



Safeguarding Policy

Reviewed by:

Designated Safeguarding Lead (Senior School): Julie Walker	Date: August 2025
Designated Safeguarding Lead (Primary School): Cait Bezzano	Date: August 2025
Deputy Designated Safeguarding Lead (SS/PS): Kirstin Hoey	Date: August 2025
Principal: Simon Lockyer	Date: August 2025
Nominated Governor: Nick Hammond	Date: August 2025
Reviewed by Board: Annually in December Education Committee Meeting	

I. Policy Statement and Principles

Our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- policies will be reviewed regularly in line with latest guidance from UK and Italian authorities including Keeping Children Safe in Education (Sept 2025)

A. Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils, and to protect them from maltreatment, whether that is within or outside the home, including online. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation, and follow our procedures to ensure that children receive effective support, protection and justice. We are also alert to signs of children in need such as those under severe academic pressures, at risk from eating disorders and mental health concerns.

The procedures contained in this policy apply to all staff, parents, volunteers, visitors and governors and to pupils on and off the school premises whilst they are the responsibility of the school.

B. Policy principles

- Welfare of the child is paramount – we are committed to acting in the best interests of the child
- 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

C. Policy aims

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

D. Contextual Safeguarding

Safeguarding at the BSM is carried out in a contextual way ie safeguarding incidents that take place outside of school may impact on the pupil's experience inside school. Where school has access to external safeguarding information, any assessment of the pupil should include this wider picture.



Safeguarding Policy

Terminology

Safeguarding and promoting the welfare of children 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

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

Child refers to all young people who have not yet reached their 18th birthday or who are in full time education at BSM

Parent refers to birth parents and other adults who are in a parenting or guardianship role, for example step-parents, foster carers, guardians and adoptive parents.



Safeguarding Policy

2. Roles and responsibilities

A: Key Personnel

The Designated Safeguarding Lead in Senior School is Julie Walker
Contact details: julie.walker@bsm.school tel: 3466224300

The Designated Safeguarding Lead in Primary School is Catherine Bezzano
Contact details: catherine.bezzano@bsm.school tel: 3737711420

The Deputy Designated Safeguarding Lead for Primary is Julie Walker and for Senior is Catherine Bezzano.

The nominated Safeguarding Governor is Nick Hammond
Contact Details: nicholas.hammond@britishschool.fr

The Assistant Head (Pupil Development) is Kirstin Hoey who deputises in the absence of both the PS and SS DSLs
Contact details: kirstin.hoey@bsm.school

The Chair of Governors is Elspeth Day
Contact details: elspeth.day@gmail.com tel: 3333491489

The legal adviser is Felicita Fenaroli
Contact details: fenaroli@studiofenaroli.it tel: 02 58319083/3475465642

The Tribunale dei Minorenni Milano is at via Leopardi 18 and their website is www.tribmin.milano.giustizia.it

Due to their day-to-day contact with pupils, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that school staff are alert to the signs of abuse and understand the procedures for reporting their concerns.

B. The Designated Safeguarding Lead (DSL) role is to:

- Receive and fully investigate any reported safeguarding concern
- Promote safeguarding to ensure that it is integral to BSM's ethos and practice
- Help ensure that all staff are familiar with and adhere to the Policy and ensure that staff sign to indicate that they have read and understood the Safeguarding Policy
- Ensure that regular training for staff on safeguarding is provided and to keep a record of staff attendance at this training
- Contribute to staff INSET on safeguarding and child protection
- Help ensure that the Safeguarding Policy is annually updated, implemented and promoted
- Act as a first point of contact for, and act as a source of support, advice and expertise to, staff on issues of safeguarding
- Encourage a culture of listening to and taking account of pupils' wishes and feelings among the staff
- Keep an up-to-date knowledge and understanding of the area of safeguarding including attending appropriate training
- Ensure that all relevant information around safeguarding is communicated to SLT and the nominated governor, and refer all cases of suspected abuse to children's social care or the police as appropriate usually following consultation with the school lawyer



Safeguarding Policy

- Provide guidance on relevant matters to SLT and to other members of staff as appropriate
- Contribute to the content and delivery of the PSHE programme with regard to safeguarding
- Make the Safeguarding Policy available to parents
- Maintain accurate, full, thorough, confidential and up-to-date documentation on all cases of safeguarding, and securely stores the documentation
- Help plan induction of all new staff in safeguarding
- Develop and maintain effective reporting and recording systems for all safeguarding issues
- Ensure that information regarding safeguarding is passed onto the new school of a pupil where there have been safeguarding issues

For more information on our school's DSL refer to our designated safeguarding lead job description: *The role of the designated lead for safeguarding.*

The deputy designated safeguarding lead(s) is appropriately trained and, in the absence of the designated person, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above.

