

The British School of Córdoba

Safeguarding and Child Protection Policy

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SAFEGUARDING AND CHILD PROTECTION POLICY STATEMENT

Our community is founded on respect and kindness for each other, and care for the world around us. Our value centred learning inspires open, inquiring minds, enabling our students to be confident communicators and proactive global citizens. We strive for academic excellence, nurturing students' curiosity through active learning, reflection and collaboration.

The British School of Córdoba is committed to providing a caring, friendly and safe environment for all pupils.

CONTACT DETAILS

The following page outlines the contact details of named staff in The British School of Córdoba and external agencies linked to child protection and safeguarding

Where a child is in immediate danger or at risk of harm a referral should be made to children's social care and/or the police immediately

BSC contacts and External agencies	
Designated safeguarding lead (DSL)	Azahara Rodriguez azahara.rodriguez@bsCórdoba.es
Deputy safeguarding leads (Deputy DSL)	Sarah Knight (Secondary Dept) sarah.knight@bsCórdoba.es Nicole Fielding (Primary Dept) nicole.fielding@bsCórdoba.es Christa Mickel (Foundation Stage) christa.mickel@bsCórdoba.es
Headteacher	Caroline Ward caroline.ward@bsCórdoba.es
BSC Managing Director	Ana Ortiz Márquez ana.ortiz@bsCórdoba.es
Dirección General de la Infancia. Junta de Andalucía.	Titular: Antonia Rubio González
Observatorio de la Infancia	955547131 secretaria.infancia.cipsc@juntadeandalucia.es https://observatoriodelainfancia.vpsocial.gob.es/
Protección de Menores. Delegación Territorial de Córdoba.	c/ Blanco Soler, 4 957249021
Portal de Protección y Defensa del Menor	https://www.defensordelmenordeandalucia.es/ 900 506 113

Línea Europea de Ayuda a la Infancia	116111
Línea Europea Niños Desaparecidos	116000
SIMIA Procedimiento de Actuación ante situaciones de riesgo y desamparo en la infancia	https://ws058.juntadeandalucia.es/simia/
Servicios Sociales Comunitarios Córdoba, Sección Norte.	957340140 Avenida Cruz de Juárez, s/n Educativa Social correspondiente a la zona.
Centro de Salud: Hospital San Juan de Dios Córdoba	957274811 Avenida del brillante, 106
Centro de Salud: Hospital Universitario Reina Sofía. Urgencias.	957010000
Emergencias	112
Unidad Móvil (Salud)	061
Policía Local	092 // Programa Agente Tutor de la PL
Policía Nacional	091 UFAM atencionfamiaymujer@policia.es

1. INTRODUCTION

The British school of Córdoba takes its responsibilities to protect and safeguard the welfare of children and young people in its care seriously. BSC has a commitment to safeguard and promote the welfare, health (including mental health) and safety of our pupils by creating and maintaining an open, safe, caring and supportive atmosphere.

In this policy, we clearly outline the responsibilities of all adults working in the school to be aware of their duty and how to act upon any concerns with regard to child safeguarding. This ensures that child protection concerns, referrals and monitoring may be handled sensitively, professionally and in ways which support the needs of the child.

The British School of Córdoba recognises its responsibility for:

- Educating staff and pupils in such issues
- Protecting pupils
- Reacting to any child protection issue that may be suspected reported or disclosed
- Reporting concerns about pupil welfare or safety within 24 hours of a disclosure or suspicion of abuse

2. LEGAL FRAMEWORK

PROTOCOLOS DE ACTUACIÓN JUNTA DE ANDALUCÍA

- [Acoso escolar](#) (bullying)
- [Sospecha situación de riesgo y/o desamparo en la infancia](#) (suspicion of children at risk)
- [Violencia de género \(ámbito educativo\)](#) (Gender violence)
- [Agresión a profesorado o personal no docente](#) (Aggression towards a member of staff)
- [Identidad de género](#) (Gender Identity)
- [Detección e intervención con alumnado con trastorno de conducta grave](#) (Detection or intervention of a child with a behaviour disorder)
- [Ciberacoso](#) (cyberbullying)
- [Absentismo escolar](#) (Truancy or absence from school)
- [Protocolo de actuación en caso de divorcio/separación](#). (Protocol for divorce or separation)

