



WESTMINSTER

INTERNATIONAL SCHOOL

SAFEGUARDING AND CHILD PROTECTION POLICY

2026

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SAFEGUARDING AND CHILD PROTECTION POLICY

1.1 Introduction and Statement of Commitment

Westminster is committed to safeguarding and promoting the welfare of all children and young people in our care. We believe that all children have the right to be protected from harm and to develop in a safe and supportive environment. This policy applies to all staff, volunteers, contractors, and visitors to our school.

We recognize that effective safeguarding requires a whole-school approach, where everyone understands their role in identifying concerns, sharing information, and taking prompt action to protect children.

Westminster operates a zero-tolerance approach to any behaviour that places a child at risk. Every adult on our premises, regardless of role, seniority, or length of service, is expected to meet the standards in this policy without exception, and any breach will be treated with the utmost seriousness.

This policy applies equally to teaching staff, support and maintenance staff, coaches, mentors, tutors, visiting instructors, contractors, drivers, and volunteers. Wherever this policy refers to “staff”, it means every adult in this list, without exception. This policy is also survivor-centred: at every stage, the child's wishes, comfort, and dignity will be considered and prioritised, alongside the need for a fair and thorough process.

1.2 Legal Framework and Guiding Principles

This policy has been developed in accordance with best practices in child protection and safeguarding.

Our guiding principles are:

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm

National Legislation:

- Constitution of Pakistan – Article 25(1): equal protection under law for all citizens, including children
- Constitution of Pakistan – Article 11(3): prohibits employment of children in hazardous conditions
- Prevention of Child Trafficking Act
- Protection Against Harassment of Women at the Workplace Act, 2010 (applicable to minors in educational settings)

International Frameworks:

- United Nations Convention on the Rights of the Child (UNCRC) – ratified by Pakistan in 1990
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- UN Sustainable Development Goals (SDGs) – particularly Goal 16 (protection of children from abuse and violence)

1.3 Definitions

Safeguarding

Safeguarding refers to the process of protecting children from abuse, preventing impairment of their health and development, and ensuring they grow up in circumstances consistent with the provision of safe and effective care.

Child Protection

Child protection is an aspect of safeguarding that focuses on protecting specific children who are suffering or at risk of suffering significant harm.

Definition of a Child

In accordance with Pakistani law and the UNCRC, a child is defined as any person under the age of 18 years.

Types of Abuse

- Physical abuse
- Emotional abuse
- Sexual abuse
- Persistent failure to meet a child's basic physical and/or psychological needs

Additional Concerns

- Bullying and cyberbullying
- Child sexual exploitation
- Radicalization
- Peer-on-peer abuse
- Online safety concerns
- Mental health issues

Low-Level Concern: any behaviour by an adult towards a child that does not meet the threshold of abuse, but which is inconsistent with the staff Code of Conduct and, over time or in a pattern, could indicate a risk to children (see Section 1.9).

1.4 Safeguarding Roles and Responsibilities

Designated Safeguarding Lead (DSL)

The school will appoint a DSL who will:

- Act as a lead in handling concerns
- Ensure all staff receive regular safeguarding training
- Maintain accurate and secure child protection records
- Liaise with external agencies when necessary
- Coordinate referrals and support
- Review and update safeguarding policies and procedures
- Maintain up-to-date knowledge of local and national child protection legislation
- Ensure compliance with reporting requirements under Pakistani law

Designated Safeguarding Contacts (Per Section/Tier)

The School shall ensure that designated teachers are available within each section/tier whom children may safely approach if they have a concern or wish to discuss any matter.

Designated teachers shall be familiar with the School's Child Protection and Safeguarding Policy and shall respond to any concerns raised with professionalism, discretion and empathy.

Parents shall be informed of their child's designated safeguarding contact to ensure that they have a clear and direct point of contact.

Designated safeguarding contacts shall work alongside, and report to, the Designated Safeguarding Lead (DSL). They provide an accessible first point of contact for children and parents and do not replace the formal reporting procedures set out in Section 1.8.