C. The governing body ensures that the school has:

- a DSL for child protection who is a member of the senior leadership team and who has undertaken advanced child protection training
- a Safeguarding policy and procedures, reviewed at least annually and made available to parents
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the Principal are identified in the Whistle Blowing Policy and with reference to the guidance for dealing with allegations of abuse against teachers and other staff
- safer recruitment procedures that include the requirement for appropriate checks
- a training strategy that ensures all staff, including the Principal, receive child protection training annually, with external refresher training at three-yearly intervals; and the DSL receives refresher training at two-yearly intervals
- arrangements to ensure that all temporary staff and volunteers are made aware of the school's child protection provision

The governing body nominates a member (normally the chair) to be responsible for liaising with the local agencies in the event of an allegation being made against the Principal.

D. The Principal:

- ensures that the child protection policy and procedures are implemented and followed by all staff
- allocates sufficient time and resources to enable the DSLs and deputies to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures
- ensures that pupils' safety and welfare is addressed through the curriculum.

3. Good practice guidelines

To meet and maintain our responsibilities towards pupils we have in place agreed standards of good practice. Good practice applies to all staff and includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive and safe behaviour among pupils



Safeguarding Policy

- being a good listener
- being alert to changes in pupils' behaviour
- recognising that challenging behaviour may be an indicator of abuse
- recognising that safeguarding issues can manifest themselves via peer-on-peer abuse
- reading and understanding the school's child protection policy and guidance documents on wider safeguarding issues, for example bullying, physical contact and information-sharing
- asking the pupil's permission before doing anything for them of a physical nature, such as assisting with dressing, physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.

4. Abuse of trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

5. Support for those involved in a child protection issue

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

- taking all suspicions and disclosures seriously
- nominating a link person (DSL) who will keep all parties informed and be the central point of contact
- nominating separate link people for the child and member of staff, where a member of staff is the subject of an allegation made by a pupil, to avoid any conflict of interest
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of helplines, counselling or other avenues of external support
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures
- co-operating fully with relevant statutory agencies.

6. Complaints procedure

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Complaints are managed by senior staff, the Principal and governors.

Complaints from staff are dealt with via the Concerns and Complaints policy.

7. If you have concerns about a colleague including low level concerns



Safeguarding Policy

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 code** enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

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

Staff reporting and low level concerns

Staff should report the behaviour of any member of staff which raises questions or concerns, by contacting the Principal, even if it fails to meet the harm threshold. Staff should also self-refer if they feel their own behaviour may have placed themselves at risk or is open to misinterpretation. The school encourages staff to act in the spirit of professional honesty and enquiry.

A low-level concern is any concern that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work but doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

- being over friendly with children
- having favourites
- adults taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

8. Staff who are the subject of an allegation

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

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff should be reported to the Principal. Allegations against the Principal should be reported to the Chair of Governors.

The procedures for dealing with allegations against staff can be found in Part four: Allegations of abuse made against other teachers and staff in the Keeping Children Safe in Education September 2025 document.



Safeguarding Policy

9. Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and governors will receive training during their induction. All staff, including the Principal and governors will receive training that is updated at least every three years and the DSL will receive advanced training updated at least every two years. In addition to formal training, the DSL should update their knowledge e.g. via e-bulletins (eg Andrew Hall newsletters) and reading at least annually. Staff members will receive safeguarding and child protection updates – both through staff meetings and electronic updates - as required but at least annually, to provide them with the relevant skills and knowledge to safeguard effectively.

Supply staff and other visiting staff will be given the school's **Visiting Staff Leaflet**.

Training Record

Catherine Bezzano – DSL Training, trauma informed response NSPCC April 2025
Julie Walker – DSL Training, Safeguarding Pro February 2025

10. Safer recruitment

Our school endeavours to ensure that we do our utmost to employ 'safe' staff.

Safer recruitment means that all applicants will:

- complete an application form
- provide two referees, including a request to comment on the applicant's suitability to work with children
- provide evidence of identity and qualifications
- provide a criminal records check
- be checked through the Teacher Services' system, the EEA regulating authority or similar authority based upon all countries in which they have been working as appropriate to their role
- if applying for a management position, be checked to ensure they do not have a prohibition to manage order
- be formally interviewed with dedicated safeguarding questions
- if shortlisted, undergo an online search linked to suitability for working with young people
- staff are only appointed on the basis of acceptable references being received

All new members of staff will undergo an induction that includes familiarisation with the school's child protection policy and identification of their child protection training needs.