3. AIMS AND OBJECTIVES OF SAFEGUARDING IN OUR SCHOOL

We have three primary aims:

- Prevent harm
- Protect pupils from harm
- Support pupils and staff when child protection and safeguarding incidents occur

The school achieves these aims by:

- Ensuring the recruitment of individuals who are suitable and appropriate to work with children and who have positive safeguarding attitude's
- Providing excellent pastoral care and fostering optimism and a positive school atmosphere where pupils feel secure and are encouraged to talk. Pupils are encouraged to find a person, whether a staff member or peer, whom they trust and to speak to that person about any issues which may be worrying them. Pupils are additionally reminded of specific individuals with whom they are able to talk.
- Valuing and promoting effective relationships with parents and professionals from other agents.
- Teaching pupils, via PSHE lessons and a varied curriculum, to identify, reduce and manage risks.
- This includes educating pupils, through regular internal and externally provided ICT safety talks, about the safe use of electronic equipment and access to the Internet.
- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach towards online safety, including the acceptable use of mobile technology and the use of appropriate filters and monitoring systems.
- Ensuring that all staff are professionally trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.
- Encouraging staff to discuss child protection, safeguarding and welfare concerns confidentially with the designated safeguarding lead DSL in order to ensure they have confidence in their own abilities to identify and appropriately handle welfare concerns in cases of abuse and neglect .
- Creating a culture of openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults in school can be shared and dealt with in an appropriate and sensitive manner.
- Following the procedures laid down in this policy and by the Junta de Andalucia as appropriate.

4. ROLES AND RESPONSIBILITIES

All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within school who have specific responsibilities under child protection procedures.

4.1 It is the role of the whole school Designated Safeguarding Lead (DSL) to:

- a) Ensure that all of the child protection procedures are followed within the school, and to make appropriate, timely referrals, in accordance with school procedures .
- b) Ensure that all staff, volunteers and temporary staff are aware of and have read the school's child safeguarding protection policy. New staff will be informed as part of the induction process.
- c) Ensure that all staff are kept up to date with child safeguarding protection procedures with regular training.
- d) Ensure all staff employed including, temporary staff and volunteers within the school are aware of the school's internal procedures, to advise staff and to offer support to those requiring this.
- e) Ensure that the Head of School is kept fully aware of any concerns.
- f) Develop effective working relationships with other agencies and services.
- g) Decide upon an appropriate level of response to specific concerns.
- h) Ensure that accurate safeguarding records are kept according to policy.
- i) Provide guidance to parents, children and staff about obtaining suitable support.

4.2 Deputy Safeguarding Leads

If for any reason the whole school DSL (Azahara Rodriguez) is unavailable, one of the Deputy DSL (Sarah Knight - Secondary, Nicole Fielding - Primary, Christa Mickel - Foundation Stage) will work in her absence.

4.3 School Recruitment

The Board and school Senior Leadership Team are responsible for ensuring that the school follows safe recruitment processes. As part of the school's recruitment, police record checks will be sought for all staff that have substantial and unsupervised access to students.

4.4 The role of the Head of School is to:

- a) ensure that the school has an effective policy
 - b) ensure that the Ministry of Health and Welfare (Consejería de Igualdad y Bienestar Social) guidelines are complied with
 - c) to support the school community with the implementation of the current policy
- Representatives from local Social Services are available to offer advice, support and training to the school's Designated Safeguarding Leads.

5. DEFINITIONS

Safeguarding and promoting the welfare of children means:

- Preventing children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

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

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

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

Children include everyone under the age of 18.