Section Head / Head of School will:

- Ensure policies and procedures are effectively implemented
- Allocate sufficient resources for safeguarding

- Create a culture where staff feel supported in raising concerns
- Oversee the safer recruitment process
- Ensure all staff undergo required background checks and verifications

1.5 Safer Recruitment and Staff Selection

School is committed to safer recruitment practices to ensure that all individuals working with children are suitable and pose no risk to child welfare.

This section applies to every adult with access to children on school premises or school activities; including teaching staff, support and maintenance staff, drivers, security personnel, contractors, and volunteers, not teaching staff alone.

Employment Screening

- Identity Verification: Verification through the National Database and Registration Authority (NADRA); valid CNIC or passport verification; proof of current address
- Educational Qualification Verification: verification with educational institutions for all claimed degrees, diplomas, and certificates (where applicable to the role)
- Employment History Verification: contact with previous employers to verify work experience and performance; assessment of any gaps in employment history (if applicable)
- Criminal Record Check: criminal background screening through NADRA; local police verification certificate; Citizens Police Liaison Committee (CPLC) record check where applicable
- Professional Reference Check: two professional references, including at least one from a previous employer

Interview and Selection Process

- Interview questions will explore candidates' understanding of child protection and safeguarding
- Candidates will be asked about their motivation to work with children
- Scenario-based questions will assess candidates' responses to safeguarding concerns
- Any gaps in employment or discrepancies in application materials will be explored

Third-party and contracted staff: where support or maintenance functions are outsourced to a third-party, the school will require written confirmation from the agency that equivalent screening has been completed for any of its staff with access to school premises during school hours and will retain copies of this confirmation.

Single Central Register: the school will maintain a single central record listing every staff member, volunteer, and regular contractor with access to children, confirming the date each required check was completed. This register will be reviewed by the DSL and Head of School each term.

1.6 Staff Code of Conduct

All staff are expected to model behaviour that keeps children safe and avoids placing themselves or children in situations that could be misinterpreted or exploited. This Code applies equally to every adult on school premises.

- Physical contact with students should be limited to what is necessary, age-appropriate, and in view of others wherever possible.
- No adult should be alone with an individual child in a closed or unobserved space
- Adults must not contact students through personal social media, personal phone numbers, or messaging apps outside official school channels.
- Photography or filming of students is only permitted through official school channels and for legitimate school purposes.
- Adults must not give students gifts, money, or preferential treatment outside of official school recognition processes.
- Any physical assistance required for young children (e.g. washroom or changing assistance) must follow the Intimate Care Protocol.
- Any breach of this Code, however minor it may seem, should be reported as a Low-Level Concern (Section 1.9).

1.7 Supervision and Intimate Care

This section directly governs how children are supervised in spaces where risk is highest, washrooms and other spaces not in general view.

- Where supervision of washrooms or similar spaces is required, it must be provided by two staff members present, or one staff member within clear sight/sound of at least one other colleague, at all times.
- Support and maintenance staff will not have unsupervised access to areas used by children (including washrooms) during school hours. Access for cleaning or repairs will be scheduled and logged, with a staff member aware of their presence.
- CCTV coverage will be maintained at entry points to washrooms, handwashing areas and other areas not in general view (not inside washrooms, in line with privacy and dignity requirements).

Intimate Care Protocol (Early Years)

- Any child requiring washroom or changing assistance will be assisted only by designated staff, with a second adult informed and reasonably nearby.
- Parents will be informed in advance of which staff are authorised to provide intimate care for their child.
- Any deviation from the usual routine or assisting adult must be recorded and communicated to the Head of school on the same day.

1.8 Procedures for Managing Concerns

Recognizing Signs of Abuse

Staff should be alert to potential indicators of abuse or neglect, including:

- Unexplained injuries
- Significant changes in behaviour
- Deterioration in appearance or hygiene
- Inappropriate sexual knowledge or behaviour
- Frequent absences
- Signs of self-harm

Responding to Disclosures

When a child discloses abuse, staff should:

- Listen carefully and take the disclosure seriously
- Not promise confidentiality
- Reassure but not make promises
- Not ask leading questions
- Not express shock or disbelief
- Make accurate notes using the child's words
- Report concerns immediately to the DSL

Reporting Procedures

1. Staff member (or any adult) identifies concern
2. Concern form completed and submitted to the DSL
3. DSL assesses the concern and informs the Head of School
4. DSL and Head determine appropriate action
5. DSL maintains appropriate records
6. DSL provides feedback to the person who raised the concern, as appropriate

How Children Can Report: Every classroom will display, in age-appropriate language and images, the names/photos of “trusted adults” a child can go to with any concern, including their section/tier's designated safeguarding contact and at least one adult outside their usual class teacher. For younger children, this will be taught and repeated verbally, not only displayed.