All staff sign to confirm they have received a copy of the child protection and safeguarding policy along with KCSIE (Sept 2025) Part 1 and that they have read and understood these documents.

11. Site security

Visitors to the school are asked to sign in and are given a badge, and leave an ID document, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All



Safeguarding Policy

visitors are expected to observe the school's safeguarding and health and safety regulations. Staff will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

12. 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 policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures. When our pupils attend off-site activities, we will check that effective child protection arrangements are in place.

13. Photography and images

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

To protect pupils we will:

- seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- ensure pupils are appropriately dressed
- encourage pupils to tell us if they are worried about any photographs or videos that are taken of them
- not use personal devices to take photographs of pupils

14. e-Safety (and use of devices in EYFS)

Mobile phones and computers are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations online, webcam filming, photography or face-to-face meetings. The school's **acceptable use policy** provides guidance for staying safe online and recognises that whilst a filter system is in place, appropriate access to the internet is important for pupils to learn how to maintain their safety online. With online safety, we consider content, contact and context. Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Guidance on use of mobile devices by teaching staff in the EYFS:

The following points apply to all staff and volunteers working within the EYFS at BSM. They apply to all mobile devices including phones and tablets:

- Personal Mobile Phones/Cameras/Tablets must only be used for the applications Frog Progress and Frog Snap in the presence of children throughout the school day. Both applications allow a photo to be taken and sent immediately to the child's profile on our Frog Progress server. This photo is then automatically deleted from the device.
- Mobile Devices may not be used for purposes other than this such as personal messages, phone calls or social media in the presence of the children
- Staff must ensure that no illegal or inappropriate content is stored on their mobile device



Safeguarding Policy

- Should any staff member become aware of inappropriate use of a mobile device they are obliged to report it to SLT
- Staff should remind parents regularly of school policy with regard to mobile device use with the following statement, when announcing events, on programmes for events or on school trips where parents may volunteer: 'You may photograph your child at this event providing the images are for personal use only (e.g. a family album). Please be aware these images (which may include other children) must not be shared on social networking sites or other web-based forums.'

15. Filtering and Monitoring

Filtering and monitoring of online systems are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

The senior leadership team are responsible for:

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why
- reviewing the effectiveness of our provision
- overseeing reports

They are also responsible for making sure that all staff:

- understand their role
- are appropriately trained
- follow policies, processes and procedures
- act on reports and concerns

The DSL takes lead responsibility for safeguarding and online safety, which includes overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

The Director of ICT has technical responsibility for:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

and works with SLT and the DSLs to:

- procure systems
- identify risk



Safeguarding Policy

- carry out reviews
- carry out checks

Filtering and monitoring provision is reviewed at least annually (or when a safeguarding risk is identified, there is a change in working practice like remote access and/or new technology including Generative AI is introduced/developed) by the DSLs, along with the external IT audit) with the review including:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked
- monitoring strategies

An active and well managed filtering system is an important part of providing a safe environment for pupils to learn.

No filtering system can be 100% effective. Staff need to understand the coverage of our filtering system, any limitations it has, and mitigate accordingly to minimise harm.

An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:

- unreasonably impact teaching and learning or school administration
- restrict students from learning how to assess and manage risk themselves

16. Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse, neglect and exploitation 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, or leaving knives or matches within reach of an unattended toddler.

A. There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

Physical abuse

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the



Safeguarding Policy

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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse and exploitation can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school's policy and procedures for dealing with it.

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, for example, 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 (such as where they see, hear or experience the effects of domestic abuse); ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definitions taken from *Keeping Children Safe in Education* (Department for Education, September 2025).

B: Further concerns

Exploitation

Both Child Criminal Exploitation and Child Sexual Exploitation 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 criminal or sexual activity. It may involve an 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. CCE and CSE 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.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. (See anti-bullying policy also)

Indicators of abuse – what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or



Safeguarding Policy

their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated senior person.

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.

A child who is being abused, neglected or exploited may:

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

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

It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

The school will do everything in its power to reduce the impact of abuse as far as is possible during the time that the child is in our care. The action points for this will vary from child to child depending on the type of abuse, their age, circumstances and personal development.

17. Recognising Children in Need



Safeguarding Policy

We seek to keep children safe by highlighting and welfare concerns to the DSLs of the relevant school section. These welfare concerns may include, but are not limited to, severe academic pressure, concerns regarding eating and mental health issues.