5.1 Definitions of Harm and Abuse

- **Physical Abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional Abuse** is the persistent emotional maltreatment of a child causing severe and persistent adverse effects on the child's emotional development, often by making them feel they are worthless or unloved, inadequate, or undervalued. It may feature age or developmentally inappropriate expectations being posed on children. These may include interactions that are beyond the 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 inappropriate treatment of another. It may involve serious 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** involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. These activities may involve physical contact, including penetrative (eg rape or buggery) or non-penetrative acts. They may include involving children in looking at, or in the production of, pornographic material, or encouraging children to behave in sexually inappropriate ways.

- **Neglect** is the persistent failure to meet the child's basic physical and all psychological needs, likely to result in serious impairment of the child's health or development, such as failing to provide adequate food, shelter and clothing, or neglect of or unresponsiveness to, a child's basic emotional needs.
- **Bullying including cyber bullying** - see bullying policy
- **Child on child abuse** is pupils hurting other pupils; physically, emotionally, sexually.
- **Female genital mutilation (FGM)** it is important to be aware of the issues and possible signs surrounding a girl being risk of FGM or already having suffered FGM. There is a range of potential indicators that a child may be at risk of FGM. Each on their own may mean nothing, but the presence of two or more may indicate risk.

6 WHEN TO BE CONCERNED

6.1 Categories of abuse

All staff and volunteers should be aware that the main categories of abuse recognised by the Junta de Andalucía are:

- a) Physical abuse
- b) Emotional abuse (including domestic violence)
- c) Sexual abuse
- d) Neglect
- e) Exploitation (sexual exploitation or child labour)

In addition, the following categories of 'vulnerability' are recognised:

- Munchausen Syndrome by Proxy
- Inducement to delinquency
- Modelo de vida inadecuado (parental/familial behaviours, such as drug abuse/trafficking, auto-destructive behaviours)
- Circumstances which make it impossible to meet parental obligations (incarceration, parental death, severe mental or physical illness)
- Prenatal abuse (e.g. drug consumption during pregnancy)
- Incapacity to manage the behaviour of the child

6.2 Possible indicators of abuse

All staff and volunteers should be concerned about a child if he/she presents possible indicators of significant harm. This is a list (not exhaustive), of common signs of possible abuse:

- Appearing frightened of the parent/s or other household members
- Acting in a way that is inappropriate to her/his age and development (consideration needs to be taken of different patterns of development and cultural norms).
- Displaying an insufficient sense of personal 'boundaries'.
- Appearing wary of adults
- Regression (losing skills they had before)
- Failure to thrive
- Sudden drop in school performance
- Not wanting to go to the bathroom/remove clothes for PE
- Showing signs of discomfort or pain while sitting, urinating, or passing stools.
- Knowing more than he or she should about sex.
- Being sick or tired most of the time
- Poor personal hygiene/consistently dishevelled appearance
- Suspicious injuries, which may include:
 - Injuries to areas of the body that usually are protected, such as the inside of the legs and arms, the back, the genitals, and the buttocks.
 - Explanations for injuries that are unlikely, inconsistent or bizarre.
 - Signs that the child has been hurt before.
 - The child doesn't receive medical care for his or her injury.

NB: Staff should ensure that any injury/alleged injury is communicated to the DSL as soon as possible.

Accidental and non-accidental injuries

Accidental injuries

- Head injuries tend to involve the parietal bone, occiput of forehead
- Forehead
- Nose
- Chin
- Palm of Hand
- Elbows
- Knees
- Shins

Remember: Accidental injuries typically,

- ❖ involve bony prominences
- ❖ match the history
- ❖ are in keeping with the development of the child

