# Safeguarding & Child Protection Policy

The British International School, Belgrade (BIS Belgrade) is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment.

This policy provides clear guidance to staff and others about expected codes of behavior in dealing with safeguarding and child protection issues, thus ensuring child protection concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child.

This policy must be read and understood by all staff, including staff who do not work directly with children, volunteers and other relevant adults working at BIS Belgrade, as appropriate to their role. All staff, including those who do not work directly with children, are required to read Keeping Children Safe in Education 2026 Part One. Appropriate mechanisms are in place to ensure staff understand and can discharge their safeguarding responsibilities

Staff responsible: Senior leadership team and Board member responsible for safeguarding children.

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School Director:

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## Key Points

- **Safeguarding is everyone's responsibility.**
- **Maintain an attitude of "it could happen here".**
- **Recognise and report concerns to the DSL/ADSL without delay.**
- **Immediate danger = take immediate action to protect the child.**
- **Listen to disclosures; do not investigate or promise confidentiality.**
- **Record concerns accurately on iSAMS.**
- **Identify needs early and provide Family Help/Early Intervention where appropriate.**
- **Child-on-child abuse is never acceptable.**
- **Maintain professional boundaries and report concerns about adults.**
- **Safeguarding applies online and offline.**
- **Persistent/unexplained absence may be a safeguarding concern.**
- **The child's welfare and best interests are paramount.**

## Introduction

BIS Belgrade recognises its responsibilities under applicable Serbian law, the British Schools Overseas Standards and its commitment to follow relevant UK safeguarding guidance, including KCSIE 2026, where appropriate to the international context.We endeavor 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.

This policy applies to all teaching, non-teaching, support, peripatetic, contract staff, volunteers 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. For the purpose of this guidance children include everyone under the age of

18. This policy is available in English and Serbian and is published to all staff and volunteers and placed on the school website.

## Safeguarding Legislation and Guidance

The School's safeguarding and child protection arrangements are informed by, and where applicable implemented in accordance with, the following key Serbian legislation and guidance:

- **Ustav Republike Srbije (Constitution of the Republic of Serbia) — 2006**, in particular the constitutional provisions concerning the rights of the child, protection of children from exploitation and abuse, equality and the right to education.
- **Zakon o osnovama sistema obrazovanja i vaspitanja (Law on the Foundations of the Education System) — 2017, as amended**, which establishes the overarching legal framework for education in Serbia, including the protection of children and students from violence, abuse, neglect, discrimination and conduct that violates dignity, reputation or honour.
- **Zakon o predškolskom vaspitanju i obrazovanju (Law on Preschool Education) — 2010, as amended**, governing preschool education and care and applicable to the School's preschool provision.
- **Zakon o osnovnom obrazovanju i vaspitanju (Law on Primary Education) — 2013, as amended**, governing primary education and applicable to the School's primary provision.
- **Zakon o srednjem obrazovanju i vaspitanju (Law on Secondary Education) — 2013, as amended**, governing secondary education and applicable to the School's secondary provision.
- **Porodični zakon (Family Law) — 2005, as amended**, which establishes fundamental principles concerning the rights, welfare and best interests of the child, parental responsibility and the protection of children from abuse and neglect.
- **Zakon o sprečavanju nasilja u porodici (Law on Prevention of Domestic Violence) — 2016, as amended**, where safeguarding concerns involve or indicate domestic violence.

- **Pravilnik o Protokolu postupanja u ustanovi u odgovoru na nasilje, zlostavljanje i zanemarivanje (Rulebook on the Protocol for Institutional Response to Violence, Abuse and Neglect) — 2024**, which establishes the principal procedures for prevention, identification, assessment and response to violence, abuse and neglect in preschool institutions, primary and secondary schools, including procedures for cooperation with competent external authorities.
- **Opšti protokol za zaštitu dece od nasilja (General Protocol for the Protection of Children from Violence) — 2022**, which establishes the national framework for the prevention of violence against children and coordinated inter-sectoral child protection.
- **Uputstvo o postupanju ustanova obrazovanja i vaspitanja i centara za socijalni rad – organa starateljstva u zaštiti dece od nasilja (Guidance on Procedures and Cooperation between Educational Institutions and Centres for Social Work – Guardianship Authorities in the Protection of Children from Violence) — 2018**, which provides the framework for cooperation between educational institutions and Centres for Social Work in child protection cases.
- **Pravilnik o postupanju ustanove u slučaju sumnje ili utvrđenog diskriminatornog ponašanja i vređanja ugleda, časti ili dostojanstva ličnosti (Rulebook on Institutional Procedures in Cases of Suspected or Established Discriminatory Conduct and Conduct Violating Reputation, Honour or Dignity) — 2018**, where safeguarding concerns involve discrimination or conduct affecting a child's dignity, reputation or honour.

The above list identifies the principal legislation and guidance underpinning this Policy and is not exhaustive. The School will comply with all other applicable Serbian legislation, regulations and competent-authority requirements relevant to a particular safeguarding or child protection matter.

### UK Safeguarding Guidance and Standards

As a British international school, the School also has regard to relevant UK safeguarding guidance and standards as a framework for good safeguarding practice. Such guidance supplements, but does not replace, the School's obligations under Serbian law.

The School has regard, where relevant and appropriate, to the current versions of:

- **Keeping Children Safe in Education (KCSIE)** — current edition;
- **Working Together to Safeguard Children** — current edition;
- **The Independent School Standards: Guidance for Independent Schools** — current applicable guidance;
- **Statutory Framework for the Early Years Foundation Stage (EYFS)** — current edition, in relation to the School's Early Years provision;
- **Prevent Duty Guidance for England and Wales** — current edition, as a safeguarding good-practice reference where relevant; and
- **What to Do if You're Worried a Child Is Being Abused: Advice for Practitioners** — 2015, where

relevant.

