as how many times this has happened, whether it happens to siblings too, or what the pupil's parents think);
- tell the child, at an appropriate time, that in order to help them, the member of staff must pass the information on;
- not automatically to offer any physical touch as comfort. It may be anything but

- comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as “I wish you had told me about this when it started”, or “I can’t believe what I’m hearing” may intended as supportive, but could be interpreted by the child to mean that they have done something wrong;
- tell the child what will happen next. The child may agree to go to see the DSL. Otherwise, let the child know that someone will come to see them before the end of the day;
- report verbally to the DSL, even if the child has promised to do it by themselves;
- write up their conversation as soon as possible on the record of concern form, and hand it directly to the DSL; and
- seek support if they feel distressed.

Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively. The DSL will make contact with the parents in the event of a concern, suspicion or disclosure. However, if the school believes that notifying parents could increase the risk to the pupil or exacerbate the problem, advice will first be sought from other agencies where possible.

Children with sexually harmful behaviour

It is important to recognise the potential for abuse by peers.

This is most likely to include, but may not be limited to:

- abuse in intimate personal relationships between peers;
- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- sharing nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents.

With regards to child-on-child abuse (including harassment and violence), staff will refer such concerns to the DSL, who will consult with external agencies where there is a risk of significant harm. Allegations of child-on-child abuse (including harassment and violence)

will involve parents being contacted.

Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection procedures, rather than anti-bullying procedures. Research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex. The school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves, and the child protection procedures will be followed for both victim and perpetrator. Members of staff who become concerned about a child's sexual behaviour should speak to the DSL immediately.

Sexual exploitation of children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims may be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff must be made aware of the indicators of sexual exploitation through safeguarding training. Any concerns should be reported immediately to the DSL.

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved, but also to ensure that potential evidence is not compromised by being released into the public domain. Members of staff should only discuss concerns with the DSL or Deputy DSL, the Head or the Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need to know' basis.

Child protection information will be stored and handled, as much as possible within the context of Kazakhstan, in line with Data (Use and Access) Act 2025 principles.

Despite this, safeguarding children from harm as indicated in KCSIE 2026 which states that, "fears about sharing information cannot be allowed to stand in the way of the need to promote and protect the welfare and safety of children."

Child protection records and other written information must be stored in a locked facility. Any electronic information (e.g. on the Google Drive) must be password-protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access. Sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or

stolen. When members of staff write up safeguarding concerns, once the files are sent to the DSL they must be deleted from the staff member's email accounts and computer(s).

If it is necessary to store child protection information on portable media, such as a USB or portable hard drive, these items must also be kept in locked storage. Child protection information will be stored separately from the child's file; the file will be 'tagged' to indicate that separate information is held. Child protection records are normally exempt from the disclosure provisions of the Data (Use and Access) Act 2025. This means that pupils and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Head. The UK Data (Use and Access) Act 2025 does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Children and families requiring additional support

As distinct from cases where a child has suffered or is likely to suffer significant harm, where children and families need support from agencies beyond school, we will respond after consultation with the relevant Head of school and the Deputy Head. We will liaise closely to coordinate support, with the agreement of the child and their parent/carer(s), and in accordance with local children's social care procedures in Kazakhstan, where available.

5. 'PREVENT' DUTY AND FEMALE GENITAL MUTILATION (FGM)

The Prevent Duty is the duty placed by the UK Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

This is a concern of the Republic of Kazakhstan as well. UK Department of Education advice (June 2015) for schools and childcare providers regarding the Prevent Duty states, "School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately."

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Members of staff who have concerns about a pupil must make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether or not it is appropriate to make a referral to external agencies in Kazakhstan, or the appropriate embassies for foreign nationals.

In the UK, 'Channel' is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism:

www.gov.uk/government/publications/channel-guidance

Signs of vulnerability

There are no known definitive indicators that a young person is susceptible to radicalisation, but there are various factors that may increase risk.

Signs of vulnerability include:

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events
- religious conversion
- change in behaviour
- extremist influences
- conflict with family over lifestyle
- confused identity
- being a victim of, or witness to, race or hate crimes
- rejection by peers, family, social groups or faith

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially against those of other faiths or cultures
- making remarks or comments about being at extremist events outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online, so involvement with particular groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing on extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is a form of child abuse and violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Members of staff should recognise the possibility that a girl may disclose information relating to a sibling or close friend who has suffered abuse in the form of FGM. Members of staff should be alert to the mandatory reporting requirement for suspected cases of

FGM, which became a statutory duty from October 2015 in the UK. Suspected case of FGM must be disclosed immediately to the DSL.