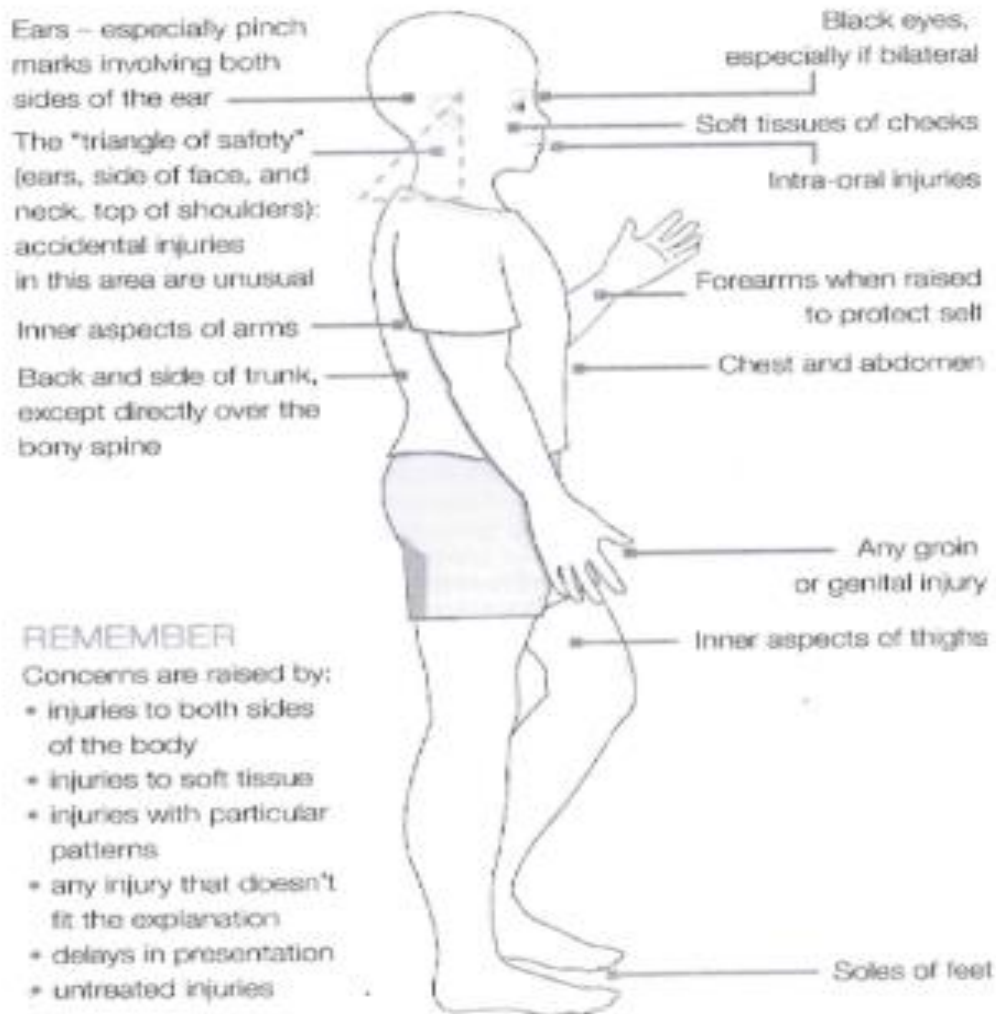
Non- accidental injuries

- Ears - especially pinch marks involving both sides of the ear
- The “triangle of safety” - (ears, side of face, and neck, top of shoulders): accidental injuries in this area are unusual
- inner aspects of arms
- back and side of trunk, except directly over the bony spine
- black eyes especially bilateral
- soft tissues of cheeks
- intra-oral injuries
- forearms when raised to protect self
- chest and abdomen
- any groin or genital injury
- inner aspects of thighs
- soles of feet

Remember: Concerns are raised by:

- ❖ injuries to both sides of the body
- ❖ injuries to soft tissue
- ❖ injuries with particular patterns
- ❖ any injury that doesn't fit the explanation
- ❖ delays in presentation