Record Keeping

- All concerns must be recorded in writing
- Records should be factual, dated, and signed
- Records must be stored securely with restricted access

Records relating to a child protection concern will be retained for a minimum of 10 years. The school will seek local legal advice to confirm the appropriate retention period under applicable Pakistani data protection requirements.

Confidentiality and Information Sharing

- Child protection information will be stored and handled in accordance with data protection principles
- Information will only be shared on a need-to-know basis
- Staff should never promise a child that they will not tell anyone about an allegation
- The DSL will make decisions about information sharing in line with the best interests of the child and legal requirements
- Information will be shared with external authorities when required by law or when necessary to protect a child

1.9 Managing Low-Level Concerns

A low-level concern is any behaviour towards a child that does not meet the threshold of abuse but is inconsistent with the Staff/student Code of Conduct, for example, repeatedly seeking to be alone with a particular child, ignoring supervision protocols, or overly familiar communication.

- Staff are expected, and supported, to report low-level concerns about a colleague's/student's behaviour, even where they are unsure, and even about senior colleagues.
- Low-level concerns are reported to the DSL (or Head of School, if the concern is about the DSL) and logged centrally, separately from formal allegation records.
- The DSL will review logged concerns for patterns over time; a single low-level concern may not warrant action, but a pattern involving the same individual will be escalated.
- Reporting a low-level concern in good faith will never be treated as disloyalty or a performance issue against the person who raised it.

This process exists because, in many documented cases of abuse in schools internationally, colleagues, students, or parents had concerns about an individual's behaviour long before any abuse was confirmed, but no mechanism existed to collect and connect those observations centrally.

1.10 Managing Allegations Against Staff and Other Adults

This procedure applies to any adult with access to children, including support, contracted, and third-party staff, not only teaching staff.

Procedure for Allegations

- The allegation should be reported immediately to the Head of School
- If the allegation involves the Head of School, it should be reported to the Directors
- The accused person should not be informed until initial consultation has taken place
- A full investigation will be conducted in accordance with school policy and Pakistani law
- Appropriate external authorities (police, Child Protection and Welfare Bureau) will be informed as required

Interim Risk Management: Pending the outcome of an investigation, the accused individual will be removed from all direct contact with students (through suspension, reassignment, or restricted duties, as appropriate) as a standard precautionary measure. This is not a finding of guilt, and will be communicated to the individual as such, but is applied without exception to protect children while the facts are established.

Support for Those Involved

- Support will be provided for the child and family
- The accused staff member will be treated fairly and honestly, and informed of the process and their rights
- Confidentiality will be maintained for all parties
- Swift resolution will be sought

Outcomes

- Allegation is substantiated: Disciplinary action up to and including termination, and reporting to police/authorities
- Allegation is malicious: Appropriate action will be taken against the person making the allegation
- Allegation is unsubstantiated: The individual will be supported to return to normal duties, with a documented explanation of the outcome
- All outcomes will be properly documented and retained

Survivor-Centred Practice

- The child's account will be believed and acted upon in good faith unless and until an investigation finds otherwise.
- Wherever possible, the child (and family, as appropriate) will be kept informed of the process and next steps in age-appropriate language, and their wishes about support and pace will be considered.
- The child will not be required to repeat their account more times than is strictly necessary.
- Support (counselling, a trusted adult check-in, adjustments to routine) will be offered to the child for as long as needed, not only in the immediate aftermath.
- The child will never be made to feel responsible for the consequences of a report, including any disruption to the school community that follows.

