



# **Embassy International School**

## **Safeguarding and Child Protection Policy**

*(Aligned with Keeping Children Safe in Education 2022)*

**2024/25**



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Embassy International School, ul. Edmunda Biernackiego 10, 30-043 Kraków, Poland  
phone: +48 786 947 320, email: [office@embassyschool.pl](mailto:office@embassyschool.pl), [www.embassyschool.pl](http://www.embassyschool.pl)

# Embassy International School



## Safeguarding and Child Protection Policy

Chief Education Officer/Principal:

**Kristian Cejka**

Named personnel with designated responsibility for safeguarding and child protection 2024 - 2025

Designated safeguarding lead (Polish)

**Malgorzata Przybyszewska**

Designated safeguarding lead (International)

**Ewelina Alpin**

Deputy designated safeguarding lead

**André Swart**



## Policy Review

This policy was reviewed and adopted in September 2024

This policy is due for review in September 2025

Signature	Kristian Cejka	Date	4/09/2025
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Chief Education Officer/Principal

Signature	Katarzyna Kotulska	Date	4/09/2025
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Head of School/CEO

This policy is due for review in September 2026

Signature	Date
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Chief Education Officer/Principal

Signature	Date
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Head of School/CEO



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# 1 Policy

## 1.1 Introduction

### 1.1.1 Safeguarding is the whole school's responsibility

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment.
- preventing 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; and
- taking action to enable all children to have the best outcomes.

Embassy International School policy applies to all staff (including those not directly employed by this school), volunteers, and governors in this school. Our policy and procedures also apply to extended school and off-site activities. We believe:

- Our children/young people have the right to be protected from harm, abuse, neglect and exploitation
- Our children/young people have the right to experience their optimum mental and physical health
- Every child has the right to an education and children/young people need to be safe and to feel safe in school
- Children/young people need support that matches their individual needs, including those who may have experienced abuse
- Our children/young people have the right<sup>1</sup> to express their views, feelings and wishes and voice their own values and beliefs
- Our children/young people should be encouraged to respect each other's values and support each other
- Our children/young people have the right to be supported to meet their emotional, social and mental health needs as well as their educational needs. Our school will ensure clear systems and processes are in place to enable identification of these needs. Including consideration of when mental health needs may become a safeguarding need.
- Our school will contribute to the prevention of abuse, risk/involvement in serious violent crime, victimisation, bullying (including homophobic, biphobic, transphobic and cyber bullying), exploitation, extreme behaviours, discriminatory views.

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<sup>1</sup> [https://www.unicef.org.uk/wp-content/uploads/2019/10/UNCRC\\_summary-1\\_1.pdf](https://www.unicef.org.uk/wp-content/uploads/2019/10/UNCRC_summary-1_1.pdf)



### 1.1.2 Rights of the Child

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European

Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. [Under the HRA<sup>2</sup>](#), it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all the rights and freedoms set out in the Act must be protected and applied without discrimination,

and

- Protocol 1, Article 2: protects the right to education

Schools and colleges have obligations under the [Equality Act 2010<sup>3</sup>](#). The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges, advice on this – including on specific duties can be found [here<sup>4</sup>](#).

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<sup>2</sup> <https://www.equalityhumanrights.com/human-rights>

<sup>3</sup> <https://www.equalityhumanrights.com/guidance>

<sup>4</sup> <https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools>

## 1.2 Recognising Risk

Some students are at increased risk of abuse. Some students face additional barriers with respect to recognising or disclosing abuse. The school is committed to recognising diversity and ensures anti-discriminatory practices. Intersectionality is the acknowledgement that everyone has their own unique experiences of discrimination and oppression, and we must consider everything and anything that can marginalise people – gender, race, class, sexual orientation, physical ability, etc. We ensure that all students have the same protection.

The school gives special consideration to students who:

- Have special educational needs (SEN) or disabilities).
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion or belief, gender identification, or sexuality, or may experience Adulthood bias
- Are at risk of criminal or sexual exploitation, honour-based abuse or radicalisation.
- Are asylum seekers.
- Are known to be living in difficult situations e.g., where there are issues at home, such as: substance abuse/misuse, mental health, or domestic violence or where a family member has mental health needs.
- Are at risk due to their own mental health needs.
- Are within the care system and are looked after or previously looked after.

## **1.3 Abuse and Neglect**

### **1.3.1 Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by others in a variety of situations and environments. They may be abused by an adult or adults or by another child or children. Abuse can take place online, or technology may be used to facilitate offline abuse.

### **1.3.2 Physical abuse**

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

### **1.3.3 Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include deliberately silencing them or 'making fun' of what they say or how they communicate and them not being able to express views or feelings. It may feature age or developmentally inappropriate expectations and interactions being imposed on children as well as overprotection and limitation of exploration, learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another such as witnessing domestic abuse. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **1.3.4 Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

### 1.3.5 Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### 1.3.6 Adverse Childhood Experiences (ACEs)

The [ACEs acronym](#)<sup>5</sup> is used to describe a broad range of adverse childhood experiences that can be stressful or traumatic events that children and young people can be exposed to. ACEs range from experiences that directly harm a child, such as physical, verbal, or sexual abuse, and physical or emotional neglect, to those that affect the environments in which children grow up, such as parental separation, domestic violence, mental illness, alcohol abuse, drug use or imprisonment. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

### 1.3.7 Parental Mental Health Problems

One in four people are estimated to experience a mental health problem. Many children will grow up with a main carer or close family member who has mental health difficulty. Parental mental health problems mean that a parent or carer has a diagnosable mental health condition. This can include depression, anxiety disorders, schizophrenia, bipolar disorder, personality disorders. More information on [parental mental health](#)<sup>6</sup>.

### 1.3.8 Domestic Abuse

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Domestic abuse can impact on children when they witness it at home and/or suffer it in an intimate personal relationship.

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<sup>5</sup> <https://www.eif.org.uk/report/adverse-childhood-experiences-what-we-know-what-we-dont-know-and-what-should-happen-next>

<sup>6</sup> <https://learning.nspcc.org.uk/children-and-families-at-risk/parental-mental-health-problems>

"Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn." More information can be found at: [Operation Encompass](https://www.operationencompass.org/)<sup>7</sup>, [National Domestic Abuse Helpline](https://www.nationaldahelpline.org.uk/)<sup>8</sup>, [NSPCC](https://www.nspcc.org.uk/)<sup>9</sup>, [Refuge](https://refuge.org.uk/)<sup>10</sup> and [SafeLives](https://safelives.org.uk/)<sup>11</sup>.

### 1.3.9 Parental Substance Misuse

Parents' dependent alcohol and drug use can negatively impact on children's physical and emotional wellbeing, their development and their safety. The impacts on children include: physical maltreatment and neglect, poor physical and mental health, development of health harming behaviours in later life, for example using alcohol and drugs and at an early age, which predicts more entrenched future use, poor school attendance due to inappropriate caring responsibilities, low educational attainment, involvement in anti-social or criminal behaviour. For Public Health information on parental substance misuse [click here](#)<sup>12</sup>.

### 1.3.10 Honour Based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. [FGM](#):<sup>13</sup> Whilst all staff should speak to the designated safeguarding lead or deputy regarding any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#)<sup>14</sup>.

### 1.3.11 Child Mental Health

All staff should be aware that 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.

