



# Child Safety and Protection Policy

Approved by:	Rosa María Tortosa	Date:
Last Reviewed:	September 24	
The next revision:	September 25	

## Content

1. Objectives .....	4
2. Regulations and legal guidance.....	4
3. Concepts .....	5
4. Equality Statement .....	6
5. Roles and responsibilities .....	7
5.1 All staff .....	8
5.2 Designated Protection Officer (DSL).....	9
5.3 School Council .....	9
5.4 Director .....	11

6. Confidentiality .....	11
7. Acknowledge abuse and take action .....	13
7.1 If a minor is suffering or is likely to be harmed, or is at risk of immediate danger. ....	13
7.2 If a minor files a return. ....	13
7.3 If you have concerns about a minor (other than believing that they are suffering or likely to be harmed, or are at risk of immediate danger) .....	14
7.4 If we are concerned about extremism. ....	16
7.4 If we are concerned about mental health. ....	16
7.5 Concerns about a staff member, substitute teacher, volunteer, or contractor .....	19
7.6 Allegations of Harassment Against Other Students. ....	19
7.7 Spreading nudity and semi-nudity ('sexting') .....	24
7.8 Reporting systems for our students .....	28
7.9 Student Statement System .....	29
8. Online security and use of mobile technology .....	31
9. Inform parents or guardians .....	32
10. Students with special educational needs, disabilities, or health problems. ....	33
11. Students with a social worker .....	33
12. Minors in care and previously in care .....	34
13. Complaints and concerns about school safety policies .....	34
13.1 Complaints against staff .....	34
13.2 Whistleblowing .....	34
14. File Management .....	37
15. Training .....	38
15.1 All Staff .....	38
15.2 DSL .....	38
15.3 Members of the Management Team .....	39
15.4 Recruitment: Interview panels .....	39
15.5 Staff who have contact with students and families. ....	39
16. Follow-up arrangements .....	39
17. Links to Other Policies .....	39
Appendix 1: Types of Abuse .....	41

Important contacts

FUNCTION/ORGANIZATION	NAME	CONTACT DETAILS
Director	Rosa María Tortosa	
Designated Protection Officer (DSL)	Desideria Bernabéu	
DSL Deputy		
Regional Director of Schools (RHoS)	Emma Newman	
Chief Executive Officer (CEO)	David Pottinger	

## 1. Objectives

The school aims to ensure that:

- Appropriate measures are taken in a timely manner to ensure and promote the well-being of minors.
- All staff are aware of their legal responsibilities with regard to protection.
- Staff are trained to recognize and report safety issues.

## 2. Regulations and legal guidance

This policy is based on the Department of Education's (DfE) legal guidelines Keeping Children Safe in Education (2024) and Working Together to Protect Children (2023), and the Government Guide <https://www.gov.uk/guidance/governance-in-maintained-schools>

At all times you will adhere to national requirements/regulations:

- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including of a sexual nature, may violate any or all of the rights that apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it illegal to discriminate against people in relation to specific protected characteristics (such as disability, sex, sexual orientation, gender reassignment and race). This means that our board members and principal should carefully consider how they are supporting their students with respect to these characteristics. The Act allows our school to take positive steps to deal with particular disadvantages affecting students (where we can demonstrate that it is proportionate). This includes making reasonable accommodations for students with disabilities. For example, it could include taking positive steps to support the child when there is evidence that he or she is being disproportionately subjected to sexual violence or harassment.
- The Public Sector Duty of Equality (PSED), which explains that we must give due consideration to the elimination of unlawful discrimination, harassment and victimisation. The PSED helps us focus on the key issues of concern and how to improve student outcomes. Some may be at higher risk of harm from problems such as sexual violence; homophobic, biphobic or transphobic harassment; or racial discrimination.

- **Organic Law 8/2021, of 4 June, on the comprehensive protection of children and adolescents against violence:** This national law, and applicable at the regional level, aims to guarantee the fundamental rights of children and adolescents to their physical, mental, psychological and moral integrity in the face of any form of violence. It establishes comprehensive protection measures, including awareness-raising, prevention, early detection, protection and reparation of damage.

<https://www.boe.es/buscar/pdf/2021/BOE-A-2021-9347-consolidado.pdf>

- **Organic Law 1/1996, of 15 January, on the Legal Protection of Minors: Amended by Organic Laws 8/2015 and 26/2015:** This law establishes a state legal framework for the protection of minors, recognising them as subjects of rights with a progressive capacity to exercise them:

<https://www.boe.es/boe/dias/2015/07/23/pdfs/BOE-A-2015-8222.pdf>

<https://www.boe.es/buscar/pdf/2015/BOE-A-2015-8470-consolidado.pdf>

- **Regional regulations:** The Valencian Community also has its own legislation on the protection of minors, adapted to the particularities of the region. This regulation focuses on the promotion of the rights of children and adolescents, as well as on the implementation of specific measures for their protection in the educational field. Such as **DECREE 195/2022, of November 11 of the Consell, on equality and coexistence in the Valencian education system**, which regulates equality and coexistence in educational centers, promoting a safe and respectful environment for all students: [https://dogv.gva.es/datos/2022/11/16/pdf/2022\\_10681.pdf](https://dogv.gva.es/datos/2022/11/16/pdf/2022_10681.pdf)

Or **Law 26/2018, of 21 December, on the rights and guarantees of children and adolescents:** This law establishes the rights and guarantees of minors in the Valencian Community, ensuring their comprehensive protection:

<https://www.boe.es/buscar/pdf/2019/BOE-A-2019-1986-consolidado.pdf>

As well as the protocol for action in situations of school absenteeism: established by the Resolution of 29 September 2021. This protocol guides schools (supported by public funds) in the management of cases of school absenteeism, ensuring that appropriate measures are taken to protect minors.

[https://dogv.gva.es/datos/2021/11/08/pdf/2021\\_11082.pdf](https://dogv.gva.es/datos/2021/11/08/pdf/2021_11082.pdf)

- These laws and regulations seek to ensure a safe and protective environment for children in schools, promoting their integral well-being and guaranteeing their rights.

All early education providers add:

- This policy also complies with the requirements related to safety and well-being in the legal framework of the Basic Stage of the Early Years

### 3. Concepts

Ensuring and promoting the well-being of children means:

- Provide help and support to meet the needs of minors as soon as problems arise.
- Protecting children from abuse, whether inside or outside the home, including online
- Prevent deterioration of children's mental and physical health or development
- Ensuring that children grow up in circumstances compatible with the provision of safe and effective care
- Take steps to enable all children to have the best outcomes.

**Child protection** is part of this definition and refers to activities undertaken to prevent minors from suffering or being able to suffer significant harm.

**Abuse** is a form of child abuse and may involve inflicting harm or failing to act to prevent harm.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in a serious deterioration of the child's health or development.

**Nude and semi-nude sharing** (also known as sexting or sexual images produced by young people) is when minors share nude or semi-nude images, videos, or live streams.

**Minors** include all those under the age of 18.

**Victim** is a widely understood and recognized term, but we understand that not everyone who has been subjected to abuse considers themselves victims or would want to be described that way. When handling an incident, we will be prepared to use whatever term the minor involved is most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognized terms. However, we will think carefully about the terminology we use (especially in front of minors) since, in some cases, abusive behavior can also be harmful to the perpetrator. We will decide what is appropriate and what terms to use on a case-by-case basis.

**Additional information on these security issues and information on other related issues is included in Annex B.**

## 4. Equality Statement

Some children are at increased risk of abuse, both on and offline, and there may be additional barriers for some children to recognize or disclose it. We are committed to the fight against discrimination and recognize the diverse circumstances of minors. We ensure that everyone has the same protection, regardless of the barriers they may face.

We give special consideration to minors who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- They are young caregivers.

- You may experience discrimination because of your race, ethnicity, religion, gender identification, or sexuality.
- Have English as an additional language.
- They are known to live in difficult situations, for example, in temporary accommodation or where there are problems such as substance abuse or domestic violence.
- They are at risk because of their own mental health needs or those of a family member.

