St. Paul's School
The British School of São Paulo

St. Paul's School Policy & Procedures on Safeguarding and Child Protection

Reviewed August 2025
St. Paul's Leadership

Mission Statement

Provide a high quality British and Brazilian holistic education, for the personal and academic development of pupils and students, within a framework of a caring, inclusive, and united community. We share the core values of Aspiration, Adventure, Resilience, Responsibility, Inclusion and above all Kindness.

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INTRODUCTION

St. Paul's School recognises its clear responsibility to safeguard and promote the welfare and wellbeing of all pupils in its care. All members of staff share this responsibility and understand that they must report any suspicion of abuse, neglect and/or exploitation occurring to any pupil in our community. In all cases strict confidentiality must be maintained.

This policy should be read in conjunction with the following:

- Anti-bullying Policy
- Junior School Behaviour policy and procedures
- Senior School Behaviour policy and procedures
- Online and E-safety policy
- Permitted Devices and Acceptable Use Agreement
- PSHE & RSE Policy
- Safer Recruitment
- Staff Code of Conduct
- Speak Up Policy
- Mental Health & Wellbeing Policy

Staff should be aware that many of the concerns and issues addressed in these documents are also safeguarding concerns. At all times, our approach is child-centred, taking into consideration what is in the best interest of the child or young person in our care.

DEFINITION OF SAFEGUARDING

St. Paul's defines safeguarding as:

- Protecting children from maltreatment (abuse, neglect and or exploitation)
- Preventing the impairment of children's mental and physical health or development
- Ensuring the provision of safe and effective care for all pupils
- Taking action to enable all children to have the best outcomes

AIMS & OBJECTIVES

- For the school to comply fully with the requirements of the Children Statute (Federal Law 8.069/1990), Lei Henry Borel, which obliges the school to protect and report any signs of abuse to Brazilian authorities and regulations issued by the Council of Children's Rights.
- To provide an ethos within school where children feel secure, valued, respected and encouraged to talk and are listened to. To follow best practice from the statutory advice in the UK Government's Department for Education

(DofE) document, Keeping Children Safe in Education (2023) and the Statutory Framework for the early years foundation stage (September 2023)

- To follow good practice advised in the Brazilian Government's Conselho Nacional de Justiça document Cartilha Bullying (2010) and in the document produced by the Secretary of Education for São Paulo State, Normas Gerais de Conduta Escolar: sistema de proteção escolar (2009).
- For the Executive, Safeguarding Team, Leadership and Board of Governors to monitor and review policy and procedures every year.
- To provide support and counselling for staff whenever the need arises.

STAFF RECRUITMENT AND TRAINING

St. Paul's School is committed to safeguarding, protecting and promoting the welfare of children and young people and expects all staff to share this commitment.

We recognise that for children, high self-esteem, confidence, supportive friends and clear lines of communication with trusted adults help to protect them. We seek to build a culture and environment where children feel secure, are encouraged to talk and know that they will be listened to, with staff making time to support children whenever the need arises.

The school requires that necessary police checks are in place before any person is employed by the school and by its suppliers. The school monitors closely all personnel who work with children during induction and probationary phases. We provide annual safeguarding training to all staff members in both English and Portuguese.

All new staff receive safeguarding guidance during their induction, and we deliver annual safeguarding training in relation to anti-bullying strategies, reporting and recording safeguarding concerns and online safety during the school year.

Any concerns about the behaviour of a colleague should be reported to the Head. The ELT, Safeguarding Team and the Board of Governors will review effective implementation of the safeguarding of children annually. Where there are concerns surrounding any colleague's safeguarding and conduct around pupils, we will be obliged to make reference to this to any future employer or school.

Staff should always adhere to the school's intimate care policy where appropriate.

SAFEGUARDING TEAM

The Designated Safeguarding Lead at St Paul's is the Head of safeguarding & Wellbeing. Each section of the school has a Safeguarding Lead:

Pre-Prep: Deputy Head (Pre-Prep)
Prep: Assistant Head (Pastoral) for Junior School
Senior School Forms 1-5: Assistant Head (Pastoral) for Senior School
Sixth Form: Assistant Head (6th Form)
SEL and PSHE Co-ordinator

The Safeguarding Team meets weekly to review incidents, action plans, referrals to appropriate organisations, staff training and monitoring and the effective management of safeguarding across the school. The DSL reports weekly to the Head.