Education staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and speaking

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<sup>7</sup> <https://www.operationencompass.org/>

<sup>8</sup> <https://www.nationaldahelpline.org.uk/>

<sup>9</sup> <https://www.nspcc.org.uk/>

<sup>10</sup> <https://refuge.org.uk/>

<sup>11</sup> <https://safelives.org.uk/>

<sup>12</sup> <https://www.gov.uk/government/publications/parents-with-alcohol-and-drug-problems-support-resources/parents-with-alcohol-and-drug-problems-guidance-for-adult-treatment-and-children-and-family-services>

<sup>13</sup> <https://nationalfgmcentre.org.uk/>

<sup>14</sup> <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

to the designated safeguarding lead or a deputy. More information can be found using the following links: [YoungMinds](#)<sup>15</sup>, [Department for Education \(DfE\) \(2018\) Mental health and behaviour in schools](#)<sup>16</sup>, [UK Trauma Council](#)<sup>17</sup>.

### 1.3.12 Self-Harm and Suicide

Over the past two decades, rates of non-suicidal self-harm have increased across the population. Self-harm is more common among young people than other age groups, particularly young women. Self-harm has a strong relationship to suicide. While most young people who self-harm will not go on to take their own life, reducing rates of self-harm is important for suicide prevention. More information can be found [here](#)<sup>18</sup>.

Thoughts of suicide can affect anyone at any time. Often, people thinking about suicide will have experienced a stressful event associated with a feeling of loss. Events and experiences have different meanings and a different significance to each person – some people may feel able to cope whilst others may feel suicidal. More information can be found using on [Papyrus](#)<sup>19</sup>.

### 1.3.13 Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school. All staff should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. For more information, please [click here](#)<sup>20</sup>.

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<sup>15</sup> <https://www.youngminds.org.uk/>

<sup>16</sup> <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

<sup>17</sup> <https://uktraumacouncil.org/>

<sup>18</sup> <https://www.youngminds.org.uk/young-person/my-feelings/self-harm>

<sup>19</sup> <https://www.papyrus-uk.org/>

<sup>20</sup> <https://www.contextualsafeguarding.org.uk/>

## 1.4 Exploitation

### 1.4.1 Child Criminal Exploitation (CCE)

Some specific forms of [CCE](#)<sup>21</sup> can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys, professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### 1.4.2 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited as they believe they are in a genuine romantic relationship.

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with exploitation these may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. More information [here](#)<sup>22</sup>.

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<sup>21</sup> <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

<sup>22</sup> <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

### 1.4.3 Serious violence

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#)<sup>23</sup> and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#)<sup>24</sup>.

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<sup>23</sup> <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

<sup>24</sup> <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>



## 1.5 Online Safety

The use of technology has become a significant factor of many safeguarding issues such as child sexual exploitation, child on child abuse and radicalisation. An effective approach to online safety empowers a school to protect the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. The range of incidents classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material: for example, pornography, fake news, racist or radical and extremist views.
- **contact:** being subjected to harmful online interaction with other users: for example, commercial advertising as well as adults posing as children or young adults.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the [Anti-Phishing Working Group](#)<sup>25</sup>.

As part of online safety risks, schools must now also consider disinformation, misinformation and conspiracy theories.

- Disinformation refers to the deliberate creation and spread of false or misleading content (e.g. fake news).
- Misinformation refers to the unintentional spread of such false or misleading content.
- The school is committed to educating pupils to recognise, critically analyse and safely respond to such content."

### 1.5.1 Filtering and Monitoring

The school complies with the DfE guidance *Generative AI: product safety expectations regarding the safe use of generative artificial intelligence in education*. Filtering and monitoring systems also apply to the use of generative AI, ensuring a safe and responsible learning environment."

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. [UKCIS](#)<sup>26</sup> provides detailed advice about sharing of nudes and semi-nude images and videos and guidance [Education for a connected world](#).<sup>27</sup>

[IWF](#)<sup>28</sup> provides up to date information on web safety. There is new information on, [Harmful online challenges and online hoaxes](#)<sup>29</sup> - this includes advice on preparing for

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<sup>25</sup> <https://apwg.org/>

<sup>26</sup> <https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

<sup>27</sup> <https://www.gov.uk/government/publications/education-for-a-connected-world>

<sup>28</sup> <https://www.iwf.org.uk/>

<sup>29</sup> <https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes>

any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

[LGFL 'Undressed'](https://undressed.lgfl.net/)<sup>30</sup> provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

### 1.5.2 Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Like protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Click here for more information on [Prevent](https://www.gov.uk/government/publications/prevent-public-knowledge-and-interactions)<sup>31</sup>.

### 1.5.3 Protected Characteristics

Public Sector Equality Duty (PSED) for education settings. This includes a need to be conscious that pupils with protected characteristics may be more at risk of harm and integrate this into safeguarding policies and procedures. What are protected characteristics?

Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Schools must not unlawfully discriminate against pupils because of their protected characteristics, must consider how they are supporting pupils with protected characteristics, must take positive action, where proportionate, to deal with the disadvantages these pupils face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

### 1.5.4 Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they

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<sup>30</sup> <https://undressed.lgfl.net/>

<sup>31</sup> <https://www.gov.uk/government/publications/prevent-public-knowledge-and-interactions>

are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education curriculum](#)<sup>32</sup> and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

### 1.5.5 Racism and Safeguarding

Many children and young people who come from Black, Asian and minoritised ethnic communities experience racism, bias, stereotyping or cultural misunderstanding as they grow up. It might happen at an individual, institutional or societal level and might be displayed consciously or unconsciously. This can result in some children being more likely to come to the attention of child protection services, while other children are less likely to receive effective support.

### 1.5.6 Adultification

Adultification is a form of bias where children from Black, Asian and minoritised ethnic communities are perceived as being more 'streetwise', more 'grown up', less innocent and less vulnerable than other children. Adultification reduces professional and organisational responsibility to safeguard and protect children yet increases a *responsibilisation* of children to safeguard themselves. Adultification bias is a breach of child safeguarding legislation and guidance.

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<sup>32</sup> <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

## 1.6 Child on Child Abuse

All staff should be aware that children can abuse other children and that it can happen both inside and outside of school or college and online. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy). Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse) for more information; [Department for Education \(DfE\) \(2017\) Preventing bullying<sup>33</sup>](#).

### 1.6.1 Child on Child Abuse - Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This is likely to adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers.

Embassy International School are aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- understanding that all the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language.

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<sup>33</sup> <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

- importance of understanding intra familial harms and any necessary support for siblings following incidents.

Embassy International School are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the [Sexual Offences Act 2003](#)<sup>34</sup>.

### 1.6.2 Sexual Harassment

Sexual harassment 'unwanted conduct of a sexual nature' that can occur online and offline and can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual "jokes" or taunting; physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos.
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats.

Please click on the link below to lead to any further information should you have any concerns regarding this issue:

[NSPCC helpline](#)<sup>35</sup>

### 1.6.3 Harmful sexual behaviour (HSB)

is an umbrella term that describes a range of sexual behaviours. Hackett et al. (2016) define HSB as "sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, that may be harmful towards self or others, or be abusive towards another child, young person or adult".

This definition captures a range of behaviours, both offline and online, such as sexualised, gendered or sexist name calling, sexual image sharing without consent, unwanted sexual touching, sexual assault and rape. Sexual behaviours are seen across a continuum ranging from normal and appropriate sexual behaviours that are expected from people of a certain developmental age through to sexual behaviours that are inappropriate, problematic, abusive or violent. For more information on [HSB](#)<sup>36</sup>.