## 5. Roles and responsibilities

The safety and protection of children is **everyone's responsibility**. This policy applies to all staff, volunteers and members of the school's leadership team and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended and off-site school activities.

The school plays a crucial role in preventive education. This is in the context of a whole-school approach to preparing students for a "model society and global citizenship." **It therefore seeks to prevent different forms of discrimination such as: racial discrimination, gender discrimination, sexual orientation, gender identity, disability or functional diversity, religious reasons, socioeconomic situation, origin or nationality or discrimination on linguistic grounds. It is about presenting** a culture of zero tolerance for **racism**, sexism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence/harassment, etc. This will be supported by our:

- Behavior Policy
- Support System: Social Educator
- Planned Relationship, Sex and Health Education (RSHE) programme, which is inclusive and regularly delivered, addressing issues such as:
  - Healthy and respectful relationships
  - Limits and consent
  - Stereotypes, prejudices and equality
  - Body confidence and self-esteem
  - How to recognize an abusive relationship (including coercive and controlling behavior)
  - Concepts and laws relating to sexual consent, sexual exploitation, abuse, child grooming, coercion, harassment, rape, domestic abuse and how to access help.
  - What constitutes sexual harassment and sexual violence and why they are always unacceptable.

### 5.1 All staff

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

All other staff members are expected to read Annex A of the KCSIE.

Staff who work directly with children are also expected to read KCSIE Annex B (on specific safety issues).

All staff:

- Read and understand Part 1 and Annex B of the Department of Education's established safety guide, Keeping Minors Safe in Education, 2024, and review this guide at least once a year.
- Sign a statement at the beginning of each academic year to say that you have reviewed the guide.
- Reinforce the importance of online safety when communicating with parents and guardians. This includes making them aware of what we ask minors to do online (for example, the sites they need to visit or who they will interact with)

All staff will be aware of:

- Our systems that support security, including this child protection and safety policy, person, role, identity of the designated security officer (DSL), and behavior policy.
- The early help evaluation process (sometimes referred to as the Common Evaluation Framework) and your role in it, including identifying emerging issues, liaising with the DSL, and sharing information with other professionals to support early identification and evaluation.
- The process for making referrals to local children's social care authorities or external authorities and for assessments that may follow a referral, including the role they are expected to play.
- What to do if they identify a safeguarding issue or if a child tells us they are being abused or neglected and how to maintain an appropriate level of confidentiality while communicating with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific protection issues, such as child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), risk indicators of serious violent crime, radicalisation and serious violence.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that minors can be at risk of harm inside and outside their home, at school and online.
- The fact that minors who are (or who are perceived as) lesbian, gay, bisexual, or trans (LGBTQ+) may be targeted by other minors.
- What to look for to identify children in need of help or protection

Section 15 of this policy describes in more detail how staff are supported to do this.

## 5.2 Designated Protection Officer (DSL)

The DSL is a member who will meet with the management team on time when necessary in order to review the case studies. The DSL assumes primary responsibility for child protection and the broader safeguarding at school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

During the school term, the DSL will be available during school hours for staff to discuss any concerns about protection.

When the DSL is absent, the Director along with the stage director would act as a backup.

The DSL will have the time, funding, training, resources, and support to:

- Provide advice and support to other staff on child welfare and protection.
- Participate in strategic discussions and interagency meetings and/or support other staff members to do so.
- Contribute to the evaluation of children.
- Refer suspected cases, as appropriate, to the Regional Director of Schools (RHoS) or the Director-General and, if necessary, to the relevant body (local authority, child welfare and/or police), and to the support staff making such referrals directly.
- Have a good understanding of harmful sexual behavior.
- Have a good understanding of the filtering and monitoring systems and processes implemented in our school.

DSL also:

- Keep the manager informed of any problems.
- Liaise with the RHoS, local authority case managers, and designated officials for child protection concerns, as appropriate.
- Rest assured that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident in how to access this support.
- Keep in mind that children should have a "suitable adult" to support and assist them in the event of a police investigation or search.

## 5.3 School Council

The School Board:

- Facilitate a school-wide approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring that it complies with the law, and hold the Director accountable for its implementation.
- Please be aware of your obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Duty of Equality) and our college's local multi-agency protection agreements.

## Regional Director of Schools

- On behalf of the School Board, ensure that all staff receive training in safeguarding and child protection, including online safety, and that such training is regularly updated and in line with the advice of safeguarding partners.
- Make sure the school has adequate filtering and monitoring systems in place and check their effectiveness. This includes:
  - Ensure that the leadership team and staff are aware of the provisions in place and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
  - Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting these standards.
- Make sure:
  - The DSL has the appropriate status and authority to carry out its work, including additional time, funding, training, resources, and support.
  - Online safety is a recurring and interrelated theme within the school-wide approach to safeguarding and related policies.
  - The DSL has the primary authority to safeguard, including online security and understand the filtering and monitoring systems and processes in place.
  - The school has procedures in place to handle any protective concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers, and contractors). See KCSIE Guidance Part Four: Safeguarding Concerns or Accusations Made About Staff, Including Substitute Teachers, Volunteers, and Contractors.
  - That this policy reflects that the child with SEND, or certain medical or physical health conditions, may face additional barriers to having any abuse or neglect recognized.
- In cases where another agency provides services or activities (regardless of whether or not the children attending these services or activities are children in school):
  - Seek assurance that the other agency has adequate child safeguarding and protection policies/procedures in place and inspect them if necessary.
  - Make sure there are arrangements for the agency to consult with the school about safeguarding arrangements, where appropriate.

- Ensure that safeguarding requirements are a condition of the use of school facilities, and that any agreement to use the facilities is terminated if the other body does not comply.

The CEO of RHoS will function as the "case manager" in the event that an allegation of abuse is filed against the Principal, where applicable.

All members of the leadership team will be aware of the key aspects and responsibilities referenced in Keeping Children Safe in Education.

Section 15 of this policy contains information on how Board members are supported to fulfill their role.

#### **5.4 Director**

The Director is responsible for the implementation of this policy, including:

- Ensure that staff (including temporary staff) and volunteers:
  - They are informed of school systems that support protection, including this policy, as part of their induction.
  - Understand and follow the procedures included in this policy, particularly those related to referrals of suspected abuse and neglect.
- Communicate this policy to parents/guardians when their child joins the school and through the school's website.
- Ensure that DSL is provided with adequate time, funding, training and resources, and that there is always adequate coverage in the absence of DSL.
- Act as a "case manager" in the event of an allegation of abuse against another staff member or volunteer, where appropriate (see Appendix 3).
- Make decisions regarding all low-level concerns, although they may wish to collaborate with the DSL and RHoS on this.
- Ensure compliance with relevant staffing ratios, where appropriate

The suppliers of the Children's add to:

- Ensure that each child in the Early Years Basic Stage is assigned a key person.
- Monitor the safe use of technology, mobile phones, and cameras in the environment.

## **6. Confidentiality**

You should keep in mind that:

- The timely exchange of information is essential for effective safeguarding.
- Fears of sharing information must not be allowed to get in the way of the need to promote the well-being and protect the safety of children.

- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent or limit the sharing of information for the purpose of keeping children safe.
- If staff need to share "special category personal data," the 2018 DPA contains "protection of minors and persons at risk" as a condition of processing that allows professionals to share information without consent if: consent cannot be obtained; a professional cannot reasonably be expected to obtain consent; or if obtaining consent would put a minor at risk.
- Staff should never promise a minor that they will not tell anyone about a report of abuse, as this may not be in the best interest of the minor.
- If a victim asks the school not to tell anyone about the sexual violence or harassment:
  - There is no definitive answer, because even if a victim does not consent to sharing information, staff can still legally share it if there is another legal basis in the country.
  - The DSL will have to balance the victim's wishes with its duty to protect the victim and other children.
  - The DSL must take into account that:
    - Parents or caregivers should usually be informed (unless this puts the victim at greater risk)
    - The basic principle of safeguarding is as follows: if a child is at risk of harm, is in immediate danger or has been harmed, the case should be referred to the competent authority.
    - Rape, penetrative assault, and sexual assault are all crimes. When a complaint of rape, penetrative assault or sexual assault is filed, it must be referred to the police. While the age of criminal responsibility is 10 years, if the alleged perpetrator is under 10 years of age, the initial principle of referral to the police is maintained.
- As for anonymity, all staff:
  - Be aware of anonymity, witness support, and the overall criminal process in which an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
  - To make every reasonable effort to protect the anonymity of any child involved in any report of sexual violence or sexual harassment, for example by carefully considering what staff should know about the report and any support for the children involved.
  - Consider the potential impact of social media in facilitating the spread of rumors and exposing victims' identities.
- The committee on information sharing to protect professionals includes 7 "golden rules" for sharing information, and will support staff who have to make decisions about information sharing

- If staff have any questions about information sharing, they should speak to the DSL (or alternate)

Confidentiality is also addressed in this policy regarding recordkeeping in section 14, and see KCSIE guidance Part Four: Safeguarding Concerns or Allegations Made About Staff, Including Substitute Teachers, Volunteers, and Contractors

## 7. Acknowledge abuse and take action

Staff, volunteers, and board members are required to follow the procedures set forth below in the event that a safeguarding issue arises.

Note that in this section and the following sections, you should take any reference to the DSL as "the DSL (or DSL attached)."

### 7.1 If a minor is suffering or is likely to be harmed, or is at risk of immediate danger.

Refer them to social services and/or the police **immediately** if you believe a child is suffering or likely to be harmed or in immediate danger. **Anyone can refer it.**

Communicate this to the DSL (see section 5.2) as soon as possible if you are making a referral directly.

### 7.2 If a minor files a return,

If a child discloses a safety issue to you, you should:

- Listen and believe. Give yourself time to talk freely and don't ask leading questions.
- Stay calm and don't show that you're shocked or upset.
- Tell the child that they have done the right thing by telling them. Don't tell him he should have told you sooner.
- Explain what will happen next and that you will need to convey this information. Don't promise to keep it a secret.
- Make a note of the conversation as soon as possible in the child's own words. Stick to the facts and don't judge yourself for it.
- Sign and date the letter and transfer it to the DSL. Alternatively, if appropriate, make a referral to social services and/or the police directly (see 7.1), and inform the DSL as soon as possible that you have done so. Other than these individuals, do not disclose the information to anyone else unless instructed to do so by a relevant authority involved in the security process.

Keep in mind that some children may:

- Not feeling prepared or knowing how to tell someone that they are being abused, exploited, or neglected.
- Not recognizing their experiences as harmful.
- You feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation, and/or language barriers.

Comentado [GM1]: @Katya Dimitrova We just need to remove the yellow and see how we insert it.

None of this should stop you from having a "professional curiosity" and talking to the DSL if you have concerns about a child.

### **7.3 If you have concerns about a minor (other than believing that they are suffering or likely to be harmed, or are at risk of immediate danger)**

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Whenever possible, talk to the DSL first to agree on a course of action.

If in exceptional circumstances DSL is not available, this should not delay the adoption of appropriate measures. Talk to a member of the senior leadership team or the RHoS.

#### **Early Help Assessment**

If an early evaluation of aid is appropriate, the DSL will generally lead liaison with other agencies and the establishment of an interagency evaluation as appropriate. Staff may be required to support other agencies and practitioners in an early assessment of the aid, in some cases acting as the lead practitioner.

We will discuss and agree, with safeguarding partners and other agencies, on the levels for the different types of assessment, as part of local agreements.

The DSL will keep the case under constant review and the school will consider a referral to local child welfare if the situation does not appear to be improving. The timing of interventions will be monitored and reviewed.

**1. Detection of the dangerous situation:** If a situation of danger or serious risk to the child's development is detected, it is crucial to act immediately. This can be identified by health professionals, education, social services or even by the family.

**2. Immediate contact with emergency services:** In situations of imminent danger, the emergency services (112) should be contacted to ensure the immediate protection of the child.

**3. Urgent report from the pediatrician:** Go to the nearest health center so that the pediatrician can perform an urgent evaluation and issue a health report for early care. This report should highlight the urgency of the situation.

<https://fundacionsaludinfantil.org/cdiat/atencion-temprana-paso-a-paso/>

**4. Submission of the application:** With the urgent report, parents or legal guardians must submit the request for early care as a priority. This application can be submitted to the registers of the town halls, PROP offices, or directly to the Territorial Directorate of the Ministry of Equality and Inclusive Policies of Alicante. It can also be done electronically through the Generalitat Valenciana portal.

[https://www.gva.es/es/inicio/procedimientos?id\\_proc=G23126](https://www.gva.es/es/inicio/procedimientos?id_proc=G23126)

**5. Evaluation by the UVSAT: The Early Care Assessment and Follow-up Units (UVSAT) will prioritize the evaluation of urgent cases. These units manage access to early care services and schedule the necessary intervention.**

**[https://www.gva.es/es/inicio/procedimientos?id\\_proc=G23126](https://www.gva.es/es/inicio/procedimientos?id_proc=G23126)**

**6. Immediate intervention: If it is determined that the child needs urgent early care, the intervention will be initiated immediately, coordinated by the health, social services and education systems.**

**[https://www.gva.es/es/inicio/procedimientos?id\\_proc=G23126](https://www.gva.es/es/inicio/procedimientos?id_proc=G23126)**

**Derivation:**

If it is appropriate to refer the case to social services or law enforcement, the Director or DSL will make the referral after consultation with the Director and RHoS.

If the child's situation does not appear to improve after the referral, the DSL or the person who made the referral should follow local escalation procedures to ensure that their concerns have been addressed and that the child's situation improves.

Add details of your local procedures for escalation and escalation.

**If after referring a case of a child's dangerous situation to social services the situation does not improve, it is crucial to follow a rigorous procedure to ensure the protection of the child. Steps to follow:**

**1. Case Reassessment: Social services should conduct a thorough re-evaluation of the case to determine why there has been no improvement. This may include additional interviews with the child, family, and other professionals involved.**

**2. Multidisciplinary intervention: A multidisciplinary team should be convened, including social workers, psychologists, educators, and, if necessary, medical personnel. This team will review the intervention plan and propose adjustments or new strategies.**

**3. Additional protection measures: If the child is considered to be still in danger, additional protection measures can be taken, such as:**

**- Intensive supervision: Increase the frequency of check-ups, visits and follow-up by social services.**

- **Judicial intervention:** Request the intervention of a judge to take legal measures to ensure the protection of the minor, such as the temporary removal of custody from the parents or guardians (if applicable).

**4. Collaboration with other entities:** Social services can coordinate with other entities, such as the police, non-governmental organizations, and mental health services, to provide more comprehensive support.

**5. Follow-up plan:** Establish an ongoing follow-up plan to monitor the child's situation and ensure that the new measures are having the desired effect. This plan should include periodic reviews and adjustments as needed.

**6. Constant communication:** Maintain constant communication with the family and the child, making sure that they understand the measures that are being taken and the reason for them. It is also important to provide emotional and psychological support during this process.

#### **7.4 If we are concerned about extremism.**

If a minor is not suffering or is not likely to be harmed, or is in immediate danger, whenever possible, talk to the DSL first to agree on a course of action.

If in exceptional circumstances DSL is not available, this should not delay the adoption of appropriate measures. Talk to a senior team member.

When there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to.

#### **7.4 If we are concerned about mental health.**

Mental health issues can, in some cases, be an indicator that a child has suffered or is at risk of abuse, neglect, or exploitation.

Staff will be on the lookout for signs of behavior that suggest a minor may be experiencing a mental health problem or at risk of developing one.