Non accidental injuries

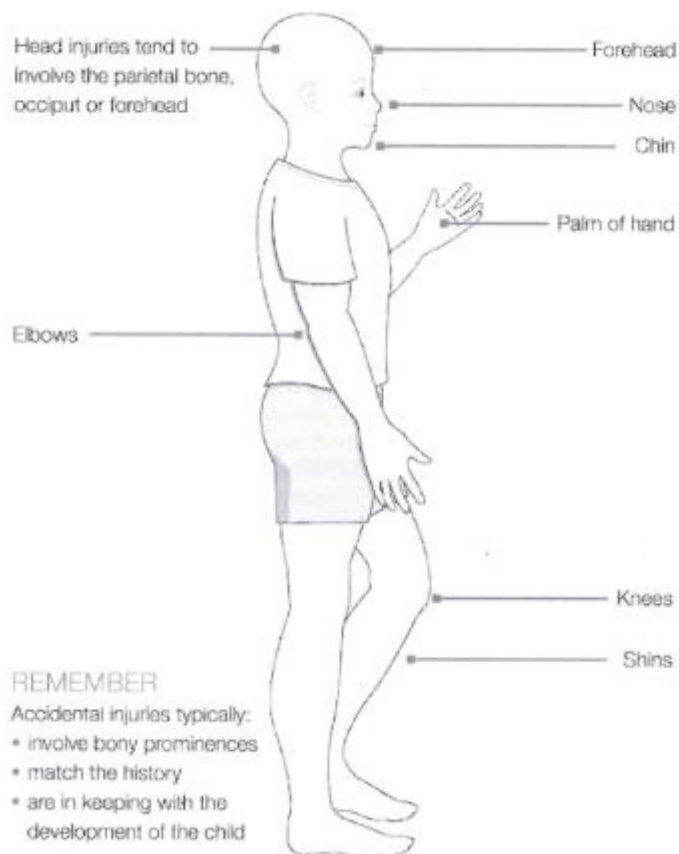


REMEMBER

- Concerns are raised by:
- injuries to both sides of the body
 - injuries to soft tissue
 - injuries with particular patterns
 - any injury that doesn't fit the explanation
 - delays in presentation
 - untreated injuries

ACCIDENTAL AND NON-ACCIDENTAL INJURIES

Accidental Injuries



7 CHILD ON CHILD ABUSE

All staff should be alert to the risk of child on child abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh', and should not develop high thresholds before taking action. Abuse is abuse and child on child abuse should be taken as seriously as abuse by adults.

7.1 What is child on child abuse?

For these purposes, child on child abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms, including, but not limited to, serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation⁰, youth and serious youth violence¹, 'upskirting' (see below), harmful sexual behaviour and gender-based violence³.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative

relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to with reference to the school's policy and in accordance with this policy).

7.2 What role does gender play?

Children of all gender identities can both perpetrate and be the victim of child on child abuse, but this often manifests itself differently; girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

7.3 When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the school's Anti-Bullying Policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include:

- a) where it is repeated over time and/or where the perpetrator intended to cause serious harm;
- b) where there is an element of coercion or pre-planning; and
- c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

This list is not exhaustive, and staff should always use their professional judgement and discuss any concerns with the DSL.

7.4 How can I identify victims of child on child abuse?

Identifying child on child abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from child on child abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document.

Signs can include:

- a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect.
- b) physical injuries.
- c) having difficulties with mental health and/or emotional wellbeing.
- d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much.

e) drugs and/or alcohol use.

f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age.

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

7.5 Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by child on child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

a) child on child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.

b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.

c) children with SEN/D and those who identify as LGBT+ are particularly vulnerable to both abuse and child on child abuse.

7.6 What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with this policy. If a child is in immediate danger, or at risk of harm, a referral to Children's Social Care and/or the police should be made immediately.

7.7 How will the DSL respond to concerns of child on child abuse?

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other child.

Where the DSL considers or suspects that the behaviour might constitute abuse, Children's Social Care will be contacted immediately and, in any event, within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with Children's Social Care and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services.

Any response should be decided in conjunction with Seguridad Social and/or other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of child on child abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting;
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the school. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the school
- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in this Safeguarding Policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the school; (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term; and
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

7.9 How does the school raise awareness of, and reduce the risk, of child on child abuse?

Staff are trained on the nature, prevalence and effect of child on child abuse, and how to prevent, identify and respond to it. The school actively seeks to prevent all forms of child on child abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child on child abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Children are educated about the nature and prevalence of child on child abuse via RE and RSE; they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of bullying and child on child abuse.

7.10 Sexual Violence and Sexual Harassment between Children

Child on child abuse can include two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with, the school's wider approach to peer-on-peer abuse (see above).

