

SAFEGUARDING GOVERNANCE

Briefing for International Schools

February 2025

International Task Force on Child Protection (ITFCP)

Founding members:

[The Academy for International School Heads](#) (AISH)

[The Association for the Advancement of International Education](#) (AAIE)

[Council of International Schools](#) (CIS)

[Council of British International Schools](#) (COBIS)

[The Educational Collaborative for International Schools](#) (ECIS)

[International Schools Services](#) (ISS)

[U.S. Department of State, Office of Overseas Schools](#)

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INTRODUCTION

School Boards and Owners are increasingly expected to provide strategic oversight of child protection and safeguarding in the schools they govern. This briefing provides practical guidance as to how Boards and Owners can do this effectively without becoming involved in operational matters. The accompanying [Safeguarding Governance Resource Pack](#) includes tools to facilitate the implementation of this guidance. This briefing takes into account:

- the diverse national and international legal and regulatory contexts in which schools operate;
- the United Nations Convention on the Rights of the Child (UNCRC), which is central to the protection of children across the globe; and
- the ITFCP Statement of Commitment to Child Protection:

All children have equal rights to be protected from harm and abuse. Everyone has a responsibility to support the protection of children. All schools have a responsibility to build a community that values diversity, equity, and inclusion for each child. All schools have a duty of care to children enrolled in the school and those who are affected by the operations of the school. All actions on child protection are taken with consideration for the best interests of the child, which are paramount.

- the ITFCP Expectations for School Communities 2021, specifying the role of Governance:

3A. The School Governing Board/Owner provides strategic oversight of safeguarding but does not involve itself in the day to day management of child protection in the school. It:

- appoints a member of the Board/Owner as the Safeguarding Trustee*;
- receives child protection induction and training;
- has safeguarding as a standing item on the Board/Owner's agenda;
- creates a statement of commitment to safeguarding and child rights, reviews and approves key safeguarding policies;
- receives a safeguarding report at least annually from the school's Designated Safeguarding Lead;
- reviews anonymous data so that it can spot patterns and trends; and
- receives and reviews any allegations of abuse against the head of school.

**Referred to in this document as the Designated Safeguarding Board Member*

Governance structures in international schools

The Taskforce recognises that international school governance can take many forms: parent-foundations, individual owners, school groups with a central administration, etc. Some of these governance variations include an advisory and/or strategic governing group with varying terminology such as Board, governors, trustees, advisory council, etc. Governing bodies can be elected, appointed, or may include a combination of the two. For the purposes of this briefing, the generic term “Board/Owner” will be used to refer to the school’s highest-level governing structure and its members, whether they be owners or elected/appointed advisors, who have responsibility for long-range strategy, fiduciary oversight, and management of the Head of School.

Setting the context

Scrutiny of the role of the Board/Owner in overseeing safeguarding within a school is increasing. Failings or inadequacies in a school’s safeguarding practices can expose the school (and potentially its staff, owner, and/or board members) to legal, regulatory, reputational and financial risk. Where failings are significant, these risks can be substantial, and in some cases, existential for a school as an institution. Ensuring safeguarding policies and practices are appropriate and effective is therefore an essential part of the Board/Owner’s governance of a school as an educational establishment, charity and/or company. Recent high-profile investigations into abuse (see [Serious Case Reviews](#)), have considered the role of the Board/Owner in safeguarding, asking the governing body questions such as:

- Why did you not have procedures in place which enabled concerns to be reported up to you?
- Why were you not aware that students within your school were being abused?
- Why did you as executives of the school company not talk about safeguarding in your meetings, or review the school’s child protection policy?
- What was the role of the School Board in overseeing and developing safeguarding policy and practices, and how could this be improved?

These investigations emphasised the need for the Board/Owner to play an active role in creating and nurturing a safe culture and monitoring the mitigation of safeguarding risks within the school. They further identified that the Board/Owner must acquire specific safeguarding knowledge and expertise through regular training to be able to do this effectively.



Knowing the Local Legal Context

When reviewing the advice presented in this document, **it is important and necessary** to consider the school’s legal framework, regulatory obligations, and unique cultural sensitivities. In addition to the local governmental authorities, schools may need to consult with Embassies/Consulates when referring allegations to international law enforcement agencies.

ALIGNMENT WITH THE ITFCP EXPECTATIONS FOR SCHOOL COMMUNITIES 2021

Providing strategic oversight of safeguarding

Subject to the legal and cultural expectations in the country where a school is located, effective safeguarding governance involves leadership and decision-making, as well as support and **accountability**, with the Board/Owner performing the role of 'critical friend' to the school leadership and child protection team. Once the Board/Owner's responsibilities have been agreed upon, they should be set out clearly in the school's governance handbook, with reference made to them in the child protection/safeguarding policy and other relevant policies where appropriate.