If you detect a mental health problem in a child that is also a safety issue, take immediate action by following the steps in section 7.4.

If you spot a mental health issue that **isn't** a safety issue, talk to the DSL to agree on a course of action. Add more detail, as needed, about your procedures for identifying potential mental health issues, including escalation routes and referral and reporting systems. For more information, see the Department of Education's guidance on [mental health and behaviour in schools](#).

**The steps to follow would be:**

#### **1. Detection and Identification:**

- Observe and document any behaviors or signs that raise suspicion of a mental health problem.
- Inform the school's management team and the school counsellor.

## **2. Consultation and Coordination:**

- The school counselor will assess the situation and, if necessary, contact child and adolescent mental health services (USMIA).
- A meeting will be arranged with the student's parents or guardians to inform them and obtain their consent for any necessary interventions.

## **3. Intervention:**

- If the need for intervention is confirmed, an action plan will be developed in collaboration with mental health professionals.
- This plan may include psychological support sessions, adaptations in the educational environment and continuous monitoring.

## **4. Monitoring and Evaluation:**

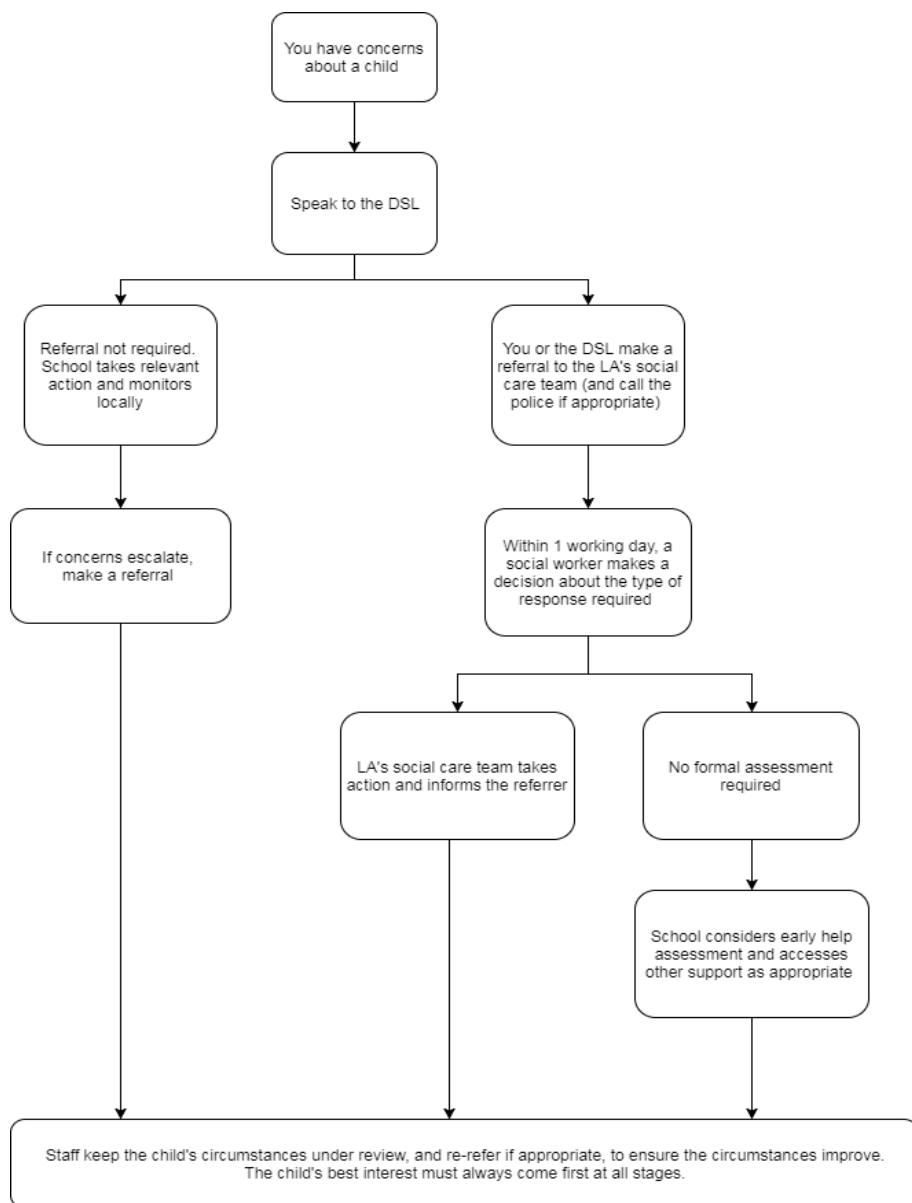
- Regularly monitor the learner to assess their progress and adjust the action plan as needed.
- Maintain constant communication with parents and mental health professionals to ensure comprehensive care.

## **5. Documentation:**

- Record all actions and communications related to the case to ensure proper follow-up and comply with data protection regulations.

**Figure 1: Procedure if you are concerned about the well-being of a minor (who is not suffering or is likely to be harmed, or who is in immediate danger)**

(Note: If DSL is not available, this should not delay action. See section 7.4 for what to do.)



### **7.5 Concerns about a staff member, substitute teacher, volunteer, or contractor**

If you have concerns about a staff member (including a substitute, volunteer, or contractor teacher), or if an allegation is made about a staff member (including a substitute, volunteer, or contractor teacher) who poses a risk of harm to minors, speak to the principal as soon as possible. If the concerns/allegations are about the Director, please speak to the RHoS

The Director/RHoS shall then follow the procedures set out in Appendix 3, if applicable.

When you believe there is a conflict of interest in reporting a concern or allegation about a staff member (including a substitute teacher, volunteer, or contractor) to the Principal, please report it directly to the RHoS.

If you receive a report related to an incident where a person or organization was using school premises to conduct a children's activity, please follow our school safeguarding policies and procedures, reporting to the principal, as you would any safety allegations.

### **7.6 Allegations of Harassment Against Other Students.**

We recognize that children are capable of bullying their peers. Bullying will never be tolerated or interpreted as "jokes", "just laughing" or "age stuff", as this can lead to a culture of unacceptable behaviour and an unsafe environment for students.

We also recognize the gendered nature of violence between minors. However, any abuse between minors is unacceptable and will be treated seriously.

Most cases of students harming others will be handled under our school's behaviour policy, but this child safety and security policy will apply to any allegations that raise safety concerns. This could include when the alleged behavior:

- It is serious and potentially a criminal offense.
- It could put the school's students at risk.
- It's violent.
- It involves students being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting, or sexually inappropriate images or videos (including the exchange of nudity and semi-nudity)

See the KCSIE Guide Part Five: Child Sexual Violence and Bullying for more information on child abuse.

#### **Procedures for dealing with allegations of child abuse.**

If a student accuses another student:

- You should take note of the allegation and report it to the DSL, but don't investigate it.
- The DSL will contact the RHoS and, if necessary, the local social assistance team and follow their advice, as well as the police if the accusation involves a possible criminal offence.

- DSL will put in place a risk assessment and support plan for all minors involved (including victims, minors against whom the allegation has been made, and any other affected persons) with a designated person they can speak to if necessary. This will include considering school transportation as a potentially vulnerable place for the victim or alleged perpetrators.

If the incident is a criminal offense and there are delays in the criminal process, the DSL will work closely with law enforcement (and other agencies as needed) while protecting minors and/or taking disciplinary action against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Add more details here depending on your school's procedures for recording, investigating, and dealing with allegations, and supporting victims, perpetrators, and any other affected children.

Comentado [KD2]: @Rosa Tortosa

Comentado [KD3R2]: @DESI BERNABEU SERRANO

## DESI

### 1. Register of Allegations of Child Abuse

- Reception of Information:
  - Any allegations or suspicions of abuse must be reported immediately by Magno staff.
  - If a student reports abuse directly, the staff member should listen to them without asking questions that could influence the account.
- Initial Documentation:
  - Record the allegation in a safeguarding incident report.
  - Write down the date, time, and location of the alleged incident, the names of all those involved, and any relevant details provided without personal interpretation.
  - Notification to the Designated Safeguarding Lead (DSL):
  - Immediately after registration, the staff member must notify the DSL, the safeguarding officer.
  - The DSL should review the report and assess the initial risk level.

