



Child protection and safeguarding policy

Adapted from the integrated safeguarding portfolio in the *Child Protection & Safeguarding Handbook for Schools* by Ann Raymond

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Date: 14/03/2023

Deputy Designated Safeguarding Lead(s) Anita Pestana

Date: 14/03/2023

Headteacher: Kevin Arthur (Secondary) Martin Price (Primary)

Date: 14/03/2023

Nominated Governor: Samantha Horsley-Lloyd

Date: 14/03/2023

1. Policy statement and principles

At the British School of Tenerife, we pride ourselves on offering an excellent education to students of different abilities. We are known for our friendly, family atmosphere and for the excellent behaviour of our students. We want all our students to enter the work market with qualifications that will make them highly employable; and to enter the world outside school as exemplary citizens. Our school's values are Commitment, Kindness, Honesty, and Respect.

This policy is one of a series in the school's integrated safeguarding portfolio which includes Staff Code of Conduct, Recruitment policy, Complaints policy, Behavioural policy and E-safety policy.

This policy is available on the school website and is included in the staff handbook.

Our core safeguarding principles are:

- Safeguarding is everyone's responsibility
- The school's responsibility to safeguard and promote the welfare of children is of paramount importance
- Safer children make more successful learners
- Staff and governors to be involved in policy development and review
- Policies will be reviewed annually unless an incident or new legislation or guidance suggests the need for an interim review.

1.1. Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors

1.1. a) Policy principles

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- All staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.
- Students and staff involved in child protection issues will receive appropriate support.

1.1. b) Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice.
- To demonstrate the school's commitment regarding child protection to students, parents and other partners.

Terminology

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of 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.

Child protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

DSL refers to the designated safeguarding lead at the school

Child includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

2. Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014

- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2018
- Working Together: Transitional Guidance 2018
- Keeping Children Safe in Education 2022
- What to do if you're worried a child is being abused 2015.
- The Domestic Abuse Act 2021
- PACE Code C 2019

3. Roles and responsibilities

Key personnel

The designated safeguarding lead (DSL) for child protection is:

Kim Langdon

Contact details: email: Kim.langdon@bstenerife.com tel: (+ 34) 922 34 54 50

The deputy designated lead(s) are:

Anita Pestana (Secondary)

Contact details: email: anita.pestana@bstenerife.com tel: (+ 34) 922 34 54 50

Florencia Avila Pianforini (Primary)

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Jenni Garnett (Early years)

Contact details: email: jenni.garnett@bstenerife.com tel: (+ 34) 922 33 69 29

The nominated child protection governor is:

Samantha Horsley-Lloyd

Contact details: email: samantha.horsleylloyd@bstenerife.com tel: (+ 34) 922 34 54 50

The Headteachers are:

Kevin Arthur (Secondary)

Contact details: email: kevin.arthur@bstenerife.com tel: (+34) 922 34 54 50

Martin Price (Primary)

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3.1. The Safeguarding team (ST)

The Safeguarding Team(ST) includes the Designated Safeguarding Lead (DSL), the Deputy Designated Safeguarding Leads(DDSL) and the Executive Management Team (Head of Secondary, Head of Primary and Academic Director)

The Designated Safeguarding Lead (DSL)takes **lead responsibility** for safeguarding and child protection (including online safety) in the school with the support of the Safeguarding Team. The DSL has the status and authority within the school to carry out the duties of the post, which include:

- ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publicly available
- advising and supporting staff on child protection and safeguarding matters
- encouraging a culture of listening to children
- managing safeguarding referrals to children’s social care, the police, or other agencies (with the support of the ST who speak fluent Spanish)
- liaising with the Headteacher regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and be aware of the requirement for children to have an appropriate adult in relevant circumstances.
- taking part in strategy discussions and inter-agency meetings
- liaising with the “case manager” and the designated officer(s) at the local authority where allegations are made against staff (with the support of the ST who speak fluent Spanish)
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child’s new school
- undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.

3.2. The deputy designated safeguarding lead(s):

Are trained to the same level as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSL carries out those functions necessary to ensure the ongoing safety and protection of students along with the support of the ST. In the event of the long-term absence of the DSL, the deputy will assume the functions above.

4. Good practice guidelines and staff code of conduct

Good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students
- being a good listener
- being alert to changes in students’ behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school’s child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues

- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
- referring all concerns about a student's safety and welfare to the DSL or the ST using the school's referral system

5. Abuse of position of trust

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual.

The school's staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

6. Children who may be particularly vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that our students receive equal protection, we will give special consideration to children who are:

- living away from home or in temporary accommodation
- living in chaotic and unsupportive home situations
- living transient lifestyles
- affected by parental substance misuse, domestic violence or parental mental health needs
- vulnerable to being bullied, or engaging in bullying
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- do not have English or Spanish as a first language
- at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

7. Children with special educational needs and disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and

- communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded.