6. ROLES AND RESPONSIBILITIES

Professional expectations

Everyone who comes into contact with our children and their families has a role to play in safeguarding children. We place a high priority on identifying concerns early and providing help for children in order to prevent concerns from escalating. We do this because we are acutely aware that we play a vital role in the wider safeguarding system for children. Together with the police, health care system and other children's services, we promote the welfare of children and protect them from harm.

All our staff are aware that *Teacher Standards 2012* states that teachers, including headteachers, should safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties. These standards also apply to trainees, inductees and Newly Qualified Teachers (NQTs), and we fully adhere to these standards with rigour, applying our school disciplinary procedures, where appropriate, in cases of misconduct.

The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL):

- has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff;
- must receive updated child protection training at least every two years;
- acts as a source of support and expertise to the school community;
- encourages a culture of listening to children and taking account of their wishes and feelings;
- is alert to the specific needs of children in need, and those with Special Educational Needs (SEN);
- has a working knowledge of Haileybury Almaty procedures;
- has been trained in the Prevent Duty and how to make referrals to the appropriate agencies, or Channel in the UK;
- has an understanding of locally agreed processes for providing early help and intervention;
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on the child's general file, but kept separately from it;
- immediately refers cases of suspected abuse to local services or the police as appropriate;
- ensures that the child protection file for any pupil leaving the school is forwarded in confidence (and separately from the main pupil file) to the proper person at the pupil's new school as soon as possible;
- attends and/or contributes to child protection conferences;
- coordinates the school's contribution to child protection plans;
- develops effective links with relevant statutory and voluntary agencies;
- ensures that all staff sign to indicate that they have read and understood the Child Protection Policy and Safeguarding Code of Conduct;
- ensures that a record of staff attendance at child protection training is kept;

- ensures that the Safeguarding and Child Protection Policy is regularly reviewed and updated annually;
- liaises with the Nominated Governor and the Head as appropriate;
- publishes the Safeguarding and Child Protection Policy, e.g. on the school's website;
- ensures parents are aware of the school's role in safeguarding, and that referrals about suspected abuse and neglect may be made;
- in the Head's absence, ensures cases concerning a member of staff are referred appropriately to the Chair of Governors and/or the Disclosure and Barring Service (DBS); and
- where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college upon request;
- submits an annual report to the Governors about how the school's duties have been carried out. Any reported weaknesses will be rectified by the DSL without delay.

Deputy Designated Safeguarding Lead (DDSL)

The Deputy Designated Safeguarding Lead (DDSL):

- must be appropriately trained in child protection at least every two years. In the absence of the DSL, the DDSL carries out those functions necessary to ensure the ongoing safety and protection of children at the school;
- must have the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff;
- will assume all of the functions as for the DSL, as stated above, in the event of the long-term absence of the DSL.

The Board of Governors:

- will appoint a governor for child protection who will undertake training in inter-agency working, in addition to basic child protection training;
 - This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding.
- will ensure that the school has a Designated Safeguarding Lead (DSL), whose role is explicit in the role holder's job description;
- will ensure that the school has a safeguarding and child protection policy and procedures, including a staff safeguarding code of conduct, that are consistent with UK and Kazakh statutory requirements, as well as the standards of an appropriate accrediting body, are reviewed annually, and are signed off by the Chair of the Board of Governors;
- will ensure that the school's Safeguarding and Child Protection Policy and procedures are made available publicly on the school's website and/or by other means as appropriate;
- will ensure that the school has procedures for dealing with allegations of abuse made against members of staff, including allegations made against the Head, and allegations against other children;

- will ensure that the school follows safer recruitment procedures that include statutory checks on staff suitability to work with children;
- will ensure that the school develops a training strategy that ensures all staff, including the Head, receive information about the school's safeguarding arrangements on induction and appropriate safeguarding and child protection training, which is regularly updated in line with any changing statutory and accreditation requirements;
- will ensure that the school makes all contract staff, temporary staff and volunteers, interns, Trainee Teachers aware of the school's arrangements for safeguarding and child protection;
- will ensure that the school contributes to any relevant inter-agency working and plans, where necessary;
- will ensure that the school provides a coordinated offer of early help when additional needs of pupils are identified;
- will ensure that the school considers how pupils may be taught about safeguarding, including online safety, as part of a broad and balanced curriculum, and
- remain aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010, (including the Public Sector Equality Duty), and their individualised safeguarding arrangements, and
- will address and rectify without delay any deficiencies or weaknesses in the school's safeguarding and child protection policy and procedures, which are brought to the attention of the Board of Governors.