### 2. Investigation of the Accusation

- Immediate Risk Assessment:
  - Assess whether the victim or any other child is at immediate risk of harm.
  - In cases of immediate risk, take immediate action to protect the affected child, including possible temporary separation from the children involved.
- Collection of Additional Information:
  - The DSL or another member of the facility trained for investigations shall discreetly interview

the alleged victim, the alleged perpetrator, and any witnesses.

- All interviews will be conducted in a safe environment, and each child may be accompanied by a trusted adult if deemed appropriate.
- Notification to local authorities (if necessary):
- If the allegation is serious and constitutes physical or sexual abuse, inform the local authorities or the relevant social service.
- Follow the instructions of the authorities so as not to interfere with a possible external investigation.

### **3. Dealing with the Accusation**

- Disciplinary Actions and Preventive Measures:

- If the allegation is confirmed, appropriate sanctions will be implemented in accordance with school policies, which may include suspension or expulsion of the perpetrator.
- Establish protocols to prevent recidivism, such as increasing supervision and improving safety measures.

- Inform Parents or Guardians:

- Inform the parents or guardians of the victim and alleged perpetrator about the accusation and the steps Magno is taking, maintaining confidentiality to the extent possible.

### **4. Support for the Students Involved**

- Support for the victim:

- Provide immediate access to an external professional who specializes in supporting victims of abuse.
- Maintain ongoing communication with the victim and their parents to monitor their emotional well-being.
- Create a personalized protection plan so that the victim feels safe within the school environment.

- Support for the alleged perpetrator:

- Offer psychological support and counselling, as the child may also be a victim of underlying problems or an unsuitable environment.
- Ensure that the alleged perpetrator is treated fairly and age-appropriately, and help develop empathy and conflict resolution skills.

- Support for other affected children:

- Discreetly inform any other students who witnessed or were affected by the incident of the availability of psychological support.

- Maintain open communication to address fears or anxieties in other students and implement awareness workshops on respect and coexistence.

#### **5. Follow-up and review of the case**

- Continuous Monitoring:  
- Establish periodic meetings with the students and families involved to ensure that the support and protection plans are working.

- Protocol Review:  
- Internally review the procedure followed in the case, document any areas for improvement, and train staff if necessary to prevent future incidents.

#### **6. Long-Term Education and Prevention**

- Implement abuse prevention and coexistence programs in the school curriculum, such as workshops on respectful relationships, personal boundaries and empathy.
- Continuously train staff to identify signs of abuse and handle sensitive situations with professionalism and sensitivity.

### **Create a supportive environment at school and minimize the risk of child abuse**

We recognize the importance of taking proactive steps to minimize the risk of child abuse and of creating a supportive environment where victims feel safe to report incidents.

To achieve this, we will:

- Challenging any form of derogatory or sexualized language or inappropriate behavior between peers, including soliciting or sending sexual images.
- Pay attention to issues that particularly affect different genders, such as sexualized or aggressive touching or grabbing of female students, and initiation or hazing violence toward female students.
- Ensure that our curriculum helps educate students about appropriate behavior and consent.
- Ensure that students can easily and securely report abuse using our reporting systems (as described in section 7.10 below)
- Make sure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic issues that could be addressed through updated policies, processes, and curriculum, or that could reflect broader issues at the local level that should be shared with security peers.

- It supports minors who have witnessed sexual violence, especially sexual abuse or penetrative assault. We will do everything we can to ensure that the victim, alleged perpetrators, and witnesses are not intimidated or harassed.
- Consider intra-family damages and any necessary support for siblings after a complaint of violence and/or sexual harassment.
- Make sure staff are trained to understand:
  - How to recognize the indicators and signs of child abuse and how to identify it and respond to reports.
  - Just because even if there are no reports of child abuse at the school, doesn't mean it's not happening: staff must maintain a "it could happen here" attitude.
  - That if you have any concerns about the well-being of a child, you should act immediately rather than wait for them to be reported, and that victims cannot always file a direct complaint. For example:
    - Children may show signs or act in ways waiting for adults to notice and react
    - A friend can file a complaint.
    - A staff member can listen in on a conversation.
    - A minor's behavior may indicate that something is wrong.
  - That certain minors may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity, and/or sexual orientation.
  - The fact that a student harms a classmate could be a sign that the minor is being abused, and that this would fall within the scope of this policy.
  - The important role you have to play in preventing child abuse and responding when you think a child may be at risk of child abuse.
  - That you should talk to the DSL if you have any concerns.
  - Social media is likely to play a role in the aftermath of any incident or alleged incident, including potential contact between the victim, the alleged perpetrator(s), and friends on both sides.

The Director/DSL will assume the lead role in any discipline of the alleged perpetrators. We will provide support at the same time as we take any disciplinary action.

Disciplinary action may be taken while other investigations are being conducted, for example, by the police. The fact that another body is investigating or has investigated an incident does not prevent (in itself) our college from reaching its own conclusion about what happened and imposing a sanction accordingly. We will examine these issues on a case-by-case basis, taking into account whether:

- Taking action would prejudice a further investigation and/or prosecution – we will contact the RHoS and the police and/or local authorities' social assistance to determine this.

- There are circumstances that make it unreasonable or irrational for us to come to our own opinion about what happened while an independent investigation is being conducted.

### 7.7 Spreading nudity and semi-nudity ('sexting')

This is a suggested approach based on the UK Council's guidance for Internet Safety for all staff and for DSLs and above.

The specific protocol to be followed in those educational centers in the Valencian Community that detect cases of sexting consists of the following steps:

#### 1. Detection and Notification:

- Identification of the case: Teachers or any member of the educational community who detects or becomes aware of a case of sexting must immediately inform the school's management team.
- Notification to the authorities: The management team must **notify** the case to the Educational Inspectorate and, if necessary, to the security forces (National Police or Civil Guard) and 112.

<https://ceice.gva.es/es/web/inclusioeducativa/protocols>

#### 2. Student Protection:

- Protective measures: Immediate measures must be taken to protect the victim, including notifying the parents or legal guardians of those involved.
- Psychological support: Offer psychological support to both the victim and the aggressor, if necessary, through the centre's guidance department.

<https://ceice.gva.es/es/web/inclusioeducativa/protocols>

#### 3. Research and Documentation:

- Evidence collection: Document all details of the incident, including testimonies and any available digital evidence.
- Report to the Education Inspectorate: Prepare a detailed report and send it to the Education Inspectorate for follow-up

<https://www.orientanet.es/como-poner-una-denuncia-en-inspeccion-educativa/>

#### 4. Disciplinary and Educational Measures:

- Sanctions: Apply the corresponding sanctions according to the internal regulations of the center and the regulations in force.

- Educational programs: Implement awareness and prevention programs on the safe use of technologies and the risks of sexting<sup>1</sup>(<https://ceice.gva.es/es/web/inclusioeducativa/protocols>).

#### 5. Follow-up:

- Continuous monitoring: Carry out continuous follow-up of the case to ensure that all necessary measures have been taken and that similar situations are not repeated.

**<https://ceice.gva.es/es/web/inclusioeducativa/protocols>**

#### **Your responsibilities when responding to an incident.**

If you become aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth-produced sexual imagery'), you should report it to DSL immediately.

You must not:

- View, copy, print, share, store, or save the images, or ask a student to share or download them (if you have already seen the images by accident, you must report this to the DSL)
- Delete the images or ask the student to delete them.
- Ask students who are involved in the incident to disclose information about the footage (this is the responsibility of the DSL).
- Share information about the incident with other staff members, the students it involves or their parents and/or guardians or others.
- Saying or doing anything to blame or shame the youth involved.