8. Children missing education

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

9. Mental health

Schools have an important role to play in supporting the mental health and wellbeing of their students.

All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.

Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy.

10. Children who are lesbian, gay, bi, trans, queer/questioning, intersex, asexual or plus (LGBTQIA+)

The fact that a child or a young person may be LGBTQIA+ is not in itself an inherent risk factor for harm. Unfortunately, children who are LGBTQIA+, or are perceived to be LGBTQIA+, can be targeted by children. The risk to these children can be compounded where children who are LGBTQIA+ lack a trusted adult with whom they can be open. Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them.

11. Whistleblowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's whistleblowing code (*This can be found on our website*) enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher. Complaints about the Headteacher/Academic Director should be reported to the President of the Board. Carlos.board@bstenrife.com

12. Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers

When a safeguarding concern or allegation is made about a member of staff, including supply staff, contractors or volunteers, our set procedures must be followed. The full procedures for dealing with allegations against staff and managing low level concerns raised about staff can be found in *Keeping Children Safe in Education* ([Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/92241/keeping-children-safe-in-education-2022.pdf)) and in the school's safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers policy and procedures.

Safeguarding concerns or allegations made about staff who no longer work at the school, or historical allegations will be reported to the police.

13. Staff and governor training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation, online safety and to know what to do if they have a concern.

New staff receive a briefing during their induction, which includes the school's child protection policy and staff behaviour policy, reporting and recording arrangements, and details for the DSL. All staff, including the DSL, Headteacher and governors will receive training that is regularly updated. All staff will also receive safeguarding and child protection updates via email, e-bulletins, website access and staff meetings throughout the year.

Our governors receive appropriate safeguarding and child protection (including online) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

Our safeguarding governor (Nayra Romero López) receives additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high quality safeguarding across the trust.

14. Safer recruitment

Our school Safer Recruitment Governor is Carlos Díez Fuster. Our school complies with the requirements of *Keeping Children Safe in Education* (DfE 2022) and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The school's Staff Recruitment policy and procedures set out the process in full and can be shared on request. The President of the Board, Academic Director and Finance Manager attend safer recruitment training annually.

All relevant staff (involved in early years' settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare legislation and their obligations to disclose relevant information to the school.

The school obtains written confirmation from third party organisations that other individuals who may work in the school have been appropriately checked and are suitable to work with children.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The school maintains a single central record of recruitment checks undertaken.

14.1 Contractors

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

15. Site security

Visitors to the school, including contractors, are asked to sign in and are given a visitor's lanyard, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in as long as they remain in the school office. All visitors are expected to observe the school's safeguarding and health and safety regulations, they are also supervised whilst on site.

16. Extended school and off-site arrangements

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

17. Staff/student online relationships

In accordance with the school's Code of Conduct, the school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with student. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

18. Child protection procedures

a. Recognising abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2022) refers to four categories of abuse. These are set out at

Appendix One along with indicators of abuse.

b. Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported in accordance with our Anti-bullying policy. If it is found that an incident escalates beyond the school's control, a referral can be made through the link below:

<https://www3.gobiernodecanarias.org/medusa/ecoescuela/acosoescolar/>

c. Taking action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”. Key points for staff to remember for acting are:

- in an emergency take the action necessary to help the child (including calling 112)
- report your concern as soon as possible to the DSL, definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern
- seek support for yourself if you are distressed.

d. If you are concerned about a student's welfare

There will be occasions when staff may suspect that a student may be at risk. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use the school's referral form to record these early concerns. If the student does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff has concerns, they should discuss their concerns with the DSL.

Staff are 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. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

e. If a student discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their

own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the student know that in order to help them they must pass the information on to the DSL.** The point at which they tell the student this is a matter for professional judgement. During their conversations with the students, staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring gestures or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the student’s mother think about it
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ may be interpreted by the child to mean that they have done something wrong
- tell the student what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- complete the **student referral form** and hand it to the DSL as soon as possible
- seek support if they feel distressed

f. Notifying parents

The school will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the student. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.

19. Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, ST or President of the Board (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

Following several cases where senior leaders in school had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2022)* emphasises that **any** member of staff can contact children’s social care if they are concerned about a child. However, it is strongly recommended that any member of staff seek support and advice from the Safeguarding Team prior to doing so. This is to ensure the best possible outcome for the child.

Child protection information will be stored and handled in line with our Data Protection Policy.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Welfare concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Child protection information will be stored separately from the student's school file and the school file will be 'marked' to indicate that separate information is held.

The DSL will normally obtain consent from the student and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the DSL.

The UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The school's data protection policy is available to parents and students on request.

20. Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

21. Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the Headteacher and the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the student's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

22. Child-on-child abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, all staff recognise that children can abuse other children and young people and should be clear about the school's policy and procedures regarding child-on-child abuse. Staff will maintain an attitude of 'it could happen here'. All child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse can take many forms, including:

- **physical abuse** such as shaking, biting, hitting, kicking or hair pulling
- **bullying**, including cyberbullying, prejudice-based and discriminatory bullying
- **sexual violence and sexual harassment** such as inappropriate sexual language, touching, sexual assault or rape
- **causing someone to engage in sexual activity without consent**, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)** including pressuring another person to send sexual imagery or video content
- **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
- **upskirting** – taking a picture under a person’s clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress or alarm
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse is abuse and should never be tolerated or passed off as ‘banter’, ‘just having a laugh’, ‘part of growing up’ or ‘boys being boys’. Tolerance of such behaviours can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. However, all staff recognise that it is more likely that girls will be victims of child-on-child abuse and boys are more likely to be the perpetrators.

Staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but simply not being reported.

a. Minimising risk

At our school, we take the following steps to minimise or prevent the risk of child-on-child abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- PSHEE is used to reinforce the message through stories, role play, current affairs and other suitable activities.

- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school.
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.

b. Managing allegations of child-on-child abuse

Staff should pass all allegations of child-on-child abuse to the DSL immediately. They will then be investigated and dealt with as follows.

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSL will then work with children’s social care to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a student with parents. Our focus is the safety and wellbeing of the student and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.
- **Record** – all concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing, kept confidential and stored securely on the school’s child protection and safeguarding systems and/or in the child’s separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.

Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, the school has the following system in place for children to confidently report abuse.

Children use the confidential well-being box.

Where allegations of sexual violence or sexual harassment are made, the school will act in accordance with the guidance set out in *Keeping Children Safe in Education (2022)*.

c. Supporting those involved

Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a

number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

The support required for the student who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the student that harmed. We will seek to understand why the student acted in this way and consider what support may be required to help the student and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

23. Serious violence

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, 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 could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

All staff are made 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.

24. Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including age, gender sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

The school includes the risks of criminal exploitation and sexual exploitation in the PSHE and SRE curriculum. A common feature of such exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

a. Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for 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 e.g. they believe they are in a genuine romantic relationship.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

All staff are made aware of the indicators of sexual exploitation which, as well as including the indicators set out under CCE below, can also include having older boyfriends and suffering sexually transmitted infections or becoming pregnant. All concerns are reported immediately to the DSL.

b. Child Criminal Exploitation (CCE)

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this 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 carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. 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 and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator can include children who:

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs or alcohol
- go missing for periods of time or regular return home late
- regularly miss school or education or do not take part in education.

c. County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out under CCE, above.

Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out under CCE, above, with the main indicator being missing episodes from home and/or school. Additional specific indicators that may be present where a child is criminally exploited include children who:

- go missing and are subsequently found in areas away from home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation with which they have no connection or in a hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

25. Online safety

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to students, who can contact our students and the personal conduct of our students online. These filtering and monitoring systems are reviewed regularly to ensure their effectiveness. We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe. We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

We have also ensured that appropriate level of security protection procedures are in place to safeguard our systems, staff and learners. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Online safety risks can be categorised into four areas of risk:

- **content** - being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- **contact** - being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **conduct** - personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **commerce** - risks such as online gambling, inappropriate advertising, phishing or financial scams.

All staff are aware of these risk areas and should report any concerns to the DSL.

26. Sharing nudes and semi nudes

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate management. There will be subsequent interviews with the young people involved, using the behaviour referral system.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of devices and interviews with the young people involved.

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 – [UKCIS advice 2020](#). The school will have regard to this advice when managing these issues. (Spanish law adhered to).

Article 18 of the Spanish Constitution

- 1. The right to honour to personal and family privacy and to one's own image shall be guaranteed.*
- 2. The home is inviolable. No entry or search may be made therein without the consent of the owner or without a court order, except in cases of flagrante delicto.*

3. *The secrecy of communications and, in particular, of postal, telegraphic and telephone communications is guaranteed, except in the event of a court order.*
4. *The law shall limit the use of information technology to guarantee the honour and personal and family privacy of citizens and the full exercise of their rights.*

Criminal Code. Article 197.