The role of the Designated Safeguarding Lead (DSL)

At St Paul's, the Head of Safeguarding & Wellbeing is the DSL. The Head of Safeguarding & Wellbeing leads a Safeguarding Team all of whom have the same level of safeguarding training as the DSL. The DSL is available to all staff at St Paul's to discuss safeguarding concerns, as are the Safeguarding Team. The DSL handles all cases of suspected abuse or neglect, exploitation, radicalisation, any risk/harm from a staff member and where a crime may have been committed.

The DSL acts as a source of support, advice and expertise to staff, a point of contact with safeguarding partners, and liaises with the Head, Governors and all concerned parties in relation to specific incidents or issues.

The DSL liaises with a range of professionals in school and out, including but not limited to the Learning Support Coordinators in Junior and Senior School, SEL & PSHE coordinator, School Psychologists as well as Pastoral leaders and the Conselho Tutelar. Where a crime may have been committed, the DSL also refers cases directly to the Police.

The DSL works with parents, carers and families to promote the welfare of children inside and outside of school, as well as their social and emotional learning and development.

The DSL is also responsible for ensuring that all child protection files are kept up to date, confidential and securely stored. Additionally, the DSL is responsible for all aspects of online safety, including the filtering and monitoring systems and processes in place to protect children and ensure that their learning environment is safe from potentially harmful and inappropriate material.

THE BOARD

The Head and DSL are responsible for reporting issues related to this policy to the Board of Governors. The school has representation for safeguarding on the Board of Governors by the presence of a member of the Board identified as a specialist for

safeguarding and a link between the safeguarding provided by the head and the DSL and the board.

The Governor responsible for Safeguarding has the following responsibilities:

- Being a critical friend – offering a listening ear on occasion to the Safeguarding Team and providing support and advice where there are complex decisions to be made.
- Ensuring that the safeguarding policy is reviewed regularly and kept up to date.
- Having oversight of the procedure for training and recruitment of staff with respect to safeguarding.
- Sharing expertise with the Board and raising the status and importance of safeguarding, especially with new Board members.
- In the case of a disclosure / concern about safeguarding in which the allegation is made against the Head, the specialist for safeguarding on the Board is the person to whom the allegation should be passed.

PROCEDURES

There are five key elements to the safeguarding of children:

- recognising,
- responding,
- reporting, and
- recording the abuse or concern.
- review

RECOGNISE: staff must be able to recognise signs of children in need of help and/or at risk, including signs of possible abuse.
RESPOND: staff must be able to respond appropriately if a child makes a disclosure to them about a safeguarding need or possible abuse or if they suspect a child is suffering from possible abuse.
REPORT: staff must report the concerns/disclosure to the appropriate person(s)
RECORD: staff must record all information (details of observations, disclosures, concerns and actions taken) relating to the safeguarding issue using the CPOMS system within 24 hours of a disclosure, incident or concern.
REVIEW: The Safeguarding Team and DSL are responsible for an annual review of policies and practices

Where staff recognise signs that give cause for concern (i.e. children in need of help or who are at risk) they should make this known to the relevant Safeguarding Team Member for their section immediately. For the sake of the children, all cases must be treated with confidentiality by all of the people involved. Staff should note that it is not their responsibility to diagnose abuse, but just to be aware of the different signs and

indicators which may alert them to the possibility that a child may be being harmed, and to take those concerns to the appropriate Safeguarding Team Member. Throughout this process, staff should always act in the best interests of the child.

RECOGNISE

What is abuse, neglect and exploitation?
Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse, neglect and exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children also called child-on-child abuse. This can take place at school, at home or online.

Exploitation
We know that different forms of harm can overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (ex: money, gifts or affection). This can be of financial benefit and/or advantage, such as increased status.

In most instances, the conduct of pupils towards each other will be covered by the school's Anti-Bullying and Behaviour policies. Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is also likely that incidents dealt with under this policy will involve older pupils and their behaviour towards younger pupils or those who are vulnerable. For example, those with special educational needs and/or disabilities.