The Board of Governors nominates a member (normally the Chair) to be responsible for liaising with the agencies on strategic issues of safeguarding and child protection, and in the event of an allegation being made against the Head or a member of the Board of Governors. It is the responsibility of the Board of Governors to ensure that the school's safeguarding, recruitment and managing allegations procedures are in accordance with national guidance both in Kazakhstan and the UK, as well as the requirements of relevant accrediting bodies.

The Head

The Head:

- ensures that the Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff;
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice, and that such concerns are handled sensitively and in accordance with 'whistle-blowing' procedures;
- ensures that children are provided with opportunities throughout the curriculum and in PD to learn about safeguarding, including keeping themselves safe online;
- liaises with the Chair of the Board of Governors where an allegation is made against a member of staff or of the Board of Governors; and
- ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service (DBS), if a UK national, or to the relevant embassy for other foreign nationals.

Heads of House (Senior School) and Phase Leaders (Junior School)

Heads of House (Senior School) and Phase Leaders (Junior School):

- Are expected to complete Advanced Safeguarding Training at least every two academic years.
- According to the triaging process, concerns may be assigned to Heads of House (Senior School) to act as the Case Owner.
 - Once assigned, Case Owners are responsible for ensuring that the concern is followed up and that Tasks are set as required. When a Task is set, the responsibility for that concern is with the member of staff responsible for completing the Task; deadlines must be adhered to in order to prompt the Case Owner to proceed with next steps accordingly.
- At *any* time, colleagues assigned as Case Owners may request that a concern is transferred to a member of the Safeguarding Committee.

Senior pupils in positions of responsibility

Senior pupils who hold positions of responsibility (e.g. Head Boy/Head Girl, prefects) will be briefed on appropriate action to take should they have concerns or receive any allegations of abuse. Peer coaching training is offered to enhance senior pupils' awareness of safeguarding issues, and empower them in carrying out their pastoral responsibilities.

The Medical Team

The medical team will hold copies of *Working together to Safeguard Children* (DfE March 2015) and *Keeping Children Safe in Education* (DfE, 2026) and has its own protocols for recognising and acting upon signs of child abuse. The Nurse works in accordance with the *Nursing & Midwifery Council's Code of Conduct*. They will liaise closely with the DSL and other members of the school's safeguarding team, e.g. the Health & Safety team.

The Doctor has legal and contractual obligations to report the same, either to the Head or hospital. Medical staff are invited to participate in any school training concerned with the welfare and protection of children.

On Call

In the event of an emergency, staff, parents and/or visitors may contact:

Simon Mills (Headmaster):

Darshak Pandya (DSL):

Elizabeth Kirton (DDSL)

Matthew Hunt-Brown (DDSL)

Shynar Sadykova (DDSL Administrative)

Dina Amangaldiyeva (DDSL Administrative)

The wider Safeguarding Committee and SLT remain available in the event of an emergency.

7. GOOD PRACTICE GUIDELINES AND STAFF CODE OF CONDUCT

To meet and maintain our responsibilities towards pupils, Haileybury Almaty agrees standards of good practice, which are published as professional guidelines in the relevant handbooks. These include guidelines on physical contact; use of reasonable force; supervising changing rooms; language; searching and confiscation; working alone with a pupil; social media; bullying; favouritism; gifts and private tutoring.

Members of staff (including volunteers, interns, Trainee Teachers and supply or cover staff not employed by Haileybury Almaty) are expected to follow the guidance given in the document '*Guidance for Safer Working Practice for Adults who Work with Children and Young People*' (DfE 2009) and *Working Together to Safeguard Children* (DfE September 2019).

