MAGNO International School, Alicante
an Orbital Education School

Child Protection and Safeguarding Policy

Approved by:	Rosa María Tortosa
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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Principal	Rosa María Tortosa	
Designated Safeguarding Lead (DSL)	Desideria Bernabeu	
Deputy DSL	--	
Regional Head of Schools (RHoS)	Emma Newman	
Chief Executive Officer (CEO)	David Pottinger	

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), and the Governance Guide https://www.gov.uk/guidance/governance-in-maintained-schools. In addition, the following Acts and guidance are considered:

- **The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)**
- **The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our board members and Principal should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it is proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they are being disproportionately subjected to sexual violence or harassment.**
- **The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.**

At all times it will adhere to national and regional requirements/ regulations:

- **Organic Law 8/2021, of June 4, on Comprehensive Protection for Children and Adolescents against Violence:** This national law, implemented at the regional level, aims to ensure the fundamental rights of children and adolescents to physical, psychological, and moral integrity against any form of violence. It establishes comprehensive protection measures, including awareness, prevention, early detection, protection, and harm repair.

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

- **Organic Law 1/1996, of January 15, on the Legal Protection of Minors:** Amended by Organic Laws 8/2015 and 26/2015. This law establishes a state-level legal framework for

the protection of minors, recognizing them as rights holders with a progressive ability to exercise these rights.

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

- **Organic Law 3/2020 (LOMLOE)** of 29 December, amending Organic Law 2/2006, of 3 May, on Education:
  The law promotes an inclusive, competency-based curriculum focused on diversity, equity, and sustainability.

  https://www.boe.es/boe/dias/2020/12/30/pdfs/BOE-A-2020-17264.pdf

- **Organic Law 5/2000**, of 12 January, regulating the criminal responsibility of minors.

  It applies to individuals aged 14 to 18 who commit criminal offenses. The law emphasizes rehabilitation over punishment, offering tailored sanctions such as community service or supervised freedom. It includes a specialized judicial process and multidisciplinary teams to ensure minors' rights and personal development

  https://www.boe.es/buscar/pdf/2000/BOE-A-2000-641-consolidado.pdf

With regard to regional legislation, **t**he Valencian Community also has its own legislation regarding the protection of minors, tailored to the specifics of the region. This regulation focuses on promoting the rights of children and adolescents and implementing specific protective measures in educational settings. For example:

- **Law 26/2018, of December 21, 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

- **DECREE 195/2022, of November 11 by the Consell, on equality and coexistence in the Valencian educational system**, regulates equality and coexistence in educational institutions, promoting a safe and respectful environment for all students:

  https://dogv.gva.es/datos/2022/11/16/pdf/2022_10681.pdf

- **DECREE 60/2021, of 14 May, by the Consell,** on the regulation and coordination of the bodies of the Administration of the Regional Government of Valencia for child and adolescent participation, and for the protection of children and adolescents.

  https://dogv.gva.es/es/eli/es-vc/d/2021/05/14/60

- **DECREE 27/2023, of 10 March, of the Regional Government,** regulating the types and operation of social service centres, services and programmes, and their organisation within

the functional, territorial and jurisdictional structure of the Valencian Public Social Services System.

https://dogv.gva.es/datos/consolidacion/2023/2023_2822_20250601_es.pdf

- Additionally, the **protocol for action in cases of school absenteeism, established by the Resolution of September 29, 2021.** This protocol guides publicly funded schools in handling 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

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

  All early education providers also add:

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child 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 the serious impairment of the child's health or development.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that

way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are at risk due to either their own or a family member's mental health needs.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and board members in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for 'model society and global citizenship'. **The aim, therefore, is to prevent different forms of discrimination, such as racial discrimination, gender discrimination, discrimination based on sexual orientation, gender identity, disability or functional diversity, religious beliefs, socioeconomic status, origin or nationality, or linguistic**

discrimination. The goal is to foster a culture of zero tolerance for racism, sexism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence/harassment, etc. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE) https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education, which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FMG and how to access support.
    - 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):

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

All other staff are expected to read annex A of KCSIE.