18. Emergency Contacts

Where reasonably possible, more than one emergency contact number is kept for each pupil. The annual Online Trips and Medical Update Form facilitates the collection of this information on a regular basis.

19. Curriculum

The school curriculum has an important role to play in the protection of children. It aims to ensure that curriculum development meets the following objectives, often through the PSHE programme:

- developing student self-esteem
- developing communication skills
- informing about all aspects of risk
- developing strategies for self-protection
- developing a sense of the boundaries between appropriate and inappropriate behaviour in adults
- developing non-abusive behaviour between students
- explaining levels of confidentiality

20. 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 all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
 - we recognise that behaviour, mood and injury may relate to possible abuse and not just to their SEND
 - we recognise that they have a higher risk of peer group isolation and may be impacted disproportionately by bullying
 - there may be additional challenges with communication
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- in one-to-one lessons
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- At risk of HBV (Honour Based Violence)
- at risk of forced marriage



Safeguarding Policy

- at risk of being drawn into radicalisation and extremism (the Prevent duty).

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

Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

Safeguarding at the BSM is carried out in a contextual way ie safeguarding incidents that take place outside of school may impact on the pupil's experience inside school. Where school has access to external safeguarding information, any assessment of the pupil should include this wider picture.

21. Unexplained and/or persistent absence

Attendance, absence and exclusions are closely monitored. A child absent from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unexplained and/or persistent absence and take appropriate action including notifying the local authority, particularly where children are absent from education on repeated occasions and/or are absent from education for periods during the school day. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

22. Taking action

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, for example, call 112
- report your concern to the DSL 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 a record of concern
- seek support for yourself if you are distressed.

If you suspect a pupil is at risk of harm

There will be occasions when staff may suspect that a pupil may be at risk, but have no 'real' evidence. 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 but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the pupil if they are OK or if they can help in any way. Harms also include pupils' exposure to misinformation, disinformation and conspiracy theories.

Staff should report any concern through the MyConcern software by clicking on the 'Report A Concern' button and completing the form. Anyone who does not have access to this system should use the **welfare concern form** to record a concern and hand the form to the relevant DSL. If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened 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.



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Safeguarding Policy

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they cannot promise confidentiality and may need to pass the information on** – staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen, if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the pupils staff will:

- allow them to speak freely
- remain calm and collected – the pupil may stop talking if they feel they are upsetting their listener
- 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’
- not be afraid of silences – staff must remember how hard this must be for the pupil
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil’s mother think about all this
- tell the pupil that in order to help them, the member of staff must pass the information on
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next. The pupil may agree to go to see the designated senior person. Otherwise it is the duty of the member of staff to inform the DSL of what has been discussed. If the pupil does agree to go and see the designated person, the staff member should inform the DSL that the child will be coming to see them at some point
- report verbally to the DSL even if the child has promised to do it by themselves
- write up their conversation **as soon as possible** on MyConcern and within 24 hours at the latest (or the **welfare concern form** if no access to MyConcern and hand it to the relevant DSL)
- seek support if they feel distressed

Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from our legal adviser Felicity Fenaroli 02 58319083/ 3475465642 fenaroli@studiofenaroli.it

Referral to children’s social care (Tribunale dei Minori)

The DSL will make a referral to the Tribunale dei Minori if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Children with sexually harmful behaviour

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school’s **anti-bullying procedures** where necessary. However, there will be occasions when a pupil’s behaviour warrants a response under child protection rather than anti-bullying procedures.

The care of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such



Safeguarding Policy

behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

Reporting directly to child protection agencies

Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Tribunale dei Minori or police if:

- the situation is an emergency and the designated safeguarding person, their deputy, the Principal and the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety.

23. Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the designated senior person, Principal or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Principal.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Sharing information with relevant agencies is permissible, where that information may help to protect a child. If a member of staff has been dismissed (or would have been dismissed had they not resigned) we would refer the member of staff to the Teaching Regulation Agency in the UK

24. Child on Child abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.



Safeguarding Policy

Child on child abuse can take many forms, including:

- **physical abuse** such as biting, hitting, kicking or hair pulling
- **sexually harmful behaviour/sexual abuse** such as inappropriate sexual language, touching, sexual assault
- **sexting**, including pressuring another person to send a sexual imagery or video content
- **teenage relationship abuse** - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Sexual harassment, online sexual abuse and sexual violence (including sexualized language) is unacceptable with the sanction likely to be exclusion.

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

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- PSHE is used to reinforce the message through stories, role play, current affairs and other suitable activities - ensuring that students are aware that they can speak to any member of staff, including their tutor, teacher, Head of Key Stage, School Counsellor or Head if they have a concern with or experience of peer-on-peer abuse
- 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.

