

Designated Safeguarding Lead

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INDEX

Section I: Policy

1. RATIONALE AND PRINCIPLES
 - a. The importance of safeguarding and child protection
 - b. Guiding Principles
 - c. The Role of The Designated Safeguarding Lead and Deputies
2. MEASURES
 - a. Staff Recruitment
 - b. Staff Training
 - c. Curriculum
 - d. Dealing with Allegations of Abuse
 - e. Referrals
 - f. Child in Need
 - g. Child Requiring Protection
 - h. Protecting the Mental Health and Wellbeing of Children
 - i. Confidentiality
 - j. Dealing with allegations of abuse against a professional
 - k. Ensuring a Safe Environment
 - l. Resources
 - m. Policy review
3. LOCAL LAW

Section II: Guidelines & Procedures

1. GUIDELINES
 - a. Responsibility
 - b. Recognising when a child may be at risk
 - c. Signs and symptoms of child abuse and neglect
 - d. Guidelines for dealing with allegations of peer-on-peer abuse
 - e. Guidelines for listening and talking to children
 - f. Guidelines for record keeping
 - g. School staff and allegations of abuse
2. PROCEDURES

Appendix 1: Local inter-agency procedures

Appendix 2: Local Embassy Contacts

Appendix 3: Avoiding false allegations of inappropriate behaviour

Appendix 4: Guidance for reporting sexual violence or harassment

Section I: Policy

1. RATIONALE AND PRINCIPLES

a. Rationale: The importance of safeguarding and child protection:

The BSF Board is committed to achieving the highest possible standards of safeguarding and child protection in our school. Safeguarding and child protection underpin our systems, processes and policies ensuring that we operate with the best interests of the child at heart.

This policy document provides the basis for good practice within the school for safeguarding and child protection work. The procedures provide a framework to ensure that all practices in the area of safeguarding and child protection are consistent and that the school takes every reasonable measure to ensure every child is healthy and safe.

This document also seeks to make the professional responsibilities clear to all staff to ensure that statutory and other duties are met. All staff members should be aware of systems within the school which support safeguarding. This includes the Staff Code of Conduct and the role of the designated safeguarding lead and deputies.

All staff should also receive appropriate child protection training which is regularly updated as detailed further in this policy.

This policy has been established with reference to the document Keeping Children Safe In Education (2025) issued by the UK Department of Education.

b. Guiding principles

The school is committed to the following principles:

- Each child has a right to be protected from harm and exploitation and to have their physical and mental welfare safeguarded.
- “Children” includes everyone under the age of 18.
- Our actions are child-centred, taking account of cultural, ethnic and religious backgrounds, gender and sexual orientation and any special needs.
- All staff have a professional duty to provide a safe learning environment.
- All staff must complete formal safeguarding and child protection training as part of their induction and revisit school procedures regularly.
- All staff are aware of the Staff Code of Conduct and are expected to adhere to it.
- All concerns or allegations of abuse in connection with a staff member (permanent, supply, visiting professionals or volunteers) must be reported to the DSL immediately.
- Early intervention is important. Where a child is suffering significant harm, or is likely to do so, **immediate** action should be taken to protect that child.
- Individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children’s welfare.
- Personal information is usually confidential. It should only be shared with the permission of the individual concerned, or if it is necessary in order to protect a child.
- Our school has a designated safeguarding lead and team that provides support to staff and the board in their safeguarding duties and liaise with relevant external services.

d. The Role of The Designated Safeguarding Lead and Deputies

The Designated Safeguarding Lead (DSL) is responsible for ensuring that school policy and procedures for safeguarding are shared, understood and followed consistently. He/she is fully supported by the BSF Board who are committed to providing the necessary resources to carry out the role effectively.

The DSL has final say on actions related to the welfare of students including online safety. The role of the DSL and deputies are defined in clear job descriptions but can be summarised as follows:

Managing referrals:

To support, advise and provide expertise to staff on matters of safeguarding and making referrals. To receive all cases of suspected abuse from staff members and ensure that records are maintained appropriately. Where necessary make referrals to:

- Disclosure and Barring Service (person is dismissed or left due to risk/harm to a child);
- Police (cases where a crime may have been committed).
- the Headteacher/ Board regarding serious issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Social Care authorities

Training

The DSL and deputies receive annual advanced level training in order to:

- Understand the assessment process for providing early help and intervention
- Understand how child protection case conferences and review conferences work
- Ensure each member of staff has access to and understands our safeguarding and child protection policy and procedures, especially new and part time staff.
- Be alert to vulnerable children (e.g special educational needs and young carers)
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff

Raising Awareness

The DSL and deputies ensure that our school policies are known and used appropriately:

- Review the school's safeguarding and child protection policy and procedures annually in consultation with the BSF Board.
- Ensuring that parents are aware of our safeguarding and child protection policies and procedures including the referral process.
- Link the external agencies to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- When children leave the school ensure their child protection file is transferred to the new school promptly, securely and separately from the main pupil file.