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<sup>34</sup> <https://www.legislation.gov.uk/ukpga/2003/42/contents>

<sup>35</sup> <https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>

<sup>36</sup> <https://www.lucyfaithfull.org.uk/>

## 1.7 Statutory Framework & Guidance

In order to safeguard and promote the welfare of children, this policy and our safeguarding and child protection procedures have been developed in accordance with the following legislation and guidance:

- [The Children Act 1989](#)<sup>37</sup>
- [The Children Act 2004](#)<sup>38</sup> (section 10 and section 14B)
- [London Safeguarding Children Procedures and Practice Guidance, 7th Edition, 2022](#)<sup>39</sup>
- [Working together to safeguard children \(December 2023\)](#)<sup>40</sup>
- [Children and Social Work Act 2017](#)<sup>41</sup>
- [Keeping Children Safe in Education \(DfE September 2022\)](#)<sup>42</sup>
- [Mandatory reporting of female genital mutilation procedural information.](#)<sup>43</sup>
- [Mental Health & Behaviour in Schools \(November 2018\)](#)<sup>44</sup>
- [Data Protection Act \(2018\)](#)<sup>45</sup>
- [Children and Families Act 2014](#)<sup>46</sup>
- [Protecting Children from Radicalisation: The Prevent Duty, 2023](#)<sup>47</sup>
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)<sup>48</sup>
- [Safeguarding Vulnerable Groups Act 2006](#)<sup>49</sup>
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)<sup>50</sup>
- [Voyeurism Offences Act 2019](#)<sup>51</sup>
- [The Sexual Offences Act 2003](#)<sup>52</sup>

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<sup>37</sup> <https://www.legislation.gov.uk/ukpga/1989/41/contents>

<sup>38</sup> <https://www.legislation.gov.uk/ukpga/2004/31/contents>

<sup>39</sup> <https://www.londonsafeguardingchildrenprocedures.co.uk/>

<sup>40</sup>

[https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working\\_together\\_to\\_safeguard\\_children\\_2023.pdf](https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf)

<sup>41</sup> <https://www.legislation.gov.uk/ukpga/2017/16/contents/enacted>

<sup>42</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<sup>43</sup> <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

<sup>44</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1069687/Mental\\_health\\_and\\_behaviour\\_in\\_schools.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069687/Mental_health_and_behaviour_in_schools.pdf)

<sup>45</sup> <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

<sup>46</sup> <https://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

<sup>47</sup>

[https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258\\_HO\\_Prevent+Duty+Guidance\\_v5d\\_Final\\_Web\\_1\\_.pdf](https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Web_1_.pdf)

<sup>48</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1090195/Relationships\\_Education\\_RSE\\_and\\_Health\\_Education.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1090195/Relationships_Education_RSE_and_Health_Education.pdf)

<sup>49</sup> <https://www.legislation.gov.uk/ukpga/2006/47/contents>

<sup>50</sup> <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

<sup>51</sup> <https://www.legislation.gov.uk/ukpga/2019/2/contents/enacted>

<sup>52</sup> <https://www.legislation.gov.uk/ukpga/2003/42/contents>

- [Teaching Online Safety in Schools 2019](#)<sup>53</sup>
- [Searching, screening and confiscation at school \(DfE\) 2022](#)<sup>54</sup>
- [Behaviour in Schools 2022](#)<sup>55</sup>
- [Preventing and Tackling Bullying](#)<sup>56</sup>
- [Help, protection, education: concluding the children in need review 2019](#)<sup>57</sup>

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<sup>53</sup> <https://www.gov.uk/government/publications/teaching-online-safety-in-schools/teaching-online-safety-in-schools>

<sup>54</sup> <https://www.gov.uk/government/publications/searching-screening-and-confiscation>

<sup>55</sup> [https://assets.publishing.service.gov.uk/media/65ce3721e1bdec001a3221fe/Behaviour\\_in\\_schools\\_-\\_advice\\_for\\_headteachers\\_and\\_school\\_staff\\_Feb\\_2024.pdf](https://assets.publishing.service.gov.uk/media/65ce3721e1bdec001a3221fe/Behaviour_in_schools_-_advice_for_headteachers_and_school_staff_Feb_2024.pdf)

<sup>56</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1069688/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069688/Preventing_and_tackling_bullying_advice.pdf)

<sup>57</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/809236/190614\\_CHILDREN\\_IN\\_NEED\\_PUBLICATION\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809236/190614_CHILDREN_IN_NEED_PUBLICATION_FINAL.pdf)



## 2 Procedures

### 2.1 Responsibilities: All Staff

School staff are particularly important as they can identify concerns early, provide help for children and prevent concerns from escalating. Staff should be aware "it could happen here" and create a safe environment where children can disclose abuse.

It is the responsibility of every member of staff to know and understand Safeguarding policies and procedures. Every school should have a designated safeguarding lead who is the first point of contact for safeguarding and child protection concerns. The designated safeguarding lead and deputy should always be available to discuss safeguarding concerns.

#### 2.1.1 What staff should do if they have concerns about a child

The Designated Safeguarding Lead (Polish) is: **Malgorzata Przybyszewska** (Head of Polish School), [m.przybyszewska@embassyschool.org](mailto:m.przybyszewska@embassyschool.org)

The Designated Safeguarding Lead (International) is: **Ewelina Alpin** (Head of MFL), [e.alpin@embassyschool.org](mailto:e.alpin@embassyschool.org)

The Deputy Designated Safeguarding Lead is: **André Swart** (Primary Teacher/English Lead) [a.swart@embassyschool.org](mailto:a.swart@embassyschool.org)

Other members of the Safeguarding Team are: **Katarzyna Kotulska** (CEO/Head of School), **Kristian Cejka** (Chief Education Officer/Principal)

The school's approach aims to have the DSL or a deputy always on site while the school is open. Should they not be on site then they are contactable via mobile phone and another member of the Safeguarding Team will remain onsite to advise in person.

#### 2.1.2 Local Authorities

<b>Police</b>	Komisariat Policji IV w Krakowie Królewska 4, 30-045 Kraków
<b>Neighbourhood Police Officer</b>	Michał Księżycki
<b>Municipal Social Welfare Centre in Krakow</b>	Miejski Ośrodek Pomocy Społecznej w Krakowie ul. Józefińska 14, 30-529 Kraków
<b>District Family Assistance Center in Krakow</b>	Powiatowe centrum pomocy rodzinie w Krakowie al. Słowackiego 20, 30-037 Kraków
<b>Society of Friends of Children, Municipal Branch</b>	Towarzystwo przyjaciół dzieci oddział miejski Teofila Lenartowicza 14, 31-020 Kraków



### 2.1.3 Concern about a child

If you are concerned about a child, make sure that you:

- Speak to Designated Safeguarding Lead (DSL) or deputy.
- Record on in writing on Safeguarding Concern Form (found in the staff room and PPA rooms) and hand to DSL.
- In case of emergency phone police on 997.
- If staff have any concerns about a child's welfare or a child makes a disclosure to you, it should be acted on immediately, in line with our school's policy and procedures and you must **always** seek advice from the Designated Safeguarding Lead/Deputy DSL.
- All concerns, discussion and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead or deputy.

### 2.1.4 Being ready to talk about abuse

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

### 2.1.5 Hearing disclosures

All staff should know what to do if a child tells them s/he is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality while never promising a child that they will not tell anyone about what they have disclosed.

All staff should be able to reassure victims of abuse that they are being taken seriously and will be supported. Children and young people should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

All members of staff have been trained to employ a T.E.D. (tell/explain/describe) approach when responding to children making disclosures.

If a child discloses that he or she has been abused in some way, the member of staff or volunteer should:

- Listen carefully to what they're saying - Be patient and focus on what you're being told. Try not to express your own views and feelings. If you appear shocked or as if you don't believe them, it could make them stop talking and take back what they've said.