You should explain that you need to report the incident and assure the student(s) that they will receive support and help from the DSL.

#### **Initial Review Meeting**

After a report of an incident, the DSL will conduct an initial review meeting with the appropriate school personnel, this may include the staff member who reported the incident and the protective or leadership team dealing with safety concerns. This meeting will review the initial evidence and seek to determine:

- If there is an immediate risk to students.
- If reference should be made to RHoS.
- If necessary, refer the case to the police and/or children's social services.
- If it is necessary to see the image(s) to protect the child (in most cases, no images or videos should be seen).

- What additional information is required to decide what the best answer is.
- Whether the image(s) has been shared widely and through which services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or delete images or videos from devices or online services.
- Any relevant data about the students involved that may influence the risk assessment.
- If necessary, contact another school, environment or person.
- Whether parents or guardians of the students involved should be contacted (in most cases, parents/guardians should be involved).

The DSL will make an immediate referral to law enforcement and/or social services if:

- The incident involves an adult.
- There is reason to believe that a minor has been coerced, blackmailed or manipulated if there are doubts about their ability to consent (e.g. due to SEN).
- What the DSL knows about the images or videos suggests that the content depicts sexual acts that are unusual for the child's developmental stage or that are violent.
- The images involve sexual acts and any students in the images or videos are under the age of 13.
- The DSL has reason to believe that a student is at immediate risk of harm due to sharing nudity and semi-nudity (e.g., the minor presents as suicidal or self-harms)

If none of the above applies, the DSL, in consultation with the Director, RHoS, and other staff members, as appropriate, may decide to respond to the incident without involving police or social services personnel. The decision will be made and recorded in accordance with the procedures set out in this policy.

#### **Additional revision by the DSL**

If a decision has been made at the initial review stage not to refer the matter to the police and/or social vices, the DSL will conduct a further review to determine the facts and assess the risks.

They will conduct interviews with the students involved (if applicable).

If at any point in the process there is a concern that a student has been harmed or is at risk, a referral will be made to social services and/or law enforcement immediately.

#### **Inform parents/guardians**

The DSL will inform parents/guardians without delay and keep them involved in the process, unless there is good reason to believe that involving them would put the student in danger.

#### **Referral to the police**

If an incident needs to be referred to the police, this will be done through the Director of the facility **in consultation** with the RHoS.

### **Incident logging**

All incidents of nude and semi-nude exchange, and decisions made to respond to them, will be recorded. The file management provisions set out in section 14 of this policy also apply to the recording of these incidents.

### **Curriculum coverage**

Here's an example of how you might demonstrate the way your resume covers nudity and semi-nude sharing.

**Magno International School's approach would not only approach the problem from a normative perspective, but would also promote a culture of respect and responsibility among students. The points of the approach would be:**

#### **1. Education and Awareness:**

- Educational Programs: Implement educational programs that inform students about the legal and emotional risks and consequences of sexting.
- Talks and Workshops: Organize talks and workshops with cybersecurity experts, psychologists, and legal representatives to educate both students and parents.

#### **2. Clear and specific policies:**

- School Regulations: Include in the school regulations a specific section on the appropriate use of technology and the consequences of sexting.
- Action Protocols: Have a clear protocol for action in cases of sexting, including the protection of the privacy of those involved and collaboration with the authorities if necessary.

#### **3. Psychological Support:**

- Counseling Services: Provide access to counseling and psychological support services for students who may be involved in sexting cases.
- Helplines: Provide information about external helplines and resources where students can seek support confidentially.

#### **4. Involvement of the Educational Community:**

- Parent Collaboration: Encourage collaboration with parents through informational meetings and provide them with educational resources so they can address the topic at home.

- Awareness Campaigns: Carry out awareness campaigns inside and outside the school to create an environment of respect and digital responsibility.

## 5. Responsible Use of Technology:

- Digital Education: Include education on the responsible use of technology and social networks in the school curriculum.
- Control Tools: Implement tools to control and monitor the use of electronic devices within the educational center.

## Additional resources

- Guides and Protocols: Use existing guides and protocols, such as those provided by the Generalitat Valenciana to adapt and develop specific policies for each educational centre.

<https://ceice.gva.es/es/web/inclusioeducativa/protocol>

Students are taught about the issues surrounding the exchange of nudity and semi-nudity as part of our talk program. The teaching covers the following in relation to the exchange of nudity and semi-nudity:

- What is it?
- How you're most likely to be found
- The consequences of requesting, forwarding, or providing such images, including when they are or are not abusive and when they may be considered online sexual harassment.
- Questions of legality.
- The risk of damage to people's feelings and reputations.

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The reception of these images.

This policy on the exchange of nudity and semi-nudity is also shared with students so that they are aware of the processes that the school will follow in the event of an incident.

## 7.8 Reporting systems for our students

Where there is a safety concern, we will take into account the child's wishes and opinions when determining what measures to take and what services to provide.

We recognize the importance of ensuring that students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Implement systems for students to report abuse with confidence.
- Ensure that our declaration systems are properly encouraged and are easily understandable and accessible to students.
- Make it clear to students that their concerns will be treated seriously and that they can safely express their views and give feedback.

[Insert details here about:

- Your reporting systems for students, for example, what they look like in terms of who they should report their concerns to.
- How to make students aware of reporting systems and processes, for example, through discussion in their relationship/sex education curriculum
- How students will feel confident in raising any concerns, e.g., assurances provided after disclosures]

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## DESI

### 7.9 Student Statement System

The declaration system will be accessible, confidential and flexible to adapt to the needs and comfort levels of each student. Below are some of the possible methods to adopt:

- Designated points of contact:

Assign trusted staff as specific points of contact (e.g., tutors, teachers, counsellor, etc.) who are knowledgeable about receiving and handling concerns in a professional and sensitive manner. These adults will be clearly identified and available to students.

- Anonymous suggestion boxes and reports:

Install drop boxes in discreet locations within the school where students can leave their concerns anonymously. These mailboxes must be checked regularly by the DSL.

- Helplines and digital platforms:

Create a helpline or use online platforms where students can submit concerns anonymously or confidentially, using their own device or a school device if they do not wish to do so in person.

- School Report Form:

Create a simple and accessible report form, with language understandable to students, available in common areas (e.g., study room, library, etc.) and in both physical and digital formats.

- Private consultation hours:

Establish consultation hours when students can speak to the DSL privately without having to ask permission publicly, to facilitate access to the declaration system without exposure.

## **2. Raising student awareness of reporting processes**

For the declaration system to be effective, students must be fully informed about how and when to use it. Some awareness strategies may include:

- Talks and Workshops:  
Organize workshops at the beginning of each school year for students to learn about DSL, understand their rights and the reporting process, and learn how they can communicate their concerns.

- Visual and digital materials:

Post posters and signage in the school, in visible places, that clearly and concisely explain the steps to make a statement. In addition, provide digital guides to students.

- Reporting simulations:

Conduct what-if simulations in which students practice how they might make a statement if they were concerned, so that they become familiar with the process and understand the role of DSL.

## **3. Guarantees for students after making a declaration**

It is essential to provide confidence-building assurances in students so that they feel safe in reporting their concerns. These warranties include:

- Confidentiality and protection against retaliation:

Assure students that their identity and details of their statement will be handled with the utmost confidentiality and that information will only be shared with those persons who are necessary to resolve the issue. They must be assured that they will be protected against any retaliation or unfavorable treatment arising from their statement.

- Active listening and regular follow-up:

Inform the student of the steps that will be taken after their statement and keep them informed of progress and any decisions made in relation to their concern. Regular follow-up should also be scheduled to ensure the student feels supported and safe.

- Emotional and psychological support:

Give them as much support as possible if they need emotional help if the deposition process or related circumstances cause them anxiety, fear, or discomfort.

- Commitment to a safe environment:

Assure the student that the school is committed to maintaining a safe environment and that specific measures will be taken to prevent the recurrence of reported situations. This includes implementing additional oversight measures, if necessary, and reviewing school policies.