Where there is any difference between UK safeguarding guidance adopted by the School and mandatory requirements under Serbian law, **applicable Serbian law and the requirements of the competent Serbian authorities take precedence**.

**Inter-Agency Child Protection**

Safeguarding and child protection are not solely internal School matters. Where a concern meets the relevant threshold, or where referral, notification, consultation or cooperation is otherwise required under Serbian law or applicable protocols, the School will work with and/or refer the matter to the competent Serbian authorities. Depending on the nature and circumstances of the concern, these may include the competent **Centre for Social Work (Centar za socijalni rad – organ starateljstva), Police, Public Prosecutor's Office, healthcare services, education authorities and other competent child-protection bodies**.

The School will follow applicable Serbian inter-agency child-protection procedures and will not allow an internal safeguarding investigation or School procedure to delay or replace a referral or notification to a competent authority where such referral or notification is required.

## Contact Details

The table below outlines the contact details of designated staff in school and external agencies linked to child protection and safeguarding. In the event that a student is in immediate danger or at risk of harm a referral should be made to social services and/or to the police immediately. All concerns about a student (including signs of abuse and neglect) must be reported to the Designated Safeguarding Lead (DSL) or Assistant Designated Safeguarding Lead (ADSL) without delay. In the unlikely event that all the members of safeguarding team are not available, staff should raise concerns with a member of the Senior Leadership Team.

**School Safeguarding Team**

| | |
|---|---|
| Designated safeguarding lead | Milica Jevtić<br>Contact telephone number: 011/3066096 ext.2<br>Email address: milica.jevtic@bis.edu.rs |
| Assistant Designated Safeguarding Lead | Milica Sretenović<br>Contact telephone number: 011/3066096 ext.1<br>Email address: milica.sretenovic@bis.edu.rs |
| Assistant Designated Safeguarding Lead | Ljubica Stankovic<br>Contact telephone number: 011/3066096 ext.1<br>Email address: ljubica.stankovic@bis.edu.rs |
| Safeguarding Officers | - Gordana Janjić (Neznanog junaka Campus)<br>- Jelena Perišić (Palackova Campus)<br>- Michelle Moors (Župana Vlastimira Campus)<br>- Daniel Moors (Župana Vlastimira Campus) |
| Special educational needs & disabilities coordinator | Jelena Ilić Milenković<br>Contact telephone number: 011/3066096 ext.2<br>Email address: jelena.ilic@bis.edu.rs |
| Designated safeguarding governor | Stefan Slijepčević<br>Contact telephone number: 011/3066096 ext.2<br>Email address: stefan.slijepcevic1@gmail.com |
| Head of Primary | Michelle Moors<br>Contact telephone number: 011/3066096 ext.1<br>Email address: michelle.moors@bis.edu.rs |
| Head of School | Robert Robinson<br>Contact telephone number: 011/3066096 ext.2<br>Email address: robert.robinson@bis.edu.rs |
| Director/Proprietor | Aleksandra Keserovic<br>Contact telephone number: 011/3066096 ext.2<br>Email address: director@bis.edu.rs |

**Authority Contacts**

| | | |
|---|---|---|
| Ministry of Education | 011/3613-734 | 07.30-3.30pm |
| Police | 192<br>infomup@mup.gov.rs | 24h |
| Gradski centar za socijalni rad u Beogradu<br>(Center of social work Belgrade) | 011/2650-542<br>office@gcsrbg.org | 07.30-3.30pm |
| Online sexual exploitation/grooming | prijavipedofiliju@mup.gov.rs<br>vtk@mup.gov.rs | 24h |
| 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 |
| Suicide prevention | 011 7777 000 | 24h |

## Part A: Principles and Aims

Our commitment is to safeguard and promote the welfare, health and safety of our students by creating and maintaining an open, safe, caring and supportive environment. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

Providing help and support to meet the needs of children as soon as problems emerge.

Protecting children from maltreatment, whether that is within or outside the home, including online.
Preventing impairment of children's mental and physical health or development
Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
Taking action to enable all children to have the best outcomes.

Policy principles:

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

We aim to:

- Provide all staff with the necessary information to enable them to meet their child protection responsibilities
- Ensure consistent good practice to protect students from harm
- To demonstrate the school's commitment regarding child protection to students and parents.

The school achieves these aims by:

- Ensuring the recruitment of staff that is suitable and appropriate to work with children and have all the necessary and legal documentation in place before starting.

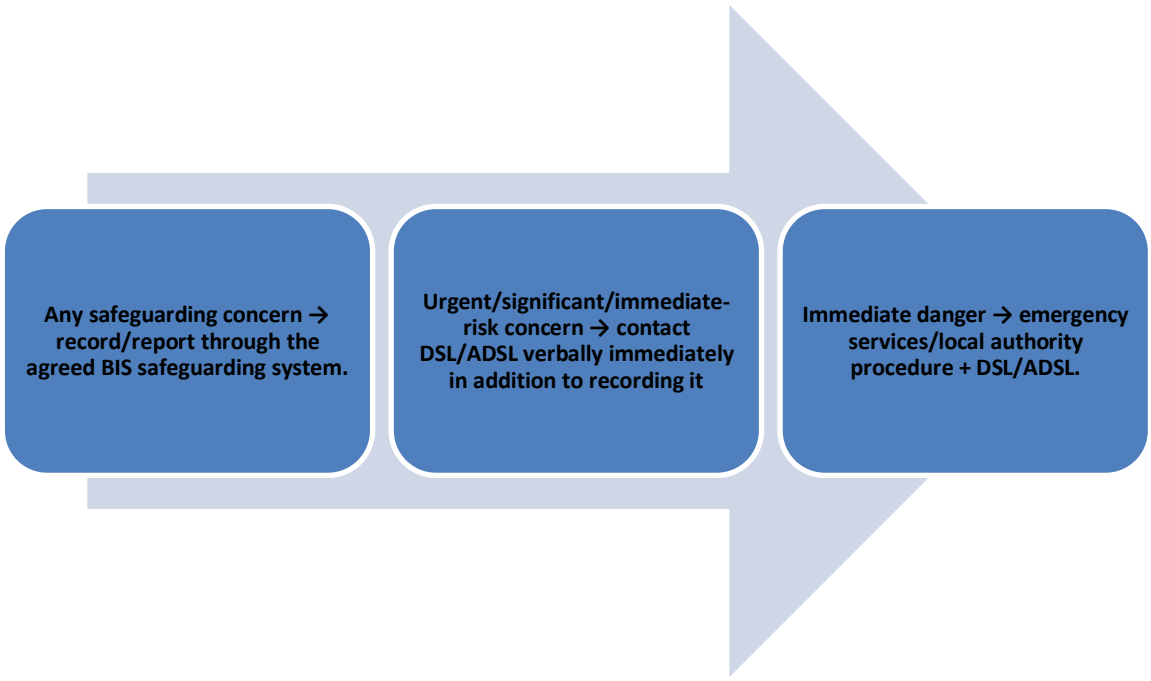
Providing excellent pastoral care and providing a positive school atmosphere where students feel safe and secure and are encouraged to talk.

