



Whole School Child Protection and Safeguarding Policy

2023-2024

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Contents

Key Points	3
Introduction	4
Safeguarding Legislation and Guidance	4
Contact Details	5
Part A: Principles and Aims	6
Part B: Actions Where There are Concerns About a Child	7
Recognising Abuse	7
Bullying	8
Taking Action	8
If You Are Concerned About a Pupil's Welfare	8
Early Help	8
Child in Need, Suffering, or Likely to Suffer, Significant Harm	9
If a Pupil Makes a Disclosure to You	9
Notifying Parents	10
Reporting Directly to the School Inspector or Polic	10
Confidentiality and Sharing Information	10
Children Who May be Particularly Vulnerable	11
Children with Special Educational Needs and Disabilities	11
Part C: Types and signs of abuse and neglect	12
Abuse	12
1. Physical Abuse	13
2. Emotional Abuse	13
3. Sexual Abuse	14
4. Neglet	14
Part D: Specific Safeguarding Issues	15
Children Missing Education	15
Children Absent from Education	15
Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	15
Child Criminal Exploitation	15
Child on Child Abuse	16
Child Sexual Exploitation (CSE)	17
Domestic Abuse	18
Honour-Based Abuse	18
Mental Health	19
Nude or Semi-Nude Imagery or Videos (Youth produced sexual imagery)	20
Serious Violence	20
Supporting Those Involved	21
Preventing Radicalisation and Extremism	21
Online Safety	22
Part E: Roles and Responsibilities	24
The Designated Safeguarding Leads (DSL):	24
Opportunities to teach Safeguarding	24
Staff Training	25
Support for and Supervision of Staff	26
Abuse of Position of Trust	26
Proprietorial Oversight	26
Part F: Other Safeguarding Policies and Procedures	27
Safer Recruitment	27
Good Practice Guidelines and Staff Code of Conduct	27
Whistleblowing	28
Allegations Against Staff	28
Site Security	30
Extended School and Off-site Arrangements	30
Staff/Pupil and Parent Online Relationships	30
Children Staying with Host Families during a Foreign Exchange	30
Related Safeguarding Policies	30

Key Points

The safety and welfare of our pupils is our number one priority

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

All low level concerns or doubts should be shared with the DSL or the DDSL

All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL English) or the Deputy Designated Safeguarding Lead (DDSL Spanish)

Primary & EYFS DSL:
Barbara Stenhouse
Secondary DSL:
Jonathan Best

Primary & EYFS DDSL:
Silvia Sanchis & John Fraser
Secondary DDSL:
Cristina Pérez & Emma Andrews

In the event that a child is in immediate danger or at risk of harm a referral to the Police and/or the School Inspector should be made immediately. If in doubt about which agency to contact, advice should be sought from Emergencias on **112**.

Allegations or higher level concerns about another staff member or adult in school should be referred to the Headteacher(s) or School Directors

Allegations or higher level concerns about the Headteacher should be referred to the School Directors or the School Inspector

Allegations or higher level concerns about the School Directors should be referred to the Headteacher(s) or School Inspector

Introduction

Caxton College fully recognises its moral and statutory responsibilities to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

This policy applies to all teaching, non-teaching, support, peripatetic, contract staff, volunteers and any other adults working at the school. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated. For the purpose of this guidance children include everyone under the age of 18.

Safeguarding Legislation and Guidance

The following UK and Spanish safeguarding legislation and guidance has been considered when drafting this policy:

- [**Keeping children safe in education - GOV.UK**](#)
- [**KCSiE 2023 updates**](#)
- [**UKCIS guidance: Sharing nudes and semi-nudes: how to respond to an incident \(overview\) 2020**](#)
- [**Working Together to Safeguarding Children 2018**](#)
- [**What to do if you're worried a child is being abused 2015**](#)
- [**Promoting and Supporting Mental Health and Wellbeing in Schools and Colleges 2021**](#)
- [**The Teacher Standards \(terminology update 2021\)**](#)
- [**British schools overseas: standards for schools - GOV.UK**](#)
- [**The Ley 26/2015, de 28 de julio, de modificación del sistema a la infancia y a la adolescencia \(Save the Children guidance\)**](#)
- [**The Ley 26/2018 de derechos y garantías de la Infancia y la adolescencia \(Generalitat Valenciana\)**](#)
- [**Codigo Civil**](#)

In child protection matters the school will follow the inter-agency and child protection procedures laid down by the Valencian Generalitat.

This policy is available in English and Spanish and is published to all staff and volunteers and placed on the school website.

Contact Details

The table below outlines the contact details of named staff in school, the school Inspector and external agencies linked to child protection and safeguarding.

Where a child is in immediate danger or at risk of harm a referral should be made to the School Inspector and/or the police immediately.

