



Safeguarding and Child Protection Policy

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To provide clear guidance to staff and others about expected codes of behaviour in dealing with safeguarding and child protection issues, thus ensuring child protection concerns and referrals will be handled sensitively, professionally and in ways which support the needs of the child.

Staff responsible: Senior management team and Board member responsible for safeguarding children

To be read by: all staff working with children at BIS



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Introduction

BIS fully recognises its responsibilities for safeguarding children. Our students' welfare and safety are at the heart of our school's ethic and in everything we do. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

In accordance with relevant law and guidance, this policy details our procedures for safeguarding and child protection.

Application

This policy applies to all teaching, non-teaching, residential, pastoral, support, contract staff and ancillary staff, volunteers, non-school based staff and any other adults working at the School. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned unless otherwise stated. It also applies to adults in the early years phase of the School.

Throughout the document, the term DSL (designated safeguarding lead) is used.

This Safeguarding Policy applies to all students and adults in the school, including when being educated off-site and undertaking an educational visit. It also applies to any visiting students.

Publication

This Policy is updated annually and is published to all staff and volunteers.

Rather than duplicating content from UK [Keeping Students Safe in Education](#) (September 2020) in this policy, it should be understood that the School will always refer to this document as the benchmark for all safeguarding practice and decision making unless guidance is superseded by Serbian law.

Policy statement

BIS believes that children, young people and vulnerable adults should never experience abuse of any kind. We have an unfaltering commitment to promote the welfare of all children, young people and vulnerable adults to keep them safe. We are committed to reducing risk connected to all safeguarding and child protection matters.

We recognise that the welfare of children, young people and vulnerable adults is paramount in the work we do and in the decisions we take, and that all children, young people and vulnerable adults, regardless of age, disability, gender reassignment/identity, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.

Safeguarding children

Safeguarding is the golden thread within an organisation in which practitioners are required to undertake preventative and protective measures to keep those most vulnerable free from risk, maltreatment and harm.

Safeguarding is often described as an umbrella, and some of the areas that are considered under this umbrella



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are: child protection, staff code of conduct, safe working practice, curriculum, safer recruitment, health and safety, contracts, due diligence, transition arrangements, e-safety, anti-bullying, legal compliance, attendance, missing children, pastoral care and mental well-being, governance and accountability, staff training and mentoring, medical compliance, whistleblowing, staff records, single center record.

Child protection is part of safeguarding and promoting the welfare of children. It is an activity undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. Child protection forms both direct and indirect actions that should be taken to mitigate a risk.

Key personnel in the school

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

Jelena Milicevic

Contact Telephone Number: 069/1505972

Email address: jelena.milicevic@bis.edu.rs

The assistant designated safeguarding lead (ADSL) in this school is:

Ljubica Stankovic

Contact Telephone Number: 062/204243

Email address: ljubica.stankovic@bis.edu.rs

The designated safeguarding governor (DSG) for this school is:

Mirjana Djoric

Email address: mima_djoric@hotmail.com

Aims

BIS recognises that safeguarding covers a broad range of areas and it aims to achieve the following:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health and/or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Undertaking that role so as to enable children to have optimum life chances, so they can enter adulthood successfully.

Our school will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to
- Ensure that children know that there are adults in school who they can approach if they are worried or in difficulty
- Include in the curriculum activities and opportunities which equip children with the skills they need to stay safe
- Ensure that wherever possible every effort will be made to establish effective and positive working



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relationships with parents and colleagues

- All students and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance in doing so.

Due to their day-to-day contact with children, school staff are uniquely placed to observe changes in children's behaviour and to recognise the outward signs of abuse. Children may also turn to a trusted adult in the school when they are in distress or at risk. It is vital that school staff are alert to the signs of neglect and abuse and understand the local procedures for reporting and acting upon their concerns.

Legislation and guidance

As BIS is working closely with Council of British International Schools (COBIS), it is obliged to follow the British requirements where possible as well as incorporate local regulations.

Guidance is largely taken from [Keeping Children Safe in Education 2020](#).

In child protection matters the school will follow the inter-agency and child protection procedures laid down by the relevant Municipality Social Work Centre - Child Protection Office in Serbia as well as

- '[General Protocol for Protection of Children from Abuse and Neglect](#)' - 2005 (Serb)
- '[Special Protocol for Protection of Children and Students from Violence Abuse and Neglect in Education Institutions](#)' - 2007 (Serb)
- '[Republic of Serbia: The National Plan of Action for Children](#)' - 2004
- '[Violence against children in Serbia](#)', UNICEF Serbia, 2017

This policy is also informed by UK regulations as follows:

- '[The Education \(Independent School Standards\) Regulations](#)' (ISSR) - 2019
- '[Keeping Children Safe in Education](#)' (KCSIE) - Sep 2020
- '[Working Together to Safeguard children](#)' (WTSC) - 2018
- '[Prevent Duty Guidance for England and Wales](#)' - 2015
- '[Statutory Framework for the Early Years Foundation Stage](#)' - 2017
- '[What to do if you are worried a child is being abused – advice for practitioners](#)' - 2015 and
- '[Sexual Violence and Harassment between children in Schools and Colleges](#)', - May 2018.

Related policies

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the school policies and procedures referred to below:

- [Safer recruitment policy](#)
- [Security staff policy](#)
- [E-safety policy](#)
- [Acceptable Use Policy](#)



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- [Staff Code of Conduct](#)
- [Data management and data retention schedule policy](#)
- [Primary school behaviour policy](#)
- [Secondary school behaviour policy](#)
- [Anti-bullying policy](#)
- [Information sharing policy](#)
- [Health and Safety policy](#)
- [Off-site activities policy](#)
- [Whistleblowing policy.](#)

Roles and responsibilities

The school will ensure that the Designated Safeguarding Lead:

- is appropriately trained
- acts as a source of support and expertise to the school community
- has an understanding of the local Serbian procedures
- keeps written records of all concerns when noted and reported by staff or when disclosed by a child ensuring that such records are stored securely and reported onward in accordance with this policy guidance but kept separately from the child's general file
- refers cases of suspected neglect and/or abuse to children's social care or police in accordance with this guidance and local procedure
- notifies children's social care if a child with a child protection plan is absent for more than two days without explanation
- ensures that when a child with a child protection plan leaves the school, their information is passed to their new school and the child's social worker is informed
- attends and/or contributes to child protection conferences in accordance with local procedure and guidance
- coordinates the school's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies
- ensures that all staff sign to indicate that they have read and understood this policy
- ensures that the child protection policy is updated annually
- liaises with the nominated governor and Director as appropriate
- keeps a record of staff attendance at child protection training
- makes this policy available to parents

The assistant designated safeguarding lead (ADSL) is appropriately trained and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the assistant will assume all of the functions above.

