

GROUP MODEL POLICY

Child Safeguarding and Protection Policy

Ariston Education minimum expectations for child and adolescent protection and safeguarding in its schools in Spain

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Approval	Rosa Tortosa	Approval date	June 2026
Next review	June 2027	Scope	Ariston Education schools in Spain
Autonomous Community	Comunitat Valenciana (Alicante)	Language	English. In schools with a co-official language, the version in the co-official language shall prevail where required by regional legislation.

1. Purpose

This policy sets out Ariston Education's minimum expectations for child protection and safeguarding. It explains how MAGNO International School will protect and promote the welfare of children, respond to concerns, support children at risk and ensure that safeguarding remains embedded in the school's leadership, culture, practice and decision-making.

Its objectives are:

- Ensure prompt action is taken to protect and promote the welfare of children.
- Ensure staff understand their responsibilities and know how to report a concern.
- Ensure procedures are clear, recordable, defensible and consistent with Spanish and regional legislation.
- Maintain consistent practice across all Group schools while allowing the necessary local adaptation.

Ariston Education applies the highest standard principle: where the Group's internal standards and Spanish or regional legislation differ, applicable law shall always be complied with and, where legally compatible, the standard that provides greater protection to the child shall be applied.

2. Scope

This policy applies to all children under the age of eighteen for whom the school has safeguarding responsibility. It applies during the school day, school-organised activities, off-site activities, school trips and visits, online learning, school transport and any situation in which the school performs a safeguarding role.

It applies to all adults who work with or on behalf of the school, whether paid or unpaid:

- All teaching, support, administrative, services and leadership staff.
- Temporary, supply, agency and contractor staff.
- Volunteers, members of governing bodies and the school proprietor.
- Trainees, university students on placement and visiting specialists.
- External providers, clubs, transport companies, host families and organisations using the premises.
- Families and visitors where their conduct raises a safeguarding concern.

3. Legislation and reference framework

3.1. Spanish framework

- Organic Law 8/2021, of 4 June, on the comprehensive protection of children and adolescents against violence (LOPVI).
- Organic Law 2/2006, of 3 May, on Education (LOE), as amended by Organic Law 3/2020 (LOMLOE).
- Organic Law 1/1996, of 15 January, on the Legal Protection of Minors.
- Organic Law 8/1985, of 3 July, regulating the Right to Education (LODE).

- Regulation (EU) 2016/679 (GDPR) and Organic Law 3/2018, of 5 December, on Personal Data Protection and guarantee of digital rights (LOPDGDD).
- Organic Law 8/2021, of 4 June (LOPIVI): Article 3 (purposes), Articles 15 and 16 (general and qualified duty to report), Article 30 (educational project), Article 31 (action protocols), Article 33 (training), Article 35 (Wellbeing and Protection Coordinator) and Article 57 (negative certificate for sexual offences).
- Organic Law 1/1996 on the Legal Protection of Minors, Articles 13 (duty to report), 17 (risk situation) and 18 (situation of abandonment).
- Organic Law 10/1995, Criminal Code: offences against sexual freedom and indemnity (Arts. 178 to 194 bis), against moral integrity (Arts. 173 to 177), bodily harm, abandonment of family (Arts. 226 to 233), female genital mutilation (Art. 149.2), forced marriage (Art. 172 bis), trafficking in human beings (Art. 177 bis) and failure to prevent certain offences (Art. 450).
- Criminal Procedure Act, Articles 259 to 262, on the duty to report.
- Organic Law 10/2022, of 6 September, on the comprehensive guarantee of sexual freedom.
- Organic Law 1/2004, on Comprehensive Protection Measures against Gender-Based Violence.
- Law 4/2023, of 28 February, for the real and effective equality of trans people and the guarantee of the rights of LGBTBI people.
- Law 15/2022, of 12 July, comprehensive law for equal treatment and non-discrimination.
- Law 26/2015, amending the child and adolescent protection system.
- Regional legislation on child protection, school coexistence and action protocols applicable in the Comunitat Valenciana (Alicante).

3.2. Group documents and international references

- Safer Recruitment Policy and Safer Recruitment Commitment Statement.
- Allegations Against Staff Policy.
- Staff Code of Conduct.
- Online Safety Policy and Social Media Policy.
- Whistleblowing Policy and Internal Reporting System.
- United Nations Convention on the Rights of the Child and General Comments of the Committee on the Rights of the Child.
- Keeping Children Safe in Education and Working Together to Safeguard Children, as international good-practice references.
- International Task Force on Child Protection (ITFCP) standards and recommended practices.