- Revision and restatement options:

Inform the student that if they feel that they have not been taken seriously or that their situation has not been resolved, they can approach the DSL or the school management again.

## 8. Online security and use of mobile technology

We recognize the importance of protecting minors from potentially harmful and inappropriate online material, and we understand that technology is an important component in many safety and wellbeing issues.

To address this, our school aims to:

- Have robust processes (**including filtering and monitoring systems**) in place to ensure the online safety of students, staff, volunteers, and board members.
- Protect and educate the entire school community in the safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Establish clear guidelines for mobile phone use for the entire school community.
- Establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

### The Four Key Risk Categories

Our approach to online security is based on addressing the following risk categories:

- **Content:** Being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalization, and extremism.
- **Contact:** Being subjected to harmful online interactions with other users, such as peer tension, commercial advertising, and adults posing as minors or young adults with the intent to groom or exploit them for sexual, criminal, financial, or other purposes.
- **Conduct:** individual online behavior that increases or causes harm, such as making, sending, and receiving explicit images (e.g., sharing nudity and semi-nudity and/or pornography in a consensual and non-consensual manner), sharing other explicit images, and online harassment;
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams

**To meet our objectives and address the above risks, we will:**

- Educate students about online safety as part of our curriculum. For example:
  - The safe use of social networks, the Internet and technology
  - Keeping personal information private
  - How to recognize unacceptable behavior online
  - How to report any incidents of cyberbullying, ensuring students are encouraged to do so, even when they are witnesses rather than victims.
- Train staff, as part of their induction, on safe internet use and online protection issues, including cyberbullying, and expectations, roles, and responsibilities around filtering and monitoring. All staff members will receive refresher training as needed and at least once per academic year.

- Raise awareness among parents/guardians about online safety through our website, communications sent directly to them and during parent meetings/information sessions. We'll also share clear procedures with them so they know how to raise their concerns about online security
- Ensure that staff are aware of any restrictions placed on them regarding the use of their mobile phone and cameras, for example, that:
  - Staff may bring their personal phones to the school for their own use, but will limit their use in its entirety when students are present.
  - Staff will not take pictures or recordings of students with their personal phones or cameras.
- Inform all students, parents/guardians, staff and volunteers that they are expected to sign an agreement on acceptable use of the internet in the school, the use of the school's ICT systems and the use of its mobile and smart technology.
- Explain the penalties we will use if a student violates our policies on acceptable use of the internet and mobile phones.
- Ensure that all staff, students, and parents/guardians are aware that staff have the power to search student phones, as set out in the [DfE guidance on search, detection, and confiscation](#)
- Put in place robust filtering and tracking systems to limit children's exposure to the 4 key risk categories (described above) of the school's computer systems.
- Conduct an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular updates on the safety and security of minors, including online safety, to all staff, at least once a year, in order to continue to provide them with the relevant skills and knowledge for effective safety.
- Annually review the child safety and protection policy, including online safety, and ensure that procedures and implementation are regularly updated and reviewed.

This section summarizes our approach to online safety and mobile phone use. For full details of our school's policies in these areas, please see our online safety policy and mobile phone policies which can be found on our [website](#).

Comentado [KD6]: @Alicia Perello

## 9. Inform parents or guardians

Where appropriate, we will discuss any concerns about a minor with their parents or guardians. Normally, the DSL will do this in the event of suspicion or exposure.

Other staff will only talk to parents or guardians about such concerns after consulting with the DSL.

If we believe that notifying the parent or guardian would increase the risk to the child, we will consult with the local authority's social services team before doing so.

In the case of allegations of abuse made against other minors, we will normally notify the parents or guardians of all minors involved. We will think carefully about what

information we provide about the other child involved and when. We will work with police and/or local social services authorities to ensure that our approach to information sharing is consistent.

The DSL, together with the relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or guardians and the victim, to discuss what is being put in place to protect them and understand their willingness in terms of what support they may need and how the report will progress.
- Meet with the parents or guardians of the alleged aggressor to talk about support for them and what is being implemented that may affect them, for example, taking them out of classes with the victim, and the reasons behind any decision.

## **10. Students with special educational needs, disabilities, or health problems**

We recognize that students with SEN or certain health conditions may face additional safety challenges and are three times more likely to experience abuse than their peers. There may be additional barriers to recognizing abuse and neglect in this group, including:

- Assumptions that indicators of potential abuse, such as behavior, mood, and injury, relate to the child's condition without further examination.
- Students are more prone to peer group isolation or bullying (including bias-based bullying) than other students.
- The possibility that students with SEN, disabilities, or certain health conditions are disproportionately affected by behaviors such as bullying, without showing any outward signs.
- Communication barriers and difficulties in managing or reporting on these challenges.

Any abuse involving students with SEN will require close liaison with the DSL (or substitute) and the SEN coordinator.

## **11. Students with a social worker**

Students may need a social worker due to protection or welfare needs. We recognize that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as potentially create barriers to attendance, learning, behavior, and mental health.

The DSL and all staff members will work with and support social workers to help protect vulnerable children.

When we know that a student has a social worker, the DSL will always consider this fact to ensure that any decision is made in the best interest of the student's safety, well-being, and educational outcomes. For example, it will inform decisions about:

- Respond to unauthorised absences or lack of education when there are known safety risks.
- The provision of emotional and/or academic support.

## 12. Minors in care and previously in care

We will ensure that staff have the skills, knowledge, and understanding to keep children in care and children who have already been in care safe. In particular, we will ensure that:

- Appropriate staff have relevant information on the legal status of foster children, contact arrangements with biological parents or parents with parental responsibility, and care arrangements.
- The DSL has details of the social workers.

Guardians shall be informed and shall inform social workers, if any, as well as DSL so that it may take the lead in promoting the educational attainment of minors cared for and previously cared for.

As part of their role, they will:

- Work closely with the DSL to ensure that any safety concerns regarding foster and formerly warded minors are responded to quickly and effectively.

## 13. Complaints and concerns about school safety policies

### 13.1 Complaints against staff

Complaints against staff that are likely to require a child protective investigation will be dealt with in accordance with our procedures for dealing with allegations of abuse made against staff (see guidance – Part Four: Safety Concerns or Allegations About Staff, Including Substitute Teachers, Volunteers, and Contractors).

### 13.2 Whistleblowing

Concerns regarding how the school protects students, including poor or unsafe practices, or potential failures, should be raised in our Whistleblowing Policy.

Alternatively, explain here your procedures for raising concerns about the school's safety practice. You should keep the following in mind:

- What areas of malpractice or irregularities are covered by the procedures?
- The options available for reporting a concern, including who to approach within the school and externally.
- How the school will respond to such concerns

- What protection is available to staff reporting another staff member?

**DESI**

### 1. Areas of malpractice or irregularities covered by the procedures

The safety practices that must be followed at Magno cover several critical areas to ensure a safe environment for students. Irregularities that should be reported include:

- Violation of Safeguarding Policies: any failure to comply with established child safety and protection protocols.
- Misconduct or inappropriate behavior with students: any act that compromises the physical or emotional well-being of students, including disrespectful treatment, verbal or physical violence, and risky situations.
- Lack of adequate supervision: situations in which students are left without proper supervision or in dangerous environments.
- Abuse of power or position of trust: any abuse of authority, favoritism or manipulative behaviors that put students in a situation of vulnerability.
- Non-compliance with Legal Standards and Regulations: any non-compliance with national or local regulations on child protection.
- Deficiencies in safety facilities or resources: lack of maintenance of equipment, unsafe areas or inadequate emergency resources.

### 2. Options Available for Reporting a Concern

To ensure that all concerns are heard and treated seriously, Magno will offer several options for employees, students, and parents to report any concerns:

- Designated Safeguarding Lead (DSL):

The first contact person for any concerns about security practices is the DSL. The DSL is responsible for receiving, evaluating, and acting on any complaints or concerns.