All student protection and safeguarding concerns, discussions and decisions made and the reasons for such decisions are recorded accurately and kept securely in a locked cabinet, if in paper form, in the Head of school's office. Records are carefully managed by the DSL.

The governing body ensures that the school has:

- a DSL for safeguarding and child protection who is a member of the senior leadership team and who has undertaken the approved training in inter-agency working in addition to basic child protection training



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- child protection policy and procedures that are consistent with requirements, reviewed annually and made available to parents on request
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the Directors
- safer recruitment procedures that include the requirement for appropriate checks
- a training strategy that ensures all staff including the Directors receive child protection training with refresher training at three-yearly intervals. The DSL should receive refresher training at two-yearly intervals.
- provision to ensure that all temporary staff and volunteers are made aware of the school's arrangements for child protection
- the governing body nominates a member to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Directors.

The Directors:

- ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff
- allocates sufficient time and resources to enable the DSL and the ADSL to carry out their roles effectively including the assessment of students and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures (see [Whistleblowing Policy](#))
- ensures that child's safety and welfare is addressed through the curriculum.

Good practice guidelines

To meet and maintain our responsibilities towards children, the school community agrees to the following standards of good practice:

- treating each other with respect
- setting a good example by conducting ourselves appropriately
- involving children in decision-making which affects them
- encouraging positive and safe behaviour among all stakeholders
- being a good listener
- being alert to changes in child's behaviour
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding all of the school's safeguarding and guidance documents on wider safeguarding issues, for example bullying, physical contact, e-safety plans and information-sharing
- asking the child's permission before doing anything for them which is of a physical nature such as assisting with dressing, physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language
- being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse

Abuse of trust

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



In addition, staff should understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18 where that person is in a position of trust even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a child under 18 may be a criminal offence even if that child is over the age of consent.

Children who may be particularly vulnerable

Some children may be at increased risk of neglect and/or 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 happens or who have a high level of tolerance in respect of neglect.

To ensure that all of our children receive equal protection, we will give special consideration and attention to children who are:

- disabled or have additional educational needs
- living in a known domestic abuse situation
- affected by known parental substance misuse
- asylum seekers
- living away from home
- vulnerable to being bullied or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- living in chaotic, neglectful and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking

Special consideration includes the provision of safeguarding information, resources and support services in community languages and accessible formats.

Students with additional educational needs and/or disabilities

Students with additional educational needs and disabilities can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of students. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration;
- that students with AEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these challenges.

Support for those involved in a child protection issue

Child neglect and abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person (Director of Education) who will keep all parties informed and be the



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central point of contact. Where a member of staff is the subject of an allegation made by a child, a separate link person, acceptable to both parties, will be nominated to avoid any conflict of interest

- responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of help lines, counselling or other avenues of external support
- following the procedures laid down in our whistle blowing, complaints and disciplinary procedures
- co-operating fully with relevant statutory agencies.

Staff training

As part of their induction programme all newly appointed staff, including part-time, temporary and voluntary staff, receive training in safeguarding issues including:

- this Safeguarding and Child Protection Policy;
- relevant local Serbian legislation;
- [Keeping Children Safe in Education](#) (September 2020) Part 1 and Annex A for adults working directly with students;
- the School's [Primary Behaviour policy](#); [Secondary Behaviour policy](#)
- the School's Safeguarding: [Preventing Extremism and Radicalisation](#);
- ['What to do if you're worried a student is being abused – advice for practitioners'](#) (2015);
- the role of the DSL.

At induction (and annually thereafter, as minimum) staff are trained on:

- identifying signs of abuse;
- knowing what to do to raise concerns;
- knowing how to make a referral (including if the DSL is not available or the DSL is not acting); and
- recognising the need for early help.

Staff should re-read KCSIE each time it is updated by the DfE (usually annually), and are told of updates by the DSL and ADSL. Staff are expected to sign to note they have read and understood the content of [KCSIE Part 1](#). Refresher training for staff is provided regularly. All staff are provided with safeguarding and student protection updates annually, as minimum. The DSL leads on ensuring that regular safeguarding and student protection updates are circulated to all staff.

DSL will receive training updated at least every two years, including training in inter-agency procedures, Serbian local legislation, KCSIE and the student protection procedures and training in preventing extremism.

Safer recruitment

Our school endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in [Keeping Children Safe in Education](#) (September 2020) together with the school's individual procedures. The Director is required to ask staff for necessary certification in this area.

Safer recruitment means that all applicants will:



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- complete an application form
- provide two referees including at least one who can comment on the applicant's suitability to work with children
- provide evidence of identity (passport and birth certificate) and qualifications
- be checked through the Criminal Records Bureau as appropriate to their role
- be interviewed

All new members of staff will undergo an induction that includes familiarisation with the school's safeguarding and child protection policy and identification of their own safeguarding and child protection training needs. All staff sign to confirm they have received a copy of the child protection policy (see Appendix I). Training includes the staff code of ethical behaviour, and the identity of the designated persons. Training takes place before teaching starts.

All employees of the school, and other professionals who work regularly alongside children, have police clearance (i.e. a DBS check, ICPC, "Uverenje o (ne)kaznjavanju"). All professionals who work in school, staff or volunteer, are compiled in the Single Centre Register maintained by the Business manager. Any other professional workers entering school without police clearance are expected to comply with the above advice and work alongside teachers and never in isolation with children.