For schools located outside England, Keeping Children Safe in Education is used as a good-practice reference and does not replace Spanish legislation, the requirements of the education authorities or statutory reporting duties.

4. Definitions

Safeguarding and promoting the welfare of children means: providing help and support to meet their needs as soon as problems arise; protecting them from maltreatment inside and outside the home, including the digital environment; preventing impairment of their physical and mental health or development; ensuring that they grow up in circumstances consistent with safe and effective care; and taking action to enable all children to achieve the best possible outcomes.

Child protection is part of safeguarding and refers to the activity undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Term	Meaning in this policy
Child	Any person under eighteen years of age.
Staff	Employees, leaders, supply staff, external-company staff, volunteers, contractors and any adult acting on behalf of the school.
Wellbeing and Protection Coordinator (DSL)	Mandatory role under Article 35 of LOPIVI, which in Ariston Education schools carries out the functions of the

	Designated Safeguarding Lead. The deputy acts in their absence.
Risk situation	A situation in which, due to family, social or educational circumstances, shortcomings or conflicts, the child is adversely affected in their personal, family, social or educational development without reaching the seriousness, intensity or persistence that would justify a declaration of abandonment (Art. 17 Organic Law 1/1996). Assessment falls to the competent social services.
Situation of abandonment	A situation arising in practice from failure, impossibility or inadequate exercise of protection duties, where the child is deprived of the necessary moral or material assistance (Art. 18 Organic Law 1/1996). Its declaration falls to the public child-protection authority.
Violence against children	Any action, omission or negligent treatment that deprives minors of their rights and wellbeing, threatens or interferes with their physical, psychological or social development, regardless of the form or means by which it is committed, including through technology (Art. 1 LOPIVI).
Peer-on-peer violence	Abuse, bullying, violence, exploitation or harmful behaviour by a child or group of children towards another.
Low-level concern	A concern about an adult's conduct towards children that does not meet the harm threshold but may indicate unsafe, inappropriate or unprofessional behaviour.

5. Equality, inclusion and vulnerability

MAGNO International School is committed to non-discriminatory safeguarding practice. Some children face additional barriers to recognition of their situation, disclosure or access to help. Staff must remain alert to vulnerability without making assumptions or applying stereotypes.

Safeguarding practice must be child-centred, evidence-based, proportionate and respectful of legislation, equality obligations, privacy and dignity. Particular attention will be paid to:

- Children with specific educational support needs, disabilities or health conditions.
- Children with family caring responsibilities.
- Children experiencing mental health difficulties.
- Children affected by gender-based or domestic violence, substance use in the family environment or housing instability.
- Children at risk of exploitation, forced marriage, female genital mutilation, radicalisation or serious violence.
- Children subject to protection measures, in foster or residential care, adopted or with an open case.
- Children experiencing discrimination, prejudice-based bullying, racism, misogyny, LGBTBI-phobia or other harmful attitudes.
- Unaccompanied migrant children or children with irregular immigration status, whose right to education is guaranteed regardless of that status (Art. 9 Organic Law 4/2000).
- Children who are persistently absent, out of school or frequently absent.

6. Essential safeguarding contacts

Role or organisation	Name	Contact and out-of-hours route
School address	Avenida de Levante nº 10-12, Urbanización Alenda Golf, 03670, Monforte del Cid, Alicante	965 625 200 info@magnoschool.es
Wellbeing and Protection Coordinator	Dario Lucas	dario.lucas@magnoschool.es

(DSL)		
Deputy DSL	Rosa Tortosa	rtortosa@magnoschool.es
Confidential safeguarding mailbox	Guidance Department	Open access 24/7
School Human Resources	Noelia Aullo	naullo@magnoschool.es
Chair of governing body	Rosa Tortosa	rtortosa@magnoschool.es
Ariston Education Regional Safeguarding Lead	Emma Newman	emma@orbital.education
Municipal social services	According to the child's registered municipality	-
Autonomous Community public child-protection authority	Territorial Directorate of Social Services, Family and Childhood - Alicante	012 963866000
Juvenile Prosecutor's Office	Juvenile Prosecutor's Office Alicante	965 69 30 34 Avinguda d'Aguilera, 53, 03007 Alacant, Alicante
Emergencies	112	112
Child helpline	ANAR Foundation 116 111 900 20 20 10	Free, 24 hours
Support for victims of gender-based violence	900 018 018 016	Free, 24 hours
Support for victims of sexual violence	900 20 20 10	Free, 24 hours
Cybersecurity helpline (INCIBE)	017	Free
Education Inspectorate	Bárbara Aguilar	649267536 aguilar_bar@gva.es
Reference child and adolescent mental health service	According to the child's registered municipality. For emergencies, Hospital General de Elche	Hospital General de Elche 966 61 69 00