2. MEASURES

a. Staff recruitment

When recruiting new members of staff our school refers to *Safeguarding Children: Safer Recruitment in Education* (2006), and *Keeping Children Safe in Education* (2025). Our recruitment measures are fully detailed in the BSF Safe Recruitment Policy.

A full range of checks are taken to ensure that staff are recruited safely.

A Single Central Record (SCR) is maintained and kept in a secure place with limited access within the administration department.

All Governing Board and Management Team members are required to provide proof of identity, police checks, safeguarding training certifications and conflict of interests documents.

Other Adults in Contact with Children

Volunteers or contractors/outside service providers are sometimes engaged by the school. If unsupervised by a regular member of staff, then an ICPC must be obtained or appropriate criminal records check for the host country, alongside proof of ID and reference checks. If supervised at all times, no such check is required. A risk assessment is completed for all volunteers or contractors. Regular external providers (EG Sports coaches) are also required to complete safeguarding training or demonstrate that they have already completed training.

In instances where children are off-site, risk assessments are carried out which include checks on whether the company has carried out child protection and disclosure checks on all adults that will lead or support activities. (See Educational Visits Policy)

House Stays

If students are housed with a host family, local police checks are required for any adults over 18 who live or are staying at the house during the visit.

b. Staff Training

All staff receive guidance during induction to ensure understanding of:

- Staff Code of Conduct
- Pupil Behaviour Policies
- Online Safety Policy
- Safeguarding and Child Protection Policy
- Whistleblowing Policy

All newly appointed and established staff, including the BSF Board have annual training in safeguarding and child protection as part of their induction programme.

The Designated Safeguarding Governor, Designated Safeguarding Leads, Deputies and members of the School Leadership Team complete advanced Child Protection training annually in order to complete their duties.

School Policy and Procedures are revisited throughout the year during staff meetings to maintain staff confidence and awareness.

All staff are expected to read Part One, Annex A and Annex G of the document *Keeping Children Safe in Education* each year to ensure current best practice is followed.

c. Curriculum

Child protection awareness and online safety is taught through our PSHE curriculum. Our aim is to ensure all pupils understand what is meant by child protection and how they can be safe.

d. Dealing with allegations of abuse or neglect

Any allegations or suspicions of abuse or neglect must be referred immediately to the DSL within the school who will initiate a case. A written record of concerns is made using the school's internal recording forms. The DSL will then make the decision whether the case is serious and needs to be brought to the attention of the Headteacher. The Headteacher and the DSL may consult with the child's parents or guardians in order to reach a decision on whether the matter needs referral to the relevant outside agency.

e. Referrals

The decision to refer a case to an outside agency is to be made with consultation between the Headteacher, DSL and at least one member of the board. Final say rests with the DSL.

The school will take all appropriate measures to pass on information regarding those who have been convicted of abuse to the authorities in the UK charged with ensuring that unsuitable individuals do not come into contact with children.

f. Child in Need

External referral is considered when a child shows evidence that her/his physical or mental health, development or achievement may be adversely affected. For example:

- Age appropriate progress is not being made and the causes are unclear.
- He/she is unlikely to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority or outside agency.
- His/her health or development is likely to be impaired, or further impaired without the provision of such services.

g. Child Requiring Protection

It should be considered a child protection matter for external referral if:

- A child is at risk or suffering significant physical or mental harm.
- A child is suffering the effects of significant physical or mental harm.
- Serious health problems are in evidence.

It is the 'significant harm' threshold that justifies statutory intervention into family life, in this case immediate referral. A professional making a child protection referral must therefore provide information that clearly outlines that a child is suffering or likely to suffer significant harm.

It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill treatment may include the extent of the harm suffered, the context within which it occurred and its duration.

In order to both understand and establish significant harm, it is necessary to consider the family context, within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family.

h. Protecting the Mental Health and Wellbeing of Children

Teachers are able to play a crucial role in supporting the mental health and wellbeing of children through the secure relationships that are developed in our mentoring programme.

It is important for all staff to observe, recognise and react to changes in pupil's behaviour.

The DSL is responsible for ensuring that training, induction and support resources (e.g. [Rise Again](#)) raise awareness of the indicators that might mean a pupil's mental health is moving away from 'flourishing' and towards 'languishing' (Educare 2021 Mental Health Awareness).