Single Central Register

Our school prioritises embedding a culture of safe recruitment as part of our strategy for preventing harm to students (see [Safer Recruitment Policy](#)). Statutory procedures for checking the suitability of staff and volunteers who work with students are always followed, including checking their identity, mental and physical fitness, right to work in Serbia, verifying professional qualifications as appropriate, overseas background checks as appropriate, prohibition from teaching and/or management of an independent school checks, detailed references and interview information. All such recruitment checks are recorded in the school's office and all applicants show their original certificates to the school before they take up the post or as soon as practicable afterwards and in which case, the school will ensure a separate barred list check has been undertaken in advance. A Risk Assessment will be in place, approved by the Director of Education, until full DBS or equivalent clearance is received. This will fully detail reasons and the supervision in place to mitigate any risks. This will be reviewed regularly.

The school adheres to the definition of supervision as "reasonable day to day supervision by another person engaging in regulated activity" and follows Annex F of [Keeping Children Safe in Education](#) (September 2020) accordingly. Importantly, the following points are adhered to:

- there must be supervision by a person who is in regulated activity
- the supervision must be regular and day to day; and
- the supervision must be 'reasonable' in all the circumstances to ensure the protection of students.

Health and Safety

The Head of School will ensure that there is a robust, up to date [Health and Safety Policy](#) and Procedure to meet the statutory responsibility for the safety of students and staff at the school.

The Head of School will identify and manage health and safety through the use of risk assessments, which are carried out:



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- On an annual basis for the school learning spaces and environment in and outdoors.
- For all school trips and educational visits.
- For students travelling between locations during the school day.
- For all work-based learning on work experience placements.
- When a student returns following an exclusion due to risky or violent behaviour.
- When there are any changes to the premises or practices.
- Following a serious accident in relation to staff and/or students.
- When there is a high-level risk associated with contact with parents.
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage.

Visitors and contractors will be expected to:

- Report to the school reception on arrival.
- Provide proof of identity.
- Wear a visitors badge at all times.
- Receive suitable supervision by school staff when on site.
- Be made aware of the arrangements for safeguarding and health and safety.
- Comply with the relevant vetting checks specified through the school's recruitment process.

Staff wellbeing

BIS will promote the health and wellbeing of all staff through learning, policies, and creating a safe and healthy physical and social environment. This policy confirms our commitment to:

- providing our staff with a safe, healthy and supportive environment in which to work
- recognising that the health and wellbeing of our staff is important, and that it not only benefits the individual, but also children, families and the wider community
- providing a supportive workplace culture where healthy lifestyle choices are valued and encouraged.

Management has a responsibility to:

- ensure all staff are accepted and valued as individuals and professionals
- ensure effective health and wellbeing communication channels are in place
- enable and cultivate a workplace culture that promotes connectedness, is inclusive and provides support
- recognise staff for the work they do and provide relevant and regular feedback
- provide professional development and resources as required, to support staff to enhance knowledge of their own health

Student wellbeing

BIS recognises that it has an important role to play in supporting the mental health and wellbeing of our students and that in some cases mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, BIS staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Staff will have special consideration for:



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- Emotional state (fearful, withdrawn, low self-esteem);
- Behaviour (aggressive or oppositional; habitual body rocking);
- Interpersonal behaviours (indiscriminate contact or affection seeking, overfriendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).

To support parents and carers, students and staff, BIS will take into consideration the below factors:

- The importance on how to connect with and support others;
- The importance of voicing concerns;
- How to handle worries and concerns and coping strategies;
- The importance of physical wellbeing;
- The importance of sleep;
- Managing media and information;
- Understanding the facts;
- Focusing on positives and goal setting;
- Keeping an active mind;
- Worries about health and finance;
- Routine.

As a consequence of the pandemic, staff, students, parents and carers may be experiencing severe stress and anxiety. Everyone reacts differently to events and changes in the way that we think, feel and behave vary between different people and over time.

Teachers should be aware of this in setting expectations of students' work where they are at home and/or on site. Equally taking into consideration their own working arrangements and workload.

In response to COVID-19 BIS has a dedicated school counsellor Ms Jelena Milicevic who can be contacted via jelena.milicevic@bis.edu.rs.

The contact details of the pastoral care lead is: Ms Aleksandra Keserovic, director@bis.edu.rs

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is essential that staff are aware of how these children's experiences can affect their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead.

Management of safeguarding

The elected governor for Child Protection (DSG), DSL and ADSL are responsible for child protection matters. The DSG's responsibility is to maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice at all times. Safeguarding duties remain the responsibility of the proprietor group as a whole including the annual review of safeguarding.

The DSL should be provided with sufficient time, funding, supervision and support to fulfil his or her child welfare and safeguarding responsibilities effectively. All professionals working with children should



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review their own practice and discuss any concerns they may have about welfare and safeguarding matters at the two-yearly meetings with the Director of Education or at any time.

It is the staff's professional duty to report welfare and safeguarding concerns to the designated safeguarding lead or, in the absence of action, directly to local children's services following the procedures as set out in this document.

Extended school and off-site arrangements

Where extended school activities are provided by and managed by the school, our own safeguarding and child protection policy and procedures apply. If other organisations provide services or activities on our site, we will check that they have appropriate procedures in place including safer recruitment procedures.

When our children attend off-site activities, we will check that effective child protection arrangements are in place.

Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images so we must ensure that we have some safeguards in place. To protect children, we will:

- seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- use only the child's first name with an image
- ensure that children are appropriately dressed
- encourage children to tell us if they are worried about any photographs that are taken of them
- remind large gatherings of parents that they are responsible for the images they take and they are not to upload these images to any social media.

All staff should be aware that 'upskirting' is now a criminal offence. A definition of upskirting is, "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm" (DfE, 2019a).

E-Safety

Most of our children will use mobile phones and computers at some time. We acknowledge that many children have unlimited access to 3G and 4G networks. They are a source of fun, entertainment, communication and education. However, we know that some people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Cyber-bullying by children via texts and emails will be treated as seriously as any other type of bullying and will be managed through our behavioural and safeguarding procedures.

Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and children are not allowed to access these sites whilst in school. Some children will undoubtedly be chatting on mobiles or social networking sites at home. The school makes every effort to educate students about the associated risks of this behaviour.