Staff who work directly with children are also expected to read Annex B of KCSIE (about specific safeguarding issues).

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (2025) and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g., sites they need to visit or who they will be interacting with online).

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputies, the behaviour policy and the online safety policy.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local children's social care/ external authorities and for assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, 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 children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.
- What to look for to identify children who need help or protection

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

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Desi Bernabeu. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

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

Insert details of how your DSL can also be contacted out of school hours, if necessary, e.g. email desi.bernabeu@magnoschool.es

When the DSL is absent, Rosa Tortosa (the Principal), along with Francisco Álvarez, Aarón Erades and Trini Aniorte (the stage coordinators), will act as cover.

If the DSL and deputies are not available, Noelia Aulló (Admin Manager – HR) will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the Regional Head of Schools (RHoS)/ CEO and if necessary to the relevant body (local authority children's social care, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.

The DSL will also:

- Keep the Principal informed of any issues.
- Liaise with the RHoS, local authority case managers and designated officers for child protection concerns as appropriate.
- Be confident 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 as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and deputies are set out in their job description.

5.3 The School Board

The School Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a senior board level (or equivalent) lead or the RHoS to monitor the effectiveness of this policy in conjunction with the full School Board. This is always a different person from the DSL.

The Regional Head of Schools will:

- On behalf of the School Board, ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
    - Making sure 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.
    - Reviewing the DfE's filtering and monitoring standards, and discussing 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 their job, including additional time, funding, training, resources and support.
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
    - The school has procedures to manage any safeguarding 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 guidance KCSIE Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors.
    - That this policy reflects that child with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
    - Make sure there are arrangements for the body to consult with the school about safeguarding arrangements, where appropriate.
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The RHoS/ CEO will function as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate.

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

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

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

5.4 The Principal

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

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of school systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL and RHoS on this.
- Ensuring the relevant staffing ratios are met, where applicable

Early years providers add:

- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

6. Confidentiality

The school's approach to confidentiality and data protection will be as follows:

1. Applicable Regulatory Framework

The school will be governed by the following legal framework:

- **General Data Protection Regulation (GDPR)**: Regulation (EU) 2016/679
- **Organic Law 3/2018**, on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD)
  Full text in BOE

- **Regional Resolution of the Generalitat Valenciana (2018)** on data protection in educational centers
  Regional regulation

2. Role of the DSL and Key Principles

The DSL will ensure that the processing of personal data related to safeguarding is carried out in accordance with the following principles:

- **Lawfulness, fairness, and transparency**: Clearly inform families and students about the use of their data.
- **Purpose limitation**: Data must be used only for purposes related to the protection and well-being of the minor.
- **Data minimization**: Collect only the data strictly necessary.
- **Accuracy**: Keep data up to date.
- **Storage limitation**: Do not retain data longer than necessary.
- **Integrity and confidentiality**: Protect data against unauthorized access or improper disclosure.

3. Data Protection Officer (DPO)

The school has appointed Noelia Aulló as DPO, who will be the point of contact for any issues related to data protection.

4. Internal Information Sharing Process

Information sharing within the school will follow these steps:

- **Identifying the need**: Determine whether sharing information is essential to protect the minor.
- **Assessing legitimacy**: Verify whether the processing is covered by the educational function or requires consent.
- **Informed consent**: If not covered by the educational function, obtain explicit written consent.
- **Recording the processing**: Document the activity in the school's data processing register.
- **Secure communication**: Use protected channels (encrypted email, secure platforms) to share information.
- **Restricted access**: Only authorized personnel should access sensitive information.

You should note that:

- Timely information sharing is essential to effective safeguarding.

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis in the country.
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the relevant authority.
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and see guidance KCSIE Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors.

7. Recognising abuse and taking action

Staff, volunteers and board members must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)."

7.1 If a child is suffering or likely to suffer harm, or in immediate danger.

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

7.2 If a child makes a disclosure to you.

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

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

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

7.3 If you discover that FGM has taken place or a student is at risk of FGM.

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs."