Staff must follow the same protocol (referral to the safeguarding team) when they feel a child's mental wellbeing may be compromised.

The DSL is responsible for engaging external professional support or advice in serious instances. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

i. Confidentiality

Confidentiality is an important and complex issue that needs to be understood in the context of child protection. Our most important principles are set out below.

A guarantee of confidentiality should never be given to a child as some kinds of information may need to be shared with others.

DSLs are expected to share relevant information with staff regarding the welfare and safeguarding and CP issues of individual pupils where it is likely to promote positive educational outcomes.

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. However, any disclosure of personal information to others, including social service departments, must always have regard to both common and statute law where possible in the UK and locally.

Normally, personal information is only disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998 European Convention on Human Rights, Article 8). However, the safety and welfare of the child is paramount and may dictate that the information should be shared without consent.

UK law requires the disclosure of confidential information necessary to safeguard a child or children. Under Section 47 of the Children Act 1989 statutory agencies have a duty to co-operate. In the event of any conflict with local law in this instance the advice of the school's legal team will be sought.

j. Dealing with allegations of abuse against a professional

All allegations of abuse of children carried out by any permanent staff member, temporary staff member (including supply staff) or volunteer are taken seriously. The Staff Code of Conduct is shared with all staff ensuring that the professional boundaries we advocate are clear and can be

adhered to. Our aim is to identify concerning, problematic or inappropriate behaviour at an early stage in order to minimise the risk of abuse and support staff to meet the highest professional standards.

k. Ensuring a secure environment

Staff should challenge any person not showing identification or visitor badges within the school grounds. Staff should report and challenge any suspicious behaviour around the school perimeters. All staff have a professional responsibility to report any inappropriate actions or conduct by a member of staff or school community.

l. Resources

Safeguarding and Child protection is a matter for all members of staff. The Whole School Leadership Team ensures that sufficient resources are made available to enable the necessary tasks to be carried out properly, including attending meetings, collating and writing assessment reports, staff training and making contact with outside agencies.

m. Policy Review

This policy is reviewed annually by the BSF Board in consultation with the Headteacher, and academic management team.

Any significant deficiencies and weaknesses in the policy that are identified in the meantime are remedied without delay with prior approval of the Designated Safeguarding Governor.

3. LOCAL LAW

The school's policy on safeguarding and child protection draws principally from UK statutory guidelines and best practice. However, local laws and regulations may be binding and we ensure that we consult locally and are fully compliant with any applicable local laws.

Further information is available in Appendix I. Local Inter-Agency Procedures

Section II: Guidelines & Procedures

1. GUIDELINES

a. Responsibility

All staff members are responsible for contributing to the safety and well being of pupils at the school. Being aware of the information below and following the guidelines contained here is a part of that responsibility. All school staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

b. Recognising when a child may be at risk

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

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 DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms may 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.

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: The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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 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 online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Neglect: Neglect may involve a parent or carer failing to:

- Provide adequate food, clothing or shelter
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision
- Ensure access to appropriate medical care or treatment
- Provide a child's basic emotional needs.

Child on child abuse: Child-on-child abuse is any form of physical, sexual, emotional, financial, and/or coercive control exercised between children and young people.

This abuse can take many forms including:

- Sexual violence and sexual harassment
- Sharing of nude and semi nude images
- Upskirting

Coercive control

Coercive control is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten a victim.

Serious Violence

Serious Violence refers to crime that involves guns, knives or any form of weapon intended to hurt maim or kill. Early indicators that children may be being coerced or exploited to take part in serious violence include increased absences, changes in friendship groups, significant decline in performance, signs of self-harm, injury or deterioration in well being. New possessions or gifts may indicate an association with criminal action.

Bullying/cyber bullying (See Anti Bullying Policy)

Cyber bullying may take place on phones, instant messaging, email, chat rooms or social networking sites such as Facebook and Twitter to harass, threaten or intimidate someone.

Initiation or Hazing

An initiation ceremony is where a potential new member is expected to perform a task, and on completion they will be accepted into a gang, team or group.

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

Staff should be aware that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. The power imbalance can be caused by age, gender, sexual identity, cognitive ability, physical strength or status.

c. Signs and symptoms of abuse and neglect

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. The possibility of abuse should be considered if a child shows a number of these symptoms, or any of them to a marked degree.