Opportunities to teach safeguarding

We consider opportunities for teaching safeguarding as part of a broad and balanced curriculum. This will be covered through PSHE.

Safeguarding and child protection procedures

Safeguarding is everyone's responsibility

Safeguarding is everyone's responsibility and all staff, regardless of their role, should exercise vigilance and be watchful for, and aware of, signs that a student may be in need of help as well as the signs of abuse and neglect (see below for a list of some common signs). If a staff member has any concerns about a student s/he should report the concern to the DSL. If staff members have nagging doubts or questions they should speak immediately to the DSL or in their absence to the ADSL. The DSL (or ADSL if appropriate) will discuss the matter with the member of staff and will decide on an appropriate course of action. This discussion and actions may be recorded if found appropriate by the DSL/ADSL.

Early help and inter-agency work

All staff should be aware of the early help process, and understand their role in it. This includes:

- identifying emerging problems and potential unmet needs;
- liaising with the DSL;
- sharing information with other professionals to support early identification and assessment; and
- in some cases, acting as the lead professional in undertaking an assessment of the need for early help.

All staff should be alert to identifying students who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a student's life. If a member of staff has a concern that a student may be in need of early help then s/he should, in the first instance, report it and discuss early help requirements with the DSL.

Where a student and family would benefit from coordinated support this would be discussed with the DSL who will make appropriate arrangements. If early help is appropriate, where they are not taking the lead, then the DSL should support the member of staff in liaising with other agencies as appropriate.

Effective early help in a school setting involves the school (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the student and their family early, in order to significantly improve the outcomes for the student. It is hoped that in each case this should improve the welfare of the relevant student. However, each case should be kept under constant review, and consideration should be given to a referral to student's social care if the student's situation does not appear to be improving.

What to do if there is a concern?

If it is a minor concern, such as if a child is often tired in lessons, the teacher should speak to the parents and monitor improvements and changes of the situation and inform the Director of Education. If it is a more serious concern or issue the teacher must speak to the DSL before taking any action. Parents need to be informed and the relevant staff will attend the meeting together with the class teacher if there is a serious concern.

What to do if you suspect a child is at risk of harm?



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There will be occasions when you suspect that a child may be at serious risk but you have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

If following your conversation, you remain concerned, you should discuss your concerns with the DSL. Use the Expression of concern form (see Appendix II) to record these early concerns and send the form to DSL or ADSL.

What do to if a child is at risk of significant harm or in immediate danger?

If at any time it is considered that the student may be a student in need, has suffered or is at risk of significant harm, or is in immediate danger, a referral should be made immediately to students' social services – in the local area where the student lives (it may also be necessary to liaise with prior schools and agencies in another country). In accordance with Serbian national procedures the parents must also be informed unless they are deemed to be a risk to the student. In cases of significant harm or immediate danger the police should be notified immediately.

Responding to a disclosure

When reporting and/or handling a concern about a student all staff should act with the utmost discretion and any students who are involved will receive appropriate care and support. Staff should always listen to a student who wants to talk about a concern. If a student tells a member of staff that they know about or have been a victim of student abuse or neglect the member of staff should:

- Allow the student to speak freely and remain calm. Do not interrupt the student or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Limit questioning to the minimum necessary for clarification "Can you tell me more about that please?" "Where exactly did this happen?" and avoid leading questions such as, "Has this happened to your siblings?"
- At an appropriate time tell the student that the matter will be referred in confidence to the appropriate people. Promises of confidentiality should not be given (see Confidentiality section below).
- Tell the student what will happen next. The student may want to accompany you to see the DSL, otherwise let the student know that someone will come to see them before the end of the day.
- Seek support if they feel distressed.

Taking action

Key points to remember for taking action are:

- in an emergency take the action necessary to help the child, for example, call 192
- report your concern to the DSL by the end of the day
- if the DSL or ADSL are not around, ensure the information is shared with the most senior person in the school that day and ensure action is taken to report the concern to children's social care without delay
- do not start your own investigation alone
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends



or family

- complete Expression of concern form (see Appendix II)
- seek support for yourself if you are distressed.

Confidentiality

Staff are informed that every adult working within school must respect the need for confidentiality within the school. By law teachers should refrain from discussing personal matter or behaviour of a student or other staff member openly without their consent. Staff members are advised to comply with these regulations at all times – including break times and outside school. Possible concerns should be discussed in a professional setting with the DSL who will liaise with the nominated child protection governor.

Staff should never guarantee confidentiality to students or adults wishing to tell them about something serious as this may ultimately not be in the best interests of the student. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure that the appropriate action is taken. All staff involved will also take whatever steps they can to protect the informant from any retaliation or unnecessary stress that may occur after a disclosure has been made. Generally, there is an obligation on schools to speak to the parents about the situation. The only exception to this is when there is immediate danger from the parents and it could worsen the child's situation. In that case the DSL needs to be informed immediately.

Recognising abuse

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

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example, by hitting them or by failing to act to prevent harm, for example, by leaving a small child alone at home or leaving knives or matches within reach of an unattended toddler.

There are a number of different categories of abuse and each will be described below.

Physical 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 - this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness. Physical abuse also includes female genital mutilation (see section below).

There isn't one sign to look out for that will prove that a student is being physically abused. But if a student often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated. Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- respiratory problems from drowning, suffocation or poisoning;
- untreated or inadequately treated injuries;
- bruising which looks like hand or finger marks;
- cigarette burns, human bites; or scarring, scalds and burns.



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 children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age- or developmentally-inappropriate expectations being imposed 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 from participating in normal social interaction. It may involve seeing or hearing the ill-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.

Signs of emotional abuse tend to be behavioural rather than physical (see below). If a student is being abused, their behaviour may change in a number of ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other students;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- become sexually active at a young age;
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other students;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;
- refuse to attend school or run away from home;
- lack confidence or have low self-esteem; or use drugs or alcohol.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities including prostitution whether or not the child is aware of what is happening. The activities may involve physical contact including penetrative and non-penetrative acts. They may include non-contact activities such as involving children in looking at pornographic material or participating in the production of pornographic material, watching sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a student 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 students.