- Give them the tools to talk - If they're struggling to talk to you, use open ended questions and simple prompts to help them share what's happening and how they're feeling.
- Let them know they've done the right thing by telling you - Reassurance can make a big impact. If they've kept the abuse a secret, it can have a big impact knowing they've shared what's happened.
- Tell them it's not their fault - Abuse is never a child's fault. It's important they hear, and know, this.
- Say you'll take them seriously - They may have kept the abuse secret because they were scared, they wouldn't be believed. Make sure they know they can trust you and you'll listen and support them.
- Don't confront the alleged abuser - Confronting the alleged abuser could make the situation worse for the child.
- Explain what you'll do next- For younger children, explain you're going to speak to someone who will be able to help. For older children, explain you'll need to report the abuse to someone who can help.
- Report what the child has told you as soon as possible- Report as soon after you've been told about the abuse so the details are fresh in your mind and action can be taken quickly. It can be helpful to take notes as soon after you've spoken to the child. Try to keep these as accurate as possible.

This link provides further advice on responding to a disclosure from a child: [NSPCC Hearing Disclosures](https://learning.nspcc.org.uk/research-resources/2019/let-children-know-you-re-listening)<sup>58</sup>

When a child has made a disclosure, or when an individual has concerns about a child's welfare our school protocols and systems require the member of staff/volunteer to adhere to the following guidelines:

- make brief notes immediately after the conversation.
- make a complete and formal record as soon as possible afterwards. Use the school record of concern sheet (which should be included as an appendix to this policy) or upload on the school's digital record (Safeguard My School).
- not destroy the original notes in case they are needed by a court.
- record the dates and times of your observations.
- record the date, time, place and any noticeable non-verbal behaviour and the actual words used by the child or any discussions you were involved in.
- record explanations given by the child / adult.
- draw on a body map to indicate the position of any injuries.
- record statements and observations rather than interpretations or assumptions.
- sign and date the record
- Report and submit records to the designated safeguarding lead **immediately**. If the designated safeguarding lead is unavailable, then the deputy safeguarding lead or another member of the safeguarding team should be notified.

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<sup>58</sup> <https://learning.nspcc.org.uk/research-resources/2019/let-children-know-you-re-listening>

The Designated Safeguarding Lead will maintain case files for pupils where there are concerns, with an overview chronology and a record of all communications and actions and ensure that all safeguarding records are managed appropriately.

On receipt of a safeguarding report, the DSL will decide upon the best course of action. They will also inform the rest of the safeguarding team of any updates in weekly meetings and may discuss options for actions with them. Possible options include:

- with the DSL, managing any support for the child through our own pastoral support processes.
- an early help assessment; or
- a referral for statutory services, for examples as the child might be in need, is in need or suffering or likely to suffer harm.

Staff should provide as much information as possible as part of the referral process to help social care assessments consider contexts outside the home and enable a contextual approach to harm. Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect.
- poor record keeping.
- failing to listen to the views of the child.
- failing to re-assess concerns when situations do not improve.
- not sharing information.
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking appropriate action.

Staff should immediately raise any mental health concerns which are also safeguarding concerns with the Designated Safeguarding Lead (DSL) or deputy.

Early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role that they might be expected to play in such assessments.

### 2.1.6 Allegations or concerns about staff

This procedure must be used in any case in which it is alleged that a member of staff, Governor/Trustee, visiting professional or volunteer has:

- Behaved in a way that has harmed a child/young person or may have harmed a child/young person
- Possibly committed a criminal offence against or related to a child/young person; or
- Behaved in a way that indicates s/he may not be suitable to work with children/young people.
- Behaved towards a child or children in a way that indicated s/he may pose a risk of harm to children.
- The provision as set out in part 4 of KCSIE should apply to anyone working in the school who has behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse pupils/students. In our school we also recognise that concerns may be apparent before an allegation is made. All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.

Allegations or concerns about staff, colleagues and visitors (recognising that schools hold the responsibility to fully explore concerns about supply staff) must be reported directly to the Head of School/Principal.

If the concern relates to the Head of School/Principal, it must be reported immediately to the HR.

We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the DSL or Head of School.

Any staff or volunteers from outside our setting will complete an induction to ensure they are aware of the risks and know what they need to do if they are concerned.

## 2.2 The Designated Safeguarding Lead

The Safeguarding team in our school is:]

The Designated Safeguarding Lead (Polish) is: **Malgorzata Przybyszewska** (Head of Polish School), [m.przybyszewska@embassyschool.org](mailto:m.przybyszewska@embassyschool.org)

The Designated Safeguarding Lead (International) is: **Ewelina Alpin** (Head of MFL), [e.alpin@embassyschool.org](mailto:e.alpin@embassyschool.org)

The Deputy Designated Safeguarding Lead is: **André Swart** (Primary Teacher/English Lead) [a.swart@embassyschool.org](mailto:a.swart@embassyschool.org)

Other members of the Safeguarding Team are: **Katarzyna Kotulska** (CEO/Head of School), **Kristian Cejka** (Chief Education Officer/Principal)

The role of the Designated Safeguarding Person was specified in the Children Act 2004 and ensures every organisation had a “named person” for safeguarding children and young people. The school can appoint deputies to support the role of the DSL. The deputy designated safeguarding lead is trained to the same standard as the lead and formal training for both will be updated at least every two years. The DSL is a member of the Senior Leadership Team. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility should not be delegated. Key Aspects of the Designated Person role includes:

- Being the first point of contact for all safeguarding concerns
- Making sure all staff are aware how to raise safeguarding concerns and ensuring all staff understand child abuse and neglect
- Referring any child protection concerns to social care and to relevant agencies who can provide support to children and families
- Monitoring children who are the subject of plans with social care (CP/CIN/CLA)
- Maintaining accurate and secure child protection records
- Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues.
- DSLs should work closely with senior mental health leads.
- DSLs should help promote educational outcomes by working closely with teachers about children's welfare, safeguarding and child protection concerns.
- Ensuring safeguarding and child protection information is dealt with in a confidential manner.
- The DSL will ensure that the school is clear on parental responsibility for children on roll, and report all identified private fostering arrangements to the local authority.

## 2.2.1 Raising Awareness

The designated safeguarding lead should:

- Actively promote safeguarding throughout all aspects of the school
- Ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new, agency and part-time staff.
- Ensure this child protection policy is available publicly and parents know referrals about suspected abuse or neglect may be made.
- Link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding; and be able to analyse concerns and referrals for patterns, trends and gaps and other safeguarding data and identify and target training for staff or groups of staff accordingly.
- Are alert to specific needs of children in need, those with special educational needs and disabilities, young carers.

- Understand and promote relevant data protection legislation and regulations, especially the [Data Protection Act 2018](#)<sup>59</sup> and the [General Data Protection Regulation \(GDPR\)](#)<sup>60</sup>.
- Can maintain a centralised register of all concerns and referrals, including robust and chronological records of actions taken and encourages staff to be robust around documenting and reporting concerns
- Regularly monitor and review all concerns and referrals - that links are made to all contextual sources of information relevant to a child's safeguarding, for example their behaviour, attendance and learning and progress, and that all decisions are recorded and actioned and where appropriate this is communicated to relevant staff
- Understand and support the school with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school. Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- Encourage a culture of listening to children, ensuring their voices are reflected in safeguarding and taking account of their wishes and feelings.
- The school complies with the statutory guidance Working together to improve school attendance (DfE) and monitors pupil absence systematically, intervening promptly when concerns arise.