Sexual Abuse

- Being overly affectionate or sexually knowledgeable inappropriate to the child's age
- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Extreme behaviour such as self-harm, running away, overdoses, anorexia
- Personality changes such as becoming insecure or attention seeking
- Regressing to younger behaviour patterns such as thumb sucking or cuddling toys
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Lack of trust or fear of someone they know well, eg: babysitter or childminder
- Bed or clothes wetting, day or night/nightmares
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism

Physical Abuse

- Unexplained recurrent injuries or burns
- Improbable excuses or refusal to explain injuries
- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Bald patches
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Aggression towards others
- Fear of physical contact - shrinking back if touched
- Experiencing severe punishment for low level behaviour (eg. to encourage study)
- Fear of suspected abuser being contacted

Emotional Abuse

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Extremes of passivity or aggression

Neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies

Children Missing from Education

All staff should be aware that children going missing or being regularly absent from school, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the school's unauthorised absence procedures and report any concerns regarding absenteeism or children missing in education to the DSL.

Annex A of the KCSIE (2025) provides detailed guidance on specific forms of abuse such as: Child Sex Exploitation, Child Criminal Exploitation, Domestic Abuse, Honour Based Abuse and Preventing Radicalisation.

d. Guideline for dealing with allegations of child on child abuse

Minimising Incidents

Incidents can be minimised by developing a school ethos in which any form of peer on peer abuse is regarded as unacceptable and by promoting excellent values, positive behaviour and relationships between all members of the community.

Dealing with Incidents

Any alleged incidents will be dealt with promptly and referred to the DSL or deputies. Evidence will be gathered from all sources in a sensitive manner and records of conversations kept and signed in Student Welfare Files. Disciplinary action, in line with the school's established range of sanctions, will be taken where necessary. Such action may include letters or meetings with parents, internal suspension or exclusion from school.

Supporting Victims and Perpetrators of Child on Child Abuse

It is important that the victim is fully supported and feels safe and comfortable. It is also important that the (suspected or confirmed) perpetrator have a fair hearing and once an issue is dealt with that they are given an opportunity to atone for their actions in a positive way.

It is therefore crucial that all parties affected by any incident of peer on peer abuse are monitored closely by the teaching team and school leadership to ensure that there are no further incidents or negative impact.

e. Guidelines for listening and talking to children

Pupils need to feel safe and confident that their concerns will be treated seriously.

Our aim is to reassure children that they are being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting abuse or neglect of any kind. Nor should a child ever be made to feel ashamed for making a report. Staff should know that not all children will recognize that they are being harmed, abused or neglected and may not feel ready to share information.

If a child chooses to disclose or share information, we must:

- Be accessible and receptive;
- Ensure that the environment is quiet and supports privacy;
- Listen carefully and uncritically at the child's pace;
- Take what is said seriously;
- Reassure the child that they are right to talk;
- Tell the child that you must pass this information on;
- Make a careful record of what was said verbatim
- Avoid leading the students with your questions
- Use open questions "Tell me, describe to me, show me, explain to me"

We must not:

- Take photographs or examine an injury;
- Investigate to prove or disprove possible abuse – never ask leading questions;
- Make promises to children about confidentiality or keeping 'secrets';
- Assume that someone else will take the necessary action;
- Jump to conclusions or react with shock, anger or horror;
- Speculate or accuse anybody;
- Confront another person (adult or child) allegedly involved;
- Offer opinions about what is being said or about the persons allegedly involved;
- Forget to record what you have been told;
- Fail to pass the information on to the correct person;

- Ask a child to sign a written copy of the disclosure.

For children with communication difficulties or who use alternative/augmented communication systems, we may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

If any child requests confidentiality during a disclosure, it is important to state that this is not possible for their own welfare. If they refuse to disclose further, this must be reported to the DSL immediately.

f. Guidelines for record keeping

Well-kept records are essential when a child may be at risk from harm. Records must:

- State who was present, time, date and place
- Use the child's words wherever possible
- Be factual/state exactly what was said
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation
- Be written in ink and signed by the recorder using the school format
- Be safely stored in a locked file on school premises with extremely limited access
- Include how the concern or referral was followed up or resolved
- Include any action taken, decisions reached or final outcome

g. School staff and allegations of abuse

All members of staff are expected to uphold the highest standards of professional conduct. Specific guidance is given in the staff code of conduct which is reviewed with all staff by the designated safeguarding team at the beginning of the academic year.

Should any member of staff not follow these guidelines it should be reported to the safeguarding team following the guidelines of the BSF Whistleblowing Policy.

It is appropriate for a member of staff to self report an incident.

If an allegation of abuse is received by any member of staff, it must be referred immediately (including an allegation to oneself) to a member of the Senior Leadership Team. Under no circumstances should a member of staff investigate such an allegation. The SLT will review the details of the referral and consider if it meets the harm threshold.

g.1. Concerns that do not meet the harm threshold

Behaviour is considered to be a low-level concern if it is inconsistent with the staff code of conduct but does not carry risk of harm to a child.

