SURVAL MONTREUX
GIRLS' SCHOOL IN SWITZERLAND

Child Protection (Safeguarding) Policy

Bellevue Safeguarding Governor	Steven Wade
Education Directors with Safeguarding Responsibility	David Williams
Principal and Deputy Designated Safeguarding Lead	Patricia Woodhouse
Designated Safeguarding Lead	Stephanie Walmsley
Deputy Designated Safeguarding Leads	Francesca Bradbury, Thabbeth Cotton (School Nurse) and Carmina Aguilera (House mistress)
Reviewed	03.09.26

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About the Policy

This policy has been informed by:

- Conventions on the Rights of the Child
- Keeping Children Safe in Education (KCSIE) - 2026
- 'Working Together to Safeguarding Children' - 2023
- 'Guidance for safer working practice for those working children and young people in education settings' - 2023
- CIS - The International Task Force on Child Protection (ITFCP)
- Swiss Law Application - The Child and Adult Protection Act - 2013
- La Direction générale de l'enfance et de la jeunesse (DGEJ) de l'Etat de Vaud

This policy complies with the Canton of Vaud VAUD - LAW 850.41 on the protection of minors (LProMin) of 4 May 2004, through the Service de protection de la jeunesse who sets out the expectations for the protection of minors in the Canton of Vaud, Switzerland.

Surval fully recognises its responsibilities for Child Protection. Every pupil should feel safe and protected from any form of abuse. This is defined in this policy as 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 by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

This policy applies to all Surval Montreux Employees, including teaching, non-teaching staff, support staff, peripatetic, contract staff and volunteers, and any other adults working at the School.

This Safeguarding and Child Protection Policy and the Code of Conduct applies to all children and adults in the school, including when being educated off-site and undertaking educational visits. It also applies to students who are on an exchange and being hosted by the School. This includes all visiting students hosted by Surval Montreux when involved in events and activities organised.

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Publication

This policy is updated annually and is available to all employees and volunteers.

Designated Safeguarding Lead - Stephanie Walmsley, Surval Montreux
Governor with Safeguarding responsibility - Steve Wade, Bellevue

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Definitions

1.1 Safeguarding

Safeguarding is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

(KCSIE Sept 2026, p7)

The United Nations Convention relating to the rights of the child defines the rights which must be satisfied to allow children (every human being under the age of 18 years) to develop fully.

Article 19 of the Convention establishes the right of children to be protected from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.

Under Swiss federal law, Vaud cantonal laws and the regulations and directives enforcing them[1] , all private school employees (including health professionals, educators and teachers, faith group members, sports instructors, psychologists active in an educational setting) have an obligation to report to the relevant authorities any suspected or proven cases of violence, abuse and mistreatment suffered by its students. The obligation to report is satisfied in all cases on reporting the case to the DSL. Reporting procedures are described in this policy. The law says

that it is the responsibility of the Autorité de protection de l'enfant (APE – Child Protection Authority) to protect the child. The APE acts as a judge in Vaud canton.

Surval Montreux also acknowledges that its employees reserve the right to report child protection cases directly to external child protection authorities ,(DGEJ) particularly if they are concerned that this policy and procedures are not adequately upheld or implemented.

[1]The laws and directives governing the obligation to report abuse are as follows: Swiss Civil Code, Article 314d, which came into force on 1 January 2019; Article 34 of Law implementing the Swiss Civil Code and other federal civil laws, which came into force on 1 January 2013; Article 18, Para. 3 of the Loi sur l'enfance et la jeunesse (Law on childhood and youth) of the Canton of Geneva (LEJ 12054, 2018 amended in 2022; Directive produced by Geneva's Service de l'enseignement privé (private education service): "Enfants en danger et écoles privées", 2023 version pending approval.

1.2 Child Protection

Child Protection refers to the action required to protect a child from a situation that is causing significant harm, or that is likely to do so.

2.0 Safeguarding and Child Protection

Aims & Objectives - Surval Montreux is committed to the safeguarding and protection of children and to the prevention of child abuse in any form. We are committed to educating and supporting students, parents and teachers in ways that develop protective behaviours, and to working with all members of the Surval Montreux community to help them recognise signs of abuse and give appropriate support where necessary. Protecting the welfare of the students is the role of every adult who has contact with Surval students.

All staff employed at Surval Montreux are required to report suspected incidences of physical, Statemotional or sexual abuse or neglect to the Safeguarding Team. The Designated Safeguarding Lead must report all serious concerns to the DGEJ (Direction generale de l'enfance et de la jeunesse).
Serious concerns include - a child in immediate danger. Reporting and follow up of all suspected incidences of child abuse or neglect will proceed in accordance with administrative regulations respective to this policy and with Swiss law, regardless of cultural interpretation. In

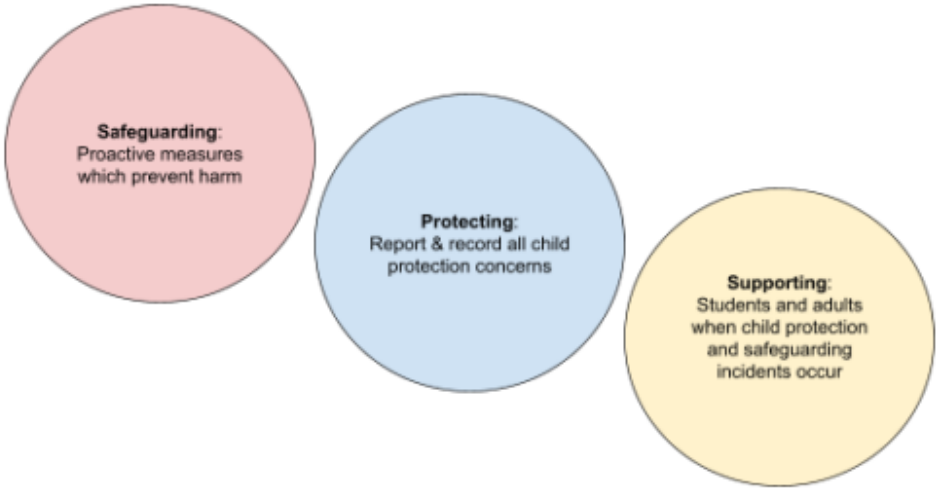
addition, cases of suspected child abuse or neglect may be reported to the respective consulate in Switzerland, and/or to the appropriate child protection agency in the home country.

Safeguarding and promoting the welfare of children is everyone's responsibility

We operate within a culture of openness and recognise and accept that abuse can happen in any organisation

We are a 'sharing organisation' - all concerns should be reported

We have three primary responsibilities:



The school fulfils these responsibilities by:

2.1 Safeguarding

- Ensuring the recruitment of individuals who are suitable and appropriate to work with children and who have positive safeguarding attitudes.
- Providing training to all employees regarding the procedures laid down in this policy and its supporting documents:
- The Staff and Students Codes of Conduct
- Providing age appropriate lessons to help students understand personal safety needs and rights and to identify, reduce and manage risks. This includes educating students about the safe use of electronic equipment and behaviour in the virtual world.
- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach towards online safety,

including the acceptable use of mobile technology and the use of appropriate filters and monitoring systems (the school uses FortiGate Cloud).