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting,' 'circumcision' or 'initiation.'

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been conducted on her; or
- Observes physical signs which appear to show that an act of FGM has been conducted on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow the local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

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

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team or the RHoS.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

The DSL will keep the case under constant review and the school will consider a referral to local children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

- **Identification of Danger:** If a situation of serious risk or danger to a child's development is detected, immediate action is essential. This can be identified by healthcare, education, social services professionals, or even the family.
- **Immediate Contact with Emergency Services:** In cases of imminent danger, emergency services (112) must be contacted to ensure the child's immediate protection.
- **Urgent Pediatric Report:** Visit the nearest health center so that the pediatrician can conduct an urgent assessment and issue a health report for early intervention. This report should emphasize the urgency of the situation.

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

- **Submission of the Application:** With the urgent report, parents or legal representatives must prioritize submitting the early intervention application. This application can be submitted at town hall registries, PROP offices, or directly at the Territorial Directorate of the Department of Equality and Inclusive Policies in Alicante. It can also be submitted online through the Generalitat Valenciana portal.

https://www.gva.es/es/inicio/procedimientos?id_proc=G23126

- **Evaluation by UVSAT:** The Early Intervention Evaluation and Monitoring Units (UVSAT) will prioritize the evaluation of urgent cases. These units manage access to early intervention services and schedule the necessary intervention.

https://www.gva.es/es/inicio/procedimientos?id_proc=G23126

- **Immediate Intervention:** If it is determined that the child requires urgent early intervention, the intervention will begin immediately, coordinated by the health, social services, and education systems.

https://www.gva.es/es/inicio/procedimientos?id_proc=G23126

Referral

If it is appropriate to refer the case to local children's social care or the police, the Principal/ DSL will make the referral after consultation with the Principal and RHoS.

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

If, after referring a child's case to social services due to a dangerous situation, there is no improvement, it is crucial to follow a rigorous procedure to ensure the child's protection. Steps to follow:

1. **Case Reevaluation:** Social services should conduct a thorough reevaluation of the case to understand 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 medical personnel if necessary. This team will review the intervention plan and propose adjustments or new strategies.
3. **Additional Protective Measures:** If the child is still considered at risk, additional protective measures can be taken, such as:
    a. **Intensive Supervision:** Increase the frequency of reviews, visits, and monitoring by social services.
    b. **Judicial Intervention:** Request a judge's intervention to take legal measures ensuring the child's protection, such as the temporary removal of custody from the parents or guardians (if applicable).
4. **Collaboration with Other Entities:** Social services may 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 a continuous follow-up plan to monitor the child's situation and ensure the new measures are achieving the desired effect. This plan should include regular reviews and adjustments as necessary.
6. **Constant Communication:** Maintain ongoing communication with the family and child, ensuring they understand the measures being taken and the reasons behind them. Providing emotional and psychological support during this process is also essential.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team.

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

7.6 If you have a concern about mental health

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. Add more details as needed about your procedures for identifying potential mental health issues, including escalation routes and referral and reporting systems. For more information, refer to the Department of Education's guide on mental health and behaviour in schools