Some schools' structures are complex, for example, in an international school group where governance is delegated at a regional and or national level. The Board/Owner should carefully consider and ensure that any delegated safeguarding responsibilities are given to those with both access and insight into the school. This will likely be the governing entity which has strategic and financial oversight of the school and manages the Head of School.

KEY RESOURCE: [Safeguarding Governance Resource Pack: Example Wording on the Role of the Board/Owner](#)

NOTE: Avoiding Board Overreach in Safeguarding

The Board/Owner must be aware of the extent and limits of their role and responsibilities to ensure no overreach hinders the management of child protection concerns and the leadership of wider safeguarding practice. The Board/Owner and Designated Safeguarding Board Member (DSBM) should **not** directly receive reports or be involved in the day-to-day case management or review of child protection concerns. **Any information about current or past child protection concerns should only be shared with the Board/Owner and DSBM on an anonymous basis.**

School safeguarding statement

The Board/Owner is responsible for ensuring that a statement of commitment to safeguarding and child rights, aligned with the responsibilities set out in the United Nations Convention on the Rights of the Child (UNCRC), has been developed and formally adopted by the school. This statement should be reviewed periodically and be readily visible to the school community. The statement might appear in the following places:

- the school's website,
- any job descriptions and advertisements,
- in the school's safeguarding policies,
- displayed in the school entrance and public areas,
- in a visitor leaflet that is provided to those who visit the school.

KEY RESOURCE: [Safeguarding Governance Resource Pack: Example Safeguarding Statement](#)

Appointing a member of the Board as the Designated Safeguarding Board Member

Safeguarding is the responsibility of the governing body collectively. The appointment of one governing body member as the primary liaison for safeguarding can help to ensure that the Board/Owner's responsibilities are implemented in practice. When appointing the Designated Safeguarding Board Member (DSBM), consideration of the following attributes is useful;

- a skillset in safeguarding and well-being;
- interest in the area of safeguarding and well-being;
- the ability to maintain confidentiality as appropriate when managing sensitive information;
- local knowledge and experience in safeguarding and well-being;
- capacity to dedicate sufficient time to carry out the role effectively;
- ability to speak up, check and challenge appropriately.

As the liaison between the Board/Owner and the Designated Safeguarding Lead (DSL) of the school, the DSBM can support the DSL to develop, for example, the annual report to the Board/Owner, help to anticipate questions and concerns that might arise, and inform the DSL of issues the Board/Owner may be interested in learning. The DSBM may be required to support the management of any allegations brought against the Head of School. They must therefore be able to maintain a level of confidentiality from the rest of the Board/Owner, as/when appropriate.

It is strongly recommended that the DSBM is **not** the Owner of the school or Board Chair. The DSBM should also **not** be a member of staff who reports to the Head of School (HoS). It is recommended that the DSBM reports to the Board Chair. To avoid bias and promote impartiality, the DSBM should not be directly employed by the Owner of the school or Board Chair or their family members in any role outside their duties as a governing body member. If any other member of the governing body carries out safeguarding duties, it is important to divide responsibilities clearly and concisely so they are reportable and clearly understood.

KEY RESOURCES:

- [ITFCP Protocol on Managing Allegations against an Adult, 2024](#)
- [ITFCP Safer Recruitment Checklist, 2024](#)
- [Safeguarding Governance Resource Pack: Example Role Profile Designated Safeguarding Board Member](#)

Child protection induction and training

Members of the governing body should each complete child protection training at induction, learn updates and undertake additional training as and when needed. This training will upskill the Board/Owner on the safeguarding risks facing students and help them to understand the role of the school

in protecting students. Where governing body members join mid-year, training should be provided as a one-to-one session with the DSL or through an external training provider.

Regular training should include:

- ✓ the Board/Owner's role in overseeing safeguarding in school,
- ✓ reviewing and approving the safeguarding risk register or learning how to put one in place,
- ✓ the Board/Owner's role in overseeing the management of any allegations of abuse against staff or volunteers in school,
- ✓ child protection scenarios, and
- ✓ addressing critical incident communications so that the Board/Owner and Head of School are in agreement on if, when and how information about an allegation of abuse or critical incident should be communicated to parents and others.

Due to the nature of the DSBM's role in managing allegations against staff, it is important they receive advanced training in child protection and, in particular, managing allegations of abuse.