7. Roles and responsibilities

Child protection and safeguarding are everyone's responsibility. Every adult must act immediately when a concern arises and must never assume that someone else will act.

Role	Core responsibilities
All staff, volunteers and adults	Read and understand this policy; remain alert to signs of violence, abuse, neglect and exploitation; report concerns immediately; keep accurate records; maintain professional boundaries; comply with the Code of Conduct; and contribute to a culture in which children feel safe to speak.
Wellbeing and Protection Coordinator (DSL)	Lead safeguarding; advise staff; manage reports to competent bodies; oversee records; coordinate with social, health and police services; lead information sharing; ensure support plans and risk assessments; understand online safety, filtering and monitoring; coordinate training; and keep leadership informed. Also performs the functions in Article 35 of LOPIVI.
Deputy DSL	Assume the DSL role when necessary, support case management and ensure continuity of response.

School leadership	Ensure implementation of this policy; provide the DSL with resources and authority; ensure effective cover for the role; communicate the policy to staff and families; act as case manager where appropriate; and embed safeguarding in the school culture.
Governing body and proprietor	Approve the local policy; obtain assurance of compliance; ensure a whole-school safeguarding approach; ensure training; and oversee and challenge the leadership team.
Regional Safeguarding Lead	Provide oversight, challenge and support, especially in complex cases, allegations, serious incidents, audits and assurance.
School Human Resources	Support safer recruitment, staff suitability, allegations procedures, training records and secure document retention.
Systems Lead	Support online safety, filtering and monitoring systems, annual review, checking records and cybersecurity.
Guidance and Inclusion Lead	Work with the DSL to support students with specific needs, communication barriers or health conditions and ensure safeguarding needs are not wrongly attributed to disability.
Data Protection Officer	Advise on the processing and sharing of safeguarding data and retention periods.

7.1. DSL availability and cover

The DSL must be available during school hours so that staff can raise concerns. The school must also establish how support will be accessed during off-site activities, overnight trips, extended services and out-of-hours activities.

The school will document cover arrangements, including the deputy, nominated escalation routes and, where appropriate, a shared confidential mailbox monitored by authorised staff. The cover schedule must be known to all staff.

Under Article 35.2 of LOPIVI, the Wellbeing and Protection Coordinator must receive specific training in the protection of children and adolescents against violence.

8. Confidentiality and information sharing

Safeguarding information will be shared only with those who need to know it in order to protect the child (the need-to-know principle).

The duty of confidentiality never overrides the duty to protect a child. Article 16 of LOPIVI imposes on staff in educational establishments a qualified duty to report immediately to the competent authorities facts that may constitute a criminal offence. Article 13 of Organic Law 1/1996 imposes the duty to report any risk situation or possible abandonment.

Article 9.2(c) of the GDPR permits the processing of special-category data where necessary to protect the vital interests of the data subject or another natural person. Article 8 of the LOPDGDD permits processing based on a legal obligation.

Staff must not promise secrecy or absolute confidentiality to a child. They must explain, in a manner appropriate to the child's age and understanding, that certain information may need to be shared with those responsible for protecting them.

Every decision to share or not share information will be documented, including its legal basis, recipient, content shared and rationale.

9. Recognising violence, abuse, neglect and exploitation

All staff must understand that violence and abuse can occur anywhere and be perpetrated by anyone. Children may be harmed inside or outside the home, online or in person, by adults or by other children.

Staff must maintain professional curiosity. A child may not feel ready or able to disclose their situation, may not recognise it as harmful, or may express distress through behaviour, personal presentation, attendance, friendship patterns, online activity or changes in wellbeing.