Sexual Harassment refers to 'unwanted conduct of a sexual nature'. This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including but not limited to making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group;
- be perpetrated by a child of any age against a child of any age;
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation;
- include behaviours that exist on an often progressive continuum and may overlap; and/o
- be online and offline (physical or verbal).

Advice from the Department for Education on [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) (2017) provides information about what sexual violence and sexual harassment is, how to minimise the risk of it occurring, and what to do when incidents occur, or are alleged to have occurred. The DfE advice highlights best practice and cross-references other advice, statutory guidance and the legal framework. The school will apply the principles set out in it when considering their approach to sexual violence and sexual harassment between children.

Key Points: The above guidance:

- stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up
- highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, and encourages early intervention to avoid potential escalation;
- advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum;
- encourages forums that enable children to talk about issues openly;
- includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;
- advises on how to manage a disclosure, either from the child who has suffered abuse or from other children;
- provides guidance on when to carry out a risk and needs assessment for children affected by sexual violence or sexual harassment;
- provides guidance on initial considerations which schools should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the children, and any power imbalance between them; and
- provides guidance on difficult scenarios which schools might encounter, for example, how to handle an incident between two pupils which is alleged to have taken place away from school premises.

7.11 Upskirting

‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Children with Special Educational Needs (SEN) are potentially more vulnerable, and there may be barriers in recognising abuse in this group of children. In addition, children who are perceived by their peers to be LGBT or identify themselves as LGBT may potentially be more vulnerable.

8 GROOMING

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female, or any gender identity. They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

Children may:

- be very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;
- have access to drugs and alcohol;
- go missing from home or school;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the [NSPCC website](#) for further information about grooming.

8.1 Signs of grooming and/or online abuse

A child may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

8.2 Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

- Overly affectionate behaviour with a child;
- Affording special attention or preferential treatment to a child;
- Excessive time spent alone with a child outside of the classroom/school;
- Frequently spending time with a child in private or isolated areas;
- Transporting a child to or from the school;
- Making friends with a child's parents and visiting their home;
- Acting as a particular child's confidante;
- Giving small gifts, money, toys, cards, letters to a child;
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child; and/or
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child.

8.3 Modus operandi of institutional grooming

- Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
- Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy.
- Gain the trust of others: Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.
- Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.
- Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.

- Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

8.4 Signs of grooming for radicalisation

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement;
- Being in possession of extremist literature;
- Poverty;
- Social exclusion;
- Traumatic events;
- Global or national events;
- Religious conversion;
- Change in behaviour;
- Extremist influences;
- Conflict with family over lifestyle;
- Confused identity;
- Victim or witness to race or hate crimes; and
- Rejection by peers, family, social groups.

9 ONLINE SAFETY

As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. All staff should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use. Whilst it is essential that schools ensure that appropriate filters and monitoring systems are in place, they 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.

Staff should be aware of the school’s policies and procedures regarding online lessons.

9.1 Youth produced sexual imagery/‘Sexting’

Whilst many professionals refer to the issue as 'sexting', there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' This policy only covers the sharing of sexual imagery by children. Possessing, creating, sharing and distributing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks which need careful management. On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'. This is to ensure clarity about the issues this advice addresses.

9.2 What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes children sharing images that they, or another child, have created of themselves.
- 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

9.3 What types of incidents are covered by this policy?

Yes:

- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18).
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.
- A child is in possession of sexual imagery created by another child.

No:

- The sharing of sexual imagery of children by adults as this constitutes child sexual abuse and schools should always inform the police.
- Children sharing adult pornography or exchanging sexual texts which do not contain imagery.
- Sexual imagery downloaded from the internet by a child.
- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult.

9.4 Disclosure of youth produced sexual imagery

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or a colleague, or inform the police directly. Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

9.5 Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with this policy. When an incident involving youth produced sexual imagery comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible;
- The DSL should hold an initial review meeting with appropriate school staff;
- There should be interviews with the children involved (if appropriate);
- Parents of each child should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at greater risk of harm and jeopardise any police/social care investigation; and
- At any point in the process, if there is a concern that a child has been harmed or is at risk of harm, a referral should be made to Children's Social Care and/or the police immediately.