Signs of sexual abuse displayed by students may include:

- pregnancy
- sexually transmitted infection
- pain/itching/bleeding/bruising/discharge to the genital area/anus;
- urinary infections/sexually transmitted diseases;
- difficulty walking or sitting; or persistent sore throats
- overtly sexual behaviour at inappropriate times or ages.



Child sexual exploitation (CSE)

CSE is a form of sexual abuse which involves students receiving something in exchange for sexual activity. CSE involves an imbalance of power in the relationship; it can involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. In addition to the behavioural indicators above, key indicators of CSE include appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; and having older boyfriends or girlfriends. Any concerns regarding CSE should be immediately reported to the DSL.

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 misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing or shelter including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision including the use of inadequate carers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of possible neglect include:

- the student seems underweight or is very small for their age;
- they are poorly clothed, with inadequate protection from the weather;
- they are often absent from school for no apparent reason; or
- they are regularly left alone, or in charge of younger brothers or sisters.

Grooming

Grooming is the process by which an individual prepares a student, significant adults and the environment for abuse of this student. Students 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. They could be any age. Many students 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.

Students 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 students, 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.



Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit these signs 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 student;
- affording special attention or preferential treatment to a student;
- excessive time spent alone with a student outside of the classroom/school;
- frequently spending time with a student in private or isolated areas;
- transporting a student to or from the school;
- making friends with a student's parents and visiting their home;
- acting as a particular student's confidante;
- giving small gifts, money, toys, cards, letters to a student;
- using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a student;
- flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a student.

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 student to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the student's parents or the school in order to foster secrecy.
- Gain the trust of others – Institutional offenders are often popular with students 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 student - This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the student - 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 student believe that they have no choice but to submit to the offender.

Signs of grooming for radicalisation

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



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- Change in behaviour
- Extremist influences
- Conflict with family over lifestyle
- Confused identity
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups or faith

Female genital mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a student or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present it could signal a risk to the student or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on the [World Health Organisation](#) site.

Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, he or she has a statutory duty to personally report it to the police. Those failing to report such cases to the police will face disciplinary sanctions. Unless the teacher has good reason not to they should still consider and discuss the case with the DSL and involve students' social care as appropriate. Any other adults with concerns about FGM should report their concerns to the DSL immediately.

Serious crime

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs. (DfE, 2019a)

Children who run away or go missing

It is the school's duty to check up on absent children and inform the local authority of any unexplained absences.

If a child runs away from school or goes missing, the Director of Education or Head of School must be informed immediately. Immediate contact with the police is required if the child cannot be found or caught. Also, immediate contact with the parents is required. All facts are to be documented.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. The subject of bullying is addressed at regular intervals in the PSHE curriculum. If the bullying is particularly serious or the anti-bullying procedures are deemed to be ineffective, the Director of Education



and the Head of School will consider implementing child protection procedures.

Peer-on-Peer Abuse

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships. All staff should recognise that children are capable of abusing their peers. Peer-on-peer abuse can take various forms, including but is not limited to bullying (including cyber bullying), gender based violence, grooming, inappropriate or harmful sexualised play (younger students), sexual assaults, sexting and gender issues within groups of girls and boys. These types of abuse rarely take place in isolation.

Any response to peer-on-peer abuse therefore needs to consider the range of possible types of peer-on-peer abuse set out above and capture the full context of children's experiences.

If a member of staff thinks for whatever reason that a student may pose a risk of harm to him/herself or to others (this includes but is not limited to cases of serious bullying) the member of staff should report their concern and talk to the DSL immediately (see the School's [Anti-Bullying Policy](#) for further details).

All staff should be aware

- (a) that safeguarding issues can manifest themselves via peer on peer abuse; and
- (b) that students are capable of abusing their peers. Such abuse should never be tolerated or normalised through the common myth that it is part of growing up.

Should an allegation of abuse be made against another student all students involved (whether perpetrator or victim) will be treated as being "at risk". Where there is reasonable cause to suspect that a student is suffering, or likely to suffer, significant harm, the allegation will be referred to students' social services. The concern may indicate that one or more of the students concerned may be in need of additional support by local agencies and in those cases the DSL should follow local inter-agency procedures. Where appropriate, the matter will be dealt with under the School's Behaviour Policy with the use of relevant disciplinary sanctions.

What to look out for

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:

- (a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected;
- (b) physical injuries;
- (c) experiencing difficulties with mental health and/or emotional wellbeing;
- (d) becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;
- (e) broader changes in behaviour including alcohol or substance misuse;
- (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- (g) abusive behaviour towards others.



Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff should be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

Children with sexually harmful behaviour

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, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

The impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Allegations about the conduct of another adult

The safety and wellbeing of students in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or ADSL of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to students. Such concerns may arise in relation to any adult. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated. The school is conscious of its duty of care to students 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 students. 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

The overarching aim of the school's low-level concern policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Behavioural policy are lived, constantly monitored, and reinforced by all staff. This is consistent with '[Working Together to Safeguard children](#)' which states: "*Students are best protected when professionals are clear about what is required of them individually and how they need to work together*". 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 Behavioural policies.
- 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?

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 [Staff code of conduct policy](#) 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 students.

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 [Staff code of conduct policy](#). 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.

What should I do if I have one?

Where a low-level concern exists, it should be reported to the Director of Education 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?

The Director of Education will discuss all low-level concerns s/he receives with the Senior management team as soon as possible and in any event within 24 hours of becoming aware of it. The Director of Education will in the first instance satisfy herself that it is a low-level concern and should not be reclassified as a higher-level concern/allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where

- (a) the threshold is met for a higher-level concern/allegation
 - (b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation
- or
- (c) there is other information which when taken into account leads to a higher-level concern/allegation.



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Where the Director of Education is in any doubt whatsoever, advice will be sought from the Board of Governors, if necessary, on a no-names basis.

Having established that the concern is low-level, the Director of Education 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.

What records will be kept?

Where a low-level concern has been communicated via expression of concern forms, a confidential record will be kept in a central file which logs all low-level concerns held by the DSL. 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 a higher level concern 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.