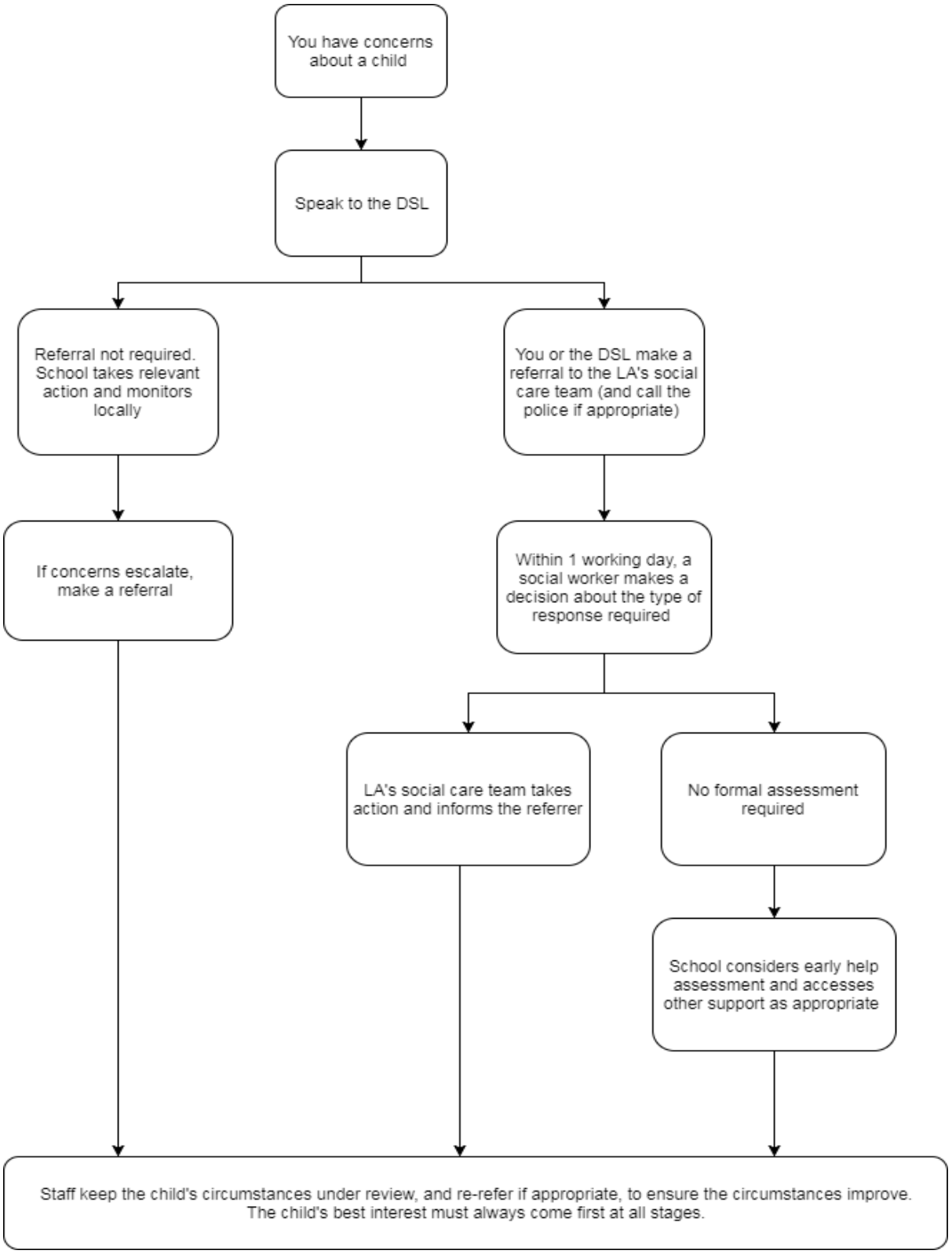
The steps to follow would be:

1. **Detection and Identification:**
    a. Observe and document any behavior or signs that might indicate a mental health issue.
    b. Inform the school's administrative team and the school counselor.
2. **Consultation and Coordination:**
    a. The school counselor will assess the situation and, if necessary, contact child and adolescent mental health services (USMIA).
    b. A meeting with the student's parents or guardians will be arranged to inform them and obtain consent for any necessary intervention.
3. **Intervention:**
    a. If intervention is confirmed, an action plan will be created in collaboration with mental health professionals.
    b. This plan may include psychological support sessions, adjustments in the educational environment, and continuous monitoring.
4. **Follow-Up and Evaluation:**
    a. Conduct regular follow-ups with the student to assess progress and adjust the action plan as needed.
    b. Maintain open communication with parents and mental health professionals to ensure comprehensive care.
5. **Documentation:**
    a. Record all actions and communications related to the case to ensure proper follow-up and compliance with data protection regulations.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

MAGNO International School, Alicante
an Orbital Education School



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the RHoS, Emma Newman.

The Principal/RHoS will then follow the procedures set out in appendix 3, if appropriate.

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the Principal, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other students.