All allegations of peer on peer abuse should be passed to the DSL immediately. They will then be investigated and dealt with as follows.

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police.
- **Inform parents** - 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 children's social care and/or the police before parents are contacted.

Supporting those involved

The support required for the pupil who has been harmed will depend on their circumstance 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.



Safeguarding Policy

Support may also be required for the pupil that harmed. 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.

25. Monitoring and evaluating effectiveness of the policy

The Board requires the Principal to report to them regularly on the effectiveness of the BSM's Safeguarding Policy and on associated issues in the school. The DSLs prepare quarterly reports for the Board that contains:

- the names of staff with designated child protection responsibilities
- any training that has been undertaken by the designated staff
- training that has been undertaken by any other staff and volunteers
- details of any significant incidents when physical restraint of students has been used
- details of information and guidance that have been given to staff
- details of safeguarding issues taught as part of the curriculum
- confirmation that all child protection records are stored securely and where appropriate have been transferred to another school
- details of safeguarding and child protection information given to parents
- numbers of child protection referrals made to Tribunale dei Minori

A member of the Board oversees the Single Central Register as part of the BSO checks, which includes:

- confirmation that all new staff and volunteers have been recruited safely and that a record of all staff vetting checks is up-to-date and complete

Associated policies and documents:

Anti-bullying and anti-cyberbullying Policy
Health and safety Policy
Equal Opportunities Policy
Acceptable Use Policy
Drug and Substance Abuse Policy
Whistle blowing Policy
Welfare Concern Form
Designated person's role description
Visiting staff leaflet
Concerns and complaints Policy
Data Protection Policy
GDPR Privacy Policy
E-safety Policy
Keeping Children Safe in Education September 2025
Managing Allegations Against Staff including the Principal

Appendix I - Guidelines on how a member of staff should respond if a student shares information relating to a disclosure:

DO

- Do treat any allegations extremely seriously and act at all times towards the student as if you believe what they are saying
- Do tell the student they are right to tell you



Safeguarding Policy

- Do reassure them that they are not to blame
- Do be honest about your own position, who you have to tell and why
- Do tell the student what you are doing and when, and keep them up to date with what is happening
- Do take further action – you may be the only person in a position to prevent future abuse – tell the DSL immediately
- Do write down everything said and what was done

DON'T

- Don't make promises you can't keep
- Don't interrogate the student – it is not your job to carry out an investigation
- Don't cast doubt on what the student has told you and don't interrupt or change the subject
- Don't say anything that could make the student feel responsible for the abuse
- Don't do nothing – make sure you tell the DSL immediately – they will know how to follow this up and where to go for further advice.

Appendix 2: Keeping Children Safe in Education September 2025 (recognising that paragraphs 62 to 70 inclusive are written for the UK and do not apply in Italy, therefore the School's policy provides more location-specific guidance)

[Keeping children safe in education from 1 September 2025.pdf](#)

[Keeping children safe in education 2025 part one Information for school college staff.pdf](#)

Appendix 3:

[Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

Appendix 4:

Managing Allegations against pupils

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the Behaviour and Anti-Bullying Policies.

Child on child abuse can manifest itself in many ways and can include bullying, sexting, sexual violence, sexual harassment and gender-based issues. When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raised a safeguarding concern. If there is a safeguarding concern, the Designated Safeguarding Leads must be informed via MyConcern.

The school will ensure that any victim or alleged victim of child-on-child abuse is provided with appropriate support and reassurance tailored to their needs.



Safeguarding Policy

Procedure:

A factual record should be made of the allegation, but no attempt at this stage to investigate the circumstances

Where a pupil is at risk of significant harm, the Designated Safeguarding Lead will seek external support, usually through the school's lawyer, follow through the outcomes of the discussion and make a referral to the Tribunale dei Minori where appropriate.

The Designated Safeguarding Lead will make a record of the concern, the discussion and any outcome on the files of all pupils involved

If the allegation indicates a potential serious criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed. IN the case that the victim has asked school not to tell anyone about the harm, the DSL will have to balance the victim's wishes against their duty to protect the victim and other children

Where neither social services or the police accept the complaint, a thorough school investigation should take place in line with the school's usual disciplinary procedures.

In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative supervision plan. This plan should be monitored and a date set for a follow up evaluation with all concerned.

Where there has been a report of sexual abuse, the DSL should make an immediate risk assessment.

Full consideration of the wishes of the victim will be given, with victims being given as much control as is reasonably possible and any support they will be offered. This will be balanced with the school's duty to protect other children