Higher level concerns and allegations

When handling allegations, the school will always adhere to the guidance in [Keeping Children Safe in Education](#) (September 2020) and relevant Municipality Social Work Centre guidance.

What is a higher-level concern or allegation?

A higher-level concern or allegation is any behaviour where an adult is alleged to have:

- (a) behaved in a way that has harmed a student, or may have harmed a student;
- (b) possibly committed a criminal offence against or related to a student; or
- (c) behaved towards a student or students in a way that indicates he or she could pose a risk of harm to students.

A higher-level concern or allegation may be triggered by one specific incident or by a pattern of behaviour or low-level concerns which when considered collectively amount to a higher-level concern/allegation.

What should I do if I have one?

Higher level concerns or allegations should be reported to the Director of Education immediately. The adult to whom the concern or allegation (referred to hereafter as allegation) relates should not be informed.

If the allegation is about the Director of Education, the DSL will refer this to the Designated Safeguarding Governor.

How will higher level concerns or allegations be handled?

The Director of Education (or Board of Governors in the case of an allegation about the Director) will contact the Directors and conduct a strategy team. The decision of the strategy team could be:

- official investigation by local social services
- police investigation if there is a criminal element



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Confidentiality and information sharing

When an allegation is made, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The UK Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a student from the same school (where that identification would identify the teacher as the subject of the allegation).

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public”. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

The person against whom an allegation is made, and parents or carers of a student or students involved, should normally be informed as soon as possible after the result of the initial investigation is known. However, where a strategy discussion is needed or police or student’s social care need to be involved neither the person against whom the allegation has been made, nor the parents, should be informed until these agencies have been consulted.

During the course of the investigation the school in consultation with the local social services will decide what information should be given to parents, staff and other students and how press enquiries are to be dealt with.

When the individual against whom the allegations have been made is spoken to, he/she will be warned that anything said will be recorded. The school will appoint a representative to keep the person informed of the likely course of action and the progress of the case. They should also advise the individual to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice. They will be kept informed of the timescales in accordance with [Keeping Children safe in Education](#) (September 2020) relevant Municipality Social Work Centre guidance.

Circumstances where suspension will be considered

If there is cause to suspect that a student or students at the school are at risk of harm from the accused person or if the case is so serious that it might be grounds for dismissal then the person concerned may be suspended.

Safe School - Safe Staff

The school offers the following advice to staff and other responsible adults (including volunteers):

- Avoid physical contact with students where possible, in line with the [Staff code of conduct policy](#).
- When working in a one-to-one situation with a student, be in a room covered with CCTV whenever possible.
- Only communicate with students via sanctioned means, and try to minimise contact with students outside the school context as much as possible. (see the Staff Code of Conduct). This does not apply to staff who are also parents of BIS.
- Report to a senior member of staff if a student attempts to make personal contact outside of school sanctioned means.
- Report to a senior member of staff if a student shows any sign of becoming overly fixated with



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the responsible adult or another colleague.

- Not to make gifts to students or their families, which could be interpreted as a gesture to bribe or groom.
- Exercise care when selecting students for or excluding students from activities, to avoid any perception of favouritism or injustice.
- Any discussions about sexual matters, whatever the nature, will only be discussed in a normal teaching situation and never on a one-to-one basis.

Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children’s social care.

Referral to children’s social care

The DSL will make a referral to children’s social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (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.

If a member of staff requests that a case is referred to social services, but the DSL takes the decision that this is not the correct course of action, then the nominated child protection governor is to be informed by the DSL without delay of the details of the case, and the justification for not referring. The nominated child protection governor, as the individual with ultimate legal responsibility for the school’s actions, will then liaise with the DSL on the best way forward.

It should be remembered that it is possible to consult social services at any point for advice. This can be done anonymously.

First contact with the social services will typically be by telephone, whether or not the school discloses the identity of the child concerned at this point. The social services will then advise on next steps, and whether a written disclosure is required.

Local SOS numbers

NADEL-National child line	116111; 0800123456	24h
Cyber bullying	198 33	7.30am – 3:30pm
Bullying in schools	0800-200-201; 011/116-111	8:30am - 4:30pm
Online sexual exploitation /grooming	prijavipedofiliju@mup.gov.rs vtk@mup.gov.rs	24h
Suicide prevention	011 7777 000	24h
Center Heart-suicide	0800 300 303	5pm – 11pm



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prevention		
Psychosocial support for parents, students and teachers during COVID-19	0800 200 201	9am-2pm
Parental support	0800 007 000	4pm – 10pm
Victims of abuse	800 222 003	24h
SOS to report abuse	0800 200 201	7:30am – 3pm
Serbian association of victims (VDS)	011 630-3022; 011 2288-040	9am - 4pm
Women's center	0800-100-007	10am - 8pm
ASTRA-women trafficking	011 785-0000; 065 3347-817	24h
European number for missing children	116-000	24h
Incest trauma center	011 3441-737; 011 3861-332	24h
SOS against mobbing	064 2127-880	8am – 10pm

Arrangements for reviewing policies and procedures

There is an annual review of the policy or when new regulations are published, including an update and review of procedures and their implementation. The Board of governors should also ensure that the school contributes to effective communication and good cooperation with local agencies.

If there has been a substantiated allegation against a member of staff, the school should determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.



Appendix I-Confirmation of receipt of safeguarding children and child protection policy

Name: _____

Date of joining school: _____

Post: _____

Date of induction: _____

Name and designation of staff member responsible for induction:

I confirm that I have received and read the school child protection policy.

I have been made aware of my duty to safeguard and promote children's welfare.

The procedure for reporting concerns about a child has been explained to me.

