Thames British School Madrid

Safeguarding and Child Protection Policy

Guiding Statements Alignment

The Safeguarding and Child Protection Policy at Thames British School Madrid is firmly grounded in and aligned with the school's vision, mission, and core values.

Mission Alignment:
Our mission is to "inspire positive changes through holistic education." This safeguarding policy plays a critical role in achieving that mission by ensuring that children feel safe, valued, and protected—foundational conditions that support personal growth and the development of the whole child. A secure environment is essential for students to explore, learn, and achieve their full potential.

Vision Alignment:
Our vision of promoting global engagement and social impact is reflected in our commitment to protecting all children regardless of their background, identity, or situation. By fostering a culture of inclusion, respect, and protection, we prepare our students to become active, empathetic global citizens.

Values Reflected:

- **Integrity:** We uphold the highest standards of ethical conduct and transparency in all safeguarding practices, reporting, and decision-making processes.

- **Collaboration:** Safeguarding is a shared responsibility. We actively engage staff, students, parents, and external agencies in maintaining a safe and nurturing school environment.

- **Curiosity:** We empower staff and students to be vigilant, ask questions, and learn from incidents or challenges to strengthen our protective practices.

- **Resilience:** We are committed to equipping students and staff with the tools to adapt and respond to adversity. Our proactive and reactive safeguarding systems are designed to support recovery and growth after safeguarding concerns or incidents.

This alignment underscores that safeguarding is not a standalone duty but an integral part of our educational ethos—a school where every child has the right to be safe, heard, and supported.

Contents

1. Policy statement and principles 3

1.1. Child protection statement 3

1.1. a) Policy principles 3

1.1. b) Policy aims 4

2. Safeguarding legislation and guidance 4

3. Roles and responsibilities 5

3.1. The designated safeguarding lead (DSL) 5

3.2. The deputy designated safeguarding lead(s): 6

4. Good practice guidelines and staff code of conduct 6

5. Abuse of position of trust 6

6. Children who may be particularly vulnerable 6

7. Children with special educational needs and disabilities 7

8. Children missing education 7

9. Mental health 7

10. Whistleblowing if you have concerns about a colleague 8

11. Allegations and concerns raised in relation to staff, supply staff, contractors and volunteers 8

12. Staff training 8

13. Safer recruitment 9

13.1. Volunteers 9

13.2. Contractors 10

14. Site security 10

15. Extended school and off-site arrangements 10

16. Staff/pupil online relationships 10

17. Child protection procedures 10

17.1. Recognising abuse 10

17.2. Bullying 11

17.3. Taking action 11

17.4. If you are concerned about a pupil's welfare 11

17.5. If a pupil discloses to you 11

17.6. Notifying parents 12
18. Confidentiality and sharing information 12
19. Referral to children's social care 13
20. Reporting directly to child protection agencies 13
21. Peer on peer abuse 13
21.1. Minimising risk 14
21.2. Managing allegations of peer on peer abuse 15
21.3. Supporting those involved 15
22. Serious violence 16
23. Child criminal exploitation (CCE) and child sexual exploitation (CSE)16
23.1. Child Sexual Exploitation (CSE) 16
23.2. Child Criminal Exploitation (CCE) 17
23.3. County lines 17
24. Online safety 18
25. Sharing nudes and semi nudes 19
27. Honour-based abuse 20
28. Radicalisation and extremism 21
29. Private fostering arrangements 21
30. Related safeguarding portfolio policies 21
31. Special circumstances 22
31.1. Looked after children 22
31.2. Children who have a social worker 22
31.3. Children staying with host families 22
31.4. Boarding schools and children's homes 22
Appendix One 23
Four categories of abuse 23
Physical abuse 23
Emotional abuse 23
Sexual abuse 23
Neglect 23
Indicators of abuse 24
Appendix Two 25
Related safeguarding policies 25

1. Policy statement and principles

Thames British School acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and Spanish legal requirements.

This policy is one of a series in the school's integrated safeguarding portfolio. The portfolio also includes Code of Conduct, Safer Recruitment, Allegations Against Staff, Complaints, Pupil Behaviour and online safety.

This policy is available on the school website

Our core safeguarding principles are:

- safeguarding is everyone's responsibility
- the definition of safeguarding is: Working together to safeguard children. The school's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.
- Early help is support for children of all ages that improves a family´s resilience and outcomes and reduces the chance of a problem getting worse.