- Providing parents' materials and information sessions to help parents better understand their role and responsibilities around safeguarding and child protection.
- Producing age-appropriate versions of the Child Safeguarding and Protection Policy, reporting procedures and contact details of the school's DSLs.
- All Safeguarding efforts will be documented including appropriate signatures

2.2 Protecting & Supporting

- Ensuring that all employees are properly trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.
- Providing a positive school atmosphere where students feel secure and are encouraged to talk.
- Encouraging staff to discuss child protection, safeguarding and welfare concerns confidentially with the Designated Safeguarding Lead (DSL) in order to ensure they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect.
- Ensuring a culture of openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults in school will be shared and dealt with in an appropriate and sensitive manner.
- Staff should not engage in social relationships with students until a minimum period of 2 years after the date of graduation has passed. This includes all social media, telecommunication and email contact in addition to in person contact.

3.0 Commitment to Safeguarding

3.1 Recruiting

Surval Montreux Human Resources team will adhere to Safer Recruitment Practices when hiring all faculty and staff, including:

- Appropriate criminal background checks for employees (current and home country minimum)
- Verbal and written reference checks, including current School Head
- Declarations as part of the Employment application form

- **Child protection questions as part of interviews (documented)**
- Include a barred list and Disclosure and Barring Services (DBS) check that can be accessed via the TRA's prohibition, restriction and barred list checks. See Teacher Record Check
- Applicants from overseas must be subject to a DBS check and also include an overseas check equivalent to the DBS check for staff appointed directly from overseas see Page 90 KCSIE 2026
- Where a school or college allows an individual to start work in regulated activity relating to children before the DBS certificate is available, it should ensure that the individual is appropriately supervised and that they carry out all other checks, including a separate children's barred list check.
- Separate barred list checks must only be carried out in the following circumstances:
  • for newly appointed staff or volunteers who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks have been carried out) see Page 77 KCSIE, or
  • where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph have been carried out).
- Include a prohibition from management check using this link to Section 128 check (For any staff taking up a management position in an independent school, academy, or in a free school as an employee; a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibility.
- **A safeguarding induction will be provided for all new employees, including appropriate training and recorded understanding of safeguarding policies and procedures and Surval Montreux Code of Conduct.**

Recruitment procedures are carried out in accordance with guidance given in 'KCSIE (September 2026)', the school should also consider the ICO guidance here when developing recruitment processes.

Existing staff and volunteers

There are limited circumstances where schools and colleges will need to carry out new checks on existing staff or volunteers. These are when:

- an individual working or volunteering at the school or college moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children. In such circumstances, the relevant checks for that regulated activity must be carried out
- there has been a break in service of 12 weeks or more

- There are concerns about an individual's suitability to work with children.

3.2 Third Party Providers

Third party providers must provide evidence of:

- Criminal Background Checks for all adults working with children
- Child Protection Policies (as appropriate)
- Checked annually by Surval Montreux

3.3 Volunteers and visitors

Schools and colleges receive a range of visitors. These include professionals such as educational psychologists, social workers, and other education-related practitioners, as well as educational visitors like guest speakers or performers. They may also host individuals connected to the site, including contractors working on the building or grounds, children's family members, or others attending school events such as sports days.

Surval Montreux will obtain written notification from any agency, or third party organisation, that they have carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school or college (or who will be providing education on the school or college's behalf, including through online delivery).

If an individual working at Surval Montreux is self-employed, Surval Montreux will either obtain the DBS check, or request to see the certificate if the self-employed person has obtained their own check and ensure that the DBS check is at the level required by the school.

Schools and colleges should not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day.

- For all volunteers who have regular access to small groups / individual children a criminal background check must be completed
- All volunteers who have regular access to small groups / individual children must be made aware of the Safeguarding and Child Protection Policy and the Code of Conduct
- Trips - Where a trip is not chaperoned by a Surval employee, volunteers must have a criminal background check completed and must understand the Safeguarding & Child Protection Policy, Surval Montreux Trip Risk Management and Code of Conduct.

4.0 Commitment to Safeguarding **Preventative Education**

4.1 Faculty & Staff Training

DSL will run annual training sessions, appropriate to role, for all employees with regards to:

- The Safeguarding & Child Protection Policy
- The Safeguarding Code of Conduct Staff and Student
- The school's safeguarding response to children missing education
- The role and identity of the DSL, and Deputies
- The school's approach to online safety, including knowing their role and responsibilities in relation to filtering and monitoring with reference to the policy for the Appropriate and Safe Use of Technology; including the Internet and AI (1)
- Awareness and Scenario based training around safeguarding and child protection
- The Safeguarding & Child Protection Policy and The Safeguarding Code of Conduct will be translated for local hire ancillary staff
- Safeguarding & Child Protection training will be provided in French for all ancillary staff
- The Principal and DSL will work further with individual teachers as appropriate and as the need arises

4.2 Parent Education

The Safeguarding and Child Protection Policy will be accessible on the school website. Other safeguarding and e-safety information is also available on the website for parents to access.

4.3 Students

Age Appropriate Curriculum

- Themes raised in the Child Protection Policy are integrated into the curriculum at all levels in age-appropriate ways. DSL to be involved in coordinating themes across the school and also to work with individual classes and groups as needed.
- Education on group dynamics and the roles individuals play in bullying situations, teaching students how to develop a culture of no tolerance to bullying.
- Lifestyle education, particularly regarding drugs, alcohol and the internet delivered half termly.
- Mentoring of students perceived to be at risk
- Use of QR codes to raise confidential concerns with staff
- All curriculum will be documented appropriately and is the responsibility of the curriculum leaders in the school

- The school will clarify expectations related to bystanders, and provide opportunities for students to learn disclosure strategies

4.4 Role of the DSL

The school has appointed an experienced and suitably qualified member of staff who is the member of the Senior Leadership Team as DSL to be responsible for matters relating to child protection and welfare. To ensure continuity of safeguarding responsibilities, the school will implement robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances. This includes training DDSLs to deputise alongside arrangements including a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

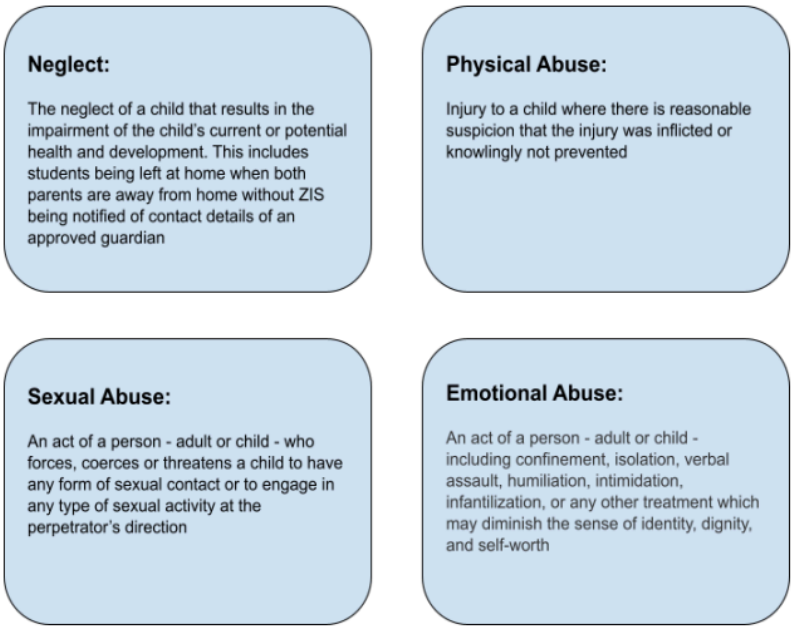
The DSL and deputies develop a complete safeguarding picture and are the most appropriate people to advise on the response to safeguarding concerns. The responsibilities of the DSL and DDSLs are provided in job descriptions specific to this aspect of their school role. (School to ensure that the DSL's full job description, as a minimum, includes all matters covered in KCSIE September 2026 Annex B) They include;