- Valuing and promoting effective relationships with parents and professionals from external agencies.
- Teaching students, through PSHE and a varied curriculum, to identify and manage risks. This includes educating students, through regular internal and externally provided ICT safety talks, about the safe use of devices and access to the internet.
- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach toward online safety, including the acceptable use of

devices and the use of appropriate filters and monitoring systems.

- Ensuring that all staff, teaching and non-teaching staff, are properly trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.
- Encourage staff to discuss child protection, safeguarding and welfare concerns confidentially with the DSL and/or the ADSL in order to ensure that they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect.
- Creating a culture of openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults in school can be shared and dealt with in an appropriate and sensitive manner.
- Following the procedures laid down in this Policy.

## Part B: Actions when there are concerns about a child




## MAINTAIN CONFIDENTIALITY.

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 child may be in need of help as well as the signs of abuse and neglect. If a staff member has any concerns about a child, they should raise the concern by creating it through the iSAMS Well-being manager, by sending the email to or by speaking directly to a member of the Safeguarding team.

All concerns, discussions and decisions made, as well as the reasons for those decisions, should be recorded accurately and kept confidential on iSAMS Well-being manager.

Records should include the following:

- **Detailed Summary of the Concern**: A clear and comprehensive description of the issue, including relevant context, key individuals involved, and any supporting information that provides a full understanding of the situation.
- **Follow-up and Resolution Process**: A thorough account of the steps taken to follow up, assess, refer and respond to the concern, as appropriate to the person's safeguarding role.and address the concern,

including any communications, meetings, or interventions carried out to resolve the matter.

- **Actions Taken, Decisions Made, and Outcomes**: A documented record of any actions implemented, the rationale behind decisions reached, and the final outcome, ensuring transparency and accountability in the resolution process.

If a staff member has any doubts or questions, including those regarding recording requirements, they should speak with the DSL/ADSL, who will discuss the matter with them and decide on appropriate action. Safeguarding leaders will ensure that the child's wishes and feelings are carefully considered when determining appropriate actions and identifying suitable services to provide, prioritizing the child's best interests and well-being.

Safeguarding records should be clear and factual and should distinguish between observed facts, professional opinion and historic information.

### Recognising Abuse, Neglect and Exploitation

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

A child may be harmed by an adult or adults, or by another child or children. Harm may occur through acts that cause harm or through a failure to act to prevent harm. Abuse, neglect and exploitation can take place wholly online, or technology may be used to facilitate offline abuse.

Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, neglected or exploited, and they may not always recognise their experiences as harmful. Staff should therefore exercise professional curiosity and speak to the DSL/ADSL if they have concerns about a child.

The four categories of abuse are physical abuse, emotional abuse, sexual abuse and neglect. Further information, including indicators and specific safeguarding concerns, is set out in **Part C: Types and Signs of Abuse, Neglect and Exploitation.**

### Bullying

Bullying, including cyberbullying, discriminatory bullying and prejudice-based bullying, can have a serious impact on a child's physical and emotional wellbeing. All incidences of bullying, including cyber-bullying, discriminatory bullying and prejudice-based bullying should be reported and will be managed through our Anti- Bullying Policy. Where bullying involves or indicates a safeguarding concern, including child-on-child abuse, sexual harassment, sexual violence, harmful sexual behaviour, discriminatory abuse, serious physical violence or exploitation, the concern must also be reported to the DSL/ADSL in accordance with the school's safeguarding procedures.

Staff must not dismiss harmful behaviour as “banter”, “just having a laugh”, “part of growing up” or similar behaviour between children.

## Taking Action

Any child can experience abuse, neglect or exploitation, regardless of their background or circumstances. Staff should always maintain an attitude of "it could happen here" and act on any safeguarding concern without delay.

Key points for staff to remember when responding to a safeguarding concern are::

- In an emergency or where a child is in immediate danger, take the necessary action to protect the child, including contacting the appropriate Serbian emergency service where required. Inform the DSL/ADSL as soon as possible; internal reporting must not delay emergency action. (including calling 192).
- Report your concern to the DSL/ADSL without delay. Urgent or significant concerns must be communicated immediately. Recording on iSAMS must not delay verbal reporting where a child may be at risk.
- Do not investigate the concern yourself, question the child repeatedly, seek evidence or confront the person alleged to have caused harm.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- File the concern on the iSAMS Well-being Manager and/or inform the DSL/ADSL by speaking to them directly or through the email.
- Seek support for yourself if you are distressed.