KEY RESOURCES:

- [Safeguarding Governance Resource Pack: Board/Owner Safeguarding Training Checklist](#)
- [Safeguarding Governance Resource Pack: Safeguarding Governance Training Slide Pack](#)
- [Safeguarding Governance Resource Pack: Safeguarding Governance Case Studies](#)

Safeguarding as a standing item on the Board meeting agenda

Safeguarding should be a standing item on the Board meeting agenda and discussed annually or when new risks or incidents emerge. The Designated Safeguarding Lead's (DSL) annual report (see section below) will help to raise awareness of safeguarding practices, increase the Board's knowledge and ensure routine scrutiny of safeguarding incidents. Topics to be reported/reviewed include:

- current safeguarding initiatives in the school,
- planned professional development for the Board, DSBM, Head of School and DSL [if necessary],
- current safeguarding trends in the school and international community,
- resources and safeguarding development/action plan [if necessary], and
- the safeguarding risk register updates as they are added.

KEY RESOURCE: [ITFCP Protocol for Managing Allegations 2024](#)

Reviewing and approving key safeguarding policies

School Boards/Owners should review and approve key safeguarding policies that describe the school's commitment to a culture of student safety and well-being, thereby preventing harm to children and to responding appropriately if children are harmed or if allegations of harm to children are made. These policies should be reviewed periodically by the governing body to ensure in-depth understanding and acknowledgement of their role and responsibilities in forming and approving safeguarding policies.

KEY RESOURCES:

- [Safeguarding Governance Resource Pack: Example of Safeguarding Policy Topics](#)
- [Safeguarding Governance Resource Pack: Policy Review Checklist](#)

Reviewing a safeguarding report annually from the school's Designated Safeguarding Lead

The school's DSL (or equivalent) prepares an annual safeguarding report for the Board/Owner and presents this in person to ensure transparency and accountability. The safeguarding report should be tailored to the school's specific requirements. A safeguarding report might include:

- an update of key safeguarding trends/significant developments including any applicable and relevant legal or regulatory changes,
- quantitative data and commentary on trends evidenced in the data,
- safeguarding risk register updates and commentary highlighting key issues and quantitative data that the Board/Owner should be aware of,
- an anonymous summary and record of outcomes of any allegations against adults in the community,
- findings and recommendations from audit/inspection/evaluative reviews,
- a review of the safeguarding development/action plan, and
- policy approval as needed.

Reports completed by the DSL should be shared with and reviewed by the DSBM and Head of School prior to the DSL's formal report to the Board/Owner.

KEY RESOURCES:

- [Safeguarding Governance Resource Pack: Annual Safeguarding Board/Owner Report Checklist](#)
- [Safeguarding Governance Resource Pack: Safeguarding Development Plan](#)

Reviewing anonymous data to spot patterns and trends

When discussing safeguarding as a standing item on the agenda and reviewing annual safeguarding reports from the DSL, the Board/Owners will consider anonymous data on the prevalence and type of safeguarding concerns in the school community. The Board/Owner's role is to review this information and identify, in partnership with the HoS and DSL, what trends and patterns can be seen in the school community. The Board's role is not to create an action plan to address these patterns and trends, but to support and ensure the HoS and DSL are aware of these and have the resources and training needed to address them if appropriate.

The Board/Owner should not be involved in receiving and managing individual child protection concerns. Child protection data related to individual concerns should be provided to them on an anonymous basis at an aggregate level as part of the DSL's report. However, subject to legal requirements in the country where the school is based, and when a concern has the potential to expose the school to legal, financial or reputational damage, the concern should be reported by the DSL or Head of School to the DSBM and potentially to the Board Chair. Given their role in supporting the HoS to respond to safeguarding allegations, the Board Chair and DSBM should complete enhanced safeguarding training, proactively.

It is important that the Board/Owner monitor the management of safeguarding risks by school leadership, in the same way that they monitor other risks facing the school. These risks are typically found/presented to the Board/Owner in the safeguarding risk register, but if a risk is identified when discussing safeguarding trends and patterns at the Board/Owner level, it should be added to the risk register for the attention of the DSL and HoS.

A safeguarding risk register is maintained by the DSL and Head of School and reviewed and approved by the Board/Owner. A safeguarding risk register includes:

- I. key safeguarding risks facing the school's students - for example, self-harm, bullying, online grooming etc. This data should be provided anonymously and can help DSLs to present trends and patterns over time. Digital record-keeping tools can be very helpful in generating this data; and
- II. key strategic, legal, reputational and/or financial risks facing the school related to safeguarding - for example, the financial implications of new safer recruitment checks, any legal exposure in not having effective policies, training or insurance in place.