- Following the school's safeguarding & child protection policies and co-ordinating child protection procedures in the school.
- Being the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection.
- Consulting with the Safeguarding in Education Team (or equivalent body within the Canton de Vaud) or Social Care (or equivalent body within the Canton de Vaud), or the DGEJ, as appropriate, on issues if an allegation or suspicion occurs and liaising with the various child protection agencies where appropriate.
- The DSL should use NPCC- When to call the police to help them understand when they should consider calling the police and what to expect when they do.
- Keeping the Principal informed of all actions unless the head is the subject of a complaint. In this situation, the DSL should consult with the Safeguarding Governor, or relevant Education Director.
- Co-operating with any police and DGEJ investigations.
- Liaising with the head, Safeguarding Governor and relevant Education Director regarding training for all who work at the school on child protection issues.
- Attending appropriate higher level training every two years supplemented by informal updates as required, but at least annually.
- Undertaking training to facilitate the recognition of the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation and ensure confidence in the capability to support SEND children to stay safe online".

- Keeping appropriate records, sharing these with agencies as and when appropriate. Data protection considerations must not be a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.
- Having a role in the oversight of the school's e-safety provision, the teaching of online safety and the quality of the school's filtering and monitoring, as outlined in the policy for the Appropriate and Safe Use of Technology; including the Internet and AI (1)
- Supporting staff.
- Take responsibility, when a child leaves the school, for ensuring that the child protection file is transferred securely to the new school [when requested] as soon as possible and obtaining confirmation of receipt. Such a transfer of information should be separate from the main pupil file. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.
- The DSL should liaise with the Principal to inform them of issues - for UK students, 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.
- The DSL has responsibility for "understanding the systems and processes in place" as part of their remit.
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency

5.0 Information

Information about and indicators of abuse and neglect. All members of the Surval Montreux Community have a duty to report concerns in the following situations:



Definitions of abuse are complex and based in various cultures of child-rearing behaviours, gender and role responsibilities and expectations. The primary determination of abuse is that it is dependent on some form of a relationship that is used to meet the needs of the more powerful person, either a member of the family, a teacher, or a friend. Research guides much of the definitions that are based on understanding the impact of certain behaviours. Children and adolescents can suffer abuse from both adults and peers.

5.1 Physical Abuse is:

- Inflicting physical injury on a child by other than accidental means, causing skin bruising, burns, disfigurement, impairment of physical or emotional health, or loss or impairment of any bodily function, death; and/or
- Creating a substantial risk of physical harm to a child's bodily functioning; and/or
- Committing acts that are cruel or inhumane regardless of observable injury. Such acts may include, but are not limited to, instances of extreme discipline demonstrating a disregard of a child's pain and/or mental suffering; and/or
- Assaulting or criminally mistreating a child as defined by either the criminal code or school policy; and/or
- Engaging in actions or omissions resulting in injury to, or creating a substantial risk to the physical or mental health or development of a child; and/or
- Failing to take reasonable steps to prevent the occurrence of any of the above

POSSIBLE INDICATORS OF PHYSICAL ABUSE

- unexplained bruises and welts on any part of the body
- bruises of different ages (various colours)
- injuries reflecting shape of article used (electric cord, belt, buckle, ping pong paddle, hand)
- injuries that regularly appear after absence or vacation
- unexplained burns, especially to soles, palms, back or buttocks
- burns with a pattern from an electric burner, iron, or cigarette
- rope burns on arms, legs, neck, or torso
- injuries inconsistent with information offered by the child
- immersion burns with a distinct boundary line
- unexplained laceration, abrasions, or fractures

5.2 Emotional Abuse is a pattern of intentional verbal or behavioural actions or lack of actions that convey to a child the message that he or she is worthless, flawed, unloved, unwanted, endangered, or only of value to meet someone else's needs.

POSSIBLE INDICATORS OF EMOTIONAL ABUSE

- Yelling or swearing
- Name calling or insults; mocking
- Threats and intimidation of violence or abandonment
- Ignoring or excluding
- Humiliating
- Intentionally frightening
- Lying
- Failing to check allegations of abuse against them
- Making derogative or slanderous statements about an individual to others
- Socially isolating an individual
- Withholding important information
- Demeaning an individual
- Intentionally misinterpreting another
- Repeatedly raising the issue of death
- Telling an individual that they are too much trouble
- Ignoring or excessively criticizing
- Being over-familiar and disrespectful
- Unreasonably ordering an individual around; treating an individual like a servant
- Denial of the abuse and blaming of the victim

5.3 Neglect is failure to provide for a child's basic needs within their own environment. Neglect may be:

- Physical e.g., failure to provide necessary food or shelter, or lack of appropriate supervision - this would include failure to provide proper adult guardianship such as leaving children unsupervised at home for any extended period of time.
- Medical e.g., failure to provide necessary medical or mental health treatment. - Emotional e.g., a pattern of actions, such as: inattention to a child's emotional needs, failure to provide psychological care, or permitting the child to use alcohol or other drugs.

POSSIBLE INDICATORS OF NEGLECT

- Child is unwashed or hungry
- Parents are uninterested in child's academic performance
- Parents do not respond to repeated communications from the school
- Child does not want to go home
- Both parents or legal guardian are absent from the Zurich area for any period of 24 hours or greater and have not arranged temporary guardianship
- Parents can not be reached in the case of an emergency.

5.4 Sexual Abuse is: committing or allowing sexual offense to be committed against a child as defined in either the criminal code of the host country or school policy, or intentionally touching either directly or through clothing, the genitals, anus, or breasts of a child for other than hygiene or child care purposes.

Sexual abuse has some different characteristics of child abuse that warrant special attention. While physical abuse is often the result of immediate stress and not usually planned, sexual abuse requires planning with results that are more insidious. The planning, referred to as Grooming (see 5.4 below), which results in victims accepting the blame, responsibility, guilt and shame for the sexual behaviour of the offender. Sexual abuse requires far more secrecy than other forms of child abuse, so is more difficult to report. Many victims, through the process of grooming, are taught that the sex is a form of love, so tend to love their offender and often present as happy and well-adjusted children with no negative symptoms because of their perception of being loved. Investigating sexual abuse or grooming requires the involvement of the local authorities.

POSSIBLE INDICATORS OF SEXUAL ABUSE

- sexual knowledge, behaviour, or use of language not appropriate to age level
- unusual interpersonal relationship patterns
- venereal disease in a child of any age
- evidence of physical trauma or bleeding to the oral, genital, or anal areas
- difficulty in walking or sitting
- refusing to change into PE clothes, fear of bathrooms
- child running away from home and not giving any specific complaint
- not wanting to be alone with an individual
- pregnancy, especially at a young age
- extremely protective parents

5.5 Grooming

The term "Grooming" refers to a deliberate process undertaken by a child predator to prepare a child for sexual activity at a later time. Behaviour should only be seen as grooming where there is evidence of a pattern of conduct that is consistent with grooming the alleged victim for sexual activity and that there is no other reasonable explanation for it.

Grooming is where an adult communicates, by word or conduct, with a child under the age of 16 years or with a person who has care, supervision or authority for the child with the intention of facilitating the child's involvement in sexual conduct.