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter," "just having a laugh" or "part of growing up," as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put students in the school at risk.
- Is violent.
- 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 pictures or videos (including the sharing of nudes and semi-nudes)

See guidance KCSIE Part five: Child-on-child sexual violence and sexual harassment for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse.

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the RHoS and if necessary, the local social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include

considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).

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

1. Record of Abuse Allegations among minors

Receiving information:

- Any allegation or suspicion of abuse must be immediately recorded by Magno staff.
- If a student directly reports abuse, the staff member must listen without asking leading questions that could influence the account.

Initial documentation:

- -Record the allegation in a safeguarding incident report.
- -Note the date, time, and location of the alleged incident, the names of all involved parties, and any relevant details provided without personal interpretation.
- -Notification to the Designated Safeguarding Lead (DSL)
- -Immediately after recording the allegation, the staff member must notify the DSL, who is responsible for safeguarding.
- The DSL must review the report and assess the initial risk level.

2. Investigation of the Allegation

Immediate Risk Assessment

- Assess whether the victim or any other child is at immediate risk of harm.
- In cases of immediate risk, take urgent action to protect the affected minor, including possible temporary separation of the involved children.

Gathering Additional Information

- The DSL or another trained staff member must discreetly interview the alleged victim, the alleged perpetrator, and any witnesses.
- All interviews must 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 local authorities or the relevant social services.
- Follow the instructions of the authorities to avoid interfering with a possible external investigation.

3. Addressing the Allegation

Disciplinary Actions and Preventive Measures

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

Informing Parents or Guardians

- Notify the parents or guardians of both the victim and the alleged perpetrator about the allegation and the steps Magno is taking, maintaining confidentiality as much as possible.

4. Support for Involved Students

Support for the Victim

- Provide immediate access to an external professional specializing in support for abuse victims.
- Maintain continuous communication with the victim and their parents to monitor their emotional well-being.
- Develop a personalized protection plan to ensure the victim feels safe in the school environment.

Support for the Alleged Perpetrator

- Offer psychological support and counseling, as the minor may also be experiencing underlying issues or an inadequate environment.
- Ensure the alleged perpetrator receives fair and age-appropriate treatment and help develop empathy and conflict resolution skills.

Support for Other Affected Students

- Discreetly inform any other student who witnessed or was affected by the incident about the availability of psychological support.
- Maintain open communication to address any fears or anxieties among other students and implement awareness workshops on respect and coexistence.

5. Case Follow-Up and Review

Ongoing Monitoring

- Schedule periodic meetings with the students and families involved to ensure that support and protection plans are effective.

Review of Protocol

- Conduct an internal review of the procedures followed in the case, document any areas for improvement, and train staff as needed 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.
- Provide continuous training for staff to identify signs of abuse and handle sensitive situations with professionalism and care.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate students about appropriate behaviour and consent.
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure 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 problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here."
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report.
        - A member of staff may overhear a conversation.
        - A child's behaviour might indicate that something is wrong.
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
    - That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
    - That they should speak to the DSL if they have any concerns.
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The Principal/ DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the RHoS and police and/or local authority children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.9 Sharing of nudes and semi-nudes ('sexting')

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders. Amend or add to this as applicable to reflect your own approach.

The specific protocol to follow in educational centers in the Valencian Community that detect cases of sexting includes the following steps:

1. **Detection and Notification:**
    a. **Case Identification:** Any staff member or member of the educational community who detects or becomes aware of a sexting case must immediately inform the school's administration.
    b. **Notification to Authorities:** The administration should notify the Educational Inspection and, if necessary, law enforcement (National Police or Civil Guard) and emergency services (112).
    Protocol reference

2. **Student Protection:**
    a. **Protective Measures:** Immediate steps should be taken to protect the victim, including notifying the parents or legal guardians of those involved.
    b. **Psychological Support:** Provide psychological support to both the victim and, if necessary, the perpetrator through the school's counseling department.
    Protocol reference