### 2.2.2 Child Protection File

Safeguarding records will be stored securely in a central place separate from academic records. Individual files will be kept for each pupil/student: the school will not keep family files. Files will be kept for at least the period during which the pupil/student is attending the school, and beyond that in line with current data legislation and guidance. When children leave the school, the designated safeguarding lead should:

- Ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff, such as designated safeguarding leads and SENDCos, are aware as required.
- Consider if it would be appropriate to share any information with the new school or college in advance of the child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

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<sup>59</sup> <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

<sup>60</sup> <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>



- If a pupil/student moves from our school, child protection and safeguarding records will be forwarded on to the DSL at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools.

## 2.3 Responsibilities: The Head of School/Principal

The headteacher will ensure that the policies and procedures adopted by the governing body are fully implemented and that sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities. The headteacher or principal's role to ensure that staff understand and follow policies and procedures agreed by the governing body or proprietor.

On behalf of the governing body, the headteacher will ensure that all staff read at least Part one, Part five and Annex A of [Keeping Children Safe in Education \(2022\)](#)<sup>61</sup>. The headteacher will ensure that mechanisms are in place to assist staff to understand and carry out their roles and responsibilities, as set out in part one of the above guidance.

The headteacher and designated safeguarding lead will prepare the safeguarding annual report to the governing body to enable governors to review the effectiveness of child protection and safeguarding arrangements and, in turn, to influence the annual review of the policy. This enables the governing body to monitor compliance and to identify areas for improvement.

This will include periodic audits of child protection files and records by the designated safeguarding lead, the headteacher and external auditors. The views of children, parents and carers and staff members will be sought on child protection and safeguarding arrangements through surveys, questionnaires and other means. The headteacher will quality assure the effectiveness of the designated safeguarding lead in all aspects of their role (as defined in this policy).

In order that all members of staff have the knowledge and skills required to fulfil their duties, school leaders will:

- Publish the names and contact details for the designated safeguarding lead/s and any deputy designated safeguarding leads.
- As part of the induction programme for all new members of staff, including newly qualified teachers, provide safeguarding and child protection training. Staff new to the school, like their established colleagues, will be expected to read and understand Keeping Children Safe in Education (2022) Part One and be familiar with our safeguarding and child protection policy, the behaviour policy, the staff code of conduct and be familiar with the safeguarding response to children who go missing from education. Temporary staff will be made aware of the safeguarding policies and procedures and the school will ensure that staff provided by other agencies have received the required child

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<sup>61</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

protection and safeguarding training, commensurate with their roles, before being deployed.

- Provide all staff with appropriate safeguarding and child protection training which is updated regularly. In addition, all staff will receive safeguarding and child protection updates as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. School leaders will keep a record of staff induction and training.
- If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then: this should be referred to the headteacher or principal.
- Where a head teacher is also the sole proprietor of an independent school it is now mandatory to report to the LADO.

### 2.3.1 Early Years

The headteacher will also ensure that provision for the early years meets the specific safeguarding requirements described in the [Statutory Framework for the Early Years Foundation Stage](#)<sup>62</sup>. Ofsted inspectors will always report on whether arrangements for safeguarding children and learners are effective. In our school in relation to self-evaluation of safeguarding we will take account of [Inspecting Safeguarding in Early Years, Education and Skills Settings](#)<sup>63</sup> and the [School Inspection Handbook](#)<sup>64</sup>.

### 2.3.2 Relationships Education, Relationship & Sex Education (RSE) and Health Education

Relationship Education (for all primary pupils), RSE (for all secondary pupils) and Health Education (for all state school pupils) will be compulsory from September 2020.

Safeguarding issues, including online safety, child on child abuse, sexual harassment and extra familial harm (multiple harms) will be addressed through the curriculum in an age- appropriate way.

Statutory guidance: relationships education relationships and sex education (RSE) and health education. Colleges may cover relevant issues through tutorials.

### 2.3.3 Policies

- Ensuring that an effective safeguarding and child protection policy is in place, which describes procedures in accordance with government guidance and refers to multi- agency safeguarding arrangements and is available publicly via the school website.
- The governing body will annually review all policies/procedures that relate to safeguarding and child protection.
- Ensuring that that there is a staff behaviour policy or code of conduct that includes, amongst other expectations, acceptable use of technologies,

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<sup>62</sup> <https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2#full-publication-update-history>

<sup>63</sup> <https://www.gov.uk/government/collections/ofsted-handbooks-and-frameworks>

<sup>64</sup> <https://www.gov.uk/government/publications/school-inspection-handbook-eif>



staff/pupil relationships and communications including staff use of social media.

- Putting in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.
- Where reasonably possible, the school will hold more than one emergency contact number for each pupil so that the school has additional options to contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.
- Where a school or college has charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available at [GOV.UK](https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees)<sup>65</sup>.

### 2.3.4 Child on Child

Governing bodies and proprietors should ensure that their child protection policy includes:

- procedures to minimise the risk of peer-on-peer abuse.
- the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.
- how allegations of peer-on-peer abuse will be recorded, investigated and dealt with.
- clear processes as to how victims, perpetrators and any other children affected by peer- on-peer abuse will be supported.
- a recognition that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.
- a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The governing body takes account of [Searching Screening and Confiscation Advice](#)<sup>66</sup> for schools and the UK Council for Child Internet Safety (UKCCIS) Education Group and [Advice on Sharing nude images](#).

The governing body will expect all staff to have read and understand [Part five of Keeping Children Safe in Education: Child on Child Sexual Violence and Sexual Harassment](#)<sup>67</sup>.

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<sup>65</sup> <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

<sup>66</sup> <https://www.gov.uk/government/publications/searching-screening-and-confiscation>

<sup>67</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

### 2.3.5 Mental Health

The DfE has published advice and guidance on [Preventing and Tackling Bullying](#)<sup>68</sup>, [Mental Health and Behaviour in Schools](#)<sup>69</sup> (which may also be useful for colleges). The Mental Health and Behaviour in Schools guidance sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their pupils.

### 2.3.6 Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. The governing body should ensure that principles and arrangements for sharing information within school and with the three safeguarding partners, other agencies and practitioners are in place.

- [Working Together to Safeguard Children December 2023](#)<sup>70</sup> (Chapter 1 - which includes a myth- busting guide to information sharing);
- [Information sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young people, Parents and Carers](#)<sup>71</sup>; and
- [The information Commissioner's Office \(ICO\)](#)<sup>72</sup> which includes ICO GDPR FAQs and guidance from the department.

### 2.3.7 Training

- Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- Ensuring that all new staff (new to the role and/or new to the school including agency staff and interim appointments) undergo safeguarding and child protection training (including online safety) at induction.
- In addition to this annual training, all staff will receive regular safeguarding and child protection training and updates (for example, via email, e-bulletins, staff

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<sup>68</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1069688/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069688/Preventing_and_tackling_bullying_advice.pdf)

<sup>69</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1069687/Mental\\_health\\_and\\_behaviour\\_in\\_schools.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069687/Mental_health_and_behaviour_in_schools.pdf)

<sup>70</sup>

[https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working\\_together\\_to\\_safeguard\\_children\\_2023.pdf](https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf)

<sup>71</sup>

[https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info\\_sharing\\_advice\\_content\\_May\\_2024.pdf](https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf)

<sup>72</sup> <https://ico.org.uk/>

meetings) throughout the school year, to provide them with relevant skills and knowledge to safeguard children effectively.

- Ensuring all staff read at least [Part one, Part five and Annex A of Keeping Children Safe in Education \(2022\)](#)<sup>73</sup>

### 2.3.8 Online Safety

An effective approach to online safety empowers a school to protect the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

Schools and colleges should have appropriate filters and monitoring systems in place to limit children's exposure to online risks. Settings should also ensure they have appropriate security procedures in place to safeguard their systems.