School Details	
Primary and EYFS Designated Safeguarding Lead (DSL) Level 3 trained	Barbara Stenhouse bstenhouse@caxtoncollege.net 96 142 4178 ext. 162
Primary and EYFS Deputy Designated Safeguarding Lead (DDSL) Level 2 trained	Silvia Sanchis ssanchis@caxtoncollege.net 96 142 4178 ext. 167 John Fraser jfraser@caxtoncollege.net 96 142 4178 ext. 1196
Secondary Designated Safeguarding Lead (DSL) Level 3 trained	Jonathan Best jbest@caxtoncollege.net 96 142 4174 ext. 230
Secondary Deputy Designated Safeguarding Lead (DDSL) Level 2 trained	Cristina Perez cperez@caxtoncollege.net 96 142 4174 ext. 188 Emma Andrews eandrews@caxtoncollege.net 96 142 4178 ext.
School Principal	Marta Gil mgil@caxtoncollege.net 96 142 4500 ext. 1102
School Vice Principal	Angela Bas abas@caxtoncollege.net 96 142 4500 ext 2031 Laura Galan lgalan@caxtoncollege.net 96 142 4500 ext1169

*in the unlikely event that the designated safeguard leads are not available, staff should raise concerns with a member of the Senior Leadership Team.

Authority Contacts	
School Inspector	Manuel Ortiz Lobato 649 169 892
Conselleria d'Educación - Valencia Generalitat (hoja de notificación de posible situación de desprotección desde el ámbito educativo)	http://www.ceice.gva.es/documents/162793785/165597276/Hoja_notificacion_rellenable.pdf/a5929fb4-c515-4836-83bf-ab211a0e664a
Atención a la Infancia de la Comunitat	116111
Servicios Sociales - Valencia Sección del Menor C/ Amadeo de Saboya 11 Patio A. 46010 Valencia	96 208 24 21 / 22 ssmenor@valencia.es www.valencia.es/bienestarsocial O acudiendo al Centro que corresponda por zona. Centros de servicios sociales por área
Servicios Sociales - Puzol lunes y miércoles de 9 a 14 horas.	96 142 47 01
NSPCC (National Society for the Prevention of Cruelty to Children)	+44 808 800 5000 24/7 helpline

Police	
Emergencia	112
Local Police	092

Part A: Principles and Aims

Our commitment is to safeguard and promote the welfare, health and safety of our pupils by creating and maintaining an open, safe, caring and supportive atmosphere.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment
- Preventing 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.

Policy Principles:

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support

We aim to:

- Provide all staff with the necessary information to enable them to meet their child protection responsibilities
- Ensure consistent good practice to protect pupils from harm
- To demonstrate the school's commitment regarding child protection to pupils and parents

The school achieves these aims by:

- Ensuring the recruitment of staff who are suitable and appropriate to work with children and have all the necessary and legal documentation in place before starting.
- Providing excellent pastoral care and providing a positive school atmosphere where pupils feel safe and secure and are encouraged to talk.
- Valuing and promoting effective relationships with parents and professionals from external agencies.
- Teaching pupils, through Personal Development and a varied curriculum, to identify and manage risks. This includes educating pupils, through regular internal and externally provided ICT safety talks, about the safe use of devices and access to the internet.
- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach toward online safety, including the acceptable use of devices and the use of appropriate filters and monitoring systems.
- Ensuring that all staff, teaching and non-teaching staff, are properly trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.
- Encourage staff to discuss child protection, safeguarding and welfare concerns confidentially with the DSL and/or the DDSL in order to ensure that they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect.
- Creating a culture of openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults in school can be shared and dealt with in an appropriate and sensitive manner.
- Following the procedures laid down in this Policy.

Part B: Actions Where There are Concerns About a Child



Safeguarding is everyone's responsibility and all staff regardless of their role should exercise vigilance and be watchful for, and aware of, signs that a child may be in need of help as well as the signs of abuse and neglect. If a staff member has any concerns about a child, s/he should report the concern by completing the Report a Concern in the My Concern platform or speak directly with a member of the Safeguarding team.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in My Concern so information is accurate and logged. Information should be kept confidential.

Records should include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached and the outcome.

If a staff member has any doubts or questions, including those regarding recording requirements, they should immediately speak with the DSL/DDSL. The DSL/DDSL will discuss the matter with the member of staff decide on appropriate action. This discussion and actions may be recorded as above if found appropriate by the DSL/DDSL.

DSL's, DDSL's, and School leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Recognising Abuse

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

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. Abuse may be committed by adult men or women and by other children and young people. There are four categories of abuse which are set out in **Part C: Types and Signs of Abuse and Neglect**.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying, discriminatory bullying and prejudice-based bullying should be reported and will be managed through our Anti-Bullying Policy.

Taking Action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

Key points for staff to remember for acting are:

- In an emergency take the action necessary to help the child (including calling 112)
- Report your concern as soon as possible to the DSL/DDSL, definitely by the end of the day
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Complete the Report a Concern section on My Concern platform immediately.
- Seek support for yourself if you are distressed.