1.1. Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation 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, and are consistent with those of La Comunidad de Madrid.

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.
- Pupils 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 pupils, 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.

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

- Section 175 of the Education Act 2002 (maintained schools only)
- Section 157 of the Education Act 2002 (Independent schools only, including academies and Free Schools)
- The Education (Independent School Standards) Regulations 2014 (Independent schools only, including academies and Free Schools)
- 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 2024
- What to do if you're worried a child is being abused 2015.
- The Domestic Abuse Act 2021
- PACE Code C 2019
- Comunidad de Madrid- Unidad de Convivencia

- Comunidad de Madrid- Protocolo de Actuación Ante Cualquier Tipo de Violencia

3. Roles and responsibilities

Key personnel

The Designated Safeguarding Lead (DSL) for child protection is: Beatriz Jaua

Email: beatriz.jaua@thamesbritishschool.es Telephone number: 663416028

The Deputy Designated Safeguarding Lead (DDSL) is: Susana Miranzos

Email: susana.miranzos@thamesbritishschool.es Telephone number: 915790147

The Head of School is: Alex conroy

Email: alex.conroy@thamesbritishschool.es Telephone number: 607562748

The Safeguarding Team is:

Daniel English (Head of Secondary)
daniel.english@thamesbritishschool.es

Sophie Heaton (Head of Primary)
sophie.heaton@thamesbritishschool.es

Alex Conroy (Head of School) Email and telephone number as above

3.1. The Designated Safeguarding Lead (DSL)

The designated safeguarding lead (DSL) takes **lead responsibility** for safeguarding and child protection (including online safety) in the school. 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

- liaising with the Head of School 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
- 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 (DDSL):

Is 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 pupils. 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 pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' 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 pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to police or children's social care.

Please refer to The Code of Conduct for more details.

5. Abuse of position of trust

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

The school's 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 pupils 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 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 Spanish language.

7. Children with special educational needs and disabilities

Children with special educational needs (SEND) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation 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 SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and

- communication barriers and difficulties in overcoming these barriers.
- The school has an ongoing responsibility for the safeguarding of pupils in alternative provision (AP), with an emphasis on providing additional pastoral support for children with SEND.

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

8. Children who are absent from education

Attendance, absence and exclusions are closely monitored. A child being absent from education for prolonged periods and/or on repeat occasions, and a child going missing from education is a potential indicator of abuse, neglect and exploitation 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 are absent or 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 pupils.

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. LGBTQ+

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm.

Unfortunately, children who are LGBTQ+, or are perceived to be LGBTQ+, can be targeted by other children. The risk to these children can be compounded where children who are LGBTQ+ 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. The school emphasises caution when supporting gender-questioning children and we highlight the importance of involving parents in decision-making.

11. Whistleblowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a pupil 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 policy, which can be found in the Policies folder, 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 Head of School. Complaints about the Head of School should be reported to the COO.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

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, or relates to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children our set procedures must be followed. These are set out in the school's whistleblowing policy.

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 training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation, online safety (including an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) and to know what to do if they have a concern.

New staff receive a briefing during their induction, which includes the school's Safeguarding policy and Code of Conduct, reporting and recording arrangements, and details for the DSL. All staff, including the DSL, Head of School and administration staff will receive training that is regularly updated. All staff will also receive any safeguarding and child protection updates via email and staff meetings throughout the year.

14. Safer recruitment

Our school complies with the requirements of Keeping Children Safe in Education (DfE 2024) and the Spanish safeguarding arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The school's Safer Recruitment policy and procedures set out the process in full and can be found in the Policies folder. At least one member of each recruitment panel will have attended safer recruitment training.

The school obtains written confirmation from supply agencies or third party organisations that supply staff or 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. Volunteers

Volunteers, including governors will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

14.2. 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 lanyard, which confirms they have permission to be on site. If a visitor is not wearing a lanyard, it is the responsibility of all school staff members to redirect that person to the reception area to obtain one. Parents who are simply delivering or collecting their children out of normal hours will stay in the reception area, or be accompanied to the classroom by the receptionist. All visitors are expected to observe the school's

safeguarding and health and safety regulations. The Head of School will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. It is essential to verify that they have signed in properly and are being supervised during their time on the premises. This helps maintain school security and safeguard the well-being of students and staff. All teaching staff are required to provide a **criminal background check** (DBS) to ensure the safety and well-being of students.