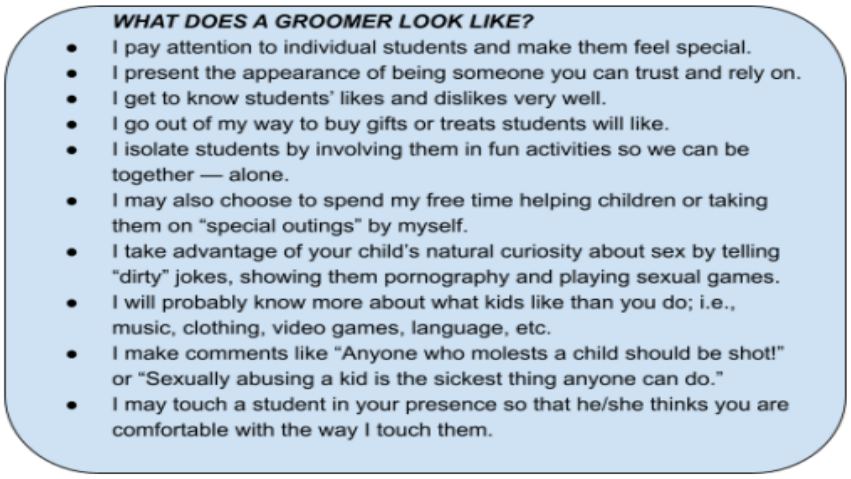
Grooming does not necessarily involve any sexual activity – for example, it may only involve establishing a relationship with the child, parent or carer for the purpose of facilitating sexual activity at a later time. Groomers are 'master-manipulators'. Grooming behaviour can also be targeted towards the parent, carer or other person who has a supervisory role towards the child with the intention of garnering the carer's trust to facilitate access to the child. Grooming of children can also happen online using a masked identity. Deleted question and the types of behaviours that may lead to such a conclusion include (but are not limited to) the following:

- Persuading a child or group of children that they have a 'special' relationship, for example by:

- Spending inappropriate special time with a child.
- Inappropriately giving gifts.
- Inappropriately showing special favours to one child but not to other children.
- Inappropriately allowing the child to overstep rules.
- Asking the child to keep this relationship to themselves.
- Initiating and maintaining a 1:1 online personal relationship with a child

- Testing boundaries, for example by -
  - Undressing in front of a child.
  - Encouraging inappropriate physical contact (even where it is not overtly sexual).
  - Talking about sex.
  - 'Accidental' intimate touching.

- Inappropriately extending a relationship outside of work (except where it may be appropriate - for example, where there was a pre-existing friendship with the child's family or as part of normal social interactions in the community).
- Inappropriate personal communication (including emails, telephone calls, text messaging, social media and web forums) that explores intimate personal or sexual feelings with a child. An adult requesting that a child keep any aspect of their relationship secret or using tactics to keep any aspect of the relationship secret, would generally increase the likelihood that grooming is occurring.



5.6 Child on Child Abuse

All Surval Montreux Employees should be aware that:

- safeguarding issues can manifest themselves via child on child abuse
- that children are capable of abusing their peers. Such abuse should never be tolerated or normalised. This is most likely to include but is not limited to bullying (including cyber bullying), gender based violence, grooming, inappropriate or harmful sexualised play (younger children), sexual assaults, sexting and gender issues within groups of girls and boys. If an adult thinks for whatever reason that a student may pose a risk of harm to herself or to others the adult should report their concern to the DSL as soon as possible. Should an allegation of abuse be made against another child, all children involved will be treated as being "at risk". Where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, the allegation will be referred to appropriate agencies and / or police, as appropriate. The concern may indicate that one or more of the students concerned may be in need of additional support by local support agencies.

Surval Montreux understands that we play a crucial role in preventative education and understand that it is most effective in the context of a whole-school or college approach that prepares students and students for life in the modern world and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. We have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life.

5.7 Sexting

Sexting is where they share inappropriate or explicit images/messages online or through mobile phones. 'Sexting' has become an increasingly common activity among students. It is often seen as flirting by children and young people who feel that it's a part of normal life. It is seen as a social norm by some students. ‘Sexting’ can leave young people vulnerable to blackmail, bullying, unwanted attention and emotional distress. ‘Sexting’ can be illegal. By sending an explicit image/message, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission. Surval Montreux will ensure that the risks associated with this issue is discussed with children on a regular basis as part of the curriculum around responsible use of technology. When the school becomes aware of ‘sexting’ that has occurred and involves a child or children from the school, parents and relevant authorities will be notified and appropriate steps are taken.

5.8 Female Genital Mutilation (FGM)

All Surval Montreux employees need to be alert to the possibility of a girl being at risk of or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present (see below) it could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Indicators of FGM

- a family arranging a long break abroad during the summer holidays.
- unexpected, repeated or prolonged absence from school.
- academic work suffering.
- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

The Swiss Criminal Code (Art. 124 CrimC) defines any and all forms of the cutting of female genitalia as a criminal offence, irrespective of whether a severe or mild form of FGM/C is involved. The child protection authorities are primarily responsible for protecting minors from the risk of genital cutting or genital cutting that has already occurred and for supporting them. The authorities are required to take protective measures when a child's welfare is at risk. Child protection under civil law in the Swiss Civil Code (CC) (Art. 307-315b CC) provides for scaled interventions that curtail parental custody rights to a degree determined by the severity of the endangerment.

Art. 314d Swiss Civil Code (SCC) "Duty to notify"

1 The following persons, provided they are not subject to professional confidentiality under the Swiss Criminal Code, are obliged to report if there are clear indications that the physical, psychological or sexual integrity of a child is at risk and that they cannot remedy the threat as part of their professional activities: 1. specialists from the fields of medicine, psychology, care services, childcare,

education, counselling, religion and sport who have regular contact with children. 2. persons who learn of such a case in their official capacity.
2 The duty to notify is fulfilled when a person notifies a superior.
3 The cantons may provide for further notification obligations. (Source: Art. 314c SCC)

Certain specialist groups not only have a right to notify, they also have an obligation to notify KESB - Kindes- und Erwachsenenschutzbehörde (Child and Adult Protection Authority), e.g. to inform their superior, if they learn of a threat as part of their professional activities and they are unable to remedy the threat themselves.

Under federal law, the following groups of people have the **duty to notify**:

- persons who work in an official capacity
- specialists who have regular contact with children as part of their professional activities

Specifically, this means that the following groups of people have the duty to notify (see Art. 314D SCC):

1. Specialists in an official capacity who are bound by professional confidentiality. The meaning of official capacity is to be understood broadly: the deciding factor is whether the person performs a public service task.For example, this applies to teachers, school social workers, social workers who provide public social services, official and lay advocates, employees of the police and immigration authorities, etc.
2. Specialists who regularly have contact with children as part of their professional activities. This applies to specialists in the areas of health, care, education, counselling and sport

In general, a notification is to be sent to KESB, but is also considered to be fulfilled if notification is made to the person's superior (for example, by employees of a crèche to their line managers). However, a breach of the duty to notify is not necessarily always a punishable offence. The decision whether a notification should be submitted should always be made in consultation with others/specialists. Internal notification regulations of organisations must always be observed.

Before a threat notification is sent, an attempt should always be made to seek a discussion with the affected person and/or their family (with the exception of urgent cases or cases of severe risk). Ideally, the affected person consents to the support and can be referred to a voluntary advice centre (social services, educational guidance, etc.); in this case KESB does not have to be notified.

There is no general reporting obligation in Switzerland. Only the criminal authorities are obliged to file a report or pursue cases themselves for all criminal offences they have ascertained or which have been reported to them as part of their professional activities (Art. 302 para. 2 Swiss Criminal Procedure Code).