If You Are Concerned About a Pupil’s Welfare

Early Help

All staff should be aware of the early help process, understand their role in it and be alert to identifying children, including children who are more vulnerable, who may benefit from early help. This includes:

- Identifying emerging problems and potential unmet needs
- Liaising with the DSL/DDSLs
- Sharing information with other professionals to support early identification and assessment and in some cases acting as the lead professional in undertaking an assessment of the need for early help.

Early help means providing support as soon as a problem emerges at any point in a child’s life. There will be occasions when staff may suspect that a pupil may be at risk. The pupil’s behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way. If a member of staff has a concern that a child may be in need of early help then s/he should complete the Report a Concern section on My Concern platform and then discuss early help requirements with the DSL/DDSL.

Effective early help involves the school providing high quality support, in cooperation with or coordinating with other agencies as appropriate, to help address the assessed needs of the child and their family, in order to significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. Nevertheless, each case should be kept under constant review, and consideration should be given to contacting the school inspection in case of a referral to children’s social care is needed if the child’s situation does not appear to be improving.

Child in Need, Suffering, or Likely to Suffer, Significant Harm

If at any time it is considered that the child may be a child in need, has suffered or is at risk of significant harm, or is in immediate danger, it should be reported to the DSL/DDSL immediately and a Report a Concern completed on MyConcern. In these cases the DSL/DDSL will initially contact the School Inspector before making a referral to the children's social services (by completing the hoja de notificación de posible situación de desprotección desde el ámbito educativo) - in the local area where the child lives. If after speaking with the School Inspector, no referral is made, the school will continue to monitor and record the situation, which may involve the parents or not, depending on the situation. Support and guidance will be given to the pupil to address any risks and prevent issues escalating, if necessary.

In cases of significant or immediate danger the police should be notified immediately. Immediate protection measures will be taken if a child shows signs of injury, grave negligence or suspicion of sexual abuse by accompanying them to the health centre or hospital.

If a Pupil Makes a Disclosure to You

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive or they may not feel ready or know how to tell someone they are being abused.

Victims who report abuse, sexual violence or sexual harassment should always be taken seriously, kept safe and never be made to feel that they are creating a problem.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL/DDSL. The point at which they tell the pupil this is a matter for professional judgement. Promises of confidentiality should never be given.

All pupils, including our LGBTQ+ children, know that they have a safe space to speak out or to share their concerns with members of staff. There is a 'Who Can I Speak with?' display in Secondary and Primary pupils complete a 'Helping Hand' activity to identify five adults they feel they can speak with.

During their conversations with the pupils, staff will:

- Allow them to speak freely and remain calm. Do not interrupt the child or be afraid of silences
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- **Under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's parent think about it
- Not automatically offer any physical touch as comfort
- Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong
- Tell the pupil what will happen next. The child may want to accompany you to see the DSL/DDSL, otherwise let the child know that someone will come to see them before the end of the day.
- Report verbally to the DSL/DDSL even if the child has promised to do it by themselves
- Complete the Report a Concern section on My Concern platform immediately.
- Seek support if they feel distressed

Notifying Parents

In accordance with national procedures the school will normally seek to discuss any concerns about a pupil with their parents or to inform them that a referral to child services will be made, unless they are deemed to be a risk to the child.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the School Directors, the school inspector and/or the police before parents are contacted.

Reporting Directly to the School Inspector or Police

Staff should follow the reporting procedures outlined in this policy. However, any member of staff may also share information directly with the school inspector or police if:

- The situation is an emergency and the designated safeguarding lead, their deputy, the headteacher(s) and the School Directors are all unavailable
- They are convinced that a direct report is the only way to ensure the pupil's safety
- For any other reason they make a judgement that direct referral is in the best interests of the child.

Confidentiality and Sharing Information

Staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious as this may not be in the best interests of the child. 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 only to the people who must be told in order to ensure that the appropriate action is taken. If a child or adult decides not to continue with a disclosure, the DSL/DDSL should also be informed as soon as possible.

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, DDSL, members of their SLT and/or the School Directors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

All electronic and paper information is confidential and only made available to relevant individuals.

The DSL/DDSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL/DDSL may share information without consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to see child protection and safeguarding records, they will refer the request to the data protection officer.

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. However, where in doubt, the school will seek legal advice.

Children Who May be Particularly Vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

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

- Living away from home or in temporary accommodation, including Boarding students
- Living in chaotic and unsupportive home situations
- Living transient lifestyles
- Affected by parental substance misuse, domestic violence or parental mental health needs
- Vulnerable to being bullied, or engaging in bullying
- Vulnerable to discrimination and maltreatment based on protected characteristics (e.g. race, ethnicity, religion, disability or sexuality)
- Do not have English or Spanish as a first language
- At risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive.

Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges and are three times more likely to be abused by their peers. Therefore it is important we ensure measures are taken to keep these pupils from harm. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- The potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Part C: Types and signs of abuse and neglect

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse

Abuse is a form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

One of the best ways to help children is by being aware of the signs of possible abuse. All staff should be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of help and protection. These signs can take many forms including physical injuries and behavioural indicators. Although in most cases these signs will manifest themselves in children who are themselves the victims of abuse, it is important to remember that adults can also display significant indicators which suggest the existence of their own abuse. Staff should also be alert to any comments or jokes made by other children in the school.

All staff should be aware that the list below is not exhaustive but includes the common signs of abuse, which if present, may indicate a problem requiring follow up. It is important to recognise that some young people who are being sexually exploited or abused do not exhibit any external signs of this abuse. Sometimes children don't even realise that what's happening is abuse. It is also sometimes difficult to tell the difference between injuries suffered as part of normal childhood activities and those caused by abuse. If a staff member is unsure he/she should discuss the case with the DSL/DDSL. **The National Society for the Prevention of Cruelty to Children (NSPCC)** includes advice on how to spot signs and patterns of abuse and neglect.

Some common signs that there may be something concerning happening in a child's life include:

- Unexplained changes in behaviour or personality
- Changes in eating habits
- Sleep problems or experiencing nightmares
- Self-harming
- Suicidal thoughts
- Becoming withdrawn
- Seeming anxious
- Becoming uncharacteristically aggressive
- Lacks social skills and has few friends, if any
- Poor bond or relationship with a parent
- Knowledge of adult issues inappropriate for their age
- Running away or going missing
- Always choosing to wear clothes which cover their body.

These signs don't necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour – but we must not ignore these signs.

KCSIE (DfE 2023) refers to four categories of abuse which are set out below:

1. Physical Abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

If a child often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated. Some signs of physical abuse can include:

- injuries to parts of the body where accidents are more unlikely, such as thighs, abdomen, back
- respiratory problems from drowning, suffocation or poisoning
- untreated or inadequately treated injuries
- bruising which looks like hand or finger marks
- cigarette burns, human bites, scarring, scalds and burns

2. Emotional Abuse

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

Signs of emotional abuse tend to be behavioural rather than physical and they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children
- become frightened of certain adults
- become angry or disinterested and/or show little creativity
- become sad, withdrawn or depressed
- have trouble sleeping
- become sexually active at a young age
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children
- refuse to change for PE or participate in physical activities
- develop eating disorders
- self-harm
- refuse to attend school or run away from home
- lacks confidence or have low self-esteem
- use drugs or alcohol

3. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection
- pain/itching/bleeding/bruising/discharge to the genital area/anus
- urinary infections/sexually transmitted diseases
- difficulty walking or sitting
- persistent sore throats

4. Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

It may also include neglect or unresponsiveness to, a child's basic emotional needs. Signs of possible neglect may include:

- the child seems underweight or is very small for their age
- they are poorly clothed, with inadequate protection from the weather
- they are often absent from school for no apparent reason
- they are regularly left alone, or in charge of younger siblings

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL/DDSL to decide how to proceed.

Part D: Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues some of which are listed below. Further details can be read in Annex B of [*Keeping Children Safe in Education 2022*](#). Safeguarding can link to issues such as drug-taking, alcohol abuse, truancing and the consensual or non-consensual sharing of nude or semi-nude images/videos.

Children Missing Education

All staff should be aware that children going missing, particularly repeatedly, can be a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The DSL will monitor unauthorised absence, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Children Absent from Education

Children being absent from school for prolonged periods and/or repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation. We must respond to persistently absent children to help prevent the risk of them becoming a child missing in education.

Parents must inform the school of a pupil's absence which is then recorded in the absence programme. If a child is persistently absent from school then parents will be contacted to discuss the situation and offer possible support. However, if the child's absence reaches 14% the Safeguarding teams will receive an automated email to inform them. Parents will then be invited to school to discuss the situation and inform parents that if it rises to 15% (unauthorised absence) then it is our duty of care to inform social services.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt.

They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

Child on Child Abuse

We understand that abuse can take place from one child to another child. Child-on-child abuse can take a number of forms including:

- Bullying, including discriminatory bullying and cyberbullying
- Physical abuse
- Sexual violence
- Sexual harassment, including online sexual harassment
- Causing someone to engage in sexual activity without consent
- Upskirting
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Initiation/hazing type violence and rituals

Sexual violence and sexual harassment can occur between two or more children of any age or sex. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can be both physical and verbal and can occur online and/or face to face.

We take a zero tolerance approach to sexual violence and sexual harassment. It is never acceptable and should not be tolerated. It should never be passed off as 'banter', 'just having a laugh', 'a part of growing up', or 'boys being boys'. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and encourage people to falsely believe that it is acceptable. Staff must challenge physical behaviour, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. We should recognise, acknowledge and understand the scale of harassment and abuse, and understand that even if there are no reports, it does not mean it is not happening.