Schools and colleges should review their online safety policies and information annually to keep up with developments in technology, risks and harms.

Governing bodies and proprietors should ensure that staff receive regular updated safeguarding training, including online safety and ensure children are taught about safeguarding, including online safety. Safeguarding training for staff, including online safety training, is integrated, aligned, and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning. In devising the approach to online safety and teaching online safety, the governing body and school leaders have taken into account [Teaching Online Safety in Schools 2019](#)<sup>74</sup>.

The school's online policy includes guidance and rules regarding the use of pupil/staff mobile technology and access to the internet via 3G, 4G and 5G on our premises. This policy should cover how schools and colleges will manage incidents of sexual harassment between children and young people via mobile or smart technology.

Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the [360 safe website](#)<sup>75</sup>. [UKCIS has published Online safety in schools and colleges: Questions from the governing board](#)<sup>76</sup>.

The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.

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<sup>73</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<sup>74</sup> <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

<sup>75</sup> <https://360safe.org.uk/>

<sup>76</sup> <https://www.gov.uk/government/publications/online-safety-in-schools-and-colleges-questions-from-the-governing-board>

Schools and colleges are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

### 2.3.9 Remote Learning

Where children are being asked to learn online at home the Department has provided advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. The NSPCC and PSHE Association also provide helpful advice:

- [NSPCC Learning - Undertaking remote teaching safely during school closures](#)<sup>77</sup>

### 2.3.10 Filtering and Monitoring

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks.

### 2.3.11 Opportunities to Teach Safeguarding

- The governing body should ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.
- Whilst it is essential that appropriate filters and monitoring systems are in place, the governing body should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

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<sup>77</sup> <https://learning.nspcc.org.uk/online-safety/photographing-filming-children>

### 2.3.12 Safer Recruitment

The governing body should prevent people who pose a risk of harm from working with children:

- By adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The governing body has recruitment and selection policies and procedures in place.
- In accordance with [The School Staffing \(England\) Regulations 2009](#)<sup>78</sup>, the governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training. The training should cover, as a minimum, the content of this guidance.
- Governing bodies and proprietors should ensure there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children.

The governing body regards it as vital that it has created a culture of safe recruitment and, as part of that, has adopted recruitment procedures that help deter, reject or identify people who might abuse children. The governing body has taken full account of the statutory guidance in [Part three of Keeping Children Safe in Education: Safer recruitment](#)<sup>79</sup>, Statutory guidance – regulated activity (children) – supervision of activity with children which is regulated activity when unsupervised and: [Disclosure and Barring Service checks](#)<sup>80</sup>.

- The school operates “Safer Recruitment” procedures and ensures that appropriate checks are carried out on all new staff, governors and relevant volunteers, DBS for volunteers are free.
- The Head Teacher/Principal and all other staff who work with children/young people undertake safeguarding training on an annual basis with additional updates as necessary within a two-year framework and a training record maintained.
- Temporary staff and volunteers are made aware of the school’s arrangements for safeguarding & child protection and their responsibilities.
- The governing body has a written policy and procedures for dealing with allegations of abuse against members of staff, visitors, volunteers or governors.
- The school remedies any deficiencies or weaknesses brought to its attention without delay A member of the governing body (usually the Chair) is nominated to be responsible for liaising with the LADO in the event of allegations of abuse being made against the Head Teacher/Principal.

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<sup>78</sup> <https://www.legislation.gov.uk/uksi/2009/2680/contents/made>

<sup>79</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<sup>80</sup> <https://www.gov.uk/government/organisations/disclosure-and-barring-service>

The school should follow part 3 of [‘Keeping children safe in education’ \(KCSIE\)](#) and [pay full regard to ‘Safer Recruitment’](#)<sup>81</sup> requirements including but not limited to:

- verifying candidates' identity and academic or vocational qualifications
- obtaining professional and character references
- checking previous employment history and ensuring that a candidate has the health and physical capacity for the job
- UK Right to Work
- clear enhanced DBS check
- any further checks as appropriate to gain all the relevant information to enable checks on suitability to work with children.

Evidence of these checks must be recorded on the Single Central Record.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils.

When reading this policy in a digital format you can [Click here for more information on identity checks](#)<sup>82</sup>.

### 2.3.13 Low level concerns

Schools and colleges should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values guardian/safeguarding champion)), or with the headteacher/principal is a matter for the school or college to decide. If the former, then the DSL should inform the headteacher/principal of all the low-level concerns and in a timely fashion according to the nature of each low-level concern. The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision-making approach. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

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<sup>81</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<sup>82</sup> <https://www.gov.uk/government/publications/identity-proofing-and-verification-of-an-individual>

### 2.3.14 Use of school or college premises for non-school/college activities

Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe. Ensuring that the organisation have a safeguarding policy and clear procedures are in place for safeguarding children and vulnerable adults.

## 2.4 Confidentiality, Consent and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect.

As part of meeting a child's needs, the governing body recognises the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the process and principles for sharing information within the school and with the three safeguarding partners, other organisations, agencies and practitioners as required.

"[Data protection: toolkit for schools](#)<sup>83</sup>", supports schools with data protection activity, including compliance with relevant legislation.

Schools should ensure that policies, training and practice give staff the confidence to know when, how and to whom they can share sensitive information when dealing with a safeguarding concern - making reference to relevant guidance such as the new toolkit and the May 2024 guidance – [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#)<sup>84</sup>. The training should also cover how to record that information in a neutral and professional manner, focusing on what is necessary for the safeguarding purpose.

School staff should be proactive in sharing information with the designated safeguarding lead as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

The governing body is aware that, among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and

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<sup>83</sup> <https://www.gov.uk/guidance/data-protection-in-schools>

<sup>84</sup>

[https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info\\_sharing\\_advice\\_content\\_May\\_2024.pdf](https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf)



protect the safety of children. Please contact the schools designated Data Protection Lead if there are any concerns around data sharing.

The governing body should ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data.'

The governing body should ensure that staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent if it is not possible to gain consent, if it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Where children leave the school, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. For schools, this will be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENDCos or the named person with oversight for SEND in a college, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

All staff members must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers supports staff who must make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations regarding the Data Protection Act 2018 and GDPR. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or deputy. 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.

In a case of female genital mutilation there is a mandatory requirement for the teacher to report directly to the police.



### 2.4.1 Seven Golden Rules to Sharing Information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your data protection lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone be clear of the basis upon which you are doing so. Where you do not have consent be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely. Seek advice on digital secure sharing from your IT professional.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. This record should be kept for at least three years.

## 2.5 Communication with Parents

- Make parents aware of the school's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on, where necessary, by making all policies available on the website and on request.
- Work with parents to support the needs of their child.
- Consider the safety of the student and, should a concern arise, the Designated Safeguarding Lead (DSL) has the responsibility to seek advice prior to contacting parents.
- Aim to help parents understand that the school has a responsibility for the welfare of all students and has a duty to refer cases to the Local Authority in the interests of the student as appropriate.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- Provide advice and signpost parents and carers to other services where students need extra support.

School leaders will:

- ensure the safeguarding and child protection policy is published on the school website and on display in the entrance foyer.
- ensure that pupils, parents and visitors to the school are clearly and visually informed of the name of the designated safeguarding lead and deputy.
- ensure that visitors are aware of their safeguarding duties while in school and how to report safeguarding concerns.

School leaders will ensure that the parents understand the responsibilities placed on the school and staff for safeguarding children.