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

- Being overly friendly with children or having favourites
- Taking photographs of children on a personal mobile phone during lessons
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate or offensive language

The school ensures that incidents of low level concern are minimised by

- Ensuring their staff are clear about what appropriate behaviour is

- Empowering staff to share any safeguarding concerns
- Supporting the individual to correct inappropriate behaviour at an early stage
- Providing a responsive, sensitive and proportionate handling of any raised concerns

Sharing low-level concerns

Inappropriate behaviour by any staff member should be reported to the SLT so that any potential patterns of inappropriate behaviour can be identified. Staff are encouraged to self-refer, where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns

All low-level concerns are recorded in writing and kept securely. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns is also noted. However, if the individual wishes to remain anonymous that should be respected as far as reasonably possible. The information is retained until the individual leaves our employment in order for any patterns of behaviour to be recognised. Low level concerns are not included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

Responding to low-level concerns

When a concern is raised, the SLT will gain a clear understanding of the level of concern by speaking directly to the person who raised the concern as well as the individual involved. If further clarity is required, witnesses may be used. The information collected is used to categorise the type of behaviour and determine what further action may need to be taken.

g.2. Concerns that meet the harm threshold

An incident is considered to have met the harm threshold if a member of staff has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved (inside or outside of school) in a manner that indicates they may not be suitable to work with children.

Where it is considered that a harm threshold has been met, an investigation is required.

A case manager (Headteacher or where Head is subject of the investigation, the Safeguarding Governor) will lead the investigation. If the allegation is against the Headteacher, the reporting individual should immediately inform the Safeguarding Governor, without notifying the Headteacher first.

Initial response

If it is identified that a child has been harmed or that there is an immediate risk of harm to a child, contact is made directly to the relevant external agency (See Appendix 1) and their advice followed.

This initial conversation will establish the validity of any allegation and if a formal referral is needed, then contact will be made within 24 hours with the relevant local agency. If this is the case a strategy meeting will be called that the Headteacher and Safeguarding Governor must attend. The decision of the strategy meeting could be:

- Police investigation if there is a criminal element to the allegation

- Single agency investigation completed by the school

Our priority is to deal with allegations quickly, fairly and consistently, providing effective protection for the child and support the person subject to the allegation. Where the initial discussion leads to no further action the case manager records the decision and justification for it. All relevant parties will be informed of the decision.

Suspension

Suspension is not automatic and is to be avoided wherever possible. It is considered only in cases where there is risk of harm, or the case is so serious that it might be grounds for dismissal. If immediate suspension is necessary, the case manager records the rationale and justification for such a course of action.

Duty of care

The welfare of a child is paramount and is our prime concern. However, an allegation against a member of staff is likely to be very stressful for that individual and appropriate support must be offered that recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation. Wherever possible, the person accused is given full opportunity to answer the allegation and make representations about it. Every effort is made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Allegation outcomes

There are 5 possible outcomes:

- Substantiated: There is sufficient evidence to prove the allegation
- Malicious: There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- False: There is sufficient evidence to disprove the allegation
- Unsubstantiated: There is insufficient evidence to either prove or disprove the allegation.
- Unfounded: There is no evidence or proper basis supporting the allegation being made.

If an allegation is substantiated, It is the responsibility of the DSL to ensure that a [Barring referral](#) is made without exception to the Disclosure and Barring Service (DBS) within one week of leaving the school of any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. The case manager must also consider if they should refer the case to the Secretary of State (via the Teaching Regulation Agency).

When a crime has been committed this should also be referred to the police authority.

The fact that a member of staff offers to resign must not prevent the allegation procedure reaching a conclusion and appropriate action taking place.

If an allegation is malicious, false, unsubstantiated or unfounded, the case manager, in consultation with governors, should consider the most appropriate course of action:

- Support or counselling for the individual that made the allegation
- Disciplinary action in the case of a deliberately malicious or false allegation

Record Keeping

The purpose of our record is to enable accurate information to be given in response to any future request for a reference, future DBS or an allegation re-surfaces after a period of time.

Allegations that are found to have been malicious or false are removed from personnel records.

For all other outcomes, the following information is kept on the file:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- A note of any action taken, decisions reached and outcome category
- A declaration on whether the information will be referred to in any future reference.

A copy is provided to the person concerned and retained on file. Records are retained on file for a period of 10 years from when the allegation was made.

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in future employer references.