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). Staff should be aware of the importance of understanding intra-familial harms and any necessary support for siblings following incidents.

At our school, we take the following steps to minimise or prevent the risk of child on child abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Ensure pupils know that the law is in place to protect rather than criminalise them
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- PSHE/Personal Development classes are used to reinforce the message through stories, role play, current affairs and other suitable activities.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school.
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.

Should an allegation of abuse be made against another pupil all children involved (whether perpetrator or victim) 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 the Inspector. The DDSL will then work with children's social care to decide on next steps, which may include contacting the police. Where appropriate, the matter will be dealt with under the school's Behaviour Policy with the use of relevant disciplinary sanctions.

As with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the School Directors, the school inspector and/or the police before parents are contacted.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

A child exploited online may be forced to:

- Distribute sexual images of themselves
- Film or livestream sexual activities
- Engage in sexual conversations

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant.

The school includes the risks of sexual exploitation in the Personal Development curriculum and during specialist talks about Sex Education. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All concerns should be immediately reported to the DSL/DDSL.

Domestic Abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and witnessing domestic abuse is child abuse. It's important to remember domestic abuse:

- can happen inside and outside the home
- can happen over the phone, on the internet and on social networking sites
- can happen in any relationship and can continue even after the relationship has ended both men and women can be abused or abusers.

The abuse can encompass but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

The indicators of potential domestic abuse can include:

- Becoming anxious or withdrawn
- Sleep difficulties
- Bed-wetting
- Complaining of physical symptoms eg. tummy ache
- Behavioural issues such as aggression or behaving in a much younger manner than their actual age
- Low sense of self-worth or self-esteem
- Self-harm
- Alcohol or drug abuse

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. More advice can be found at <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>

Honour-Based Abuse (Female Genital Mutilation and Forced Marriage)

Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse and must be reported to the police.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In Spain, the practice is a criminal offence (Ley Orgánica 1/2014 BOE Nº 63). The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In Spain the practice is a criminal offence under the Ley Orgánica 1/2015

Children may be married at a very young age, and well below the age of consent in Spain. School should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to Spain.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the ***Mental health and behaviour in schools***, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Rise Above for links to all materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy designated safeguarding lead.

Individual risk assessments are carried for all pupils deemed to be at risk. In Secondary weekly watch lists are available which identify three categories. Pupils identified as green are low risk and are monitored by staff. Pupils identified as amber are moderate risk These students must not be permitted to leave class during lessons, unless accompanied by another pupil. Pupils identified as red are high risk. These students must not be permitted to leave class during lessons. If they appear to be having any kind of crisis and are requesting to leave the room, please email Secondary SLT and Secondary Secretaries and a member of staff will come to your room to meet the child and support them to a safe space. In Primary each situation is discussed and action taken depending on the level of risk, including playground observations or staff who come into contact with the pupil are informed and regular feedback is requested.

Nude or semi-nude images/videos

The sharing of nude or semi nude images or videos refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobile or over the internet. Sharing can be classified as consensual or non-consensual.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.

All incidents involving the consensual or non-consensual sharing of nude or semi nude imagery or video will be responded to as follows:

- The incident will be referred to the DSL/DDSL immediately who will then hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a child has been harmed or is at risk of harm a referral will be made to the school inspector and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter directly to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of devices and interviews with the young people involved.

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

UK DfE advice [***What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners***](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [***NSPCC***](#) website also provides useful additional information on abuse and neglect and what to look out for.

Supporting Those Involved

The support required for the pupil who has been harmed will depend on their circumstances and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil who is the perpetrator of the harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

Preventing Radicalisation and Extremism

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, reporting to the DSL. All teaching staff complete an Online Radicalisation training session provided by The National College..

School staff are also signposted to the [***e-Learning training on Prevent***](#), to help to identify signs of radicalisation and extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture, and the school promotes fundamental British Values as part of the Personal Development curriculum and the wider curriculum. Where concerns are raised regarding possible involvement in radicalisation or extremism, these will be reported as any other Child Protection concern would be reported. In an emergency, reports can be made via the [***Stop Radicalismo website***](#).

Online Safety

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation. The School Directors liaise with the IT department regularly to review the effectiveness of school filters and monitoring systems in order to manage the content available to pupils, who can contact our pupils and the personal conduct of our pupils online.

The school takes a proactive approach to teaching children about being a safe online citizen. As well as explicit teaching opportunities, staff use incidental opportunities to promote safe messages and teach about online risks. Please refer to the Whole School **Technology Policy and Teaching Online Safety in Schools (2019)** for further information.

All staff are required to undergo regular updated safeguarding training, including online safety training.