Good practice includes:

- treating all children with respect;
- setting a good example by conducting oneself appropriately;
- involving children in decisions that protect them;
- encouraging positive, respectful and safe behaviour among children;
- being a good listener;
- being alert to changes in children's behaviour and to signs of abuse and neglect;
- recognising that challenging behaviour may be an indicator of unhappiness or abuse;
- reading and understanding the school's Safeguarding and Child Protection Policy and guidance documents on wider safeguarding issues, including: Anti-Bullying, Behaviour, Trips, Social Media and online safety, First Aid, Health & Safety, confidentiality;
- asking the child's permission before initiating physical contact, physical support during PE, touching during music lessons for the purposes of demonstration, or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language;
- meeting with a child in a room where the teacher can be seen, so that a child is never at risk or the teacher open to false allegations;
- ensuring that pupils' toilets and changing rooms are never used or frequented by adults and staff;
- being aware that the personal and family circumstances and lifestyles of some children may lead to an increased risk of abuse;
- applying the use of reasonable force only as a last resort and in compliance with the school policy on Reasonable Force;
- referring all concerns about a child's safety and welfare to the DSL, or, if necessary through the DSL to external agencies;
- following the school's rules with regard to communication with children and use of social media and online networking.

All staff will be expected to sign a Professional Code of Conduct and also a Safeguarding Code of Conduct at the start of each academic year and at the commencement of their employment.

8. ABUSE OF TRUST

All members of staff are aware that inappropriate behaviour towards children is

unacceptable and that their conduct towards the children must be beyond reproach. In addition, members of staff should understand that, under the UK Sexual Offences Act 2003, it is an offence for a person over the age of 18 who is in a position of trust to have any kind of sexual relationship with a person under the age of 18, even if the relationship is consensual. This means that any sexual activity between a member of the School staff (including volunteers, interns, Trainee Teachers and supply or cover staff not employed by Haileybury Almaty) and a pupil under 18 would be a criminal offence in the UK, even if the pupil is over the age of consent.

In relation, UK nationals and residents that are found to have committed a sexual offence in a country outside of the UK, that would normally constitute a sexual offence in England and Wales, could be found guilty under the Sexual Offences Act 2003, Section 72 following a recent update to legislation in line with KCSIE 2026.

Sexual Offences Act 2003

It is also an offence for minors to distribute child pornography to each other, including photos and sexting (making or sharing of nudes or semi-nudes), and through social media.

Members of staff must not use their status and standing to form or promote relationships with pupils which are of a sexual nature, **or which may become so once the pupil leaves the school**. Sexual relationships with former pupils may therefore be open to scrutiny in case the member of staff was grooming the person while they were a pupil of the school, and thereby constitute an abuse of trust.

The age of consent in Kazakhstan is 16. The age of consent is the minimum age at which an individual is considered legally old enough to consent to participation in sexual activity. Individuals aged 15 or younger in Kazakhstan are not legally able to consent to sexual activity, and such activity may result in prosecution for statutory rape or the equivalent local law. Kazakhstan statutory rape law is violated when an individual has consensual sexual contact with a person under age 16.

9. CHILDREN WHO MAY BE PARTICULARLY SUSCEPTIBLE

Some children may be at an increased risk of abuse. It is important to understand that this increase in risk is more likely due to societal attitudes and assumptions, and failures to acknowledge children's diverse circumstances, rather than the individual's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

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

- disabled or have special educational needs;
- young carers at home during term time, pauses and holidays;
- living in a domestic abuse situation and/or seeing, hearing or experiencing the effect of domestic abuse;
- affected by parental substance misuse;
- living away from home;
- susceptible to being bullied, or engaging in bullying;
- living in temporary accommodation;

- living transient lifestyles;
- living in chaotic and unsupportive home situations;
- susceptible to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- involved directly or indirectly in sexual exploitation;
- or who whose level of English makes it more difficult for them to express themselves to staff in school
- now in EHE (Elective Home Education)
 - in which case it is important that any strategies or plans to support in school are shared with Parents or Carers for future reference.

Gender - Questioning Children

- The school must not allow children into toilets or changing rooms/showers of the opposite biological sex.
- Students must not share overnight accommodation with the opposite biological sex.
- Sports: Students must be separated by biological sex in physical sports where safety or fairness is a factor.
- Parents/carers must be engaged as a matter of priority if a child requests social transition support and staff must not adopt social transition changes unilaterally.

Early Years Foundation Stage

Key requirements according to the [Early Years Foundation Stage Statutory Framework \(DfE, 2026\)](#), are covered through this policy. Requirements pertaining to safer recruitment are covered in the Safer Recruitment Policy.