School procedures will be reviewed during and at the conclusion of every case in order to determine if any lessons can be learned and if improvements to our practice can be made.

For more information, please see Appendix 3: Avoiding False Allegations of Inappropriate Behaviour.

2. PROCEDURES

Steps to take when you suspect a child may be at risk

1. Staff should report concerns and any supporting evidence to the DSLs as soon as possible using the My Concern platform.

Steps to take when a child reports abuse to a member of staff

1. Speak with the child following the guidelines for talking and listening to children
2. Make a record of the conversation following the guidelines for record keeping
3. Report the instance to the DSL with a copy of the record of your conversation via the My Concern platform.

Steps to be taken by a DSL/DDSL

1. Collect and review evidence on the reported case. Actions may include:
 - Offer the opportunity for the child to disclose information
 - Contact parents to gather more information if it would be safe and pertinent to do so.
 - Continue to gather information from further observations of behaviour or additional sources
 - Evaluate evidence with Deputy DSLs and or Headteacher and contact Safeguarding governor for additional guidance if needed.
2. Where an external referral is deemed necessary, consult and obtain approval from the Headteacher who may in turn consult a member of the Board.

Submitting your concern via Myconcern.

1. Log the Concern Immediately
Begin by logging the concern on the MyConcern platform as soon as possible. Prompt action is essential when dealing with safeguarding issues.
2. Record Facts, Not Opinions
Ensure that you document only factual information about what you have witnessed or heard directly from the pupil. Avoid including your own opinions or interpretations. Please be very aware of the following: It is important to refrain from asking leading questions. If clarification is necessary, use open-ended questions to allow the pupil to express themselves freely.
3. Complete All Sections of the Form
Make sure to fill in every section of the MyConcern form. If the child is not already listed on the system, you may need to add them. You can find pupil information, such as names and details, on the Schooly platform.
4. Include Relevant Details
Record any actions you have taken in response to the concern. Add other factual details that may be relevant, such as the location of the incident or how the concern originated.
5. Leave Categorisation to the DSL
You do not need to assign a category to the concern. This will be handled by one of the Designated Safeguarding Leads (DSLs).
6. Await Guidance and Follow Instructions

Once you have submitted the concern, safeguarding leaders will review the information and decide on the next steps. If you are asked to monitor the situation, make sure you understand exactly what you need to observe, how long you need to monitor, and who you should report back to. Please be mindful that teachers receive limited feedback on safeguarding concerns to ensure confidentiality.

This policy has been written by the BSF Board of Governors in consultation with the Headteachers of BSF. Where necessary, the Board consults with experts in the relevant area such as ICPA. Once drafted, this policy was submitted to the Board of Governors for approval at the annual Board meeting.

Approved: December 2025 (SF/ON/PS/TT)

Next review: November 2026

APPENDIX 1: LOCAL INTER-AGENCY PROCEDURES

The Lead Person will contact the appropriate department when aware of a child protection issue. This is done within 24 hours of a disclosure or suspicion of abuse:

SOCIAL SERVICES MARBELLA:

Dirección: Calle Vázquez Clavel, esquina con Calle San Bernabé

29601 Marbella

Teléfono: 952 76 87 00

CHILD PROTECTION SERVICES MALAGA:

Servicio de Protección de Menores

C/ Tomás de Heredia, 18

29001 - Málaga

Tfno: 951 036 800

Fax: 951 036 832

NATIONAL CHILD HOTLINE NUMBER: **900 210 966**

ANDALUCIA CHILD PROTECTION HOTLINE NUMBER: **900 506 113**

Spanish Police

If you suspect that a child is being harmed, reporting your suspicions may protect the child and obtain help for the family. Please call **061** with the following information:

-address or location where the child is being abused or neglected

-type of abuse or facts of the case

-identity of the abuser or any information related to the abuser

From this information, the Agency will then redirect us to the correct police division which deals with Child Protection issues in our area.

Disclosure and Barring Service (UK)

It is the responsibility of the Child Protection Officer to ensure that a report is made to the Disclosure and Barring Service (DBS) within one month of leaving the school of any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. For more information on making a referral:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/442338/DBS__Barring__Making_a_referral_A5_8pp.pdf