Forms of violence and abuse that staff must be aware of include:

- Physical abuse.
- Emotional and psychological abuse, including verbal violence.
- Sexual abuse and sexual exploitation.
- Neglect.
- Gender-based violence and domestic violence, including child-to-parent violence.
- Criminal exploitation and sexual exploitation of children.
- Serious violence, weapons and coercion.
- Harmful sexual behaviour, sexual harassment and sexual violence.
- Online abuse, grooming, image-based abuse and technology-facilitated harm.
- Radicalisation and violent extremism.
- Female genital mutilation, forced marriage and so-called honour-based violence.
- Bullying, prejudice-based bullying, misogyny and discriminatory conduct.
- Trafficking in human beings.
- Neglect linked to unmet medical needs.

10. Early help and reporting to competent services

The Spanish protection system provides two levels of intervention: a risk situation, whose assessment and intervention fall to the competent social services, and a situation of abandonment, whose declaration falls to the public child-protection authority of the Autonomous Community. The school does not declare either: it reports and cooperates.

Situation	Expected action
Emerging concerns with no indication of immediate harm	Consult the DSL. Consider school tutorial and pastoral support, referral to municipal social services and work with the family. Record and set a review date.
Concerns worsen or do not improve	The DSL reviews the case, records actions and considers formal reporting to municipal social services or the public child-protection authority using the regional notification form.
The child is suffering or is likely to suffer harm, or is in immediate danger	Immediate report to the Security Forces (112), the Public Prosecutor's Office and the public child-protection authority. Anyone may report. Inform the DSL as soon as possible.
Indication of a criminal offence against a child	Immediate and direct report to the Public Prosecutor's Office or Security Forces, in accordance with Article 16 of LOPIVI and Articles 259 to 262 of the Criminal Procedure Act. Certainty is not required: an indication is sufficient.
DSL unavailable	Do not delay. Contact the deputy, school leadership or directly 112 or the competent services.
Disagreement with an agency response	Use escalation routes and record the rationale, advice received and next steps. Repeat the report in writing where the risk persists.

No internal procedure may delay a legally required report. The reporting duty under Articles 15 and 16 of LOPIVI is personal to each member of staff and is not discharged merely by reporting internally to the DSL where the facts may constitute a criminal offence. Article 450 of the Criminal Code criminalises failure to prevent certain offences.

11. Responding to disclosures and concerns

When a child discloses violence, abuse, neglect, exploitation or another concern, the adult receiving the information must respond calmly, listen carefully and pass the information on without delay.

- Listen and allow the child to speak freely.
- Do not ask leading or suggestive questions.
- Tell the child that they have done the right thing by speaking.
- Do not promise secrecy. Explain that the information must be shared with those responsible for protecting them.
- Record their words as accurately as possible, distinguishing facts from opinions.
- Sign, date and submit the record through CPOMS, assigning it to the DSL.
- Report immediately to the DSL or activate emergency procedures where appropriate.
- Do not investigate, do not confront those named and do not discuss the concern with colleagues who do not need to know.

Avoid re-victimisation. Article 11 of LOPIVI and Law 4/2015 on the Statute of the Victim of Crime require repetition of statements to be minimised. School staff must not interview the child or ask them to repeat their account: that role belongs to specialist professionals and, where applicable, to the pre-constituted judicial examination provided for in Article 449 ter of the Criminal Procedure Act for children under fourteen.

12. Specific safeguarding issues

Issue	Policy expectation
Gender-based violence and domestic violence	Violence in the family environment affects children directly and indirectly. Article 1.2 of Organic Law 1/2004 recognises sons and daughters as victims of gender-based violence. Staff must be alert to the impact of coercion, control, violence and instability. Report to social services and, where there is an indication of an offence, to the authorities.
Child-to-parent violence	Repeated violent conduct by a child towards parents or carers. Requires specialist assessment and referral to the competent services.
Sexual and criminal exploitation of children	Children may be exploited by individuals, groups or organised networks. They may not recognise themselves as victims and may be criminalised for acts committed under coercion. Staff must consider coercion, fear, debt, grooming, episodes of absence and unexplained possessions.
Trafficking in human beings	Criminalised under Article 177 bis of the Criminal Code. Immediate report to the Security Forces. A framework protocol for the protection of trafficking victims exists.
Serious violence and weapons	Any concern that a child carries, uses or intends to use a weapon must be reported to the DSL, who will carry out a risk assessment and consider external reporting. In immediate danger, call 112.
Mental health and safeguarding	Mental health problems may give rise to safeguarding concerns. Staff will not diagnose, but will identify warning signs, report concerns and ensure safe and appropriate support.
Suicidal behaviour and self-harm	Any concern about suicidal ideation, attempt or self-harm must be reported immediately to the DSL and the school protocol and corresponding regional protocol activated. The family will be informed unless this increases the risk. Supervision and referral to child and adolescent mental health services or 112 will be ensured according to urgency.
Female genital mutilation, forced marriage and honour-	Criminalised under Articles 149.2 and 172 bis of the Criminal