If an allegation is made by a pupil, against another pupil or pupils, members of staff should consider whether the complaint raises a safeguarding concern. Most of the situations, which arise under this heading, here at St Paul's can usually be resolved by using the relevant policy on behaviour (see the policy for your section of the school) or the anti-bullying policy.

If there is a safeguarding concern that is not covered by either policy, then the appropriate DSL should be informed and they will decide what appropriate measures should be taken.

Physical abuse
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.

Emotional abuse
The persistent emotional maltreatment of a child such as to cause severe and 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 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.

The UK Government's Department for Education defines bullying as: 'Behaviour by an individual or a group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. It can be direct or indirect (physical or verbal) or non-direct (online) and is usually based on difference or prejudice.'

Under amendments to the Estatuto de Crianças e de Adolescentes implemented in January 2024, bullying and cyber-bullying are regarded as criminal activities in Brazil, particularly if these include threats to the school, teachers, pupils or any other individual on the school site. The school has a legal obligation to report cases of abuse, physical punishment, cruel and degrading treatment and any sexual abuse to the Conselho Tutelar.

For additional guidance on how to deal with specific allegations of bullying see the school's Anti-Bullying policy, which can be found in the policies section on SharePoint, Firefly or on the school website.

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. Sexual abuse 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.

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; ensure adequate supervision (including the use of inadequate care providers).
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child-on-child abuse
Child-on-child abuse occurs when a young person is exploited, bullied and / or harmed by another child of the same or similar age. Everyone directly involved in child-on-child abuse is under the age of 18.
Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by other children; however, it can also affect boys and young men, those with learning difficulties or disabilities, LGBTQIA+ Children and young people (CYP) and those who are from different communities.

There is no clear definition of what child-on-child abuse entails. However, it can be captured in a range of different definitions:

Domestic Abuse: Relates to young people aged 16 and 17 who experience physical, emotional, sexual and / or financial abuse, and coercive control in their intimate relationships.
Child Sexual Exploitation: Captures young people aged under-18 who are sexually abused in the context of exploitative relationships, contexts and situations by a person of any age - including another young person.
Harmful Sexual Behaviour: Refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes but is not exclusive to abusive behaviours).
Serious Youth Crime / Violence: References offences (as opposed to relationships / contexts) and captures all those of the most serious in nature including murder, rape and GBH between young people under-18.
Upskirting: Typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offense (UK) and may constitute sexual harassment.

On-line safety: Pupils and adults should be aware that all the definitions and requirements set out in this policy apply to the on-line environment just as much as the off-line. These are addressed in our Online and E-safety policy. We are committed to ensuring that all pupils are educated in the dangers of misinformation, disinformation (including fake news), and conspiracy theories from an early age through PSHE and computer lessons.

Inappropriate use of mobile phones
Inappropriate use of mobile phones by staff and pupils should be logged. This may include but is not limited to instances where receiving messages or phone calls may take attention away from the safe supervision of children, the misuse of images of children and in extreme cases, abusive practice which may be regarded as physical, emotional or sexual abuse. Further guidance is included in the Permitted Devices and Acceptable Use Agreement and in the Online and E-safety policy.

RESPOND

A disclosure is when a child says anything which makes you feel that they may have been abused/are being abused/or are at risk of abuse. The disclosure may be full or partial; a child may blurt something out and then stop before giving full details.

In the case of a disclosure, it is very important that the member of staff receiving the disclosure stays calm, listens extremely carefully to all details, confirms to the child that they have their wellbeing at heart and does not promise the child to keep the disclosure a secret.

Staff recognising/observing signs of abuse should make sure they respond appropriately to the child who has made the disclosure or to the signs which they feel may indicate abuse. Staff may see or hear something; either a mark or injury on a child, or a comment made. Staff may note a change in a child's behaviour which they feel warrants further action. A concern may be mentioned by someone else, or a child may tell you something directly.

The member of staff should also reassure the child and tell them what will happen next i.e. that they will inform the appropriate Safeguarding Lead who will do what is necessary.