KEY RESOURCE: [Safeguarding Governance Resource Pack: Example of a Safeguarding Risk Register](#)

Receiving and reviewing allegations of abuse against the Head of School

Should an allegation of abuse be made against the Head of School, and/or a report of low-level concerns, these should be recorded according to the school's policy on managing allegations and reported to the DSBM or Chair of the Board. The concern should not be reported to the Head of School. Schools should be aware that any reports made to those in a subordinate position to the Head of School risk being mismanaged due to the inherent imbalance of power and potential bias. It is, however, appropriate for the DSL to be included on the team that responds to the concern as they may hold further information that relates to responding to these concerns. When responding to an allegation, it is recommended that schools follow the process they have in place for all members of staff.

KEY RESOURCE: [ITFCP Managing Allegations Protocol 2024](#)



Action Points:

- ✓ **Are the Board/Owner's role and responsibilities clearly communicated in the governance handbook and child protection/safeguarding policy?**
- ✓ **Has the school appointed a Designated Safeguarding Board Member (DSBM)?**
- ✓ **Has every member of the Board/Owner completed safeguarding induction training?**
- ✓ **Does the Board/Owner complete regular safeguarding training that includes addressing critical incident communications?**
- ✓ **Does the Designated Safeguarding Board Member complete advanced training in safeguarding relevant to their role, specifically, related to managing allegations of abuse against members of staff?**
- ✓ **Does the school have a safeguarding training plan in place for the Board/Owner?**
- ✓ **Is safeguarding a standing item on the Board/Owner's meeting agenda?**
- ✓ **Does the Board/Owner have oversight of the development of safeguarding and child protection policies?**
- ✓ **Does the school have a schedule in place for the review of safeguarding policies?**
- ✓ **Does the DSL present annual safeguarding reports to the Board/Owner?**
- ✓ **Does the school have a safeguarding risk register in place?**
- ✓ **Does the Board/Owner issue a statement of commitment to safeguarding and review this annually?**
- ✓ **Does the school have a policy and process to manage allegations of abuse against adults in the school community and is the process clear when there is an allegation about the Head of School?**

SUPPORTING THE DEVELOPMENT OF A SAFEGUARDING CULTURE

Legal responsibilities, obligations and cultural expectations

It is important and necessary to consider and understand the legal framework, regulatory obligations and cultural context of a school community, before determining what the Board/Owner's safeguarding role will be.

Legal obligations will differ by country. In some countries, new regulations and standards have been introduced over the last decade, imposing legal obligations on Boards and Owners. (See, for example, this English and Welsh [guidance for trustees](#) and these [child safe standards](#) from Australia.) Many countries including France, Germany, Italy, Canada and Australia impose positive health and safety obligations on directors or senior managers of companies, which often involve the identification and mitigation of risks, including safeguarding risks (Bergman, Davis and Rigby, 2007).

Safer recruitment of the Board

The application of 'safer recruitment' practices in the appointment of Board members is an important responsibility. In some jurisdictions, regulations mandate background checks for governing body members and school owners. Even where these are not mandated, schools should conduct background checks when screening members of the school governing body. This may include, for example, criminal record checks and asking for professional and/or personal references.

KEY RESOURCE: [International Taskforce on Child Protection: Safer Recruitment Checklist 2024](#)

Code of conduct

Schools should design and implement a code of conduct that applies to all adults working in, volunteering at or visiting the school. The Board/Owner will potentially come into contact with young people and children when visiting the school and carrying out their roles as members of the governing body. They should abide by the same code of conduct as other adults working in, volunteering at or visiting the school. School leaders should communicate clearly that these expectations apply to every adult who has contact with students. The code of conduct should be culturally appropriate for the school community and aligned with local legal requirements.

KEY RESOURCES:

- [Safeguarding Governance Resource Pack: Code of Conduct Checklist](#)
- [Safer Recruitment Consortium, 2022: Guidance for safer working practice for those working with children and young people in education settings](#)

The role of the DSBM in supporting the development of a safeguarding culture

A Designated Safeguarding Board Member (DSBM) can help to support the development of a safeguarding culture by:

- ensuring the Board/Owner develops and reviews safeguarding policy, and the DSL and HoS write and develop the safeguarding policies;
- prioritising safeguarding culture and advocating for budgetary funding to carry out safeguarding policies;
- meeting each term with the DSL (where possible, in person) to discuss and support their work on policies and to assist them with any areas of challenge;
- collaborating and supporting the DSL when making reports to the Board (recommended at least annually);
- raising challenging questions for the HoS and DSL as a critical friend related to safeguarding policy and practice;
- collaborating on the safeguarding development plan and supporting this through the allocation of necessary resources;
- following reporting protocols;
- modelling behaviours, e.g. wearing lanyards;
- encouraging others to report using established protocols;
- being aware that unsuitable people might cultivate a relationship with them due to their perceived power; and
- ensuring they do not overreach in their responsibility, as theirs is a supportive and strategic role, not an operational one.