based violence	Code, with extraterritorial application. Risk is elevated before long holiday periods. Staff must never examine a child. Immediate report to the DSL and competent authorities, and activation of the corresponding regional protocol.
Radicalisation and violent extremism	Staff will report concerns that a child may be vulnerable to radicalisation or extremist influence. The DSL will assess risk and activate the routes provided in the National Strategic Plan to Combat Violent Radicalisation and the “Stop Radicalismos” channel (900 822 066), without prejudice to reporting to the authorities.
Housing instability and poverty	Housing instability and material deprivation may create vulnerabilities requiring information sharing, attendance monitoring and support, including referral to social services for grants and assistance.
Cybercrime and online harm	Online harm, technology-facilitated coercion, image sharing and cybercrime risks will be addressed through online-safety education, filtering, monitoring and safeguarding response. See the Online Safety Policy.
Substance use	Use of alcohol, tobacco or other substances by children is a health and safeguarding issue. It will be addressed through curriculum prevention, individual support and referral to health resources, avoiding exclusively punitive approaches.

13. Peer-on-peer violence, harmful behaviour and sexual violence

Children can abuse other children. Peer-on-peer violence must never be minimised as a joke, a normal part of growing up or horseplay. It is a safeguarding matter for all children involved, including victims, those alleged to have caused harm, witnesses and the peer group.

Forms staff must recognise:

- Bullying, prejudice-based bullying and online bullying.
- Physical harm or threats.
- Group-related violence, coercion or exploitation.
- Harmful sexual behaviour, sexual harassment and sexual violence.
- Sharing sexual-content images.
- Hazing and initiation behaviours.
- Misogyny, discriminatory language and group cultures that normalise harm.
- Violence during transport, when leaving school, online or during unsupervised periods.

13.1. Response

Following an allegation or concern, staff must record it and report it immediately to the DSL. Staff must not investigate. The DSL will assess immediate safety, risk assessment, support, external reporting and whether the facts may constitute an offence or require specialist advice.

- Create a written record.
- Assess the immediate safety of all children involved.
- Consider separation, supervision, timetable adjustments or transport measures.
- Activate the regional bullying protocol where appropriate, complying with its deadlines and procedures (see Anti-Bullying Policy).
- Report to the Security Forces or Public Prosecutor's Office where there are indications of an offence.
- Develop support plans for the victim, the person alleged to have caused harm and affected children.
- Review the school culture, spaces, times and behaviours requiring preventive action.
- Record decisions, their rationale and review dates.

Where the person alleged to have caused harm is under fourteen, they will not be criminally responsible under Article 3 of Organic Law 5/2000, but may be subject to the protection measures provided for in civil

legislation. From the age of fourteen, responsibility may be required under that law. In all cases, the child alleged to have caused harm is also a child entitled to protection and support.

13.2. Preventive culture

- Teach healthy relationships, consent, boundaries, respect, online safety and reporting routes.
- Challenge sexualised, derogatory, misogynistic or discriminatory language.
- Ensure students know how to report a concern safely and confidentially.
- Supervise higher-risk spaces and times: lesson changes, toilets and changing rooms, transport and digital spaces.
- Review patterns of concerns to identify cultural, environmental or systemic issues.
- Comply with the prevention obligations in Article 30 of LOPIVI and the school coexistence plan.

14. Sharing sexual-content images

Any incident involving the sharing of sexual-content images of children requires a safeguarding response, regardless of whether the sharing appears consensual or non-consensual. The response must be proportionate and consider age, development, circumstances, vulnerability, coercion, exploitation and the risk of further harm.

Staff must report any incident immediately to the DSL and must not view, copy, print, forward, save, upload or ask a child to share the material.

What to do	What not to do
Report immediately to the DSL.	Do not view, copy, print, save, upload or forward the material.
Reassure the child that support is available.	Do not ask the child for unnecessary details.
Record the concern factually.	Do not blame, shame or minimise.
Preserve devices only when instructed by the DSL, police or applicable protocol.	Do not delete the material or ask the child to delete it unless instructed by the competent route.
Assess immediate safety, coercion, exploitation and mental-health risk.	Do not discuss the matter or share information without a need to know.
Inform about the AEPD Priority Channel for urgent removal of content.	Do not attempt to access the child's personal device.