6.0 Reporting Concern

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff have any concerns about a child's welfare, they should act on them immediately.

Levels of Concern

Levels of concern primarily focus on the need for confidentiality rather than the severity of the incident

- Level 1 - A concern about behaviour which is a breach of a handbook, policy, or Code of Conduct which could put adults and/or children in a vulnerable position
- Level 2 - An escalated concern or an allegation of repeated inappropriate behaviour, or behaviour which puts children in a position of significant or immediate danger.
  A level 2 concern would involve external agencies and / or sensitive information about members of the community.
- Level 3 - All concerns raised / allegations made concerning individual Surval Montreux employees. Or all concerns raised which involve a criminal investigation.

6.1 Handling a concern/disclosure

- Receive the information
  - Keep an open mind; do not judge. Do not promise confidentiality
  - Listen to the child – it is not up to you to decide on the 'truth'

- Reassure the child
    - Have regard for their welfare - make them feel comfortable and reassure them
- ● React
    - Be patient, even if the child is hesitant; listen to the child - say as little as possible yourself
    - Do not stop a child who is freely disclosing abuse.
    - Ask questions only in relation to the disclosure in an open manner to establish exactly what they are saying.
- Record & Report
    - Record date, time, place, and exact words used.
    - Pass all information to the Designated Safeguarding Lead
    - Tell the child what will happen next.
    - Seek support if they feel distressed.

  When reporting and/or handling a concern about a child all employees should act with the utmost discretion and any students who are involved will receive appropriate care and support.
- Surval Montreux Employees should always listen to a student/adult who wants to talk about a concern. If a child tells a Surval Montreux employee that they know about or have been a victim of child abuse or neglect the staff member should:
    - Allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
    - Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me".
    - Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
    - Limit questioning to the minimum necessary for clarification and avoid leading questions such as, "Has this happened to your siblings?"
    - At an appropriate time tell the child that the matter will be referred in confidence to the appropriate people. Promises of confidentiality should not be given (see Confidentiality section below).

Schools and colleges should be alert to the needs of specific groups of children whose needs may impact on attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure these groups of children receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services. In

particular, staff should be alert to the potential need for an universal services and community based early help assessment or or the targeted early help level of Family Help for a child who:
• is disabled or has certain health conditions and has specific additional needs
• has special educational needs (whether or not they have a statutory Education, Health and Care plan)
• has a mental health need
• is a young carer
• is pregnant and/or is a parent themselves
• has exhibited early signs of abusive, violent and/or harmful behaviours
• is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
• is frequently missing/goes missing from education, home or care
• has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
• is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
• is at risk of being radicalised into terrorism
• has a parent or carer in custody, or is affected by parental offending
• is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
• is misusing alcohol and other drugs themselves
• is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and • is a privately fostered child.

6.2 Mental Health & Wellbeing

- We utilise an integrated, whole school approach to build resilience and prevent mental health difficulties. While all staff are responsible for observing and supporting pupil wellbeing, our designated Mental Health Lead(Vice Principal - Pastoral) works alongside the Safeguarding and teaching team to embed these social and emotional wellbeing strategies across the curriculum.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Where accessible, staff and the Mental Health Lead will actively utilise our allocated Mental Health Support Team (MHST).
- Education staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. By identifying potential warning signs, education staff can identify children who may be struggling and offer support and vital early intervention.
- If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy.

- When a pupil requires targeted mental health support, there will be an assessment whether to inform parents or carers to help support the child's wellbeing. This communication must only take place if the DSL team confirms that doing so will not place the child at any additional safeguarding risk.
- If staff feel that a child is in immediate danger, call 144 for an ambulance. The DSL and school nurse will liaise for follow up medical intervention.
- www.gov.uk/guidance/promoting-and-supporting-mental-health-and-wellbeing-in-schools-and-colleges

6.3 Student Groups

- Special Educational Needs or Disabilities (SEND). Additional barriers may include assumptions that indicators of possible abuse such as behaviour, mood or injury relate to the child's disability without further exploration, they may be disproportionately impacted by behaviours such as bullying, without showing outward signs and be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children . Children with SEND may be unable to communicate instances of possible abuse as a consequence of issues in relation to communication barriers, their ability to recognise behaviours and abuse and cognitive understanding of fact and fiction in relation to online behaviours. Any reports of abuse involving children with SEND will, therefore, require close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO) or the named person with oversight for SEND. The school's behaviour and anti-bullying policies make specific reference to dealing appropriately with SEND. The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. Further information can be found in Appendix 3
- Pupils with Mental Health support needs or living with parents who have mental health issues may, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Children who are lesbian, gay, bisexual A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who
- are. Risks can be compounded where children lack a trusted adult with whom they can be open. The school and staff will seek to reduce the additional barriers faced, and provide a safe space for pupils to speak out or share their concerns with members of staff. The school will address vulnerabilities as part of its curriculum, behaviour and anti-bullying policies.
- Children who are questioning their gender - young children also go through a period of questioning their gender, for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into

puberty. The school will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences. The school is aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

- Children subject or witness to abuse or violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame. The school may be the only stable, secure and predictable element in the lives of children at risk. However, when at school their behaviour may be challenging and defiant and they may be withdrawn.
- Children absent from education staff should be mindful of patterns of absence, this may be a consequence of wider issues within the child's life - potentially related to vulnerabilities linked to the categories above.
- Children with medical conditions - Management of a child or young person's medical condition (including allergies) would not in itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted a concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent to school without essential medication, thereby putting the individual at risk. Further information is provided in our statutory guidance on Supporting Pupils at School with Medical Conditions and Allergy Safety in Schools.

6.3 Confidentiality

Surval Montreux Employees should never guarantee confidentiality to children or adults wishing to tell them about something serious as this may ultimately not be in the best interests of the child. They should remain judgement free. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure that the appropriate action is taken. All Surval Montreux employees involved will also take whatever steps they can to protect the informant from any retaliation or unnecessary stress that may occur after a disclosure has been made.

6.4 Whistle Blowing

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of children. If an employee believes that best practice in

this area is not being adhered to or that practice may put students at risk, they should in the first instance report their concern to the Principal. If their concern relates to the Principal, they should report their concern to the Safeguarding Representative of Bellevue. No employee will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and following the whistleblowing procedures. Also, no employee, or student, may be harassed for "whistleblowing" or in any way subjected to personal or other disadvantages.

Complaints or reports made with malicious, slanderous or abusive intent, without any basis in fact, are exempt from this rule. Abuse of the right to lodge complaints or of the reporting channel will result in disciplinary measures including sanctions, warnings, termination without notice or expulsion.

6.5 Record keeping of Procedures

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely in line with the school Data Protection Policy and Privacy Notices. It is good practice to keep concerns and referrals in a separate child protection file for each child. Where record keeping includes the details of staff the school should also consider the ICO guidance here when developing recruitment processes.

7.0 Dealing with an Allegation / Reported Concern

Guidelines For DSL

- If a teacher is concerned about a student at risk of abuse in the family home, they should report it to the DSL. The DSL's options for action include:
- Managing any support for the child internally via the school or college's own pastoral support processes. The DSL will generally lead the liaison with other agencies as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. a universal services and community based early help assessment.

7.1 Procedures for Emergency situations

Immediate action is required if:

A child is thought to be in immediate or imminent danger: Representative from the DSL team to inform the appropriate organisation (Psychiatric Service, Police) and the DSL / Principal.

A child has physical injuries caused by suspected abuse: The student must be taken to the hospital, preferably by the School Nurse. The relevant agency in the town where the child lives must be informed.