KEY RESOURCES:

- [Safeguarding Governance Resource Pack: Safeguarding Development Plan](#)
- [Safeguarding Governance Resource Pack: School Board/Owner Reflective Questions](#)

Safeguarding audits

External, independent safeguarding audits are an effective way of reviewing current practice.

Internal safeguarding audits are typically carried out annually, where an external audit might be conducted every 3 to 5 years or after a serious case review. The outcome of any audit will have recommendations that will inform the school's safeguarding development plan. Internal audits are usually conducted by the DSL and/or HoS in collaboration with the wider safeguarding and leadership team depending on the school size and structure.

NOTE: Internal and external safeguarding audits review the whole school approach to safeguarding practices. These are different from the Governance Safeguarding Audit included in the resource pack. The Governance Safeguarding Audit should be completed every 3 years or when there is a change

in personnel on the governing body. This audit should be conducted by the DSL, the HoS or an external consultant to ensure that the safeguarding governance policy and practice is appropriate and does not expose the school to further risk.

KEY RESOURCES:

- [Safeguarding Governance Resource Pack: Governance Safeguarding Audit](#)
- [AISA: Safeguarding Audit Resource](#)



Action Points:

- ✓ **Does the Board/Owner understand the legal framework, regulatory obligations and cultural context that affect governance at the school?**
- ✓ **Have all members of the Board/Owner undergone appropriate background checks and references aligned with safer recruitment expectations?**
- ✓ **Does the code of conduct for school personnel also apply to the governing body members?**
- ✓ **Does your school conduct internal and external safeguarding audits?**

THE BOARD'S ROLE IN OVERSEEING THE MANAGEMENT OF A CRITICAL INCIDENT

Defining a critical incident

A critical incident is an event that is potentially traumatic, affecting a large part or the whole of an educational community. Such events are likely to cause adults and children distress and may overwhelm their capacity to cope. ([UK Trauma Council](#))

Examples of critical incidents include but are not limited to:

- the death of a student or member of staff on or off school grounds;
- a natural disaster in the local environment of the school;
- an allegation of child abuse by a member of staff (this may not be a critical incident at first but could become one if the allegation is proven true and/ or if the situation becomes public knowledge);
- a fire at the school that results in threat of life or extensive damage to the school buildings;
- an intruder on school grounds that intends or does do harm to the school population;
- the abduction of a child from the school or on a school trip/event; and
- a conflict involving the country of the school or neighbouring countries.

Roles and responsibilities in the management of a critical incident

During a critical incident, the Board/Owner must be aware of their role and responsibilities, as well as their limits to ensure no overreach hinders school leadership in managing a critical incident. The school should have a critical incident plan including the roles and responsibilities of the chair of the Board, the DSBM and other Board Members.

One key responsibility is the role of the Board/Owner to safeguard the mental health of the Head of School. In times of crisis, the risk of secondary trauma being experienced by the Head of School is significant, and the Board/Owner are often in a critical position to spot the signs of burnout and emotional fatigue. Due to power dynamics in the school, it may not be possible for the staff or leadership team to offer support to the Head of School should they feel it is needed. The Board/Owner can help out-source this support by providing Heads of School with supervision throughout and after the critical incident.

Other responsibilities of the Board/Owner will vary depending on the specifics of an incident and should be decided by the Critical Incident Response Team (CIRT), a group of staff in the school that will manage the leadership, safeguarding and communications elements of a critical incident. The CIRT may reach out to the Board/Owner for:

- community resources to support a child-centered response and community recovery;
- ensuring there is alignment in a clear communications plan, for employees, students, families and the greater school community;
- support in seeking outside assistance as necessary in the areas of:
 - independent investigation
 - crisis communication
 - legal representation and expertise;
- budgetary approval to support the response and recovery efforts; and
- outward unanimous support of the HoS and the process undertaken by the school, whenever possible and necessary.

Oversight and accountability of the management of an allegation

Managing an allegation of abuse requires a different approach to managing a critical incident. The Board/Owner should **not** be actively involved in any inquiry the school conducts in response to an allegation of abuse, however, the DSBM may be on the managing allegations team. Following the incident, the Board/Owner are accountable and responsible for reviewing how the allegation was managed. The role of the Board/Owner *before* the management of an allegation is to ensure the school:

- has in place and follows its protocols for managing allegations;
- has appropriate legal advice and support; and
- ensures the school insurance is valid for any damages that may be claimed. An annual review of the school's insurance policy is recommended to ensure adequate coverage.

Taking the steps referred to in this briefing will help the Board/Owner to be as prepared as possible if an allegation of abuse is reported. Where historic allegations are discovered or reported, the Board/Owner should support the HoS and DSL to investigate and document these allegations as if they are current allegations. If, or more likely when, an allegation of abuse by an adult in the school community is reported, the Board/Owner is obligated to partner with the school leadership team and look through moral, legal, media, and reputation lenses to address the allegation. Paramount to viewing an allegation through the moral lens are five duties.