When staff have a concern about an individual child that requires a referral to children's social care, parents should be informed prior to referral, unless it is considered to do so might place the child at increased risk of significant harm by:

- the behavioural response it prompts e.g. a child being subjected to abuse, maltreatment or threats/forced to remain silent if alleged abuses informed.
- leading to an unreasonable delay.
- leading to the loss of evidential material.
- placing a member of staff from any agency at risk.

## 2.6 Site Security

All staff members have a responsibility to ensure the buildings and grounds are secure and for reporting concerns that may come to light.

The identity of all visitors and volunteers coming into school is checked. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual, parent or anyone else, that threatens the school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

### 2.6.1 Code of Conduct of All Staff

Guidelines for Ensuring Safe Interactions Between Minors and Facility Staff, and Specifically Prohibited Behaviours Towards Minors:

#### 2.6.1.1 *General Conduct and Responsibilities of Staff*

All Facility staff, regardless of employment type, are responsible for ensuring the safety of children while they are on the premises. Under no circumstances is any form of violence against children permissible. Staff must treat every child with respect, providing support to help them overcome challenges while considering their developmental capabilities, any disabilities, and their educational needs. Staff are expected to treat each child equally, without discrimination based on gender, sexual orientation, abilities, social, ethnic, cultural, religious background, or worldview. In interactions with children, staff should promote "good manners" and engage in educational activities aimed at fostering positive behaviours.

#### 2.6.1.2 *Reporting Prohibited Behaviour*

If a staff member witnesses any of the behaviours described below, either by adults or other children, they must report it to the DSL. Extra caution is essential when interacting with children who have experienced various forms of abuse or neglect, as such experiences may lead them to seek inappropriate physical contact with adults. In such cases, staff are to intervene sensitively yet firmly, helping the child understand the importance of personal boundaries.

#### 2.6.1.3 *Staff Communication for Positive Relations with Children*

Facility staff should:

- Demonstrate patience and address children calmly and respectfully.
- Listen attentively and respond appropriately according to the child's age and the situation.
- Show understanding for the child's difficulties and issues.
- Maintain a professional relationship at all times, using communication and actions suitable to each situation.
- Ensure the child's bodily integrity by refraining from any form of violence.

- Use conflict resolution methods that foster a sense of emotional and psychosocial safety for the child.
- Treat the child with respect, honouring their dignity and needs.
- Engage in actions focused on the child's best interests and well-being.
- Promote "good manners" by engaging in educational activities that foster positive behaviours.
- Refrain from shaming, belittling, humiliating, or insulting the child.
- Respect the child's right to express and discuss their emotions.
- Avoid raising their voice unless the child's safety is at immediate risk.
- Avoid threatening, demeaning, or undermining the child's dignity and self-worth.
- Avoid disclosing sensitive information about the child to unauthorized individuals.
- Respect the child's right to privacy; if confidentiality must be breached for the child's protection, explain the reasons.
- If a private conversation is necessary, ensure visibility from outside, inviting another staff member to be present if appropriate.

## 2.6.2 Prohibited behaviours towards minors

### 2.6.2.1 Communication

In communications with children, staff must not:

1. Use authority or physical superiority to intimidate, coerce, or threaten.
2. Apply any form of psychological violence, such as isolating, ignoring, reducing a child's status within a group, stigmatizing based on health, academic performance, appearance, sexual orientation, beliefs, or financial situation, or mocking, belittling, insulting, threatening, or ridiculing the child.
3. Engage in any form of physical violence, such as taking or destroying belongings, restricting movement, hitting, pushing, poking, pinching, spanking, hitting with objects, twisting arms, pulling hair, or tugging ears.
4. Post demeaning or mocking images, drawings, photos, or videos of the child, or share any untrue, disparaging materials about them.
5. Make sexually suggestive comments regarding the child's gender, body, appearance, or clothing.
6. Use discriminatory language based on gender.
7. Use vulgar or inappropriate jokes.
8. Publish private photos or other information about the child and their family on personal social media without consent.
9. Make or propose any sexual or pornographic content to the child, including sharing such content in any form.
10. 1Disclose sensitive information about the child's family, economic, medical, caregiving, or legal situation, beliefs, or religion.
11. Show favouritism toward any child.

12. Engage in romantic or sexual relationships with the child or make ambiguous propositions, including sexually suggestive comments, jokes, gestures, or sharing erotic or pornographic content in any form.

#### 2.6.2.2 *Physical Contact with Children*

1. Physical contact should not be used as a reward nor stem from an authority relationship.
2. Physical contact with a child should not be secretive or concealed.
3. Staff must respect the child's personal integrity, refraining from inappropriate, ambiguous gestures, such as touching, petting, or patting in an overly familiar manner.
4. Exercise professional judgment by observing the child's reactions, asking permission for physical contact (e.g., a hug), and remaining aware that such contact, even with good intentions, may be misinterpreted.
5. Avoid play activities such as tickling, mock fighting, or rough play.
6. When aware that a child has suffered physical abuse or sexual exploitation, the staff should exercise special caution, demonstrating understanding and sensitivity.
7. Staff are not allowed to share a bed or sleep in the same room with a child during facility-organized trips.
8. When physical assistance is necessary (e.g., dressing, undressing, eating, bathing, using the toilet), avoid any physical contact beyond what is strictly necessary.

#### 2.6.3 Staff Contact with Children Outside Working Hours

1. Contact with children should, as a rule, occur only during working hours and within the scope of professional duties.
2. If necessary, official channels (e.g., work email, work phone) should be used for communication with children and their parents or guardians outside of working hours.
3. If a meeting with children outside working hours is required, staff must inform the Director, and the parents or guardians of the children must provide consent for such contact.
4. If staff maintain social or familial relationships with a child's parents or guardians, they are obligated to maintain the confidentiality of all information regarding other children and their parents or guardians.

## **2.7 Online Safety**

### **2.7.1 Awareness of Digital Risks**

When carrying out assigned tasks, staff must remain aware of the inherent risks associated with using digital technologies and the Internet. Therefore, staff are required to continually improve their skills and awareness in implementing cyber-secure practices at work.

### **2.7.2 Social Media Boundaries**

Staff must not establish contact with children by accepting or sending friend requests on social media.

### **2.7.3 Separation of Personal and Professional Online Activities**

Staff should be able to recognize the risks associated with the overlap between their personal online activities and professional responsibilities. In particular, they should be cautious of how their private Internet use might intersect with their professional interactions with children, which could lead to unintended correlations between these spheres.

### **2.7.4 Use of Personal Devices During Work**

During activities with children, staff are required to refrain from using personal phones or other devices if there is a likelihood that these could disrupt the activities being conducted.



## Appendix I. Safeguarding Incident Report

Date of Incident

Time

Child's Name

Class

Where the incident/conversation took place

### What happened?

Please include

- the names of all people present when the conversation took place
- what was said, what you saw and what you did
- try to be factual and not give opinion
- include as much direct speech as you can remember about the actual conversation/incident
- Use the child's words, not yours
- Include any other important areas i.e. description of any marks or injuries seen, the child's fears, wishes etc.

*Continue on additional sheets if necessary.*

Date this report was written	Time it was written	Author of report (print name)	Author of report (signed)

HAND THIS REPORT DIRECTLY TO THE DESIGNATED SAFEGUARDING LEAD (Ewelina Alpin) OR  
DEPUTY DESIGNATED SAFEGUARDING LEAD IN HER ABSENCE (André Swart)

**DO NOT DISCUSS THIS REPORT WITH ANYONE ELSE**

PTO



### Checklist of the Designated Safeguarding Lead

- ☐ Child clearly identified, with full name and class details
- ☐ Name and signature of the person completing the record populated
- ☐ Date and time of any incidents or when a concern was observed
- ☐ Date and time of written record
- ☐ Concern described in sufficient detail, i.e. no further clarification necessary
- ☐ Child's own words used?
- ☐ Written in a professional manner without stereotyping or discrimination
- ☐ The record includes an attached body map (if relevant) to show any visible injuries.