## Family help/Early intervention

All staff should be aware of the school's arrangements for early intervention and support and understand their role in identifying children and families who may benefit from additional help. KCSIE 2026 distinguishes between universal services and community-based early help and targeted early help at the level of Family Help. As BIS Belgrade operates in Serbia, these principles are applied through the school's pastoral and safeguarding arrangements and the relevant Serbian education, health, social care and multi-agency services. This includes:

**Identifying emerging issues and potential unmet needs**: Proactively monitoring and assessing the situation to identify early signs of emerging problems or unmet needs, ensuring timely intervention and support.

**Collaborating with Designated Safeguarding Lead (DSL) and Assistant Designated Safeguarding Leads (ADSLs)**: Maintaining regular communication with the DSL and ADSLs to discuss concerns, share observations, and coordinate appropriate safeguarding measures.

**Information sharing and multidisciplinary collaboration**: The school may share relevant information with

external professionals to support the early identification and comprehensive assessment of needs. In most cases, this process is carried out in collaboration with the parents. Where it is safe and appropriate to do so, parents/carers should normally be involved in support planning. However, consent is not required to share information where this is necessary and proportionate to safeguard a child. Where involving parents could increase risk to the child, the DSL/ADSL will determine the appropriate course of action in accordance with Serbian law and local safeguarding procedures.

Early intervention means providing support as soon as a problem emerges at any point in a child's life. There will be occasions when staff may suspect that a student may be at risk: the student's behaviour presentation, attendance, relationships, written work, artwork or other communication may indicate distress or an unmet need. In these circumstances, staff should provide the child with a safe opportunity to talk, listen without investigating, and report any safeguarding concern to the DSL/ADSL. If a member of staff has a concern that a child may be in need of early intervention, they should discuss early intervention requirements with the DSL/ADSL at the earliest opportunity.

Effective early intervention involves the school providing high quality support, in cooperation with or coordinating with other agencies as appropriate, to help address the assessed needs of the child and their family, in order to improve the outcomes for the child.

Staff should be particularly alert to children who may benefit from additional help, including children with SEND or disabilities; children with medical or mental health needs; young carers; children affected by domestic abuse, parental substance misuse or parental offending; children experiencing persistent absence from education; children at risk of exploitation, trafficking or modern slavery; children showing early signs of abusive or violent behaviour; and children whose family circumstances may place additional pressure on their wellbeing.

Where support is in place, the child's circumstances and progress must be reviewed regularly. If the child's situation does not improve, deteriorates, or new safeguarding concerns emerge, the DSL/ADSL must consider escalation to the relevant Serbian social care, health, police or other statutory service without delay. Early intervention must not delay appropriate child protection action where there is concern that a child may be suffering, or is likely to suffer, harm.

### Children suffering or likely to suffer harm / Immediate danger

If at any point there is concern that a child is suffering or is likely to suffer harm, or may be in immediate danger, this must be reported to the DSL/ADSL without delay. Staff do not need to have proof that abuse, neglect or exploitation has occurred before reporting a safeguarding concern.

The matter must be reported immediately to the Designated Safeguarding Lead (DSL) or an Assistant Designated Safeguarding Lead (ADSL). BIS BELGRADE will ensure that appropriate safeguarding cover is available during school hours and that staff know how to access this cover. The absence of the DSL or an ADSL must not delay appropriate safeguarding action.

The DSL/ADSL will consider the appropriate safeguarding response and, where necessary, make a referral to or seek advice from the relevant Serbian social care, police, health or other competent authority, in accordance with Serbian law and local safeguarding procedures.

Where a child is in immediate danger or requires urgent medical attention, appropriate emergency or medical assistance must be sought without delay. Where there is suspected abuse, neglect or exploitation but no immediate medical emergency, the DSL/ADSL will seek advice from and follow the procedures of the relevant Serbian safeguarding, social care, health or police authority as appropriate. Staff must not conduct their own investigation or examination of the child.

Where a referral to an external authority is not considered necessary, BIS BELGRADE will continue to support and monitor the child in accordance with its safeguarding and pastoral procedures. The DSL/ADSL will keep the situation under review and will reconsider escalation if the child's circumstances do not improve, deteriorate, or further safeguarding concerns emerge.

All safeguarding decisions, referrals, actions and outcomes will be recorded appropriately and securely in accordance with the school's safeguarding recording procedures.

If a member of staff feels that a safeguarding concern has not been appropriately addressed, or that the child's situation is not improving, they should raise the matter again with the DSL/ADSL and follow the school's escalation procedures.

### If a Student Makes a Disclosure to You

Children may not feel ready or know how to tell someone that they are being abused, neglected or exploited. They may not recognise their experiences as harmful, may feel embarrassed, humiliated or threatened, or may fear that they will not be believed. This should not prevent staff from maintaining professional curiosity and speaking to the DSL/ADSL where they have concerns about a child.

All children who make a disclosure or report a safeguarding concern must be taken seriously, listened to carefully and provided with a safe and supportive environment. A child should never be made to feel that they are creating a problem by reporting abuse, sexual violence, sexual harassment or any other safeguarding concern.

If a student talks to a member of staff about a risk to their safety or wellbeing, the member of staff should listen carefully and, at an appropriate time, explain that the information may need to be shared with the DSL/ADSL in order to help keep them safe. Staff must never promise confidentiality or agree to keep a safeguarding concern secret, even if the child asks them to do so.

All children should feel able to speak about safeguarding concerns and be confident that they will be listened to and taken seriously. Staff should be aware that some children may face additional barriers to seeking help because of their individual circumstances, including children who are lesbian, gay, bisexual or questioning their sexual orientation or gender. Staff must provide a safe, respectful and supportive environment in which

children can raise concerns.