7.2 Procedures for Non-emergency Situations

If a teacher suspects that a child may have suffered or is suffering abuse, but there is nothing to indicate the child is in immediate danger, an internal inquiry will follow.

7.3 Decision Making

- If there is evidence of physical harm caused by suspected abuse, the student may be taken to hospital for examination. External Agencies and police will be informed as appropriate.
- If it is felt that the student is in immediate or imminent danger, or a criminal offence has been committed, the police will be contacted.
- If there is deemed to be insufficient evidence to warrant immediate action, the DSL Team may be contacted for advice, and a period of observation and assessment will follow, leading to one of three conclusions.

Decision 1: There are insufficient grounds to have reasonable cause for concern. This conclusion may follow circumstances relating to:

- Student relations with peers
- Parenting skills related to disciplining children at home
- Student-parent relationships
- Mental health issues such as depression, low self-esteem, grieving The school pastoral team will work with the parents and teacher and will coordinate a programme to support the child. This may involve external support services.

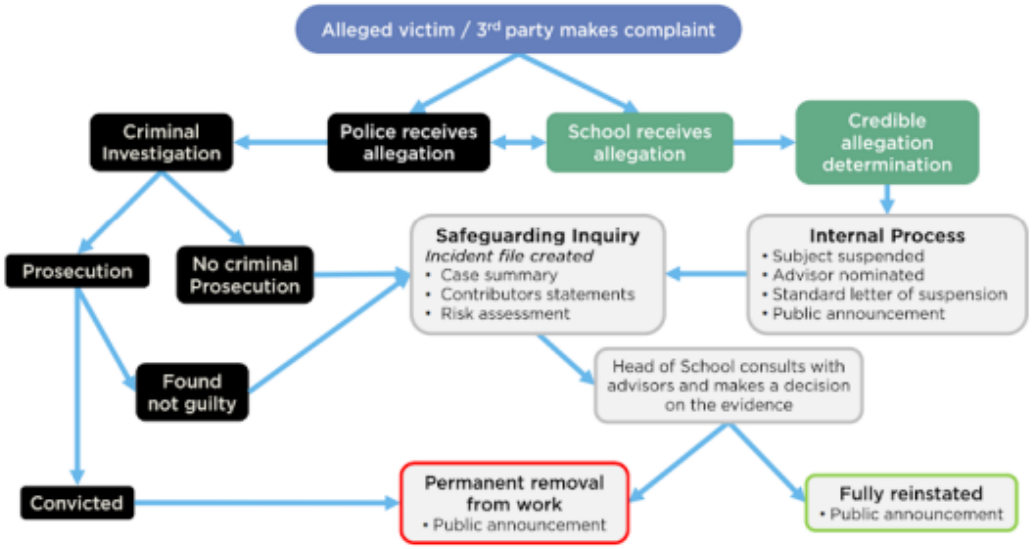
Decisions 2 & 3: There are reasonable grounds for concern of child abuse or neglect, or suspicion of a criminal offence; or in case of an emergency: The school will follow advice from the Child Protection Group (SGIS), external agencies and, where appropriate, the police. Parents will be contacted if they are not the suspected abusers. If they are suspected of child abuse, advice will be taken from the Child Protection Group. Where appropriate, the school will contact local psychological services to provide support to the student and family. Parental permission is needed for this. An attorney will be consulted if it is deemed necessary.

Further notifications: In addition to following advice and procedures given by the Child Protection Group, external agencies, and where necessary, the police, the school may notify:

- The management of the sponsoring employer of the concern with the child/family, or to the welfare office at the home-of-record.
- The consulate of the country of the involved family.
- Child Protection Groups in the home country

7.4 Conducting an Independent Safeguarding Investigation of an Employee

If it is suspected that an employee in the school has abused a child the concern must be brought directly to the School Principal, the case will be treated with the utmost gravity, and a full safeguarding investigation will follow (as highlighted below).



- A full safeguarding investigation, following an internal inquiry, is not the role of the school Safeguarding Team.
- In cases where the police deem there is insufficient evidence for a criminal investigation, Surval Montreux may engage the services of an independent safeguarding consultant to carry out a Suitability Assessment.
- This assessment is not to determine innocence/guilt but to assess the suitability of the person to work with children.
- All communication during in, and subsequent to, will be in line with Swiss Privacy and Swiss Labour Laws

- Surval Montreux will develop a communication plan and welfare plan appropriate to the situation and with the advice of external authorities

Allegations against adults - including the School Principal, staff , volunteers and adults not directly employed by the school

When dealing with allegations against the Principal, staff, supply staff or volunteers, the school aims to strike a balance between the need to protect children from abuse and the need to protect the head, staff, supply staff and volunteers from false or unfounded allegations. When deciding on whether to proceed the school should take note of the Harm Test.

Harm Test

What is the harm test? There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns which satisfy the harm test. To satisfy the harm test there needs to be credible evidence of a risk of harm to children or vulnerable adults such as statements made by an individual regarding conduct/behaviour, etc. For a case to be considered as a risk of harm, relevant conduct would not have occurred but there must be tangible evidence rather than a "feeling" that a person represents a risk to children and / or vulnerable adults. For example, a teacher who confides in their head teacher that they are sexually attracted to children (but who had not engaged in 'relevant conduct') would satisfy the harm test.

The school will follow the guidance in Part 4 of KCSIE (September 2026).

Part 4 of KCSIE is now separated into two sections.

Section One includes detailed guidance on allegations which meet the harms threshold, and:

Section Two includes guidance for **low level concerns**. Even those concerns which do not meet the harm threshold should be shared with the right person and recorded and dealt with appropriately.

Handling Allegations

Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the pupil or students concerned and the need for a full and fair investigation. Where an allegation or complaint is made against the Principal, the DSL will report to and consult immediately with the Safeguarding Governor and/or relevant Education Director, according to availability. This will be done without consultation with the Principal.

Where an allegation or complaint is made against staff, volunteers or the DSL, the Principal will be informed or, in his/her absence, the Safeguarding Governor and/or relevant Education Director.

If a decision is taken that a member of staff is suspended during the investigation the school recognises that this does not infer guilt. Under these circumstances any suspension is a 'neutral' act and no action should be viewed as an expression of opinion or judgement.

In the event of an allegation or complaint resulting in a member of staff being required not to come to school, because of suspension or other arrangements, where the school provides on-site accommodation for such a member of staff, he or she would be required to live off-site during this time. If it were not possible for offsite accommodation to be sourced by the member of staff, then the school would ensure suitable accommodation is provided.

In the event of any person (in any capacity, whether employed, contracted, a volunteer or student) leaving the school as a result of their being considered unsuitable to work with children, or who has harmed or poses a risk of harm to children, the school will report this to the Disclosure and Barring Service (DBS) promptly, within one working week (and/or the equivalent in the native country of that member or staff). This applies equally to anyone who would have been removed from the school had he or she not left earlier. The school recognises that the proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but do not have to find it from other sources.

A referral will be made to the Teaching Regulation Agency (TRA) (and/or the equivalent in the native country of that member or staff) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons for such a referral include situations where the member of staff has been dismissed for unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence. The school need only take this action if the matter has not been reported to the Disclosure and Barring Service; all matters reported to the DBS will be shared with TRA. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in 'Teacher misconduct: the prohibition of teachers (October 2015)'. Further guidance is published on the TRA website.