10 MANAGING A DISCLOSURE REGARDING ABUSE

If a child personally confides an incident and only wishes to speak to you, you should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Remain calm, gentle, sensitive and reassuring: take the child seriously
- Remember that it takes considerable courage for the child to make a disclosure because, for example, he/she may; have been specifically told not to tell, feel they are themselves to blame, be frightened that their disclosure will make things worse
- Reassure them they have done the right thing in telling someone
- Reassure the child, but not make promises which might not be possible to keep
- Do not promise confidentiality
- Listen, only asking non-leading questions when necessary to clarify eg, “Can you tell me about what is worrying you?”, “Have you shared their concerns with anyone else?”
- Do not ask leading questions which may be considered to suggest what might have happened, or who has perpetrated the abuse. Eg “Did you Dad hit you?” (If you contaminate evidence with incorrect questioning, you may put the child at risk)
- Do not criticise the alleged perpetrator
- Be honest about what happens next. Explain what has to be done next and who has to be told.
- Make detailed notes immediately (no later than one hour later) of what the child has said quoting the child’s words verbatim include; date, time, place.
- Contact the DSL in person or a member of the designated team (secondary, primary, foundation) without delay.
- Record any subsequent meetings with the students.
- Seek support: dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff should, therefore, consider seeking support for him/herself and discuss this with a member of the child protection team.

The member of staff should not:

- investigate the matter independently, especially through questioning the pupil
- Implement child protection procedures without first consulting the DSL
- if a member of staff is concerned that a pupil is at risk according to any of the definitions, they should discuss the matter with the school’s DSL/DDSL who will:
 - ❖ collect any other relevant information from colleagues
 - ❖ make a decision as to whether or not there are sufficient grounds to refer the matter to the appropriate agencies

- ❖ inform the member of staff and others concerned of the decision and future action to be taken, where appropriate on a need to know basis.

11 PROCEDURES

[Procedimiento de notificación ante la sospecha de situación de riesgo o desamparo en la infancia. SIMIA.](#)

Procedures will be guided by DSL depending on the circumstances of each case and may include contact with the social or health services and/or the police.

12 SHARING INFORMATION WITH PARENTS

The school will always undertake to share our intention to refer a child to Social Services with the parents or carers unless doing so could place the child at greater risk of harm and/or impede a criminal investigation. On these occasions advice will be taken from the Servicio Sociales, Salud, Policía Nacional or Protección de Menores.

13. RECORD KEEPING AND MONITORING

Safeguarding matters are kept with DSL and are shared with other personnel only as required. All safeguarding records are considered confidential and private.

14. TRAINING

Annual training is given to all staff with any updates or reviews, New staff should be given safeguarding training and relevant information as part of their induction.

15 CODE OF CONDUCT

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

16 ACTIONS FOLLOWING CONCERN OF ANOTHER ADULT

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or Headteacher of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adults suitability to work with or have access to children. Such concerns may arise in relation to any adult. All reference in this section to “adult” should be interpreted as meaning any adult and any visitor, unless stated otherwise. The school is conscious of its duty of care to pupils and will always act including if alerted to the possibility of abuse arising from situations or persons outside the school setting.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

Low level concerns

Aims

The overarching aim of the Schools low-level concern policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff feel empowered to raise any low level concern, whether about their own or a colleague’s behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

What is a low level concern, including those that are self-reports?

Self reporting

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct.

Low level concerns

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting of low level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

A low level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the school's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children. A self-report also falls under our Low Level Concerns Policy and can be as described above.

What should I do if I have one?

Where a low level concern (including self-reports) exists, it should be reported to the DSL or to the Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

How will my low level concern be handled (including self-report)?

The DSL will discuss all low level concerns s/he receives with the Headteacher as soon as possible and in any event within 24 hours of becoming aware of it. The Headteacher will, in the first instance, satisfy him/herself that it is a low level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure. The circumstances in which a low level concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation (see below);

b) there is a pattern of low level concerns which collectively amount to an allegation;
or

c) there is other information which, when taken into account, leads to an allegation.