- Principals and School Administration:

If staff or students prefer not to use DSL, they can contact the school administration or the school principal, who have a duty to report it immediately to DSL.

- Trusted Staff Member:

If a staff member feels more confident with another colleague, they can approach that person, who should help communicate the concern to the DSL.

- Anonymous channels:

Comentado [KD7]: @Rosa Tortosa

Comentado [KD8R7]: @DESI BERNABEU SERRANO

Anonymous reporting boxes or lines for those who prefer not to identify themselves.

- External Reports:

If the concern is not addressed within the institution, staff can turn to local child protection organizations, such as the department of social services, or the education inspectorate to report the situation.

### **3. Magno's response to concerns**

A structured and transparent approach will be taken to investigate and respond to any complaints or concerns about safety practices:

- Confirmation of receipt:

Upon receipt of the report, the DSL or school administration must confirm receipt of the report to the complainant and ensure confidentiality.

- Initial risk assessment:

The DSL will assess the urgency and immediate risk of the complaint. In high-risk cases, immediate action will be taken to ensure the safety of affected students.

- Internal research:

The school will conduct a thorough and fair investigation, interviewing all parties involved in an impartial manner. This investigation will be documented and monitored to ensure transparency.

- Corrective actions:

If malpractice is confirmed, the school will take appropriate disciplinary or corrective action, such as sanctions for the staff involved, implementation of additional training, or modifications to safety procedures.

- Inform those involved:

The college will inform all parties involved (including the complainant, provided that it is safe and appropriate) about the results of the investigation and the measures taken.

- Monitoring and follow-up:

The school administration will monitor the changes implemented and regularly review procedures to prevent future irregularities.

### **4. Protection for staff reporting another staff member**

It is critical that staff members who report wrongdoing have specific protections in place to prevent retaliation and foster an environment of transparency:

- Confidentiality and anonymity:

Complaints will be treated with the highest possible level of confidentiality. If desired, whistleblowers may opt for anonymity to the extent permitted by law.

- Non-retaliation policy:

The college will adopt a strict non-retaliation policy to protect whistleblowers from any negative action or discrimination by other staff members.

- Legal advice and emotional support:

The college will offer access to legal advice should the complainant require it, as well as emotional and psychological support, including the possibility of speaking to counsellors or workplace welfare services.

- Post-complaint retaliation review:

After a complaint, the school will monitor the complainant's employment status to identify any potential retaliation and take immediate action if signs of discrimination or intimidation are detected.

## 14. File Management

We will maintain the archive in accordance with our file management program.

All security concerns, discussions, decisions taken and the reasons for those decisions must be recorded in writing. If you have any doubts about whether to register something, discuss it with the DSL.

Records will include:

A clear and comprehensive summary of the concern

Details of how the concern was followed up and resolved.

A note of the measures taken, the decisions taken and the results.

Concerns and referrals will be kept in a separate child safety file for each.

All non-confidential records will be easily accessible and available. Confidential information and records will be kept securely and only available to those who have the right or professional need to see them.

Safety records relating to individual minors will be kept for a reasonable period of time after they have left school.

If a child for whom the school has, or has had, safety concerns moves to another school, the DSL, after consultation with the principal and RHoS, will ensure that his or her child protection file is submitted as soon as possible, securely and separately from the student's primary record.

To allow the new school to have support when the child arrives, this must be within:

5 days for a transfer during the course, or within

The first 5 days of the start of a new quarter

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak with the receiving school's DSL and provide information so that they have time to make the necessary preparations to ensure the child's safety.

The records are electronic and are stored on the centre's digital platform

This information will be kept for two academic years, after the student has left the school or throughout the student's academic life, if they remain at the school.

Records of potential child abuse cases will be hosted in Sharepoint, established by the center.

## 15. Training

### 15.1 All Staff

All staff members will receive training on child safety and protection during recruitment, including whistleblowing procedures and online safety, to ensure they understand the school's safety systems and responsibilities, and can identify signs of potential abuse or neglect.

This training will be updated regularly and:

- It will be integrated, aligned and considered as part of the school-wide safety approach and wider staff training and curriculum planning.
- Online security will be included, including understanding staff expectations, roles, and responsibilities around filtering and monitoring.
- Consider the Teacher Standards to support the expectation that all teachers:
  - They manage behavior effectively to ensure a good and safe environment.
  - They have a clear understanding of the needs of all students.

Staff will also receive regular updates on the safety and security of the minor, including online safety, as needed, but at least once a year (e.g., through emails, e-newsletters, and staff meetings).

Contractors will also receive safety training.

Volunteers will receive appropriate training, if applicable.

### 15.2 DSL

The DSL shall provide training in child protection and safety at least every two years.

In addition, you will update your knowledge and skills at regular intervals and at least once a year (e.g., through e-newsletters, meeting with other DSLs, or taking the time to read and digest security developments).

### **15.3 Members of the Management Team**

All Board members receive training on child safety and security (including online safety) during recruitment, which is regularly updated. This is to make sure that:

- Have the knowledge and information necessary to perform their duties and understand their responsibilities, such as providing strategic challenges.
- You can be confident that the security policies and procedures are effective and support the school to provide a robust school-wide approach to protection.

Since the RHoS/CEO may be required to act as a "case manager" in the event that an allegation of abuse is made against the Director, they are trained in the handling of complaints for this purpose.

### **15.4 Recruitment: Interview panels**

At least one person (*ideally all staff involved in conducting interviews and human resources staff*) who conducts any interview for any position at the college will have received more confident recruiting training. This will cover, at a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safety procedures.

### **15.5 Staff who have contact with students and families.**

All staff who have contact with children and families will have supervision that will provide support, education and training, promote the interests of children and allow confidential discussions on sensitive topics.

## **16. Follow-up arrangements**

This policy will be reviewed **annually** by the Director and RHoS. In each review, it will be approved by the School Council in full.

## **17. Links to Other Policies**

This policy is linked to the following policies and procedures:

- Behaviour
- Complaints
- Well-being and safety
- Attendance
- Online Security
- Mobile Phone Use
- Equality
- First aid

- Curriculum

These appendices are based on the Department of Education's statutory guidance, **Keeping Children Safe in Education**.

#### **Appendix 1: Types of Abuse**

**Abuse**, including neglect, and protection issues are rarely standalone events that can be covered by a definition or label. In most cases, several problems overlap.

**Physical abuse** can involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or causing physical harm to a child. Physical harm can also be caused when a parent or caregiver manufactures the symptoms of, or deliberately induces, the disease in a child.

**Emotional abuse** is persistent emotional abuse of a child that causes serious and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of child abuse, although it can occur alone.

Emotional abuse can involve:

- To convey to a child that he or she is worthless or unloved, inadequate, or valued only to the extent that he or she meets the needs of another person.
- Not giving the child a chance to express their opinions, deliberately silencing them, or "mocking" what they say or how they communicate.
- Inappropriate expectations for age or development that are placed on children. These can include interactions that are beyond a child's developmental capacity, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction.
- Seeing or hearing abuse from another person
- Severe bullying (including cyberbullying), which causes children to frequently feel scared or in danger, or exploitation or corruption of children.

**Sexual abuse** involves forcing or seducing a child or young person to engage in sexual activity, which does not necessarily involve a high level of violence, whether or not the child is aware of what is happening. Activities may consist of:

- Physical contact, including penetrative assault (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing.
- Non-contact activities, such as engaging children in observing or producing sexual images, observing sexual activity, encouraging children to behave in sexually inappropriate ways, or preparing a child in preparation for abuse (including through the Internet).

Sexual abuse is not perpetrated solely by adult men. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent inability to meet a child's basic physical and/or psychological needs, likely resulting in a serious deterioration of the child's health or development. Neglect can occur during pregnancy as a result of substance abuse by the mother.

Once a child is born, neglect can mean that a parent or caregiver cannot:

- Providing adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment.

It can also include neglect or failure to respond to a child's basic emotional needs.