In addition to the overarching requirements:

- EYFS Staff must promptly report any changes in their health, criminal record, or personal circumstances that could affect their suitability to work with children.
- Staff Ratios & Qualifications: Required adult-to-child ratios must be strictly maintained at all times based on children's ages (Under 1s, 1–2s, 2–3s, and 3+).
- Paediatric First Aid (PFA): At least one person with a current, full 12-hour Paediatric First Aid certificate must be on the premises and available at all times when children are present, and must accompany children on outings.
- Risk Assessments: The provider must assess risks to children's health and safety, taking reasonable steps to identify hazards, mitigate risk, and maintain safety across all daily activities and outings.
- Child Records: Providers must maintain accurate records for every child, including emergency contact details, allergy/medical records, and attendance logs.
- Parental Information: Parents must be kept informed about the setting's policies, key person allocations, daily routines, and any safeguarding or injury incidents occurring during the day.

This list provides examples of particularly susceptible groups but is not exhaustive. Further guidance pertaining to susceptible children or children in need is available via [Children in Need](#).

10. MISSING CHILDREN

The school must follow clear and consistent procedures for registration and attendance to ensure the safety of all children, and to carry out its duty of care. The school recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Members of staff must therefore respond promptly to absences and follow the school's Missing Child procedures, which are part of the Attendance Policy which refers to the statutory guidance included in the DfE's Working together to improve school attendance. The Heads of school monitor any unauthorised absence at the start or end of any leave period, and must be particularly cautious if a child goes missing on repeated occasions; any concerns arising must be raised promptly with the DSL.

The school recognises the duty to inform the parents of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period as determined in the Attendance Policy. If concerns are raised then the DSL may inform the police (according to UK guidance available within When to call the Police) or the relevant embassies when involving foreign children.

The Board of Governors recognises that it should put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

11. HELPING CHILDREN TO KEEP THEMSELVES SAFE

Children are taught to understand and manage risk in various ways, including the PSHE programme. Children are encouraged to think about risks they may encounter and to work out how such risks can be overcome. These discussions are empowering and enabling. They aim to promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves in a safe and responsible manner. They are also regularly reminded about online safety and counter-bullying procedures. The school continually promotes an ethos of care and respect for others. Children are encouraged to speak to a member of staff in confidence about any worries they may have.

The DSL will liaise with the headteacher or principal to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

12. SUPPORT FOR THOSE INVOLVED IN CHILD PROTECTION ISSUES

Child abuse is devastating for the child. It can also result in distress and anxiety for staff who become involved. The school will support children, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (normally the DSL) who will keep all parties informed and be the central point of contact;
- where a member of staff is the subject of an allegation made by a child, separate (independent) link people will be nominated to avoid any conflict of interest and appropriate support provided for him or her;

- responding sympathetically to any request from children or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of help lines, counselling or other avenues of external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures; and
- cooperating fully with relevant statutory agencies.

13. COMPLAINTS PROCEDURE

The school's complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that does not initially reach the threshold for child protection action. Examples of poor practice include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil, or discriminating against them in some way. Such complaints are managed by members of the Senior Leadership Team and governors. Complaints from staff are dealt with under the school's Disciplinary and Grievance procedures.

14. STAFF CONCERNS ABOUT A COLLEAGUE

A member of staff who is concerned about the conduct of a colleague towards a child is undoubtedly placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all staff must remember that the welfare of the child is paramount. The school's Whistleblowing Policy enables members of staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Head. Complaints about the Head should be reported to the Chair of Governors.

15. ALLEGATIONS AGAINST STAFF

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals can pose a serious risk to children and we must therefore act on every allegation. Members of staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff – including the DSL or a DDSL - should be reported to the Head. If the Head is absent, allegations against all staff should be reported to the Chair of Governors.

Allegations against the Head or a member of the Board of Governors should be reported to the Chair of Governors.

The full procedures and UK statutory guidance for dealing with allegations against staff can be found in 'Keeping Children Safe in Education' (DfE, September 2026).

16. STAFF TRAINING

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. Academic staff have access to online training and will be expected to undertake regular training in this on specific modules. All staff have face-to-face training annually.