The school communicates with parents regularly to reinforce the importance of children being safe online and inform them about:

- What systems we have in place to filter and monitor online use at school and at home
- What they are asking children to do online, including sites they will be asked to access
- Who from the school their child is going to be interacting with online

Filtering and Monitoring (see Whole School Technology Policy)

The school internet access is provided by Vodafone and as a backup system from Quattre. Our filtering system is appropriate to the age of pupils: the providers are Fortinet for desktop and laptop computers and IMT Lazarus in conjunction with Jamf School for iPads. Fortinet filters content such as pornography, gambling, hacking, malware, terrorist and extremist material and social media sites. Jamf School limits and ensures that the applications available during the school day on the student's iPads are only those which have been predetermined by the school. These restrictions are also in place at home as a default for Year 5 to 9 students. Parents do have the opportunity to opt out of the restrictions but in doing so take full responsibility for their child's iPad use.

We are aware that:

- filtering and monitoring are important parts of safeguarding pupils and staff from potentially harmful and inappropriate material
- we have overall strategic responsibility for filtering and monitoring
- we must ensure a safe learning and working environment for both pupils and school personnel, including when online
- The School Directors liaise with the IT department regularly to review the effectiveness of school filters and monitoring systems in order to manage the content available to pupils, who can contact our pupils and the personal conduct of our pupils online.

Mobile Phone Use

Personal communication through mobile technologies is an accepted part of everyday life and we acknowledge that we have a duty to ensure that mobile phones are used responsibly at this school and understand that we are role models for our pupils. Mobile phones and cameras are not permitted in the EYFS department. Staff use a school iPad to take any photographs for school purposes only.

During the school day school personnel are only permitted to use their phones when there are no pupils present and in the designated areas of the school. Phones must be on silent during lesson times and not visible to pupils. It is the responsibility of all school personnel to keep their mobile phones securely stored. Staff must only take photographs of pupils using their school iPad for educational purposes only.

Primary pupils are not permitted to bring a mobile phone to school, Key Stage 3 & 4 pupils may bring a phone to school but are not allowed to use it on the premises between 08.50 - 16.30. Key Stage 5 pupils are only allowed to use their phone in the designated areas (common rooms and outside area by the common room).

Maintenance and IT staff and the main playground supervisors are authorised to use a mobile phone for emergency purposes only. They are prohibited from taking photographs of children.

Parents and all school visitors must read the Visitor Guide (available in the parent portal and the entrances to school) which explains that they have a responsibility not to use their mobile phones on school premises (except in the designated areas) for the making or the receiving of phone calls and especially for the taking of photographs. At the beginning of concerts, parents are informed that they may take photographs but they can only be used for personal use and they cannot be shared or uploaded on any social media platforms.

Part E: Roles and Responsibilities

The School Directors have an overarching role in ensuring that policies, procedures and training in their school are effective and comply with the law at all times.

The school has a DSL and DDSL in Primary and Secondary who have equal responsibility for safeguarding and child protection. The DSLs are English native although they do understand and speak Spanish. The DDSLs are Spanish native although they do understand and speak English. Staff and pupils can speak with either the DSL or the DDSL depending on language needs.

The DSL and the DDSL liaise with the School Directors, on Safeguarding issues before referring any cases of suspected abuse to the School Inspector and/or the police, if there is an immediate threat to the child.

The Designated Safeguarding Leads (DSL):

The Designated Safeguarding Lead (DSL) is a member of the Primary PLT and Secondary SLT and takes responsibility for safeguarding and child protection (including online safety) in the school. The DSLs complete yearly training, have a specific job description and therefore the status and authority within the school to carry out the duties of the post. The school also has four named Deputy Designated Safeguarding Lead, who also complete annual training, ensuring there is always an appropriately trained and designated person in the school at all times.

The responsibilities of the DSL/DDSL include:

- All child protection and safeguarding incidents, policies, procedures and staff training
- Understand the filtering and monitoring systems and processes in place
- Ensuring the child protection and safeguarding policies are known, understood and used appropriately by staff, reviewed annually and publically available
- Advising and supporting staff on child protection and safeguarding matters
- Encouraging a culture of listening to children
- Taking part in strategy discussions and inter-agency meetings
- Manage safeguarding referrals to children's social services, the police or other agencies
- Ensuring all staff receive regular safeguarding training whether it be internal or online
- Transferring the child protection file to a child's new school
- Undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training

The DSL/DDSL liaise with the School Directors on safeguarding issues. DSL/DDSL training is completed every two years to ensure they are up to date with best practice advice and equip them to be a source of advice for colleagues.

Opportunities to teach Safeguarding

As a school, we will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.

This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils). Further details regarding these subjects can be found in **'Relationships Education, Relationships and Sex Education (RSE) and Health Education'**.