Possession, production or distribution of pornographic material involving children is criminalised under Article 189 of the Criminal Code. Viewing or retaining the material, even for evidential purposes, may constitute an offence. The correct procedure is not to access the content and to make it available to the Security Forces.

14.1. Initial DSL assessment

The DSL will carry out an initial assessment and decide whether immediate reporting is required. They must consider whether the incident involves an adult, coercion, blackmail, grooming, exploitation, violence, significant age differences, relevant vulnerability, wide distribution, immediate risk or an indication of an offence, and in particular:

- Whether there is immediate risk to any child.
- Whether families should be informed and how.
- Whether the Security Forces, Public Prosecutor's Office or child-protection services should be contacted.
- Whether the image has been widely shared or through platforms requiring removal.
- Whether another school or organisation should be contacted.
- What support and risk management all children involved require.
- How the incident and its rationale will be recorded.

15. Online safety, filtering, monitoring and artificial intelligence

Online safety is an integral part of safeguarding. It is developed in the Online Safety Policy, which must be read together with this document.

15.1. Filtering and monitoring

The school will have filtering and monitoring systems appropriate to the age and needs of students, reviewed at least annually by leadership, the DSL and the systems lead, with a documented record of the review.

Implementation of these systems requires prior information to students, families and staff, identification of the legal basis, registration of the processing activity and consideration of a data-protection impact assessment.

15.2. Generative artificial intelligence

- Personal data or information that could identify students must not be entered into tools not authorised by the school.
- Creating or sharing sexual or humiliating synthetic content depicting a real person is a safeguarding issue and may constitute an offence.
- The school will maintain a list of authorised tools and their conditions of use.

15.3. Mobile devices

The school will regulate students' use of mobile devices in accordance with its internal regulations and regional legislation, which in several Autonomous Communities limits or prohibits their use in schools. The use of mobile phones during the school day is prohibited.

16. Children requiring mental-health support

The school recognises that mental-health problems may give rise to safeguarding concerns. Staff will not attempt to diagnose, but play an important role in identifying warning signs, reporting concerns and ensuring the child receives appropriate support. The school will:

- Promote positive emotional wellbeing and prevention.
- Observe and identify early signs of difficulty.
- Provide early and specific support where appropriate.
- Refer to specialist child and adolescent mental-health services.
- Act immediately where there is risk of harm, self-harm or exploitation.

The school will have an action protocol for suicidal ideation or behaviour, aligned with the corresponding regional protocol and, where applicable, Ministry of Health guidance.

17. Children with specific needs, health conditions and caring responsibilities

These children may face additional barriers. Staff must avoid assuming that signs of violence, abuse or neglect are explained by the child's condition without maintaining professional curiosity.

Group	Safeguarding expectations
Children with specific educational support needs or disabilities	Ensure accessible communication routes, reasonable adjustments, close coordination between the DSL and guidance team, and careful consideration of communication barriers. These students are at significantly greater risk of abuse.
Children with health conditions	Consider whether repeated lack of medication, failure to provide medical information or unmet health needs constitute neglect.
Children with family caring responsibilities	Identify these responsibilities early and consider how they affect attendance, learning, behaviour, fatigue and emotional wellbeing.
Children with language barriers	Facilitate accessible communication, including interpretation, and do not assume that silence means there is no concern.
Children with mental-health needs	Ensure concerns are not dismissed by attributing them solely to mental health where safeguarding indicators exist.

18. Children subject to protection measures

Some children are under the intervention of the public child-protection authority, in foster or residential care, or have an open case with social services. The school recognises that adversity and trauma can create barriers to attendance, learning, behaviour and mental health, as well as increase vulnerability.

Where the school knows that a child is in this situation, the DSL will take this information into account when making decisions about safeguarding, attendance, corrective measures, tutorial support, curriculum access and transitions.

- Securely maintain details of reference professionals and current protection measures.
- Ensure relevant staff know what they need to know to support the child.
- Coordinate with social services and the public child-protection authority.
- Recognise attendance as a key safeguarding factor.
- Ensure secure transfer of safeguarding records when the child changes school.