Where the Headteacher is in any doubt whatsoever, advice will be sought from the Designated Officer, if necessary, on a no-names basis.

Having established that the concern is low level, the DSL or Headteacher as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc. The person to which the low level concern relates should be informed of any concern raised about them once all risk has been identified and assessed.

What records will be kept?

Where a low level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept by the Headteacher. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either.

a) the concern (or group of concerns) has been reclassified as an allegation as above;
or

b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

Allegations of abuse made against teachers and other school staff, including agency staff

The purpose of this section of the policy is to outline how allegations against adults will be handled.

What is an allegation?

Allegations represent situations that might indicate a person would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position, or in any capacity. This policy applies to all adults in the school if it is alleged that they have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

- behaved or may have behaved in a way that indicates they may not be suitable to work with children (potential transfer of risk)

An allegation may be triggered by one specific incident or by a pattern of behaviour by the adult, or low level concerns which when considered collectively amount to an allegation.

What should I do if I have an allegation?

Allegations about staff, agency staff or volunteers should be reported immediately to the Headteacher. The adult to whom the concern or allegation relates should not be informed. The Headteacher will liaise with the “Inspección Educativa”.

If the allegation is about the Headteacher, it must be referred to the Managing Director of the school, without informing the headteacher. The managing director will liaise with the “Inspección Educativa”.

Dealing with an allegation

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority Children’s Social Care services. In these cases, local arrangements will be followed to resolve cases without delay. Some rare allegations will be so serious they require immediate intervention by Children’s Social Care services and/or the police.

Initial discussion

The Headteacher or Managing Director (case manager) will not undertake any investigation before first speaking to the Designated Officer. The Headteacher (or Managing Director where there is an allegation against the Headteacher) will inform the Designated Officer of all allegations that come to the school’s attention and appear to meet the criteria. The Designated Officer will consult with the police and Children’s Social Care as appropriate.

The purpose of an initial discussion is for the Designated Officer(s) and the case manager (school initially) to consider the nature, content and context of the allegation and agree a course of action. The Designated Officer(s) may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual’s current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the Designated Officer(s) in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the case manager and the Designated Officer(s), and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the Designated Officer(s) what action should follow both in respect of the individual and those who made the initial allegation.

Inter-agency Strategy Discussion

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened by the Designated Officer or the police. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police will take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where a strategy discussion is needed, or police or Social services need to be involved, the case manager (school) will not inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the accused. The case manager should only inform the accused person about the allegation after consulting the Designated Officer(s) and actions have been decided. It is extremely important that the case manager provides the accused with as much information as possible at that time.

Where it is clear that an investigation by the police or Children's Social Care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the Designated Officer(s) will discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative (see guidance on suspension, below).

Internal investigations

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the Designated Officer(s) will discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, an internal

investigation will be agreed upon and should normally be undertaken by a senior member of school staff.

Where a safeguarding concern or allegation triggers another procedure, such as grievance or disciplinary, that procedure shall only be followed once the immediate safeguarding concern or allegation has been fully investigated.

Suspension of an employee

BSC will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered prior to taking that step.

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases, this will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the Designated Officer(s), Servicio Sociales

Within BSC, suspension requires the authorisation of the Managing Director and/or Members of the Board.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the Designated Officer. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched within two working days, given as much detail as appropriate for the reasons for the suspension. BSC will make clear to the suspended employee where they can obtain support. The person will be informed at the point of their suspension of who their named contact is within the organisation and will be given their contact details.

Where a strategy discussion or initial evaluation concludes that there should be enquiries by Children's Social Care services and /or an investigation by the police, the Designated Officer should canvass police and Children's Social services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision will be taken on a case by case basis having undertaken a risk assessment.

17. WHISTLE BLOWING

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered or that practice may put a pupil or pupils at risk they should in the first instance report their concern to the headteacher, unless their concern relates to the Headteacher in which case they should report their concern to the Managing Director.

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, if they do so in good faith.