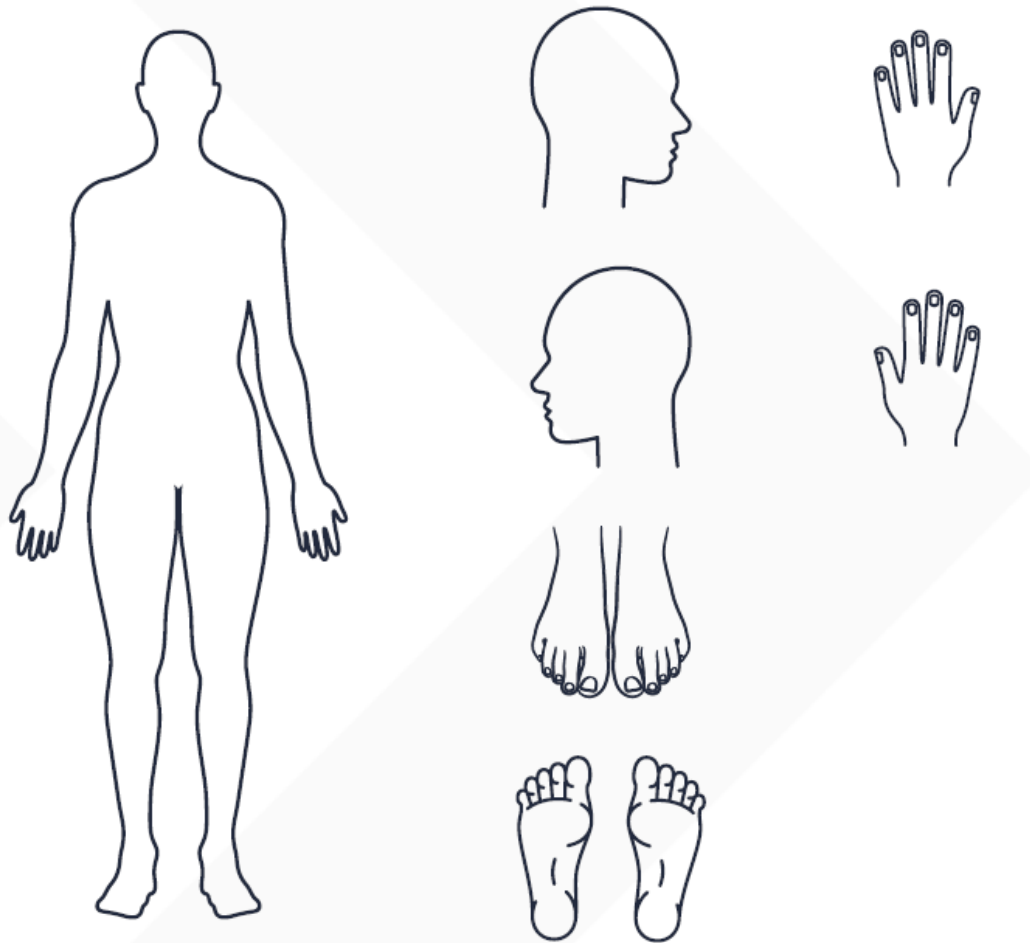
### Child Protection Designated Safeguarding Lead Response/Action Taken

At Embassy International School our Key Adults are:

**Malgorzata Przybyszewska**  
**Ewelina Alpin**  
**André Swart**



## Appendix II. Child protection Bodymap



Name of child

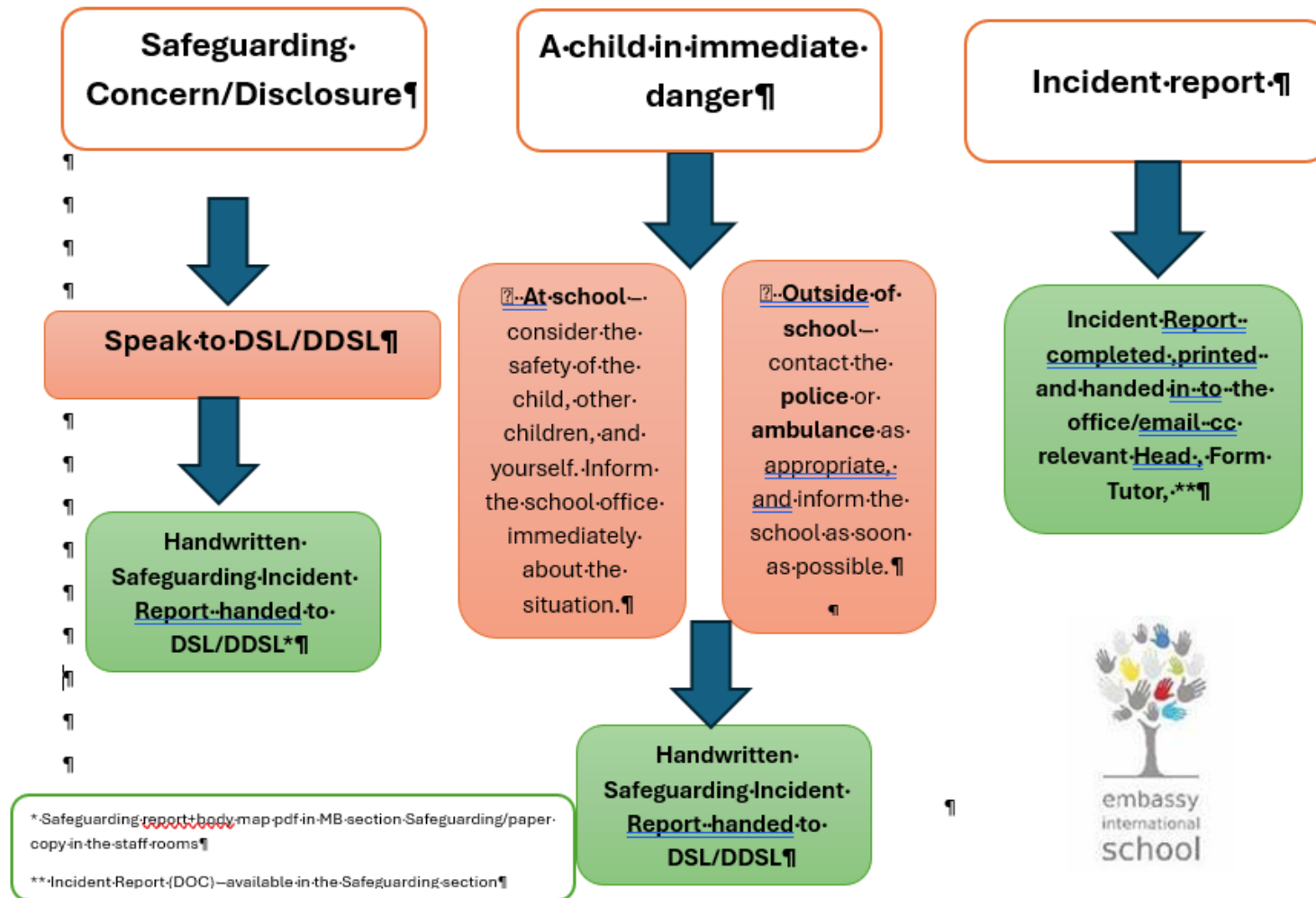
Date of birth

Name of worker

Date recorded

Observations

## Appendix III. Procedures for Reporting Incidents



### Appendix IV. Safeguarding Flowchart