The UK Department for Education has produced a one-stop page for teachers on GOV.UK, which can be accessed here: ***Teaching about relationships sex and health***. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

Staff Training

As part of the induction programme, all newly appointed staff will receive safeguarding training which includes reading the following documents (documents are available in English and Spanish for all staff to access):

- Child Protection and Safeguarding Policy which includes:
 - the role of the DSL/DDSL
 - Identifies the signs of abuse
 - Knowing what to do to raise concerns
 - Knowing how to make a referral
 - Recognising the need for early help
 - Staff Code of Conduct
 - Whistleblowing Policy
 - Behaviour Policy
 - Technology Policy (including online safety and acceptable use)

Staff Training

All staff receive the following compulsory training annually which it is recorded on completion:

- Internal training session including the role of the DSL/DDSL, identify signs of abuse, know how to raise a concern and the KCSiE updates (all staff),
- Annual Certificate in Child Protection and Safeguarding for Staff for International Schools (National College) (teaching staff)
- Annual Certificate in Online Safety for Teaching Staff for International Schools (National College)
- Online Radicalisation (National College) (teaching staff)
- Read the Child Protection and Safeguarding Policy (all staff)
- Read KCSiE 2023 Part 1 (teaching staff)
- Read KCSiE 2023 Annex B (teaching staff)
- Read KCSiE 2023 Annex A (non teaching staff)

Primary and Secondary Middle Leaders will also complete the following training during the academic year:

- Certificate in Understanding Child-on-Child Abuse and Bullying between Children and Young People for International Schools
- Certificate in Understanding Sexual Harassment and Sexual Violence for teaching staff for International Schools

Safeguarding Team

The following training is completed annually:

- Annual Advanced Certificate in Child Protection and Safeguarding for Leaders for International Schools (National College)
- Annual Advanced Certificate in Online Safety for Child Protection and Safeguarding Leads for International Schools (National College)

Other Training

Any member of staff who is involved in recruitment will complete the following course:

- Annual Certificate in Safer Recruitment for International Schools 2023-24

Support for and Supervision of Staff

All staff should feel comfortable and confident approaching the DSL, DDSL, School Directors or any other member of the senior leadership teams about safeguarding and/or pastoral concerns, including in relation to unsafe practice (see Whistleblowing section below). If a staff member would like additional support and/or training in order to fulfill their safeguarding responsibilities, including in identifying and/or handling a concern they should speak to the DSL/DDSL who will work with the member of staff to ensure that they are adequately supported.

Abuse of Position of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence under Spanish law for a person aged 18 or over and in a position of trust, authority or influence, to have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

Proprietorial Oversight

The Board of Directors are the proprietors responsible for the school. Marta Gil, the Principal, completes the same training as the DSL/DDSL, is part of the whole school safeguarding team and has an oversight of all safeguarding matters at Caxton College.

Weekly safeguarding meetings take place in Primary and Secondary and the safeguarding team meet every six weeks to review procedures, discuss serious incidents/cases (especially those involving siblings across both schools) and monitor trends.

The DSLs prepare the Annual Safeguarding report at the end of each academic year and meet with the Board of Directors every July to review it and to audit safeguarding procedures and practice.

This policy is updated annually inline with the KCSiE document.

Part F: Other Safeguarding Policies and Procedures

Safer Recruitment

Our school prioritises embedding a culture of safe recruitment as part of our strategy for preventing harm to children and complies with the requirements of BSO criteria and Keeping Children Safe in Education (DfE 2023) and the local authority arrangements by carrying out the required checks (Disclosure and Barring Certificates and prohibition from teaching and/ or management checks) and verifying the applicant's identity, qualifications, work history, detailed references and interview information. As part of our due diligence and online search will be carried out for shortlisted candidates. The school's Whole School Staff Recruitment Policy set out the process in full and can be found on the school webpage and/or in the policy folder. Candidates must complete the online application form found on the school web page. A curriculum vitae (CV) is not accepted on its own.

Trainee teachers will be checked either by the school (Private or Public Universities) or by the training provider (Instituto de Educación Secundaria), from whom written confirmation will be obtained confirming their suitability to work with children.

Volunteers and visitors will always be accompanied around the school and never be left unsupervised unless they have undergone the appropriate checks which allows them to do so.

The school checks the identity of all contractors working on site and requests the Spanish Police Check where required. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

Good Practice Guidelines and Staff Code of Conduct

- 1 When a child that is not toilet trained needs to have a change of underwear, staff should change the child in the open area of the bathroom keeping the classroom door open.
- 2 If a child requires help from a member of staff to get changed for swimming lessons, the adult should always be accompanied by another adult. If another adult is not available, the child should be changed in the pool area.
- 3 From the age of 6 children should change in the changing rooms. Monitors and teachers can wait outside, dropping in and out of the changing rooms from time to time. The door can be left ajar so that behaviour can be monitored and the pupils' privacy is protected.

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in the Staff Code of Conduct.