1. Protect and support the alleged victim.

2. Ensure there are no other victims.
3. Notify law enforcement as necessary.
4. Ensure fair process and support for the alleged perpetrator.
5. Protect the reputation of the school.

If followed in this specific order, the reputation of the school will be upheld through its care for the community and adherence to the law.

The Board/Owner must also support the HoS to ensure that the response to the allegation is both survivor and mission-focused and guided by the principles of transparency, empathy, equity, and accountability. The HoS will ensure a report is made to the local authorities if mandated reporting is necessary, engaging an independent investigator if necessary. The Board/Owner will ensure they request and follow guidance from the HoS and school leadership before answering certain questions such as:

- What happened? The Board/Owner must support the HoS to lead the school, ensuring concerns are investigated according to relevant policy. The scope of any enquiries will be determined by the Head, the Board/Owner and the school's legal counsel. This could involve local authorities only, or it might necessitate the hiring of an independent, third-party investigator, depending on the allegations and circumstances.
- What local agencies and resources can help? The Board/Owner can, if requested by the HoS, act as a conduit to obtain support from local agencies or resources that will support the school in the management of both an allegation and a critical incident. Outside services provide external expertise and guidance to avoid investigations from being too insular.
- How could the school and/or school leadership have improved their prevention and response? The Board/Owner must be committed to holding itself and the institution accountable, and importantly, acknowledge any missteps that might have happened in the past. It is for this reason that the Designated Safeguarding Board Member is not the Chair of the Board or Owner, so that someone who was not involved in the immediate management of the allegation can objectively review the response of the school.
- What can we do to ensure that this does not happen again? The Board/Owner must commit to fund and oversee any advised corrective actions and/or restorative approaches, working with the Head of School to take appropriate action to reduce further risks and introduce new policies and processes as necessary.

KEY RESOURCE: [ITFCP Managing Allegations Protocol 2024](#)

Legal responsibilities

The Board/Owner should be aware of their legal responsibilities and ensure that all policies are aligned with local legal requirements, especially when there are legally mandated reporting responsibilities. While the Board/Owner may not need to obtain legal guidance themselves, they should ensure that the school regularly seeks legal advice when reviewing new or updated policies, especially those around managing allegations of abuse by an adult in the school community.

When responding to a critical incident or an allegation of child abuse by an adult in the school community, the Board/Owner should seek and approve legal guidance for the Head of School throughout the incident.

Confidentiality

When managing an allegation or a critical incident, the confidentiality of the details of the allegations and those involved should be assured as much as possible and aligned with local legal and regulatory reporting requirements. While the DSBM may be involved as a supportive and critical friend to the Head of School and DSL, the Chair of Board should only be consulted if the case presents a risk to the reputation of the school.

Information should only be shared with the Board/Owner on a need-to-know basis, for example, if necessary to ensure the safety of those involved. Parents or members of staff who serve as Board Members should not be placed in a compromising position due to the burden of information about victims or alleged perpetrators of abuse. They should only be informed of specific identities, when this information has already become public knowledge.

Having this strict approach to confidentiality allows the Board/Owner relative independence when conducting serious case reviews due to concerns raised about the management of allegations. When information is shared with the Board/Owner about an allegation of child abuse, all members of the governing body must agree not to share such information beyond the circle of those who already know it. Schools should include confidentiality agreements as part of the code of conduct for governing body members and these documents should be individually signed upon appointment.

Communication

During the management of a critical incident, to ensure consistency of message, the Board/Owner should only be used to consult on internal school communications to staff. Should a critical incident need to be communicated to the wider community it is appropriate for the HoS to draft this communication in collaboration with the Board/Owner.

If there is an investigation into an allegation of abuse by a member of staff, at its conclusion and upon receiving the investigator's report, the Board/Owner should work with the HoS to determine what information will be shared and then communicate the findings of the investigation to community members. This may include sharing the full report or sharing a summary of the findings of the report. Communications should be transparent and balanced by the interest of privacy for students, families, faculty, and staff. This communication would usually be signed by the HoS, but could also be joint statement with the Board/Owner to show solidarity. However, when the Board/Owner is required to review how the school conducted an internal inquiry, it is then appropriate for them to lead on communications about the status and results of the review.

Communication should follow the following principles:

- Be guided by the best interests and safety of the victim(s) involved. Reconsider any communications that will place them at further risk.
- Ensure that confidentiality is properly considered and managed on a 'need to know' basis.
- Work with the families of those involved to ensure they are part of the discussion regarding what is communicated to the community. They should not be surprised by any school communications.