1.10 SOP: Allegations Involving Another Student (Peer-on-Peer)

Concerns of this nature require a distinct approach, as both children involved are owed a duty of care.

- The concern is reported to the DSL immediately, using the same reporting route as any other safeguarding concern.
- Both the reporting child and the child who is the subject of the concern will be supported separately and will not be required to discuss the matter directly with one another as part of the process.
- The DSL will assess risk to both children and put interim measures in place (e.g., adjusted supervision, separated activities) while the concern is reviewed, this is a safeguarding measure for both children, not a punishment.
- Where the concern meets the threshold of abuse or a criminal matter, it will be referred to police/Child Protection & Welfare Bureau in the same way as any other safeguarding concern.
- Where it does not meet that threshold, it will be addressed through the school's behaviour and care policy, with safeguarding oversight from the DSL.
- Parents of both children will be informed in a manner that protects the privacy and dignity of each child, in line with the confidentiality principles in Section 1.8.

1.11 Whistleblowing and Staff Protection

- Any staff member who raises a safeguarding concern in good faith about any colleague, regardless of seniority, will be protected from any form of retaliation, disciplinary action, or negative treatment as a result of having raised it.
- Concerns may be raised directly with the DSL, the Head of School, or, where the concern involves school leadership or directly with the Board of Directors.
- Staff may raise a concern anonymously; however, providing contact details allows the DSL to follow up and provide feedback.

1.12 Premises Security and CCTV

- CCTV will cover all entry points, corridors, and common areas, including approaches to washrooms and isolated spaces, with footage retained for a minimum of 15 days and accessible only to designated staff.
- All visitors, including contractors and vendors, must sign in, wear visible identification, and be accompanied while on premises during school hours.

1.13 Staff Training and Support

- All staff will receive safeguarding training upon induction and at regular intervals thereafter
- Regular updates will be provided
- The DSL will receive specialized, externally accredited training
- Training records will be maintained
- Regular safeguarding updates will be shared at staff meetings

1.14 Preventative Measures and Curriculum

Creating a Safe School Environment

- Regular risk assessments
- Secure premises
- Clear visitor procedures
- Supervision during breaks and transitions
- Safe online environment

Teaching Students About Safeguarding

Age-appropriate education will be provided on:

- Personal safety, including body autonomy and “safe touch”, from Early Years upward
- Healthy relationships
- Online safety
- Recognizing and reporting abuse, including who their trusted adults are
- Mental health awareness

Working with Parents and Community

- Open and honest communication with parents
- Information sharing about safeguarding practices
- Community partnerships

1.15 Online Safety

- Comprehensive online safety policy
- Appropriate monitoring and filtering systems on all school devices and networks
- Education for students on online risks including cyberbullying, grooming, and inappropriate content
- Clear procedures for responding to online incidents
- Regular review of online practices and technology use
- Supervision of student internet access
- Blocking of inappropriate websites and content

1.17 Safeguarding Committee

A standing Safeguarding Committee will be established to provide oversight, take parent concerns directly, and ensure this policy is lived in practice, not only on paper.

- Membership: DSL (Chair), Head of School, at least two parent representatives, one Board/Director representative, and a liaison from the Child Protection and Welfare Bureau where available.
- Meets: at least once per term or when required
- Role: review logged concerns (including low-level concerns) and patterns, monitor implementation of this policy, and provide a channel for parents to raise systemic concerns outside of an individual child's case.
- Contact points for the Committee will be published and displayed as set out in Section 1.18.

1.18 Visible Communication and Signage

The following will be displayed prominently in school spaces accessible to students, staff, and parents, in clear and age-appropriate language:

- The school's zero-tolerance statement (Section 1.1).
- How to report a concern: named DSL, with photos, phone number, and email.
- The designated safeguarding contact for that section/tier, with name and photo, displayed at the entrance to that section.
- Names and contact details of Safeguarding Committee members, including parent representatives.
- For younger children: simple, illustrated “trusted adults” signage in classrooms and washroom-adjacent areas.
- A QR code linking to this policy, for parents and visitors.
- These displays will be checked each term by the DSL and the safeguarding committee as part of the standard safeguarding audit, to confirm they are current and legible.

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