The school will follow the guidance in Part 4 of the DfE document KCSIE (September 2026) to ensure that:

- Procedures are applied with common sense and judgement (whereas before schools had to follow the required procedures closely)
- Allegations found to be malicious are removed from personnel records (whereas before all allegations had to be retained)

- Records are kept of all other allegations but any that are not substantiated, are unfounded or malicious should not be referred to in employer references (whereas before details of all allegations had to be passed on in references).

Further detail with regards to the procedures for dealing with allegations of abuse against staff are available from the School.

- Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency

Allegation against someone not directly employed by the school

Where an allegation is made against an individual not directly employed by the school, and where its disciplinary procedures do not fully apply, the school will ensure allegations are dealt with properly, to establish a suitable outcome. Schools should seek the support of governance to establish appropriate steps. The agency responsible for the individual should be involved, although the school should lead, and ensure that the individual subject to the allegation receives appropriate support, either through union or colleague representation. The school should ensure that agencies and their staff are aware of the procedures for managing allegations.

g) Low-level concerns

As part of our whole school approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

We work hard to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This should:

- encourage an open and transparent culture
- enable us to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

The term 'low-level' concern does not mean that it is insignificant. 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 in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating students.

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

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Low level concerns about a member of staff should be reported to the Principal, or a member of the senior leadership team. Staff are also encouraged to self-refer where, for instance, they have found themselves in a situation which could be misinterpreted, or on reflection feel they may have compromised the School's expected professional standards. Reports about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

The Principal will investigate the concern, speaking to the person who raised the concern, the individual involved, and any witnesses. The action to be taken will be determined by and proportionate to the nature of the incident, whether the report can be substantiated and whether any pattern of behaviour appears to be emerging. Support will be offered where appropriate and where needed to enable the member of staff in question to correct their behaviour in future.

The Principal must record all low level concerns in writing, including details of:

- The concern,
- The context of the report,
- The name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible);
- Action taken and the rationale for this

Allegations against students (including child-on-child abuse)

All staff should be aware that children can abuse other children (often referred to as child on child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse they should speak to their designated safeguarding lead (or deputy). Sexual violence and harassment can occur between two children of any age and sex. Staff working with children are advised to maintain an attitude of "it could happen here".

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- 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 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 standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- 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).

All staff should be clear as to the school's or college's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

The school's procedures in relation to child-on-child abuse follow the DfE advice to adopt a "whole school" approach, involving all staff, students, governors and parents, as part of the school's broad approach to safeguarding. Central to such an approach are
(i) staff training so that staff know what to do if they have a concern about a child
(ii) a planned curriculum and extra-curricular programme, including assemblies, which takes a preventative approach through the setting of values and standards of respect and tolerance. Through the wider curriculum, including and Personal, Social and Health Education (including Relationship and Sex Education), the school aims to provide students with an understanding appropriate to their age and stage of development of issues such as:

- healthy and respectful relationships - Recognise and be assertive to help resist pressure from others staying safe from abuse including how to recognise an abusive relationship, including coercive and controlling behaviour
- what respectful behaviour looks like
- consent
- gender roles, stereotyping, equality
- body confidence and self-esteem
- looking after their physical and mental health a curriculum that promotes body confidence, self-esteem and self-motivation
- staying safe online and ensuring students are aware of how to use AI (Artificial Intelligence) safely.
- Recognise and manage risks in different situations and then decide how to behave responsibly including understanding boundaries and consent
- stereotyping, prejudice and equality to prevent discrimination and promote respect for people with protected characteristics
- what constitutes sexual harassment and sexual violence and why these are always unacceptable together with the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support
- Judge what kind of physical contact is acceptable and unacceptable.

Sexual Violence and Sexual Harassment between children

With regard to sexual violence and sexual harassment, the school pays due regard to Part 5 of KCSIE (September 2026). The school holds and promotes a clear view that sexual violence and sexual harassment are never acceptable and will not be tolerated. Research shows that it is more likely that girls will be the victims of sexual violence or harassment and more likely that boys are the perpetrators. Children with SEND are three times more likely to be abused than their peers. Such behaviour must be challenged, since it is normalised by being dismissed or tolerated.
Definitions:

In this context, *sexual violence* is as defined in the Sexual Offences Act 2003. *Sexual harassment* is defined as unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to:

- violate a child's dignity
- make him or her feel intimidated, degraded or humiliated
- create a hostile, offensive or sexualised environment.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. It can include:

- sexual comments, (such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names)
- sexual "jokes" or taunting
- physical behaviour, (such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment, (which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence). It may include:
    - non-consensual sharing of sexual images and videos*.
    - sexualised online bullying
    - unwanted sexual comments and messages (including on social media)
    - sexual exploitation (coercion and threats).
- upskirting; this is now a criminal offence in the UK, 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.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:

• a child under the age of 13 can never consent to any sexual activity,
• the age of consent is 16,
and
• sexual intercourse without consent is rape

* UK Council for Child Internet Safety (UKCIS) provides detailed advice for schools on the sharing of nude and semi nude images (sexting) (refer to links in Appendix 2).

Harmful sexual behaviour describes online or offline sexual conduct that goes beyond what is normal and developmentally expected. This behavior ranges from inappropriate or problematic to explicitly abusive and violent. It must always be managed within a child protection context. When assessing these behaviors, a child's age and developmental stage are critical indicators. For instance, sexual behavior between children is generally considered harmful if there is a significant age gap, typically more than two years, or if a developmental power imbalance exists.

The school adopts a zero tolerance approach to HSB. Failing to challenge inappropriate actions creates an unsafe environment, risks normalising abuse, and deters victims from reporting incidents. We recognize that HSB, sexual harassment, and sexual violence can occur even without formal reports. Because misogyny and casual harassment often escalate into more severe abuse, staff must immediately challenge behaviors that may be criminal in nature, such as upskirting, lifting clothing, or unwanted touching. Furthermore, any incident involving the sharing of nude or semi-nude images, whether framed as consensual or non-consensual, demands an immediate safeguarding response. This response will always be proportionate to the children's ages, vulnerabilities, and any presence of coercion.

Victim Vulnerabilities and Targeted Support
Experiencing HSB is deeply distressing and frequently damages a pupil's educational attainment, particularly if they share a site with the alleged perpetrator. While any child can be affected, statistically, girls are significantly more likely to be victims of sexual harassment and violence, predominantly perpetrated by boys. Additionally, children with disabilities face a vastly elevated risk, being three times more likely to experience abuse than their peers. All victims must be explicitly reassured that their disclosures are taken seriously, and that they will be protected and supported.

Managing Perpetrators and Early Intervention
Children who exhibit HSB frequently have their own histories of trauma, maltreatment, or abuse, meaning they require robust therapeutic and safeguarding support alongside disciplinary measures. The Designated Safeguarding Lead (DSL) and deputies maintain specialized training in HSB to embed preventative education and manage these complex dynamics effectively. Early intervention at the first sign of problematic behavior is vital to break the continuum of abuse.

Report of Sexual Violence or Harassment
A member of staff who receives a report of sexual violence or sexual harassment will take action in line with the standard guidance for dealing with disclosures, as identified in this policy. As with all concerns about the welfare of a child, all staff should act in the best interests of the child.

A pupil reporting sexual violence or sexual harassment will be offered support and every effort will be made to ensure that his or her education is not disrupted. The child making the report will be

reassured, supported, taken seriously and kept safe. He or she should never be given the impression that reporting causes a problem, or be made to feel ashamed for making a report. In some cases, a third party, such as a friend, rather than the victim, may make the report. In such cases the same procedures will be followed, and it is important that the school understands why the victim has chosen not to make the report personally. Children may not find it easy to tell staff about abuse. Children can show signs or act in ways that they hope adults will notice and react to, or staff may overhear a conversation. If staff have **any** concerns about welfare, they should act on them immediately rather than wait to be told.