- Rather than starting with broad statements to the whole community, consider micro-communications to those who are affected. Start with small group or individual meetings with parents and students affected and then work out to inform the rest of the community.
- Avoid community-wide communications unless the details are public knowledge already. If community members are aware of the case, or are likely to hear about it from their children, then consider the following to guide your communication:
 - Acknowledge that the school received an allegation of abuse by a member of staff.
 - Share that the school is following policy in response to the allegation and working with authorities as appropriate.
 - Share the identity of the communication point person (usually HoS) for all questions and concerns.
 - Ask for anyone with concerns to talk to the DSL or HoS.
 - Offer supportive resources.

KEY RESOURCE: [Tips on Crisis Management by The Jane Group](#)

Post-critical incident

After a critical incident, there are a number of actions a Board/Owner might consider, especially in the aftermath of an investigation into an allegation of abuse by a member of staff. The Board/Owner's involvement is to ensure continued engagement and support for the community which could include:

- creating and maintaining a therapy fund to offer to survivors;
- providing any opportunities to speak with leadership using trauma-informed facilitators if requested by survivors;
- providing any necessary funding for resources to engage and support the school community in coping with any trauma and reflecting on practice, including faculty and staff, current families, and alumni;
- owning and addressing any shortfalls which the Board/Owner are responsible for including examining governance structure and recruitment; and
- working with the Head of School over a period of time, usually six to twelve months, to ensure implementation of any risk prevention measures, corrective actions or restorative justice commitments.

Importantly, when a critical incident ends, an inquiry or investigation is complete and the findings are communicated, the work is not over. Often this is only the beginning of the provision of supportive services. The Board/Owner should always remain vigilant in its responsibility for safeguarding by engaging in ongoing Board training, continuing conversations with senior leadership following any reported allegations, and ensuring oversight of student protection policies and procedures.

It is strongly recommended that **under no circumstances** should schools use Non-Disclosure Agreements to address allegations of abuse. Such agreements can cause harm to the survivors of abuse (known and unknown) and further damage the school's reputation when the abuse is inevitably discovered or shared.



KEY RESOURCE: [ITFCP Protocol for Managing Allegations 2024](#)

Action Points:

- ✓ Does the school have a critical incident plan and is the Board/Owner's role in this clear?
- ✓ Does the critical incident plan have a clear distinction between those who are on the managing allegations response team and those whose role it may be to review the actions of this team?
- ✓ Does the Board/Owner review all policies ensuring they are in line with local legal requirements?
- ✓ Do all members of the governing body understand their role in managing an allegation?
- ✓ Have all members of the governing body signed a confidentiality agreement or statement (this may be as part of their code of conduct)?
- ✓ Is there a clear communications plan for the school in the event of a critical incident?

GLOSSARY OF TERMS

abuse	<p>a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm [...] Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children</p> <p>(Department for Education, England)</p>
accreditation protocol	<p>process and procedures for the evaluation and accreditation of schools aligned with a set of standards and validated via the school's self-study and external peer review</p>
allegation	<p>Any concern that an adult working in school has:</p> <ul style="list-style-type: none">a) behaved in a way that has harmed* a child, or may have harmed a childb) possibly committed a criminal offense against or related to a childc) behaved towards a child or children in a way that indicates they may pose a risk of harm to childrend) behaved or may have behaved in a way that indicates they may not be suitable to work with children. <p>*Harm includes physical, emotional, sexual abuse and neglect and refers to actions carried out both in person and online.</p>
allegations management team	<p>cross-functional team comprised of school staff and professionals with specialised expertise to help the school to prepare for an allegation and to provide a source of expertise for the response team to draw on when coordinating the school's response to an allegation</p>

allegations response team	<p>a small response team made up of key individuals who are needed to help to coordinate the school's response</p> <p>The nature and size of the response team will depend on several factors including the nature of the allegation. The role of the response team is not to investigate the allegation. It is to coordinate the school's response to the allegation.</p>
alleged perpetrator	the adult who has been accused of abuse towards a child
Board/Owner	<p>used to refer to the school's highest-level governing structure and its members, whether they be owners or elected/appointed advisors, who have responsibility for long-range strategy, fiduciary oversight, and management of the Head of School</p> <p>"Board/Owner" should be interpreted to mean one or several persons, as applicable to the school's governing structure.</p>
child	any person aged under 18 or in receipt of educational services from the school
child protection	<p>protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of their right to safe and effective care; taking action to enable all children to have the best outcomes</p> <p>(The terms child protection and safeguarding are used interchangeably in this document.)</p>
code of conduct/behaviour	<p>principles upon which all adults working in school are expected to base their conduct and professional practice; can also be referred to as 'ethics'</p> <p>This applies to both online and offline behaviour.</p>
Designated Safeguarding Board Member (DSBM)	<p>individual Board member who has responsibility for overseeing safeguarding in the school from the Board's perspective</p> <p>An alternative term for this role is the Safeguarding Trustee. They play a key role in the management of allegations against staff and crucially are the referral point for any low-level concerns or allegations against the Head of School. They serve the school as a critical friend</p>

and should work closely with the Designated Safeguarding Lead and Head of School on the strategic development of safeguarding in the school.