Responding to a disclosure

- Be calm and receptive.
- Listen carefully without interrupting.
- Repeat back what was said for clarification.
- Keep responses neutral: Be aware of your body language.
- Take the child seriously.
- Acknowledge the child's courage and let them know you will help them.

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REPORT

Reporting means passing on the information to the relevant Safeguarding Lead in your section of the school or directly to the Designated Safeguarding Lead. All staff are responsible for passing on what has been disclosed or anything that concerns them. It is not a member of staff's responsibility to decide whether or not a child or family are in need of support or if a child is at risk of abuse.

When and how to report
Your report should be made as soon as possible and within 24 hours at most. Concerns, disclosures and incidents should be logged on CPOMS.

What needs to be reported
The CPOMS incident form includes the following areas to complete:

- Name of child.
- A description of the incident, concern or disclosure
- Categories of incident: you must check a minimum of one box, you may tick more. There are further categories that appear when you check some categories. Please be specific and remember that not all incidents will be safeguarding concerns.
- Linked student(s)
- Body maps
- Date/time (this should be of the date/time of the incident, not your report)
- Status
- Assign to –
    - Pre-prep: Paula Monteiro
    - Prep: Talula Santos
    - Forms 1-5: relevant Head of Year
    - Sixth Form: Angela Fregonesi
- Files: here you can upload screenshots of notes or other images
- Alert Staff Members: you may wish to alert class teachers or tutors to the incident.
- Agency involved: leave blank

Any notes taken, should include the date, time and emotional condition of the child during any conversations held with the child. Where possible the exact words used by the pupil should be recorded.
Other staff should be informed of concerns on a strictly need to know basis only and any suspicions or additional information added to the concern notes. Decisions about with whom to share information must be made in the best interests of the child. Any safeguarding issues which are raised will be mentioned in weekly year group minutes but no reference will be made to a pupil by name.

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RECORD

Once you have reported your concern to the SL you must make a record of what you have seen/heard and what you have done with your concerns. No matter what happens, your concerns must be recorded. You should do this using CPOMS.
Your record must be clear and accurate (see above section on reporting for details of what must be included).
Following initial discussions it may be decided that other reasons are responsible for the concern and the possibility of child abuse can be ruled out. If this is so, then the matter can be dropped, but all notes of the case, including those related to the decision to drop the case, will be held in a secure area.
Following initial discussions it may be decided to monitor the situation. In this case, the designated member may appoint somebody to record daily observations (including times), emphasizing the accuracy in the description of facts. These notes must be kept confidentially and in a secure area.

If, following initial discussions concern is still felt by all parties, then a referral must be made to the Police/Conselho Tutelar as appropriate (the DSL and the Head will decide this):

Pinheiros Section - Children Steward Council (Conselho Tutelar)
Rua Professor Frederico Hermann Junior, 595, São Paulo
Telephone: 3095 9525, 97283-6523 and 97283-6485

If a staff member has raised a concern and they do not feel that the resolution is satisfactory, then they are able to make the referral to the Conselho Tutelar him or herself.

REVIEW

DSL and Safeguarding Team will review practices and procedures. Review of categories in CPOMS and review of how we handle serious safeguarding incidents. Reviewing our procedure is a key element to ensure best practice.

MEASURING PROGRESS
The DSL produces a report based on CPOMS for every Board meeting reviewing the number of cases, the type of cases and measures taken to manage the case both internally and where any referral needs to be made.

The School also prepares an annual Safeguarding Report for the Board of Governors.

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COMMUNICATION

The School undertakes to ensure that pupils, staff and parents all understand the drive to ensure that the school environment is safe, welcoming and supportive of wellbeing and kindness

This policy has been reviewed and approved by the Board of Governors in August 2025.

APPENDIX 1

Safeguarding Team 2025-265

DSL	Laura Mack	lm@stpauls.br
Pre-prep	Paula Monteiro	pf@stpauls.br
Prep	Talula Santos	tps@stpauls.br
Senior (F1-F5)	Michelle Durham	md@stpauls.br
Sixth Form	Angela Fregonesi	acf@stpauls.br
SEL & PSHE Co-ordinator	Raquel Paganelli	rpa@stpauls.br



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