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. The extended school activities that are provided by and managed by the school, such as ECAs or Extra Care, follow and adhere to our own child protection policy. 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 pupils attend off-site activities, including day and residential visits and work-related activities, we will perform a risk assessment to ensure that effective child protection arrangements are in place.

17. Staff/pupil online relationships

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils, set out in our Code of Conduct. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

18. Child protection procedures

18.1. Recognising abuse

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

Abuse, neglect and exploitation 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 2024) refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

18.2. Bullying

While bullying between children is not a separate category of abuse, neglect and exploitation, 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 to the Safeguarding Team, who will follow the Comunidad de Madrid protocols to conduct an investigation.

18.3. 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, within the same 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.

18.4. If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk. The pupil'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 pupil the opportunity to talk and ask if they are OK or if they can help in any way.

If a pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, 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.

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

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods 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 pupil'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 pupil what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- record the disclosure on ISAMS
- seek support if they feel distressed.

18.6. Notifying parents

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

Our focus is the safety and wellbeing of the pupil. 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,¡ or Head of School. 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 (2024)* emphasises that **any** member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled by the DSL.

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 pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil 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 pupil or parent to see child protection records, they will refer the request to the DSL.

The UK GDPR and the Data Protection Act 2018 and the UK GDPR do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.
In Comunidad de Madrid, the school is allowed to share information with: other educational centres, Social Services, Social Security, Town Halls and Legal agencies.

The school follows the GDPR confidentiality and information-sharing protocols.

20. Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (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, police or Proteccion al Menor if:

- the situation is an emergency and the designated safeguarding lead, their deputy and the Head of School are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil'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 if 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.

22.1. 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.
- RE and PSHE are 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.
- The school will conduct sociograms in select classrooms where we believe additional insights are needed to better understand student interactions and address any significant findings.

22.2. 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. Students can also be asked to write a statement in order to gather the information.
- **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 (Unidad de Convivencia, in Madrid). 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 pupil with parents. Our focus is the safety and wellbeing of the pupil 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. 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. It will also state the agencies involved if applicable.

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:

Annex 1b of *Protocol for Any Form of Violence in Schools* from Comunidad de Madrid. This is available on the shared drive, and from any member of the Safeguarding Team.

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 *(2024)*.

22.3. 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 pupil 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 pupil that harmed. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil 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.

24.1. 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.

24.2. 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.

24.3. 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 and effective filters and monitoring systems are in place to block harmful and inappropriate content by managing the content available to pupils, who can contact our pupils and the personal conduct of our pupils online. We take care to ensure that these systems do not unreasonably impact on teaching and learning, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils. Our filtering and monitoring systems are reviewed regularly (at least annually) to ensure their effectiveness.

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. 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 staff. If appropriate, there will be subsequent interviews with the young people involved.
- 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. You can find the information at:
UK Council for Internet Safety - GOV.UK (www.gov.uk)

27. **Domestic abuse**

The Domestic Abuse Act 2021 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.

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.

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. It is also illegal in Spain. 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 pupils 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.

Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

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.

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 pupils 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

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 pupil 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: Code of Conduct, Safer Recruitment, Allegations Against Staff, Complaints, Pupil Behaviour and online safety.

32.Special circumstances

32.1. 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.

32.2. Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform about safeguarding and promoting the

child's welfare.

32.3. Children staying with host families

The school may arrange for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils 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 pupils 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 pupils, which will include ensuring pupils 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 (2024)* to ensure that hosting arrangements are as safe as possible.

32.4. Boarding schools and children's homes

Research has shown that children can be particularly vulnerable in residential settings. All boarding schools and residential special schools comply with the National Minimum Standards for their setting and are appropriately inspected.

Those schools should be particularly alert to the signs of abuse in such settings and work closely with the host local authority and, where relevant, any local authorities that have placed their children there.

32.5 Children in court

Annex B now includes links to two child-friendly guides or support children who have to give evidence in court.

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 DSP to decide how to proceed.

Appendix Two

Related safeguarding policies

- Code of Conduct
- Physical intervention and the use of reasonable force
- Behaviour
- Complaints procedure
- Anti bullying
- Whistleblowing
- Safer Recruitment

33 Review

This Code of Conduct is reviewed and amended every year by the school. We will monitor the application and outcomes of this code of conduct to ensure it is working effectively.

Policy Tracker

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