### Guidelines for Responding to a Child's Disclosure or Safeguarding Concern:

▪ **Listen carefully and remain calm.** Allow the child to speak freely, at their own pace, without interruption. Accept that there may be pauses or periods of silence.

▪ **Take the child seriously.** Do not express disbelief, shock or doubt, and do not minimise what the child is telling you.

▪ **Reassure the child.** Explain that they have done the right thing by speaking to you and that you will take what they have said seriously. Do not make promises about outcomes that you cannot guarantee.

▪ **Do not promise confidentiality.** Explain, in an age-appropriate way, that you will need to share the information with the DSL/ADSL so that appropriate action can be taken to help keep them safe.

▪ **Do not investigate.** Do not interrogate the child, repeatedly question them, seek evidence, ask the child to repeat their account to other members of staff, or confront the person alleged to have caused harm.

▪ **Avoid leading questions.** Where clarification is essential, use only minimal and open prompts such as "Tell me what happened" or "Tell me more about that." Do not ask questions that suggest an answer.

▪ **Do not automatically initiate physical contact.** Maintain appropriate professional boundaries and respond sensitively to the individual child's needs.

▪ **Do not criticise or question the timing of the disclosure.** A child may have many reasons for delaying or withholding information.

▪ **Explain what will happen next.** Tell the child that the concern will be shared with the DSL/ADSL and, where appropriate, explain the next steps in a way that the child can understand. Do not promise that a particular action or outcome will occur.

▪ **Report the disclosure to the DSL/ADSL without delay.** The staff member remains responsible for ensuring that the concern has been reported, even where the child says that they will report it themselves or has already spoken to another person.

▪ **Record the disclosure promptly and accurately on the iSAMS Well-being Manager.** Record the child's own words where possible, distinguish fact from opinion, and record the date, time, context and actions taken. Do not delay an urgent verbal report to the DSL/ADSL in order to complete the written record.

▪ **Preserve confidentiality.** Do not discuss the disclosure with colleagues or others unless they need the information for safeguarding purposes.

▪ **Seek appropriate support if needed.** Staff who are affected or distressed by a disclosure should seek appropriate support from the DSL/ADSL or a senior leader while maintaining confidentiality.

### Notifying Parents

Where it is safe and appropriate to do so, BIS BELGRADE will normally seek to work openly and collaboratively with parents and carers regarding concerns about their child.

However, parents or carers should not be informed where doing so may place the child at increased risk of harm, place another person at risk, compromise a safeguarding response or investigation, or otherwise be contrary to the child's best interests.

The DSL/ADSL will determine, in accordance with applicable Serbian law and local safeguarding procedures, whether and when parents or carers should be informed and whether advice should first be sought from the relevant Serbian social care, police, health or other competent authority.

Staff must not contact parents or carers about a safeguarding disclosure or concern before consulting the DSL/ADSL where there is any possibility that doing so could increase risk to the child or compromise safeguarding action.

The decision about whether, when and how parents or carers are informed, together with the reasons for that decision, should be appropriately recorded.

## Direct Referral to External Safeguarding Authorities

All staff must report safeguarding concerns to the DSL/ADSL without delay and follow the safeguarding procedures set out in this policy.

Where a safeguarding concern requires involvement of an external authority, the DSL/ADSL will coordinate the school's response and, where appropriate, seek advice from or make a referral to the relevant Serbian authority or service. Depending on the nature and circumstances of the concern, this may include the **Centre for Social Work, police, health services or other competent authority**, in accordance with applicable Serbian law and child protection procedures.

Where a child is in **immediate danger**, requires urgent physical protection or urgent medical assistance, staff must take the necessary emergency action without delay, including contacting the appropriate Serbian emergency service where required. **Internal school reporting procedures must not delay action necessary to protect a child from immediate harm.** The DSL/ADSL must be informed as soon as practicable.

Staff must not conduct their own investigation, seek evidence, interview potential witnesses or confront the person alleged to have caused harm. Any action taken by the school must not compromise an external safeguarding or police investigation.

Where an external authority determines that statutory intervention is not required, BIS Belgrade will continue to consider the child's safeguarding and support needs. The DSL/ADSL will keep the concern under review and consider further referral or escalation if the child's circumstances do not improve, deteriorate or further safeguarding concerns emerge.

All referrals, consultations with external authorities, advice received, decisions, actions and outcomes must be recorded promptly, factually and securely in accordance with the school's safeguarding recording procedures. The rationale for significant safeguarding decisions, including a decision not to make an external referral, should also be recorded.

If a member of staff believes that a child's safeguarding needs have not been appropriately addressed, they must raise the concern again with the DSL/ADSL and follow the school's safeguarding escalation and whistleblowing procedures.

## Confidentiality and Information Sharing

Safeguarding information must be treated as confidential and handled appropriately. However, confidentiality must not prevent necessary information from being shared in order to safeguard and promote the welfare of a child.

Staff must never promise a child that they will keep a safeguarding disclosure or concern secret. Staff should explain, in an age-appropriate way, that information may need to be shared with the DSL/ADSL and, where appropriate, with other professionals in order to help keep the child safe.

If a child begins to disclose a safeguarding concern but decides not to continue, the member of staff must still report what has been said or observed to the DSL/ADSL.

Safeguarding information should be shared only with those who need the information for safeguarding purposes. Staff must not discuss safeguarding concerns with colleagues who do not need to know, or with friends, family members or other unauthorised persons.

The DSL/ADSL will determine, where appropriate, what safeguarding information needs to be shared with relevant professionals or external authorities. Information sharing should be necessary, proportionate, relevant, accurate, timely and secure.

Consent is not required where sharing information is necessary and proportionate to safeguard a child. Where it is appropriate and safe to do so, children and parents/carers should be informed about how their information may be shared. Information should not be shared with a parent or carer where doing so may increase the risk of harm to the child, place another person at risk, or compromise a safeguarding response or investigation.