RIGHTS OF THE CHILD IN SPAIN

Spain submitted its periodic report to the Committee on the Rights of the Child in accordance with the provisions of article 44 . 1 (b) of the Convention on the Rights of the Child. OMCT appreciates this action and takes note that since its first report (CRC/C/8/Add 6) in 1993, Spain has demonstrated an openness and willingness to adhere to the changes recommended by the Committee concerning the protection of the child 1 . Spain ratified the Convention on the Rights of the Child on November 30, 1990. It also ratified, as recommended by the Committee, the Hague Convention on Protection of Children and Cooperation in Respect of Inter-Country Adoption, which came into force on 1 st November 1995. It also ratified the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment on October 10, 1987 and is also party to the European Convention for the Prevention of Torture since 1989. According to article 96.1 2 of the Spanish Constitution, articles from ratified international conventions and treaties are automatically incorporated into the domestic legal system. This means that the rights set out in the Convention on the Rights of the Child may be invoked by private individuals directly before Spanish judges and courts of law. Article 39.4 3 of the Constitution reinforces this disposition by allowing children to benefit from the rights which the treaties recognise are due to them. OMCT however notes that this disposition is not really accorded in actual practice. The Convention is in fact not yet sufficiently well known and is often interpreted as a simple declaration of intent rather than a legal instrument having full force of law. OMCT appreciate that several articles of the Constitution are in accordance with the principles of the Convention on the Rights of the Child, for example; the right to life (art. 15), the right to security and freedom (art. 17), the right of the child to participation and to freedom of expression (art. 20). Articles from the Convention which foresee the child's right not to be tortured, mistreated, physically or psychologically abused or exploited, are covered by art 15 of the Constitution which forbids torture and inhuman and degrading treatment, the right to a fair trial (competent legal guardian, appropriate assistance, presumption of innocence...) is covered by articles 24 and 25. OMCT welcomes the adoption of national laws with respect to the child of which, amongst others is, the 1996 4 law concerning the legal protection of the child (here, finally, the child is perceived to be an active participant in the decisions which affect it's well being), the law reforming both the right to judge and the judicial proceedings within the law concerning 1 Concluding Observations of the Committee on the Rights of the Child : Spain 24/10/94 CRC/C/15/Add.28 2 Art. 96.1 minors 5 and also the law concerning the penal responsibility of minors 6 (which raises the age of penal majority from 16 to 18 years).

APPENDIX 2: LOCAL EMBASSY CONTACTS

For advice on the following nationals, please use these contacts:

- UK Embassy : Phone FOBISIA or COBIS +44 2038 267190
- Embassy of Russian Federation in Spain: 91-411-08-0 91-562-22-64
- Embassy of Ukraine in Spain: 91 748 93 60
- Embassy of France in Spain: 91 423 89 00
- Embassy of Bulgaria in Spain: 91 3455 761
- Embassy of Denmark in Spain: 914318445
- Embassy of Estonia in Spain: 91 426 1671
- Embassy of Georgia in Spain: 91 4203589
- Embassy of Germany in Spain: 91564 4653
- Embassy of Greece in Spain: 91 564 4653
- Embassy of Hungary in Spain: 91 413 7099
- Embassy of Iran in Spain: 91 345 0112
- Embassy of Ireland in Spain: 91 436 4093
- Embassy of Israel in Spain: 91 782 9500
- Embassy of Italy in Spain: 91 423 3300
- Embassy of Jordan in Spain: 91 3191100
- Embassy of Kazakhstan in Spain: 91 7216290
- Embassy of Lithuania in Spain: 91 702 2116
- Embassy of Netherlands in Spain: 91 353 7500
- Embassy of in Norway Spain: 91 436 3840
- Embassy of Portugal in Spain: 91 7824960
- Embassy of Slovakia in Spain: 91 590 3861
- Embassy of Sweden in Spain: 91 702 2000
- Embassy of Switzerland in Spain: 91 436 3960
- Embassy of United States in Spain: 91 587 2200

APPENDIX 3: AVOIDING FALSE ALLEGATIONS OF INAPPROPRIATE BEHAVIOUR

Firstly staff must avoid actions that may be interpreted as intending to abuse the pupil. Secondly, staff must avoid being overly friendly which may give the pupil the wrong impression that the member of staff is establishing an inappropriate relationship with the pupil.

New members of staff will find that they are initially more cautious in dealing with situations and experience will bring greater confidence. The advice is to err on the side of caution if you are not comfortable with a given situation.

Early Years children and primary pupils are more likely to be touched by their teachers etc. than older pupils and this will influence the response to the following points. Consider the difference between a 4 year old child who has scraped his knee on the playground and is inconsolable until the appropriate attention has been given to a thirteen year old girl who has twisted her ankle. Both require physical attention but the actions will be different.