1. *Anyone who, in order to discover the secrets or violate the privacy of another, without their consent, seizes their papers, letters, electronic mail messages or any other documents or personal effects, intercepts their telecommunications or uses technical devices for listening, transmission, recording or reproduction of sound or image, or of any other communication signal, shall be punished with a prison sentence of one to four years and a fine of twelve to twenty-four months.*
2. *The same penalties shall be imposed on anyone who, without being authorised, seizes, uses or modifies, to the detriment of a third party, the confidential personal or family data of another person that is recorded in computer, electronic or telematic files or media, or in any other type of public or private file or register. The same penalties shall be imposed on anyone who, without being authorised, accesses them by any means and on anyone who alters or uses them to the detriment of the owner of the data or of a third party.*
3. *A prison sentence of two to five years shall be imposed if the data or facts discovered or the images captured referred to in the previous numbers are disseminated, disclosed or transferred to third parties.*

A prison sentence of one to three years and a fine of twelve to twenty-four months shall be imposed on anyone who, with knowledge of their unlawful origin and without having taken part in their discovery, engages in the conduct described in the previous paragraph.

4. *The acts described in paragraphs 1 and 2 of this Article shall be punishable by a prison sentence of three to five years when:*
 - (a) *they are committed by the persons in charge of or responsible for the files, computer, electronic or telematic supports, archives or registers; or*
 - (b) *are committed through the unauthorised use of the victim's personal data.*

If the confidential data have been disseminated, transferred or disclosed to third parties, the penalties shall be imposed in the upper half.

5. Likewise, when the facts described in the previous sections affect personal data revealing ideology, religion, beliefs, health, racial origin or sexual life, or when the victim is a minor or a disabled person in need of special protection, the penalties provided for in the upper half of the sentence shall be imposed.

6. If the acts are carried out for financial gain, the penalties provided for in paragraphs 1 to 4 of this Article shall be imposed in their upper half. If they also affect data mentioned in the previous section, the penalty to be imposed shall be imprisonment for a term of four to seven years.

7. A prison sentence of three months to one year or a fine of six to twelve months shall be imposed on anyone who, without the authorisation of the person concerned, disseminates, discloses or transfers to third parties images or audiovisual recordings of that person which they have obtained with their consent in a home or any other place beyond the reach of the gaze of third parties, when the disclosure seriously undermines the personal privacy of that person.

The penalty shall be imposed in its upper half when the acts have been committed by the spouse or by a person who is or has been united to him/her by an analogous relationship of affectivity, even without cohabitation, when the victim is a minor or a disabled person in need of special protection, or when the acts have been committed with a lucrative purpose.

<https://www.respetoimagenesintimas.com/>

27. Domestic abuse

The Domestic Abuse Act 2022 in the UK, introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, economic and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

Any child can witness and be adversely affected by domestic abuse in their home life. Experiencing domestic abuse can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL or a member of the Safeguarding Team. This ensures that the school has up to date safeguarding information about the child.

All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL or a member of the Safeguarding Team.

As well as following the UK law 'The Domestic Abuse Act 2022', we also take adhere to the Spanish law 'Organic Law 11/2003', 'Organic Law 01/2004' and 'Organic Law 03/2007'.

28. Honour-based abuse

'Honour-based' abuse (HBA) encompasses 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. All forms of HBV are abuse.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Staff and the DSL are aware of this dynamic and will consider it when deciding what safeguarding action to take.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

Children may be married at a very young age, and well below the age of consent in Spain. School staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to Spain.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

As well as adhering to the UK law 'the Female Genital Mutilation Act 2003', we also adhere to the Spanish law 'Organic Law 11/2003'.

29. Radicalisation and extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should also remain alert to the risk of radicalisation into white supremacy extremism.

School staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014).

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

We also follow guidance from the 'National Strategic Plan to Combat Violent Radicalization (The PEN-LCRV)'. [Ministry of the Interior | National Strategic Plan](#)

30. Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a student may be in a private fostering arrangement, they will raise this with the DSL and the school should notify the local authority of the circumstances.

31. Related safeguarding portfolio policies

This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

32. Special circumstances

a. Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

b. Work experience

The school has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in *Keeping Children Safe in Education (2022)*. The procedures are securely stored with The Business Manager.

c. Children staying with host families

The school may arrange for students to stay with a host family during a foreign exchange trip or sports tour. Some overseas students may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where students stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the students, which will include ensuring students understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The school follows the guidance in Annex E of *Keeping Children Safe in Education (2022)* to ensure that hosting arrangements are as safe as possible.

Appendix One

Four categories of abuse

Physical abuse

Physical abuse is 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 (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent 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 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or

unresponsiveness to, a child's basic emotional needs.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the Direct support provider (DSP) to decide how to proceed.

Appendix Two

Related safeguarding policies

- Staff Code of Conduct
- Behavioural policy
- Complaints procedure
- Anti-Bullying policy
- Safe working practice/Health and Safety policy
- Whistleblowing policy
- SEND
- Attendance policy
- Recruitment and selection
- Grievance and disciplinary
- E-safety policy
- Excursion policy
- Headlice policy
- Pastoral policy
- PSHEE policy
- Confidentiality and information sharing (Data Protection)

To be reviewed: March 2024