BIS BELGRADE will handle safeguarding information in accordance with applicable Serbian data protection and safeguarding requirements and the school's data protection procedures. Uncertainty about confidentiality or data protection must not prevent a member of staff from reporting a safeguarding concern to the DSL/ADSL.

All safeguarding records, whether electronic or paper-based, must be stored securely, separately from the main pupil file where appropriate, and access restricted to those who require the information for legitimate safeguarding purposes. Significant decisions about information sharing, including decisions not to share information, should be recorded together with the reasons for those decisions.

## Children Who May Require Additional Safeguarding Support

Some children may face additional safeguarding risks or additional barriers to recognising or reporting

abuse, neglect or exploitation because of their individual needs or circumstances. Staff should be alert to these additional vulnerabilities and ensure that all children receive appropriate safeguarding support and protection.

Staff should be particularly alert to children who:

▪ have special educational needs and/or disabilities (SEND);

▪ have a disability, medical condition or mental health need;

▪ are young carers;

▪ are living away from home, in temporary or unstable accommodation, or are boarding students;

▪ are living in challenging family circumstances, including those affected by domestic abuse, parental substance misuse or parental mental health needs;

▪ have a parent or carer in custody or are otherwise affected by parental offending;

▪ are experiencing bullying, including cyberbullying, discriminatory or prejudice-based bullying;

▪ may experience discrimination, harassment or abuse related to their individual characteristics or circumstances;

▪ face communication barriers, including children for whom English or Serbian is not their first language;

▪ are persistently or frequently absent from education, go missing from education or home, or show significant changes in attendance or engagement;

▪ are showing signs of being drawn into anti-social behaviour, criminal activity, serious violence, gangs or organised criminal networks;

▪ are at risk of child criminal exploitation or child sexual exploitation;

▪ are at risk of trafficking or modern slavery;

▪ are at risk of radicalisation or extremism;

▪ are at risk of so-called honour-based abuse, including Female Genital Mutilation (FGM) or forced marriage;

▪ are showing early signs of abusive, violent or harmful behaviour;

▪ are lesbian, gay, bisexual or questioning their sexual orientation or gender and may face additional barriers to seeking support;

▪ are pregnant and/or are parents; or

▪ have other circumstances that may create additional safeguarding needs or make it more difficult for them to seek or receive help.

This list is not exhaustive. The presence of one or more vulnerability factors does not in itself mean that a child is being abused, neglected or exploited. Staff should consider each child's individual circumstances and remain professionally curious where there are concerns about a child's welfare. Further information about specific safeguarding risks is provided in the relevant sections of this policy.

### Children with Special Educational Needs and Disabilities

Children with special educational needs and/or disabilities (SEND) may face additional safeguarding challenges. Staff must be aware that additional barriers can exist when recognising abuse, neglect or exploitation in this group of children.

These barriers may include:

- **assumptions that indicators of possible abuse, neglect or exploitation, such as changes in behaviour, mood, presentation or injuries, relate to the child's SEND or disability without further exploration;**
- **children with SEND being disproportionately affected by bullying, child-on-child abuse or other harmful behaviour without outwardly showing signs of distress;**
- **communication barriers or difficulties that may affect a child's ability to recognise, understand, communicate or report abuse, neglect or exploitation;**
- **a child not understanding that what is happening to them constitutes abuse, neglect or exploitation;**
- **cognitive or developmental needs that may affect a child's ability to recognise unsafe, abusive or exploitative situations;**
- **the need for intimate or personal care and increased dependency on adults for care, communication, mobility or other support;**
- **difficulties in reporting concerns or in being understood and believed;**
- **increased vulnerability to grooming, coercion or exploitation; and**
- **isolation from peers or fewer opportunities to communicate concerns to a trusted adult.**

Staff must not assume that changes in a child's behaviour, presentation, physical or emotional wellbeing are simply a consequence of their SEND or disability. Any safeguarding concern must be reported to the DSL/ADSL in accordance with the school's safeguarding procedures.

Staff should consider the child's individual communication needs and make appropriate adjustments to enable them to communicate concerns and participate in safeguarding processes.

Where appropriate, the DSL/ADSL will work with the school's SEND staff and other relevant professionals to ensure that safeguarding responses take account of the child's individual needs, communication methods, disability and circumstances.

## Part C: Types and Signs of Abuse, Neglect and Exploitation

Abuse, neglect and other safeguarding issues are rarely standalone events that can be covered by a single definition or label. In most cases, multiple issues may overlap.

Safeguarding concerns may arise both inside and outside the family environment and may occur **online and offline**. In many cases, abuse and other safeguarding risks may occur concurrently online and offline.

Children may be abused by an adult or adults or by another child or children. Staff should also be aware that children may experience harm in contexts outside their families, including within peer groups, the community and online.

All staff should be aware of indicators of abuse, neglect and exploitation and should maintain an attitude of **"it could happen here."** Children may not always recognise that what they are experiencing is harmful or abusive and may not feel ready or know how to tell someone.

Individual indicators will rarely provide conclusive evidence of abuse. Staff are **not responsible for investigating or determining whether abuse has occurred**. Where a member of staff has any safeguarding concern, or is unsure about the significance of an indicator, they must report the concern to the DSL/ADSL in accordance with this policy.

KCSIE 2026 identifies four main categories of abuse: **physical abuse, emotional abuse, sexual abuse and neglect.**

**1. Physical Abuse**

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Possible indicators of physical abuse may include:

▪ unexplained or recurrent injuries;

▪ injuries where the explanation is inconsistent with the injury or the child's developmental stage;

▪ bruises, burns, scalds, bites or other injuries in unusual locations or patterns;

▪ untreated or inadequately treated injuries;

▪ reluctance to explain injuries or explanations that change;

▪ fear of particular adults or of going home; or

▪ changes in behaviour or emotional presentation associated with an injury.