3. **Investigation and Documentation:**
    a. **Evidence Collection:** Document all details of the incident, including testimonies and any available digital evidence.
    b. **Report to Educational Inspection:** Prepare a detailed report and submit it to the Educational Inspection for follow-up.
    Reporting guide

4. **Disciplinary and Educational Measures:**
    a. **Sanctions:** Apply appropriate sanctions according to the school's internal regulations and current legislation.
    b. **Educational Programs:** Implement awareness and prevention programs about safe technology use and the risks of sexting.
    Protocol reference

5. **Follow-Up:**
    a. **Ongoing Monitoring:** Continuously monitor the case to ensure all necessary measures have been taken and to prevent similar situations from recurring.
    Protocol reference

Your responsibilities when responding to an incident.

If you are made 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 must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the student to delete it.
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s).
- Whether to refer to the RHoS.
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the students involved which would influence risk assessment.
- If there is a need to contact another school, setting or individual.
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts and any student in the images or videos is under 13.
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal, RHoS and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing Parents/Carers

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

Referring to the Police

If it is necessary to refer an incident to the police, this will be done by the Principal in consultation with the RHoS.

Recording incidents

All incidents involving the sharing of nude or semi-nude images, along with the decisions made in response, will be recorded. The file management provisions set out in Section 14 of this policy will also apply to the recording of these incidents.

Curriculum Coverage

The following is an example of how the curriculum might address the sharing of nude and semi-nude images.

Magno International School's Approach

Magno International School's approach would not only address the issue from a regulatory perspective but would also promote a culture of respect and responsibility among students. The focus areas include:

1. **Education and Awareness:**
    a. **Educational Programs:** Implement educational programs that inform students about the risks, and legal and emotional consequences of sexting.
    b. **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:**
    a. **School Regulations:** Include a specific section in the school regulations on appropriate technology use and the consequences of sexting.
    b. **Action Protocols:** Have a clear protocol for addressing sexting cases, including protecting the privacy of those involved and collaborating with authorities if necessary.
3. **Psychological Support:**
    a. **Counseling Services:** Provide access to counseling and psychological support services for students who may be involved in sexting cases.
    b. **Helplines:** Share information about helplines and external resources where students can seek confidential support.
4. **Involvement of the Educational Community:**
    a. **Parental Collaboration:** Encourage collaboration with parents through informational meetings and provide them with educational resources to address the topic at home.
    b. **Awareness Campaigns:** Conduct awareness campaigns both within and outside the school to foster a culture of digital respect and responsibility.
5. **Responsible Use of Technology:**
    a. **Digital Education:** Include responsible technology and social media use in the school curriculum.
    b. **Control Tools:** Implement control and monitoring tools for electronic devices used within the school.

Additional Resources

- **Guides and Protocols:** Utilize existing guides and protocols, such as those provided by the Generalitat Valenciana, to tailor and develop specific policies for each educational center.
  Protocol resource

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Students also learn the strategies and skills needed to manage:

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

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

7.10 Reporting systems for our students

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

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

To achieve this, we will:

- Put systems in place for students to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students.
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.

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

- Designated Contact Points:

Assign trusted staff members as specific contact points (e.g., tutors, teachers, counselors, etc.) who are knowledgeable in receiving and handling concerns professionally and sensitively. These adults will be clearly identified and available to students.

- Suggestion Boxes and Anonymous Reports:

Install suggestion boxes in discreet locations within the school where students can leave their concerns anonymously. These boxes should be regularly checked 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 prefer not to do so in person.

- School Reporting Form:

Develop a simple and accessible reporting form, written in clear language for students. This form should be available in common areas (e.g., study hall, library, etc.) in both physical and digital formats.

- Private Consultation Hours:

Set specific consultation hours during which students can speak privately with the DSL without having to publicly request permission. This ensures easy access to the reporting system without exposure.

Student Awareness of Reporting Processes

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

- Workshops and Talks:

Organize workshops at the beginning of each school year to introduce students to the DSL, explain their rights and the reporting process, and teach them how to express their concerns.

- Visual and Digital Materials:

Place posters and signs in visible areas of the school that clearly and concisely explain the steps for making a report. Additionally, provide students with digital guides.