Signature: _____

Name: _____

Date: _____



Appendix II-Expression of concern form

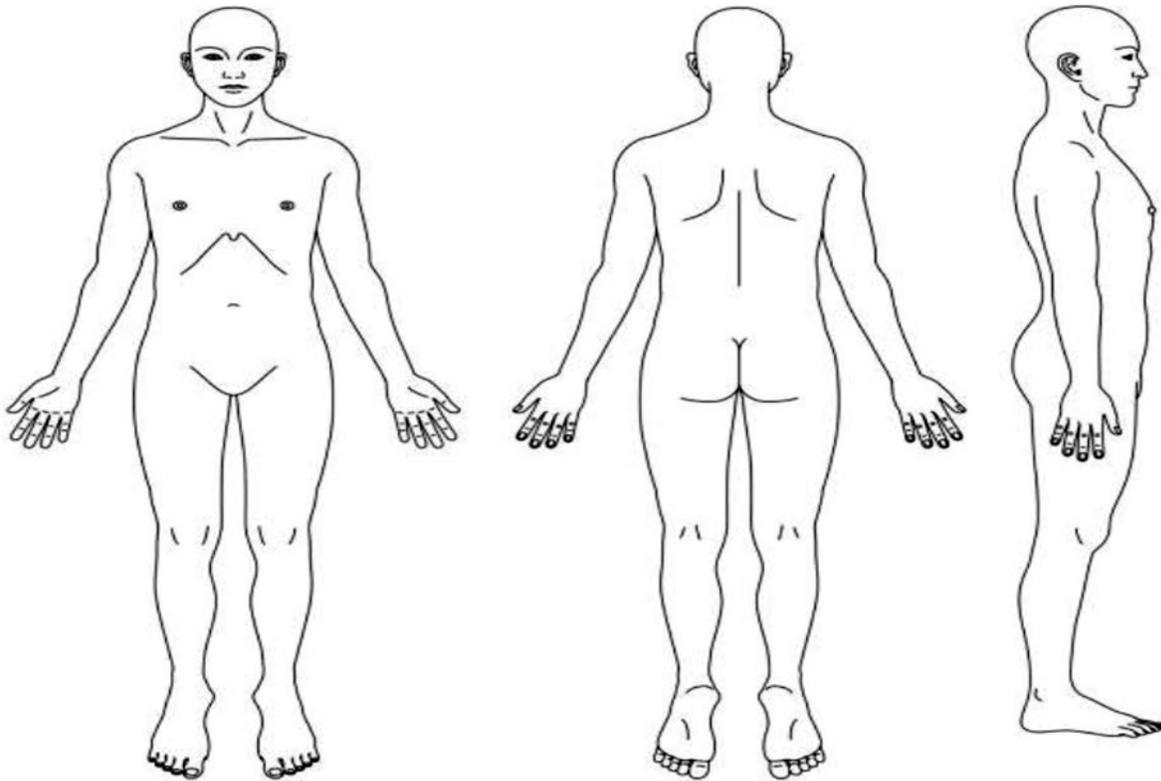
Expression of Concern Form	
This form should be completed when there is cause for concern and given to your Designated Safeguarding Lead as soon as possible.	
Details of Student:	
Child's Name: Child's Date of Birth:	
Details of the person reporting concerns:	
Full Name: Post:	
Do these concerns relate to a specific incident/disclosure? If YES complete Section A; If NO, omit section A and move straight to Section B	
Section A:	
Date and time of incident/disclosure: Location of incident/disclosure: Date this form was completed: Other persons present:	
Section B:	
Details of concern/disclosure/incident: (What was said, observed, reported)	
Action taken: (What did you do following the incident/disclosure/concern?)	
Any other relevant information:	
Signed:	Date:



Body chart

This chart must be attached to the concern form. Clearly mark the location of your concern and label each concern with a number for referencing purposes.

Child's name	
Observations made by	
Signed	
Date	





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For completion by the Designated Safeguarding Lead (DSL):

Checklist for DSL:

DSL Response:

Action taken by DSL:

Rationale for decision making/actions taken:

Outcome of action taken by DSL:

Follow up action by DSL:

Feedback given to person reporting the concerns:

Signed by DSL:

Date:

Full Name:



Appendix III- Peer on peer abuse

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

What is peer on peer abuse?

For these purposes, peer on peer abuse is any form of abuse perpetrated by a student towards another student. It can take many different forms including, but not limited to, serious bullying (including cyber-bullying), relationship abuse, domestic violence, student sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and gender-based violence.

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 students 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 Youth Produced Sexual Imagery Policy (see Appendix IV) and in accordance with the School's Safeguarding Policy.

What role does gender play?

Peer on peer abuse often manifests itself differently for boys than it does for girls. For example, 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. However, every individual case should always be assessed in detail.

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 judgment and discuss any concerns with the DSL.

How can I identify victims of peer on peer abuse?

By being alert to student's well-being and to signs of abuse. Signs that a student may be suffering from peer on peer abuse overlap with those relating to other types of abuse (please see section of the Safeguarding Policy for indicators of abuse) and 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, 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 student's age. Again, this list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

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

Any student can be affected by peer on peer abuse and staff should be alert to signs of such abuse amongst all students. Research suggests that (a) peer on peer abuse is more prevalent amongst students aged 10 and older although it also affects younger students, including by way of harmful sexual behaviour; (b) students 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.

How prevalent is peer on peer abuse?

Recent research suggests that peer on peer abuse is one of the most common forms of abuse affecting students in the UK. For example, more than four in ten teenage schoolgirls aged between 13 and 17 in England have experienced sexual coercion (Barter *et al.*, 2015). Two thirds of contact sexual abuse experienced by students aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford *et al.*, 2011) and over a third of young boys in England admitted to watching porn and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

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

If a member of staff thinks for whatever reason that a student may be at risk of abuse from another student or young person, or that a student may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with the Safeguarding Policy. If a student is in immediate danger, or at risk of harm, a referral to students' social services and/or the police should be made immediately.

How will the DSL respond to concerns of peer on peer 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 student.

Where the DSL considers or suspects that the behaviour might constitute abuse students' social services should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with student's social services and agree on a course of action, which may include

(a) taking any steps to ensure the safety and wellbeing of any students affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), a specialist harmful sexual behaviour team and/or youth offending services; and (d) a strategy meeting.