The presence of an injury does not necessarily mean that physical abuse has occurred. Staff should report concerns and must not attempt to determine the cause themselves.

**2. Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person.

It may include **verbal abuse, such as persistent criticism, belittling or name-calling**, not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate.

It may feature age- or developmentally inappropriate expectations being imposed on children. This may include interactions beyond a child's developmental capability, overprotection, 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 person. It may also involve serious bullying, including cyberbullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Possible indicators may include:

▪ significant changes in behaviour or emotional presentation;

▪ becoming withdrawn, anxious, fearful or depressed;

▪ low self-esteem or lack of confidence;

▪ extreme attention-seeking or aggressive behaviour;

▪ difficulty forming or maintaining relationships;

▪ inappropriate emotional responses for the child's age or developmental stage;

▪ self-harm or other concerning coping behaviours;

▪ persistent difficulties with attendance or engagement in education; or

▪ fear of a particular person or environment.

**3. Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, **whether or not the child is aware of what is happening**.

The activities may involve physical contact, including assault by penetration, such as rape or oral sex, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Sexual abuse may also include non-contact activities, such as involving children in looking at or producing sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can occur **online**, and technology may be used to facilitate sexual abuse occurring offline.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Children who experience sexual abuse may not recognise themselves as victims and may not understand that what is happening to them is abusive.

Possible indicators may include:

▪ sexual knowledge, language or behaviour that is unexpected for the child's age or stage of development;

▪ sexualised behaviour or play that causes concern;

▪ unexplained changes in behaviour, mood or relationships;

▪ avoidance of a particular person or place;

▪ pain, soreness, bleeding, bruising or discharge in the genital or anal area;

▪ sexually transmitted infections;

▪ pregnancy;

▪ difficulties walking or sitting;

▪ changes in attendance, engagement or educational performance;

▪ self-harm, anxiety, depression or withdrawal; or

▪ concerning online sexual behaviour or interactions.

A child may experience sexual abuse **without displaying any obvious physical or behavioural indicators**.

**4. 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, for example as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

▪ provide adequate food, clothing and shelter, including exclusion from home or abandonment;

▪ protect a child from physical and emotional harm or danger;

▪ ensure adequate supervision, including the use of inadequate caregivers; or

▪ ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible indicators may include:

▪ persistent hunger or inadequate nutrition;

▪ inappropriate or consistently inadequate clothing;

▪ poor hygiene or untreated health needs;

▪ persistent tiredness;

▪ inadequate supervision or being regularly left alone in circumstances inappropriate for the child's age or development;

▪ frequently being responsible for younger children in circumstances that cause concern;

▪ persistent or frequent absence from education where this raises safeguarding concerns;

▪ developmental or educational concerns associated with unmet needs; or

▪ persistent emotional needs that appear not to be met.

**Recognising Indicators and Taking Action**

Indicators of abuse, neglect or exploitation should **not be considered in isolation**. Staff should consider the child's circumstances, behaviour, presentation, communication and any changes or patterns over time.

A child may show no obvious signs of abuse. Equally, the presence of one or more indicators does not necessarily mean that abuse has occurred.

Staff should remain professionally curious and must not dismiss concerns because an alternative explanation appears possible.

**Staff are responsible for recognising and reporting concerns, not for investigating them.**

If staff have any concern about a child's welfare, or are unsure whether an indicator may be significant, they

must speak to the **DSL/ADSL without delay** and follow the safeguarding reporting procedures set out in this policy.

## Part D: Specific Safeguarding Issues

All staff should be aware of safeguarding issues that may place children at risk of harm. Safeguarding concerns are rarely standalone events and multiple risks may overlap. These risks may occur within or outside the family, within the school or wider community, and online or offline.

Staff should maintain an attitude of "it could happen here", remain professionally curious and report any safeguarding concern to the DSL/ADSL without delay. Further information about specific safeguarding issues is contained in Part One and Annex B of Keeping Children Safe in Education 2026.

As BIS BELGRADE operates in Serbia, the principles of KCSIE 2026 are applied alongside applicable Serbian law, national child protection procedures and the school's local safeguarding arrangements.

### Children Absent from Education

All staff should be aware that children being absent from education, particularly repeatedly and/or for prolonged periods, can be an important warning sign of a range of safeguarding concerns. These may include abuse, neglect, child sexual exploitation, child criminal exploitation, mental health concerns, risk of substance misuse, risk of travelling to conflict zones, risk of female genital mutilation, forced marriage or other safeguarding risks.

Staff should be alert to patterns of absence, including unexplained or repeated absence during the school day, sudden changes in attendance and circumstances where a child's absence appears inconsistent with the explanation provided.

Parents/carers are required to notify the school of a child's absence in accordance with the school's attendance procedures. Unexplained and persistent absence must be followed up promptly.

The school will monitor attendance and patterns of absence and will take appropriate action where concerns emerge. The DSL/ADSL will be informed where absence raises or is associated with a safeguarding concern.

Where safeguarding concerns are identified, the school will consider the child's circumstances and determine whether additional support, Family Help/early intervention or referral to an appropriate Serbian safeguarding, social care, police, health or other competent authority is required.

Staff must not assume that persistent or unexplained absence is solely an attendance or behavioural issue where there may be an underlying safeguarding concern.

In accordance with the school's Attendance Policy, where a child's attendance falls below 90%, the safeguarding team will be notified and the child's circumstances will be reviewed to identify any underlying welfare or safeguarding concerns and determine appropriate support or action.

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and exploitation.

They can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity.

The imbalance of power may arise from a range of factors, including age, gender, sexual identity, cognitive ability, physical strength, status, access to economic or other resources, or other vulnerabilities.

The exploitation may be in exchange for something the child needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may also occur through violence or the threat of violence.