The school will verify who holds custody or guardianship and who is authorised to collect the child and receive information, and will comply with judicial protection or restraining measures that have been notified to it.

19. Trans students and gender diversity

Substantive change from the English version. The original version states that the school will not make any change relating to social transition without completing an internal decision-making process and involving families. That approach does not correspond to the Spanish framework. Article 24 of Law 4/2023 and the regional protocols supporting trans students require respect for the expressed gender identity and, in most Autonomous Communities, use of the chosen name in everyday interactions and internal documentation, with varying degrees of family involvement depending on regional rules. The following section replaces the original in full.

When a student, family or third party raises an issue relating to gender identity or expression, the school will respond carefully, sensitively and in accordance with the law, considering safeguarding, wellbeing, equality, family involvement, privacy and the rights of all students together. In particular, the school will:

- Apply the current regional protocol supporting trans students in its Autonomous Community, which takes precedence over any internal Group criterion.
- Respect the expressed gender identity and use the chosen name and form of address in everyday communication and internal documentation, under the terms of that protocol. Official and academic documentation will retain registered details until registry rectification takes place under Law 4/2023.
- Involve families as provided in the regional protocol, unless there are indications that doing so would place the child at greater risk, in which case the DSL will determine and document the appropriate safeguarding action.
- Seek advice from guidance services and, where appropriate, specialist services of the competent authority.
- Document decisions, rationale, communications and review dates.
- Not allow any member of staff to take unilateral measures outside the protocol and without the knowledge of leadership and the DSL.
- Treat data relating to gender identity as special-category data, with access limited to strictly necessary staff.
- Ensure access to facilities, sports activities and accommodation under safe, respectful conditions consistent with applicable regional legislation.
- Act on any bullying or discrimination based on gender identity or expression in accordance with the Equality, Diversity and Inclusion Policy and the school coexistence plan.

Applicable legal basis:

- Instruction of 15 December 2016 of the Directorate-General for Education Policy.
- Law 8/2017, Comprehensive Law recognising the right to gender identity and expression in the Valencian Community.

20. Attendance, persistent absence and children out of school

Attendance is a safeguarding issue. Absence, persistent lateness, unexplained absence, sudden changes in attendance or being out of school may indicate violence, abuse, neglect, exploitation, mental-health difficulties, caring responsibilities, housing instability or other risks.

The school will use attendance information together with tutorial, safeguarding and academic information to identify children who may need help or protection. In particular, it will:

- Apply the regional school-absence protocol and its thresholds for reporting to social services and the education authority.
- Report to the DSL attendance patterns indicating safeguarding risk.
- Pay particular attention to children subject to protection measures, with caring responsibilities, specific needs or mental-health difficulties.
- Maintain safe admission, withdrawal and transfer procedures, verifying effective enrolment at the destination school.
- Report cases of children out of school to the Education Inspectorate and social services, since basic education is compulsory under Article 4 of the LOE.
- Contact the family on the first day of unexplained absence where there are previous safeguarding concerns.

21. Allegations, low-level concerns and whistleblowing

Concerns or allegations relating to staff, supply or external-company staff, contractors, volunteers, members of governing bodies or other adults must be reported immediately in accordance with the Allegations Against Staff Policy.

Where the concern relates to school leadership, staff must report it to the chair of the governing body, the regional lead or the Group safeguarding lead. Where there is a conflict of interest, the alternative route provided in this policy must be used.

Type of concern	Action
Allegation that may meet the harm threshold	Report to leadership or the designated alternative person. Apply the Allegations Policy and any legally required reporting to the authorities.
Low-level concern	Record and report in accordance with the low-level concerns procedure. Review patterns and ensure an appropriate response.
Whistleblowing	Use the Internal Reporting System provided for in Law 2/2023 where safeguarding practice is unsafe, inadequate or failing.
Concern relating to external staff	The school establishes the facts and manages the safeguarding response, coordinating with the company or provider.
Immediate risk	Contact 112 immediately and inform the DSL and leadership as soon as possible.

Law 2/2023 guarantees protection from retaliation for anyone who reports in good faith. Article 36 of that law declares retaliatory acts null and void.

22. Safer recruitment and suitability

Safer recruitment is an essential safeguarding control. This policy must be read together with the Safer Recruitment Policy and the corresponding Commitment Statement.

No adult will work unsupervised with children without completing the required checks or, exceptionally, without an approved written risk assessment. A negative certificate from the Central Register of Sex Offenders and Human Trafficking (Art. 57.1 LOPIVI) allows no exception or substitute risk assessment.