- New staff and governors will receive an explanation during their induction, which includes the school's safeguarding and child protection policy and procedures, reporting and recording arrangements, professional guidelines in the various staff handbooks, contact details for the DSL and a copy of Part One of KCSIE;
- All staff, including the Headmaster and Governors, will receive training that is regularly updated, in line with advice from the relevant statutory bodies in the UK and internationally and must read at least Part One of KCSIE; following recent updates in legislation, this training will also include
 - An overview of the Behaviour, Rewards and Consequences policy
 - Missing from Education (within the context of both the Junior and Senior school)
 - Online Safety Training
- The DSL and DDSL will receive child protection training updated at least every two years, including training in inter-agency procedures as appropriate in an international setting;
- Temporary staff and volunteers, interns, Trainee Teachers in regulated activity will have regular safeguarding and child protection training;
- Visitors and visiting staff will be supervised by a member of the school staff at all times;
- All staff supplied by other bodies will be made aware of the school's procedures, policy and the contact details of the DSL and her deputies.

17. SAFER RECRUITMENT

The school endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in '*Keeping Children Safe in Education*' (DfE, September 2026) and the school's own policies and procedures together with procedures pertaining to contractors, coaches and partners etc.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children; check verbally at least one of these references.
- provide evidence of identity and qualifications;
- be checked in accordance with the Disclosure and Barring Service (DBS) if worked in the UK and other agencies for other foreign nationals, meeting regulations as appropriate to their role;
- include prohibition checks with the NCTL for teaching staff;

- provide evidence of their right to work in Kazakhstan in order to obtain a working visa; and
- undergo online checks as outlined in KCSIE 2026;
- be interviewed.

Safer recruitment also means that the school will ensure that:

- the candidate's mental and physical fitness to carry out their work responsibilities is verified;
- at least one member of each recruitment panel will have attended safer recruitment training;
- all new members of staff undergo an induction that includes familiarisation with the school's Safeguarding and Child Protection and Policy and Procedures and identify their child protection training needs;
- all staff sign to confirm they have received a copy of the Safeguarding and Child Protection and Policy and Procedures; which is part of the Safeguarding Code of Conduct; and
- written confirmation is obtained from supply agencies that agency staff have been appropriately checked.

Full details of the school's recruitment procedures are to be found in the Safer Recruitment Policy.

Volunteers and Trainee Teachers

Volunteers and Trainee Teachers, including governors, will undergo checks and a risk assessment commensurate with their work in the school and contact with the children.

Supervised Volunteers

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.

Contractors

The school checks the identity of all contractors working on site and requests police checks where appropriate.

18. SITE SECURITY

Haileybury Almaty is a relatively open campus opposite the Esentai Mall development, and in an area that is being developed for residential and commercial use. Once on the site the buildings allow access to all areas of the school during the school day. All members of the school's community are therefore required to take responsibility for site security and remain vigilant about trespassers. The school's Security team provides supervision of the site and can be contacted 24/7 at the Security Control room.

Visitors to the school, including contractors, are required to sign in at the main gate where they will be given a visitor's badge on a lanyard. Key safeguarding information is issued to all visitors. Subject to their position and purpose, visitors should be escorted. All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure that children in the school are kept safe.

19. THIRD PARTY USE AND OFF-SITE ARRANGEMENTS

Procedure for third party users of the school facilities

The school's facilities, particularly sporting facilities, may be hired by third party users, and under these arrangements the school has no control over, and assumes no liability for the conduct of individuals from third party users. However, the school will ensure, as far as it is able, that third party users have appropriate child protection and safer recruitment procedures in place. Third party users are also made aware of the school ground areas which are out of bounds.

Third party users will be required to provide the school with a copy of the organisation's Child Protection Policy prior to approval being given for their use of the school's facilities. All third party users providing activities which involve children will be required to sign a declaration to confirm that:

- the third party user has a child protection policy in place;
- safer recruitment procedures are followed for the third party user's staff and volunteers; and
- all staff and volunteers, interns, Trainee Teachers are appropriately trained in child protection and safeguarding procedures.

The Head and the DSL will be informed of any child protection allegation or incident which takes place on the school premises during use by that organisation.

Procedure for dealing with an allegation of abuse by an individual of a third party user using the school's facilities

If an allegation of abuse is made about an adult in a third party user, the organisation's Safeguarding Officer must notify the Headmaster or the DSL on the same day as the incident occurred or the disclosure was made, or as soon as possible. The school expects the third party user to follow its own Child Protection Policy and the Head will require confirmation that appropriate action has been taken before further use of the school's facilities will be allowed.

External organisations who have responsibility for children on another site

When our children attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place, as outlined in the school's Trips Policy.

Out of Hours Hire

According to KCSIE 2026, out of hours hire contracts for organisations working with children on the school site must meet expectations outlined in the [guidance on keeping children safe in out-of-schools settings](#). Additionally any indication, sign or symptom that a child may be at risk of harm that arises at school whilst it has been hired out must be reported immediately to the Bursar or member of staff at the school in accordance with the G1 Safeguarding and Child Protection Policy & Guidelines.