Handling a Report of Sexual Violence or Harassment

Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Staff are provided with training to facilitate a calm and considered response to any concern.In overseeing the management of the concern, the DSL will consider, in line with overall safeguarding guidance, whether a referral should be made to children's social care services and, where a crime may have been committed, will make a referral to the police. Full details of Handling a Report of Sexual Violence or Harassment can be found in Appendix 2 of this document and on pages 123-238 of KCSIE 2026. Swiss Law will need to be referred to here as well.

Staff Code of Conduct and Safeguarding

This section outlines the schools position on several areas where the actions of staff support safeguarding in the context of their individual and collective practice. Further detail on all of these areas can be found in the Staff Handbook.

- Protecting children from abuse, exploitation or neglect - an overview duties of staff in relation to this policy
- Staff / pupil relationships - includes principles of good practice, as well as consideration of steps that staff should take in different contexts to safeguard students and themselves both within school and beyond, and legal duties of care with regard to pupil staff relationships
- Communication with students and former students (including the use of technology) - outlines good practice with regard to continuing professional communication with students, information sharing and appropriate online behaviour. This should be read in conjunction with the Appropriate Use of Technology policy, which includes mobile phones.
- Photographs and videos - specific reference to the using of electronic devices for this, again should be read in conjunction with the Appropriate Use of Technology policy, which includes mobile phones
- The use of force or physical restraint, obligations with regard to this area and should be read in conjunction with 'The Behaviour Policy' and 'Restraint and Physical Contact Policy'

- Physical Contact with students; provides guidance on where physical contact will, may and should not occur should be read in conjunction with 'The Behaviour Policy' and 'Physical Restraint Policy'

7.5 Further Support for the Child and Family

- The School Nurse or assigned contact, will maintain follow up contact with the child and family to provide support and guidance as appropriate.
- The School Nurse will meet with the child's teachers (if appropriate) and the school principal to provide in-service training regarding the needs of abused or neglected children and the important role teachers play in assisting the child's recovery and future development.
- The School Nurse will provide resource materials and strategies for teachers to use.
- The School Nurse will maintain contact with outside therapists and investigators to update the situation of the child in school.
- All documentation of the investigation will be kept in the child's school Confidential Records file. Records sent to schools to which a student may transfer will only flag a confidential file for the child with prior parental consent. Surval Montreux will only share information as appropriate to protect the child, in line with Swiss privacy laws. CP files are retained for 10 years in accordance with Swiss federal data protection law - Swiss data protection law stipulates that personal data must not be retained "any longer than necessary". There is no specific directive relating to child protection data therefore Surval Montreux has decided to retain child protection data for a period of ten years.
- All students have a right to access their files or any written documentation that concerns them, according to the directive from the DGEJ (Direction generale de l'enfance et de la jeunesse) of Vaud Canton[1]. Students may access their files on request which is countersigned by a parent. Students and parents will be informed of this as part of the admissions process to the school.
- KCSIE September 2026 provides a wide range of principles and actions through which the victim can be supported. This includes working closely with the victim on an ongoing basis, ensuring that external support is sought where relevant and that ongoing review of

[1] Directive - Annonce d'événement grave survenu dans un milieu d'accueil autorisé et/ou subventionné par la DGEJ qui concerne les enfants - Canton de Vaud - 2022.
OPE Directive R9 <<autorisations des institutions relevant de la mise en oeuvre de l'Ordonnance sur le placement d'enfants>>

the situation takes place. Further information and useful links to additional documentation can be found at paragraph 535 to 544 of the KCSIE September 2026

Appendix 1 – Contact details

School Contacts:
Designated Safeguarding Lead: Francesca Bradbury francesca.bradbury@surval.ch
Deputy Designated Safeguarding Lead: Patricia Woodhouse patricia.woodhouse@surval.ch
Bellevue Safeguarding Governor: Steve Wade swade@blvue.com

Direction générale de l'enfance et de la jeunesse (DGEJ – Department of Children and Young People)
Regional Child Protection Office:
Montreux (Eastern Vaud)
Telephone: 021 557 94 69

Disclosure and Barring Service
https://www.gov.uk/government/organisations/disclosure-and-barring-service
Email: dbsdispatch@dbs.gsi.gov.uk
Address: DBS, PO Box 181, Darlington, DL1 9FA
Telephone: 01325 953795

NSPCC Inform website
http://www.nspcc.org.uk/Inform
Telephone: +44 808 800 5000
Email: help@nspcc.org.uk

NSPCC Whistleblowing helpline
https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/
Telephone: +44 800 028 0285
Email: help@nspcc.org.uk

Office of the Children's Commissioner for England (OCC)
https://www.childrenscommissioner.gov.uk/
Email: advice.team@childrenscommissioner.gsi.gov.uk
or info.request@childrenscommissioner.gsi.gov.uk

Appendix 2 - Useful Links and Documentation

SURVAL MONTREUX
GIRLS' SCHOOL IN SWITZERLAND

Core Documentation

Keeping Children Safe in Education (September 2026) (KCSIE)
https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf

Working together to safeguard children July 2023
https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf
Version of this guidance suitable for young people
https://www.childrenscommissioner.gov.uk/publication/working-together-to-safeguard-children/
Version of this guidance suitable for younger children
https://www.childrenscommissioner.gov.uk/publication/guide-to-keeping-children-safe/
What to do if you're worried a child is being abused (March 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdfprevent

Wider Guidance

DfE guidance on mental health
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools__.pdf
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/414908/Final_EHWB_draft_20_03_15.pdf
DfE guidance on Behaviour in schools
Behaviour in schools Advice for headteachers and school staff September 2022
DfE Guidance on Information Sharing
https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf
Further information on contextual safeguarding
https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding
Guidance for safer working practice for adults who work with children and young people
http://webarchive.nationalarchives.gov.uk/20100202180143/http://www.dcsf.gov.uk/everychildmatters/resources-and-practice/IG00311/
Child Sexual Exploitation
Child sexual exploitation: definition and guide for practitioners;
www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners
Child sexual exploitation: annexes;
www.gov.uk/government/uploads/system/uploads/attachment_data/file/591905/CSE_Guidance_Annexes_13.02.2017.pdf

Child on Child Abuse; DfE Guidance
https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges
NSPCC Guidance on Harmful Sexual Behaviour:
https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexual-behaviour/

NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

GDPR and Online safety
Guidance to support schools with data protection activity, including compliance with the GDPR.
Data Protection: toolkit for schools

Sexting: How to respond to an incident:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Overview_of_Sexting_Guidance.pdf

Sexting in schools and colleges:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf
DfE advice for schools
https://www.gov.uk/government/publications/teaching-online-safety-in-schools
UK Council for Internet Safety (UKCIS)27 guidance: Education for a Connected World
National Crime Agency's CEOP education programme: Thinkuknow Public Health England Rise Above
Resources that could support schools and colleges include:

- Be Internet Legends developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 students
- Disrespectnobody is Home Office advice and includes resources on healthy relationships, including sexting and pornography
- Education for a connected world framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
- PSHE association provides guidance to schools on developing their PSHE curriculum
- Teaching online safety in school is departmental guidance outlining how schools can ensure their students understand how to stay safe and behave online as part of existing curriculum requirements
- Thinkuknow is the National Crime Agency/CEOPs education programme with age specific resources
- UK Safer Internet Centre developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.