- Job advertisements must state the safeguarding commitment.

- Application forms must include full employment history.
- Shortlisting must consider gaps and concerns.
- Interviews must include safeguarding questions.
- References must be obtained directly.
- Identity, qualifications and authorisation to work must be verified.
- International checks must be carried out where appropriate.
- Volunteers, contractors and external staff must be appropriately assessed and checked.
- The Single Central Record must be accurate and reviewed regularly.

23. Recording and transfer of documentation

All safeguarding concerns, conversations, decisions and rationales must be recorded in writing. Records must be clear, factual, timely, dated, attributable, secure and kept separately from the academic record.

Records must distinguish between fact, allegation, professional judgement and action taken, and will be accessible only to those with a professional need to know.

Each record will include:

- A clear summary of the concern.
- The child's words, where appropriate.
- Date, time and place.
- People involved.
- Action taken and by whom.
- Advice received.
- Decisions and their rationale.
- External reports made.
- Support or risk-management plan and review dates.
- Information shared and with whom.

When a child changes school, the DSL will ensure secure transfer of safeguarding records, separately from the academic record and in sufficient time for the receiving school to put the necessary support in place. In significant or complex cases, the DSL will speak directly with their counterpart at the receiving school.

Retention. The retention period must be determined by the school with advice from its Data Protection Officer, taking into account applicable limitation periods, the storage-limitation principle in Article 5.1(e) GDPR and instructions from the education authority. An indefinite period is not acceptable. It must be taken into account that Organic Law 8/2021 changed the calculation of limitation periods for the most serious offences against children, which begins when the victim reaches the age of thirty-five, which may justify extended periods in specific, duly reasoned cases.

24. Training

All staff must receive safeguarding and child-protection training at induction and periodic updates thereafter. Training must be integrated with the school's whole-school safeguarding approach, online safety, coexistence, attendance, curriculum, tutorial support and staff conduct.

Article 33 of LOPIVI establishes the obligation of specialist training for professionals working with children, and Article 35.2 requires specific training for the Wellbeing and Protection Coordinator.

Audience	Minimum training expectations
All staff	Induction, annual update, reporting procedures, online safety, filtering and monitoring, peer-on-peer violence, confidentiality, information sharing and external reporting routes.
Staff working directly with children	Assigned reading of the policy and applicable legislation, specific safeguarding issues, professional curiosity and responding to disclosures.
Wellbeing and Protection Coordinator and deputy	Specialist training under Article 35.2 LOPIVI, with annual

	update, knowledge of local agencies, information sharing, online safety, mental health, exploitation and allegations.
Governing body and proprietor	Strategic safeguarding responsibilities, policy oversight, safer recruitment, allegations, online safety and challenge function.
Contractors and volunteers	Safeguarding induction appropriate to their role, code of conduct, reporting route and supervision expectations.
Recruitment panels	Safer recruitment training aligned with Group policy.
Students	Age-appropriate education on positive treatment, boundaries, personal safety and routes to ask for help, in accordance with Article 30 LOPIVI.
Families	Information on this policy, reporting routes and available support resources.

25. Monitoring and review

This policy will be reviewed annually by leadership, the DSL and the proprietor, and earlier if legislation, Group requirements, inspection or audit findings change, or serious incidents occur.

Compliance will be monitored through safeguarding audits, training records, record checks, review of recruitment checks, review of online safety and filtering, case sampling and governance assurance.

The school will produce an annual safeguarding report for the proprietor and regional lead, with aggregated and anonymised data on recorded concerns, external reports made, training delivered and improvement measures adopted.

26. Related policies and documents

- Safer Recruitment Policy and Commitment Statement.
- Allegations Against Staff Policy and low-level concerns procedure.
- Staff Code of Conduct.
- Whistleblowing Policy and Internal Reporting System.
- Online Safety Policy and Social Media Policy.
- Data Protection Policy and document-retention schedule.
- School coexistence plan, coexistence rules and Anti-Bullying Policy.
- School absence protocol.
- Equality, Diversity and Inclusion Policy and Accessibility Statement.
- Health and Safety Policy and Incident and Accident Reporting Policy.
- First Aid and Management of Medical Conditions Policy.
- Intimate Care Policy.
- Relationships and Sex Education Policy.
- School trips and letting of premises procedure.
- Concerns and Complaints Policy.