Any response should be decided in conjunction with student's social services and any relevant



agencies:

- 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 students;
- consider that the abuse may indicate wider safeguarding concerns for any of the students involved;
- treat all students (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other students, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of peer on peer abuse and of students' experiences and consider the interplay between power, choice and consent. While students 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 and attitudes underlying it. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other students, 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 students 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 students 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 the Safeguarding Policy (including where the student is in need of early help or statutory intervention); (e) monitoring the student's well-being closely and ensuring that s/he receives on-going support from all relevant staff members within the school; (f) engaging with the student's parents and any external agencies to ensure that the student's needs are met in the long-term;
- 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.

How does the school raise awareness of and reduce the risk of peer on peer abuse?

- The school actively seeks to prevent all forms of peer on peer 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 peer on peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately.
- Students are educated about the nature and prevalence of peer on peer abuse via PSHE, 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 peer on peer abuse.
- Staff are trained on the nature, prevalence and effect of peer on peer abuse, how to prevent, identify and respond to it.



Appendix IV – Youth Produced Sexual Imagery

Whilst 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.' Yet, recent NSPCC research has revealed that when students are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know. Similarly, a recent Student Line survey has revealed that many parents think of sexting as flirty or sexual text messages rather than images.

This policy only covers the sharing of sexual imagery by students. Creating and sharing 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.

What is youth produced sexual imagery?

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

- 'Youth produced' includes students sharing images that they, or another student, 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).

What types of incidents are covered by this policy?

Yes:

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

No:

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

Disclosure

Disclosure about youth produced sexual imagery can happen in a variety of ways. The student 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 colleague, or inform the police directly.



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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. This will be covered within staff training and within the School's Safeguarding Policy.

Any direct disclosure by a student should be taken very seriously. A student 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.

Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with the School's Safeguarding 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.
- The DSL will follow the procedures and guidance set out in '[Sexting in schools and colleges: responding to incidents and safeguarding young people](#)'.
- There should be subsequent interviews with the students involved (if appropriate).
- Parents 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 student at risk of harm.
- At any point in the process if there is a concern a student has been harmed or is at risk of harm a referral should be made to the student's social care and/or the police immediately.

Education

Teaching about safeguarding issues in the classroom can prevent harm by providing students with skills, attributes and knowledge to help them navigate risks. The School will provide students with opportunities to learn about the issue of youth produced sexual imagery, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities – as also referred to in the School's Online Safety Policy at Appendix V.



Appendix V - Online Safety

All staff should be aware of the risks posed to students by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use. This Policy should be read alongside the School's [E-Safety Policy](#) and which sets out the school's approach to online safety in further detail.

The School has adopted a whole school approach to online safety which (a) captures the range and complexity of the risks and of student's experiences of those risks; (b) seeks to mitigate those risks as far as possible without depriving students of the significant benefits provided by technology and the internet; and (c) handles all cases of online harm appropriately and with sensitivity.

What are the risks?

The risks posed to students by the internet and technology are wide-ranging and include risks resulting from:

Content - being exposed to harmful material

This includes but is not limited to (a) violent pornography or sexual images of students which affect a student's perception of girls, love and relationships; (b) material promoting harmful behaviours such as self-harm or eating disorders; (c) propaganda or material promoting extremism, radicalisation and/or terrorism; (d) material showing or depicting extreme violence or brutality; and (e) social media such as Facebook and Instagram which can provide students with distorted and unrealistic images of others' lives, causing some students to feel inadequate or distressed about their own lives.

Contact - being subjected to harmful interaction with others online

This includes but is not limited to (a) cyber-bullying; and (b) contact from individuals seeking to groom students for the purposes of sexual abuse or radicalisation.

Conduct - personal online behaviour that increases the likelihood of or causes of harm

This includes but is not limited to (a) responding to and engaging with individuals seeking to groom or abuse students; (b) youth produced sexual imagery.

Online harm can be caused via a number of different media, including but not limited to: mobile phones and apps; social media; the internet; and video games.

How can I identify a student who may be at risk of online harm?

Any student may suffer from online harm and all staff should be alert to the risk of it. Indicators that a student may be being abused or harmed online overlap with other indicators of abuse which can be found at section of the Safeguarding Policy.

What should I do if I suspect that a student may be at risk of or suffering from online harm?

Follow the procedure as set out in this policy and discuss any concerns with the DSL immediately. The DSL will discuss the incident with you and agree on a course of action in accordance with the safeguarding procedures set out in the Safeguarding policy.



What preventative measures is the school taking?

Students are educated about the risk of online harm – including youth produced sexual imagery, and the ways to mitigate those risks in PSHE, computing classes, assemblies and tutor groups.

Staff are trained on the risks posed by technology and the internet and the ways in which they can prevent, identify and respond to cases appropriately and with sensitivity to cases of online harm.

The school actively engages with parents to ensure a joined up approach when responding to cases of harm, and to ensure as far as possible that parents are aware of and understand the risks of it, are able to identify and respond appropriately to cases of online harm.

The school takes measures to limit student's exposure to these risks from the school's IT systems, including by putting in place appropriate filters and monitoring systems which protect students from harm whilst not over-blocking.

Information sharing

The school recognises the fundamental importance of information sharing in protecting students from harm and promoting student's wellbeing. The importance of information sharing between agencies is highlighted in a number of serious case reviews which demonstrate that where information is not shared, concerning patterns of behaviour are often missed and students often do not receive the support they need.

The DSL is trained on the above guidance and works with staff to ensure that (a) fears about sharing information do not stand in the way of the need to promote the welfare and protect the safety of students; (b) they understand and follow this guidance; and (c) they feel confident about the ways in which they share information, including with parents, other staff, and external professionals and agencies.



Appendix VI-Key Facts

The safety of our students is our number one priority

Safeguarding and promoting the welfare of our students is everyone's responsibility

We operate within a culture of openness and recognise and accept that abuse can happen in any organisation

We are a 'sharing organisation'-all concerns should be reported

All concerns about a student (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or Assistant Designated Safeguarding Lead (ADSL)

In the event that a student is in immediate danger or at risk of harm a referral should be made to Designated Safeguarding Lead and/or the police immediately

All high level concerns about a staff member should be referred to the Director

All high level concerns about the Director/SMT should be referred to the DSG

All low- or high-level concerns about the child should be referred to the DSL or ADSL