1. Do not touch pupils inappropriately.

Members of staff must be careful about how they comfort a distressed pupil or use physical action to warn a pupil of danger or prevent an accident. This is particularly pertinent when alone with a pupil. Generally do not put your arm around a pupil to comfort him/her, unless you are confident that your action will not be misinterpreted. Be aware that pupils can misinterpret well-meant actions. Generally physical contact with pupils should be avoided unless it is necessary to prevent harm or injury to them or to others. If it is necessary to touch a pupil in order to administer medical care it is helpful to ask the pupil if it is OK to "have a look at your arm" or to tell them exactly what you are going to do. If possible try to ensure that there is someone else with you. This could be another pupil if there is no other adult available. With older pupils it is better to ask them to do things for themselves.

2. When dealing with a pupil alone in a room have regard to the following conditions.

Make sure that someone else knows where you are and why you are speaking to the pupil. This is important if you need to speak about a sensitive matter. Have that person waiting outside the room. Best case scenario is to have that person in the room with you. Avoid speaking to a pupil in a room with no window or where no-one else could see you if necessary. Do not place yourself between the pupil and the door. A pupil must never feel that they are trapped in the room. They must be able to get out without having to go past you. Do not do anything that might lead to misinterpretation of your action. If you are at all unsure about addressing a pupil ask another member of staff to be there as well. Minute the conversation to pass to the Headteacher immediately

3. Make sure that you know what the procedures are for your section of the school with respect to going into the changing rooms when pupils are changing.

a) In Early Years all children change in the classrooms supervised by the class teacher and classroom assistants.

b) In the Primary School, either the children change in the classroom with teacher supervision or the boys and girls go into their separate cloakrooms and change, again with teacher supervision. At the swimming pool, the boys and girls change in separate changing rooms and the teacher goes into both changing rooms to check and to hurry them along.

c) In the Senior School girls and boys go into their designated changing rooms and change on their own. PE staff go in and out as necessary and also to take the register.

4. Do not communicate with a pupil via your mobile phone or landline.

Use a school mobile phone where it is helpful to have a phone conversation.

- Do not give your number to a pupil.
- Do not send text messages to a pupil.
- Do not give your personal email address to pupils.

5. Generally speaking it is inadvisable to give a pupil a lift in your car if that person will be the only other person in the car.

However, if it is necessary to use your car to transport pupils make sure that parents have the exact details and have given prior permission.

6. Be careful about the language that you use.

Do not use “trendy” vocabulary or young people’s language that may give pupils the wrong impression that you are trying to be friendly with them. It is important to remain professional at all times.

7. Be wary of the pupil who asks for reassurance, e.g. please give me a hug. Avoid this for your own sake, even though it may seem to be to reject the pupil.

8. If you feel that you have not been wise in something that you have done, tell a member of the senior management team immediately.

If you are not comfortable with the way in which a pupil has approached you, then again tell one of the above people. There may well be nothing to worry about, but at least you will have been open and transparent about what has happened.

9. Under no circumstances should a member of staff enter into a physical relationship or one which could lead to a sexual relationship with a pupil.

10. The British Schools Foundation and the British International School of Marbella do not permit physical sanctions.

A useful website: www.teachernet.gov.uk search under “safe working in education”. This gives a very good code of conduct for teachers

APPENDIX 4: GUIDANCE FOR REPORTING SEXUAL VIOLENCE OR HARASSMENT

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here' by remaining vigilant.

The immediate response to a report.

The school's or college's initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should be trained to manage a referral in line with reference to the following guidance:

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child.
- if possible, manage reports with two members of staff present, (preferably one being the DSL or a deputy). However, this might not always be possible;
- informing the DSL (or deputy), as soon as practically possible, if the DSL (or deputy) is not involved in the initial report.

Once a referral has reached the DSL, he/she must consider the following:

Risk Assessment

- When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider the victim, especially their protection and support; the alleged perpetrator; all the other children at the school, especially any actions that are appropriate to protect them.
- The DSL (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.
- Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include:
 - a) the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
 - b) the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
 - c) the ages of the children involved and the developmental stages of the children involved;
 - d) any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
 - e) if the alleged incident is a one-off or a sustained pattern of abuse;
 - f) are there ongoing risks to the victim, other children, adult students or school staff?

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the school should follow general safeguarding principles as set out throughout this policy. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.

A complete set of guidelines is available in the Keeping Children Safe in Education (2022) Part 5 and it is important that this is referred to when dealing with a report of sexual violence or harassment.

Appendix 5: Additional Support Resources for Stakeholders

The following organisations provide supportive advice for children, families and professionals to protect children.

[NSPCC](#) (National Society for the Prevention of Cruelty to Children)

[CEOP](#) (Child Exploitation and Online Protection)

[Childnet](#) (Childnet - Internet Safety advice and support)

Additional support resources are available in Annex B (page 149) of [KCSIE 2025](#) (Keeping Children Safe in Education 2025)