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse

- reading and understanding the school’s child protection and safeguarding policy, staff code of conduct and other policies related to safeguarding
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil’s safety and welfare to the DSL/DDSL, or, if necessary, directly to the police or children’s social care
- ensuring any transparent panels/windows are not covered
- leaving doors open if in a 1:1 situation with a child

Staff should always avoid behaviour which might be misinterpreted by others, and report in accordance with the whistleblowing policy.

Whistleblowing

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague’s career. All staff must remember that the welfare of the child is paramount. The school’s Whistleblowing Policy enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the headteacher(s), line manager or directly with the School Directors, unless their concern relates to the Headteacher in which case they should report their concern to the School Directors. If the complaint is about the School Directors this should be reported to the Headteacher(s) or the School Inspector.

Additionally, where an individual has behaved or may have behaved in a way that indicates they may not be suitable to work with children, this must also be reported. The reason is because of transferrable risk. Where a member of staff or volunteer is involved in an incident outside of school/college which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic violence at home. No children were involved, but schools/colleges need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk.

Staff may also report their concerns directly to the school inspector or the police if they believe direct reporting is necessary to secure action.

Allegations Against Staff (including supply staff)

When an allegation is made against a member of staff, our set procedures must be followed. Guidance for dealing with allegations against staff can be found in Keeping Children Safe in Education (DfE, 2022).

There are two levels of allegations/concerns:

1 Allegations/concerns that do not meet the harms threshold (low level concerns)

- A low level concern is any concern, no matter how small and even if no more than a “nagging doubt”, that an adult may have acted in a manner inconsistent with the school’s Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult’s behaviour particularly towards or around children. It is a concern that does not meet the harm threshold.
- All low level concerns should be reported to the Headteacher(s) or line manager who will investigate it. It may be brought to the attention of the Principal should there be any doubt.

- If confirmed that it is a low level concern, it will be dealt with by means of discussion, guidance, training etc
- Low level concerns are recorded confidentially in the staff area in the school intranet. The headteacher(s) and line managers only access staff in their department. The school principal has access to all staff.

2 Allegations that may meet the harms threshold

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may
- pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Whilst we acknowledge such allegations may be false, malicious or misplaced, we also acknowledge they may be founded. It is therefore essential that all allegations are investigated properly and in line with agreed procedures.

Initial Action

- The person who has received an allegation or witnessed an event will immediately inform the Headteacher(s). Where appropriate the DSL will be informed and the final decision on how to respond may be done in consultation with the DSL.
- The School Directors will be informed immediately.
- In the event that an allegation is made against one of the Headteachers or the DSL/DDSL the matter will be reported to the School Directors. In case of allegations made against the School Directors, the Headteacher or School Inspector should be informed.
- The school will take steps, where necessary, to secure the immediate safety of the children, which may involve the suspension or supervision of the staff member.
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of the children.

The Headteacher may need to clarify any information regarding the allegation

- consideration will be given throughout to support the needs of the pupils, parents and staff
- all staff are expected to recognise the need for absolute confidentiality in these situations
- the Head will consult with the School Directors in order to determine if it is appropriate for the allegation to be dealt with internally by the school or if there needs to be a referral to the school inspector and/or the police for investigation.
- If externally investigated, the school will collaborate with the external agencies involved.

If after the internal or external investigation has been completed and the allegation is founded then the:

- Employment with the school will be ceased.
- School will report the member of staff to the UK's Disclosure and Barring Service (DBS) and to the Spanish equivalent and/or make a referral to the Teaching Regulation Agency in the UK (TRA)

- The school will make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. **This is a legal duty and failure to refer when the criteria are met is a criminal offence.**

Detailed records will be made to include decisions, actions taken and reasons for these. All records will be retained securely. All cases should be reviewed, to update procedure and learn from each situation.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

Site Security

Visitors to the school are asked to sign in and are given a sticker, which confirms their permission to be on site. If anyone is seen in school without an ID badge or sticker they should be asked to go to the nearest office to sign in. The School Directors will exercise professional judgement in determining whether any visitors should be escorted or supervised while on site.

Extended School and Off-site Arrangements

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection and safeguarding policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

Staff/Pupil and Parent Online Relationships

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils and parents. Details are found in the Whole School Technology Policy. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Children Staying with Host Families during a Foreign Exchange

The school may arrange for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the host school to check that such arrangements are safe and suitable.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

Related Safeguarding Policies

- Whole School Staff Code of Conduct
- Behaviour Policy
- Sexual violence and sexual harrassment between children Policy (draft format only)
- Whole School Complaints Policy
- Anti-Bullying Policy
- Whole School Health and Safety Policy
- Whole School Whistleblowing Policy
- SEN Policy
- Whole School Missing Children Policy
- Whole School Safer Recruitment Policy
- Whole School Technology Policy
- Whole School GDPR and Data Protection