Designated Safeguarding Lead (DSL)

individual member of staff who has overall responsibility for safeguarding in school

Their role typically includes receiving and acting upon child protection concerns, ensuring that the school's child protection policy is implemented and promoted, ensuring effective safeguarding training for staff and safeguarding practice across the wider school community. Depending on school size and capacity, this person could be the Head/Principal and/or the lead person whose role it would be to manage the school's response to an allegation of abuse by an adult working in the school.

emotional abuse

any type of abuse that involves the continual emotional mistreatment of a child

This is sometimes called psychological abuse. Emotional abuse may be perpetrated by adults or carried out by children. Emotional abuse can involve deliberately trying to scare, humiliate, isolate, or ignore a child. Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

(NSPCC)

grooming (online and in person)

the use of a variety of manipulative and controlling techniques with a vulnerable subject used in a range of settings to establish trust and/or normalise sexually harmful behaviour with the overall aim of facilitating abuse and/or prohibiting exposure

Grooming may happen over long periods of time or rapidly. It may include manipulation of family members, colleagues, and organisational practices in addition to victims. Grooming with intent to sexually abuse is illegal in some jurisdictions.

Head of School (HoS)

chief educational officer of the institution

A wide variety of terms depict this role, including Director, Head, Head Teacher, Principal, and Superintendent.

historic abuse (non-recent abuse)	an allegation of non-recent abuse has been defined as ‘an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the victim was under 18 years old’ (NSPCC)
initial evaluation	<p>preliminary steps taken to evaluate an allegation, either where external agencies will not engage unless the school has more information or where there is not enough evidence to report the allegation to external agencies</p> <p>These steps should only ever be taken following legal advice and, where possible, a discussion with an external agency.</p>
inquiry	<p>process followed by the school to determine the facts of an allegation and appropriate actions</p> <p>This can be carried out internally by the school or by an external consultant.</p>
investigation	<p>a process carried out by an external agency to determine whether the alleged perpetrator has done what they have been accused of doing</p> <p>Such investigations will ordinarily be carried out by law enforcement to determine whether the alleged perpetrator has committed a crime.</p>
Low-level concerns	<p>A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working with children may have acted in a way that:</p> <ul style="list-style-type: none"> • is inconsistent with an organisation’s staff code of conduct, including inappropriate conduct outside of work; and • does not meet the harm threshold; or is otherwise not serious enough to merit a referral to the local safeguarding authority.
physical abuse	<p>when someone hurts or harms a child or young person on purpose</p> <p>Physical abuse may be perpetrated by adults or carried out by children. It includes hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching, breaking bones, and drowning. It's important to remember that</p>

physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell, this particular form of physical abuse is sometimes referred to as fictitious disorder imposed on another (FDIA). (NSPCC)

safeguarding

a broad term used to describe the ways in which individuals and institutions promote the well-being of students and protect them from physical, sexual, and/or emotional harm and abuse
This includes but is not limited to child protection.

sexual abuse

any act that exposes a child to or involves a child in sexual processes beyond their understanding or contrary to accepted standards

Sexual abuse may be perpetrated by adults or carried out by children. Activities may involve physical contact, including assault by female genital mutilation or cutting, early marriage, penetration, or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing; they may also include non-contact activities, such as voyeurism, involving children in viewing or producing sexual images or activities, encouraging children to behave in sexually inappropriate ways, use of explicit sexual language, or grooming a child in preparation for abuse (including via the internet)

(Australia Royal Commission and NSPCC)

staff

all former and current teaching, residential, pastoral, support, peripatetic and contract staff, leaders, volunteers, governors/trustees, owners, and any other adults working in an international school setting on any basis, including contract, employment and volunteer

trauma-informed approach

counselling method which realises the widespread impact of trauma and understands potential paths for recovery; recognises the signs and symptoms of trauma in clients, families, staff, and others; responds by fully integrating knowledge about trauma into policies, procedures, and practices; actively works to prevent re-traumatisation

victim

the person who has allegedly been abused

Many victims prefer to be referred to as a 'survivor', particularly in cases of non-recent abuse.

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We welcome opportunities to report our findings and discuss our recommendations.

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