- Reporting Simulations:

Conduct hypothetical case simulations where students practice how they would make a report if they had a concern. This helps familiarize them with the process and understand the role of the DSL.

Guarantees for Students After Making a Report

It is essential to provide assurances that build students' confidence so they feel safe when reporting their concerns. These guarantees include:

- Confidentiality and Protection from Retaliation:

Ensure students that their identity and the details of their report will be handled with the highest possible confidentiality. Information will only be shared with those necessary to resolve the issue. Students must also be assured that they will be protected from any retaliation or unfavorable treatment resulting from their report.

- Active Listening and Regular Follow-Up:

Inform the student about the steps that will be taken after their report and keep them updated on the progress and any decisions made regarding their concern. Regular follow-ups should also be scheduled to ensure the student feels supported and safe.

- Emotional and Psychological Support:

Provide as much support as possible if students experience anxiety, fear, or distress due to the reporting process or related circumstances.

- Commitment to a Safe Environment:

Reassure students 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 may include additional supervision and reviewing school policies if necessary.

- Review and Re-Reporting Options:

Inform students that if they feel their concerns were not taken seriously or properly addressed, they can approach the DSL or school administration again.

8. Online safety and the use of mobile technology

KCSIE outlines that your policies on online safety and the use of mobile and smart technology should be reflected in your child protection and safeguarding policy. Among other things, this should include filtering and monitoring on school devices and the school network.

A note to early years providers: in your child protection and safeguarding policy, you must cover the use of mobile phones and cameras in your setting (as per paragraph 3.4 of the statutory framework for the Early Years Foundation Stage), so add more specific detail on this below.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding 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 whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The four key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults

with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate students about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings/ information sessions. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when students are not present.
    - Staff will not take pictures or recordings of students on their personal phones or cameras.
- Make all students, parents/carers, staff and volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out 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 safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website.

Filtering and monitoring

In line with the guidance, our school will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet our safeguarding needs.

On behalf of the School Board, the RHoS will liaise with the Principal and review the standards and discuss with IT staff and service providers what more needs to be done to the school in meeting this standard.

In addition, the Principal will ensure the school has the appropriate level of security protection procedures in place in order to safeguard our systems, staff and students and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Guidance on e-security is available from the National Education Network https://nen.gov.uk/ Broader guidance on cyber security https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges https://www.ncsc.gov.uk/information/cyber-security-training-schools

Online safety and mobile phone use

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website

https://magnoschool.es

Early years providers – as noted above, you must cover the use of mobile phones and cameras within this policy, rather than/as well as linking out to a separate policy on mobile phone use.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

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

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Students with special educational needs, disabilities or health issues

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students.
- The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

We offer extra pastoral support for these students. This includes:

- Provide a safe space where students feel valued and understood.

- We work closely with speech therapists and families to understand each student's communication profile.
- Use personalized strategies, such as simplified language, repetition, or fragmentation of information.

Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11. Students with a social worker

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

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

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support.

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers.

Tutors will be informed and inform the social worker to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see guidance - Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors).

13.2 Whistleblowing

Concerns regarding the way the school safeguards students – including poor or unsafe practice, or potential failures – should be raised under our Whistleblowing Policy.

1. Areas of Malpractice or Irregularities Covered by 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 protection and safety 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 Proper Supervision: Situations where students are left unsupervised or in dangerous environments.
- Abuse of Power or Position of Trust: Any misuse of authority, favoritism, or manipulative behavior that places students in a vulnerable position.
- Non-Compliance with Legal and Regulatory Standards: Any violation of national or local child protection regulations.
- Deficiencies in Facilities or Safety Resources: Lack of maintenance of equipment, unsafe areas, or inadequate emergency resources.

2. Available Options for Reporting a Concern

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

- Designated Safeguarding Lead (DSL):

The first point of contact for any safety concerns is the DSL. The DSL is responsible for receiving, assessing, and acting on any report or concern.

- School Directors and Administration:

If staff or students prefer not to approach the DSL, they may contact the school administration or the principal, who are required to report the issue to the DSL immediately.