At school, an ongoing process to update these contracts has been initiated and will remain

ongoing until this recommendation has been met.

Children staying with host families

The school may make arrangements for children to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the school follows the guidance in 'Keeping Children Safe in Education' (DfE, September 2026), Annex C to ensure that hosting arrangements are as safe as possible.

20. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have safeguards in place.

To protect our children we:

- seek parental consent for photography of our pupils through the school's Terms & Conditions when children are admitted to the school;
- seek parental consent for photography of pupils which may be extraordinary e.g. photos of children in advertising, a staff member's portfolio of drama productions;
- demonstrate respect, care and caution when including photographs of pupils in newsletters, our website, and any other school publication; and
- encourage children to tell us if they are worried about any photographs that are taken of them.

21. ONLINE SAFETY AND LEARNING

Children increasingly use mobile phones, tablets and computers on a daily basis. They are a source of information and entertainment, and a means of communication and education. However, we know that some adults and young people use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography, or face-to-face meetings; including most recently risks relating to disinformation, misinformation and conspiracy theories. The Prevent Duty requires the school to safeguard susceptible individuals from being radicalised or drawn into extremism through the internet or social media.

The school's online safety policy is incorporated in the IT Policy. This explains how we try to keep children safe in school. Online bullying and sexting (making or sharing of nudes or semi-nudes) by children, via texts and emails, will be treated as seriously as any other bullying behaviour and will be managed through our anti-bullying procedures. The following measures are in place to promote online safety within the school:

- **Digital Policy:** protects all parties by clearly stating what is acceptable and what is not. Children are expected to sign up to this at the start of each academic year and before access can be given to the school's ICT facilities.
- **AI Policy:** describes the use of Artificial Intelligence in the school and, in particular, refers to the responsibilities of the school with regards to the use of AI. In addition,

as part of a recent update as outlined in KCSIE 2026, reference has been included to the DfE guidance Generative AI: product safety expectations.

- **Induction and Education:** all children are inducted in appropriate use of the school's ICT facilities and other aspects of this policy upon arrival. Class teachers/House tutors must remind children at the start of each academic year about their obligations and code of conduct. This is reinforced by the PSHE programme's content on online safety.
- **Monitoring:** as outlined in the Digital Policy, the school will exercise its right to monitor the use of computer systems, including the monitoring of internet use, interception of emails, and the deletion of inappropriate materials at all times. In circumstances where the school believes unauthorised use of the computer system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the school reserves the right to inform appropriate authorities and provide documentary evidence. The computer network is owned by the school and may be used by children to advance and extend their knowledge and understanding.

Members of Staff also receive advice regarding the use of social networking and electronic communication with children, which follows the guidance given in the document '*Guidance for Safer Working Practice for Adults who Work with Children and Young People*' (DfE March 2009) and the Social Media Policy.

In order to ensure these standards are in place and maintained, the Governors have assigned a number of responsibilities across the school:

Headmaster and DSL

- *Ensure all staff are fulfilling their responsibilities in order to meet the required standards.*
- *Reviewing filtering and monitoring reports*
- *Ensuring a response to any safeguarding concerns pertaining to Online Safety*
- *Conducting an online safety review annually according to Digital and Technology Filtering and Monitoring guidance from the UK Government.*

The SLT via the Head of Digital Learning/IT Department

- Procuring filtering and monitoring systems
- Documenting decisions on what is blocked or allowed and why
- Reviewing the effectiveness of provision
- Overseeing reports and completing actions following concerns or checks to systems.
- Ensuring staff:
 - Understand their role and are appropriately trained.
 - Follow policies, processes and procedures.
 - Act on reports and concerns.

All Staff

- Ensure that personal social networking sites are set at private and pupils are never listed as approved contacts.
- Never use or access social networking sites of pupils.
- Avoid giving their personal contact details to pupils, including their mobile telephone number.
- Only use equipment e.g. mobile phones, provided by the school to communicate with children such as on field trips and expeditions.
- Only make contact with pupils for professional reasons and in accordance with the school's policy, and only through the school email system or otherwise.
- Recognise that text messaging or social messaging should only be used as part of an agreed protocol and when other forms of communication are not possible.
- Not use internet or web-based communication channels to send personal messages to pupils.