- Trusted Staff Member:

If a staff member feels more comfortable speaking with a colleague, they may approach that person, who will then help communicate the concern to the DSL.

- Anonymous Reporting Channels:

Suggestion boxes or anonymous hotlines for those who prefer not to identify themselves.

- External Reporting:

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

3. Magno's Response to Concerns

A structured and transparent approach will be adopted to investigate and respond to any report or concern regarding safety practices:

- Confirmation of Receipt:

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

- Initial Risk Assessment:

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

- Internal Investigation:

The school will conduct a thorough and fair investigation, interviewing all involved parties impartially. This investigation will be documented and supervised to ensure transparency.

- Corrective Actions:

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

- Informing Involved Parties:

The school will inform all involved parties (including the complainant, whenever safe and appropriate) about the investigation's results and the actions taken.

- Monitoring and Follow-Up:

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

4. Protection for Staff Reporting Another Staff Member

It is essential that staff members who report irregularities are provided with specific protections to prevent retaliation and encourage a culture of transparency:

- Confidentiality and Anonymity:

Reports will be handled with the highest level of confidentiality possible. If desired, complainants may choose to remain anonymous, as long as the law permits.

- Non-Retaliation Policy:

The school will enforce a strict non-retaliation policy to protect complainants from any negative actions or discrimination by other staff members.

- Legal Advice and Emotional Support:

The school will offer access to legal advice if needed, as well as emotional and psychological support, including counseling services or employee well-being programs.

- Post-Report Retaliation Review:

After a report is made, the school will monitor the complainant's work environment to identify any potential retaliation and take immediate action if signs of discrimination or intimidation are detected.

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record 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 any action taken, decisions reached and the outcome.

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

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL after consultation with the Principal and RHoS will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.

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

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

This information will be retained for two academic years after the student has left the school or for the entire duration of the student's academic life if they remain at the school.

Records of potential child abuse cases will be stored in SharePoint, as established by the school.

In Spain, both national and regional regulations (in this case, those of the Valencian Community) establish the obligation to keep certain records related to child protection, but do not always indicate a single, specific timeframe. In any case, even if there is no single deadline set by law, it is considered good legal and educational practice for schools to keep child protection records at least until the child concerned reaches the age of 23, especially if there has been evidence of abuse or risk. This ensures traceability, collaboration with authorities and legal protection of the school.

I attach more detailed information in case you consider it necessary:

- **General regulations on the conservation of documentation (Law 39/2015 on Common Administrative Procedure + LOPDGDD + Civil Code).**

- Administrative documentation (such as protocols, minutes or communications): at least 4 years from the cessation of the activity, according to Law 39/2015.

- Documentation with legal or judicial implications (such as abuse reports or interview records): at least 5 years from the age of majority of the minor involved, based on the statute of limitations for civil and criminal liability (Civil Code and Criminal Code).

- In data protection (LOPDGDD 3/2018), personal data must be kept only as long as necessary, but prolonged custody is allowed when there is a public interest or legal obligation.

- **Practical recommendation (based on good practices and official protocols such as those of the Ministry of Education and Save the Children):**

- General records (activated protocols, communications, meetings): retain for at least 5 years from the closure of the case or the age of majority of the child, whichever is later.

- Reports related to suspected or confirmed maltreatment: retain until the child is at least 23 years old (i.e. 5 years after reaching the age of majority).

- Sensitive documentation (complaints, psychological reports): even longer if there has been judicial intervention.

15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    a. Manage behaviour effectively to ensure a good and safe environment.
    b. Have a clear understanding of the needs of all students.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and [deputy/deputies]

The DSL and will undertake child protection and safeguarding training at least every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

15.3 Board members

All Board members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.

- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

As the RHoS/ CEO, may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

At least one person (*ideally all staff involved in conducting interviews and HR staff*) conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

15.5 Staff who have contact with students and families.

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16. Monitoring arrangements

This policy will be reviewed **annually** by the Principal and RHoS. At every review, it will be approved by the full School Board.

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.