CSE and CCE can affect any child and can occur online as well as offline. Children may be exploited even where the activity appears consensual. Exploitation may also involve children being moved or trafficked for the purpose of exploitation.

### Children Missing Education (CME)

BIS Belgrade recognises that a child missing education may be at increased risk of abuse, neglect, exploitation or other harm. Children missing education are distinct from pupils who remain registered at the School but are persistently or severely absent.

Where a pupil leaves BIS Belgrade and the School has not been able to establish that the child is receiving suitable education elsewhere, or where the child's whereabouts or destination school are unknown, the School will make reasonable enquiries to establish the child's circumstances and educational provision.

The School will not treat a pupil as having safely transferred solely on the basis that a parent/carer has stated that the child is leaving. Where appropriate, the School will seek confirmation of the receiving school or other educational provision and will follow up where this cannot be established.

Where there are safeguarding concerns, unexplained circumstances, an inability to establish the child's whereabouts or education, or other indicators of risk, the DSL/ADSL will consider referral to or consultation with the relevant Serbian education, social care, police or other competent authority.

Safeguarding information will be transferred securely to the receiving school as soon as practicable where the destination school is known, in accordance with the School's safeguarding information-sharing procedures. Where the destination remains unknown, safeguarding records will be retained securely and enquiries and actions taken will be recorded.

All enquiries, contact attempts, information received, safeguarding considerations, decisions and actions relating to a child who may be missing education will be recorded appropriately.

## Child Criminal Exploitation (CCE)

CCE can include children being coerced or manipulated into transporting drugs or money, committing theft, shoplifting or other offences, involvement in organised criminal activity, or threatening or committing serious violence.

Children can become trapped in exploitation through threats, violence, intimidation, coercion, debt or threats against their family or others. A child may carry a weapon because they are being exploited or because they believe it is necessary for their own protection.

Children who are criminally exploited may themselves commit offences. This must not prevent staff from recognising their vulnerability and considering them as potential victims of exploitation. A child may be criminally exploited even where their involvement appears voluntary or where they believe that they have consented to the activity.

Staff should recognise that exploitation may present differently depending on the child's individual circumstances and that both boys and girls can be victims of criminal and sexual exploitation.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.
- Changes in friendships or relationships, including association with older individuals or groups;
- Unexplained changes in behaviour, appearance, wellbeing or educational performance;
- Being found in locations away from home or school without a clear explanation;
- Receiving excessive calls, messages or online contact;
- Signs of coercion, intimidation, violence or unexplained injuries.

All staff are made aware of the indicators that a child may be at risk of or experiencing criminal exploitation. Staff are encouraged to be vigilant and report any concerns in line with safeguarding procedures to ensure timely intervention and support for the child.

## Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It may involve physical contact and sexual activity or may occur through non-contact and online activity.

CSE can occur over time or as a one-off occurrence. It may occur without the child's immediate knowledge, for example where sexual images or videos of the child are created or shared by others.

Children may be coerced, manipulated, deceived or groomed into sexual activity in exchange for something

they need or want, or for the advantage of the perpetrator or facilitator. Technology and online platforms may be used to groom, coerce, threaten, blackmail or exploit children.

A child may believe that they are in a genuine friendship or romantic relationship and may not recognise that they are being exploited. A child's apparent agreement to sexual activity does not mean that exploitation has not occurred.

Possible indicators of CSE may include:

▪ relationships with significantly older individuals or other relationships involving concerning power imbalances;

▪ unexplained gifts, money or possessions;

▪ sexually transmitted infections or pregnancy;

▪ changes in behaviour, emotional wellbeing or relationships;

▪ periods of unexplained absence or going missing;

▪ increased secrecy around online activity or relationships;

▪ concerning sexualised behaviour or sexual content;

▪ coercion or pressure to create, share or livestream nude or sexual images or activity;

▪ blackmail, threats or manipulation connected with sexual images or online activity; or

▪ other indicators associated with CCE or wider exploitation.

These indicators must be taken seriously and reported in accordance with the school's safeguarding procedures. Children experiencing CSE may not recognise themselves as victims and may resist intervention. This must not prevent staff from acting on safeguarding concerns. Any concern about possible CSE must be reported to the DSL/ADSL without delay.

### Child on Child Abuse

All staff should recognise that children can abuse other children and that this can happen both inside and outside school and online. Child-on-child abuse can occur between two children or within groups of children, and children of any age or sex may be affected.

All staff should understand that even where there are no reported cases of child-on-child abuse, such abuse may still be taking place and staff should not assume that it does not happen at BIS BELGRADE.

Child-on-child abuse is most likely to include, but may not be limited to:

▪ **bullying**, including cyberbullying, discriminatory and prejudice-based bullying;

▪ **abuse in intimate personal relationships between children**;

▪ **physical abuse**, such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;

▪ **sexual violence**, including rape, assault by penetration and sexual assault;

▪ **sexual harassment**, including sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

▪ **causing someone to engage in sexual activity without consent**;

▪ **consensual and non-consensual sharing of nude and semi-nude images and/or videos**;

▪ **upskirting**, which typically involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause humiliation, distress or alarm; and

▪ **initiation or hazing-type violence and rituals**, including activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

Child-on-child abuse may occur face-to-face, online or through a combination of both. Technology may facilitate abuse, including harassment, coercion, threats, the sharing of sexual images, or other harmful behaviour. BIS Belgrade takes a **zero-tolerance approach to child-on-child abuse, sexual violence and sexual harassment**. Such behaviour is never acceptable and must not be dismissed as "banter", "just having a laugh", "part of growing up", "boys being boys" or similar behaviour.

Staff must challenge inappropriate and harmful behaviour between children. Dismissing or tolerating such behaviour can contribute to an unsafe culture in which children may believe that harmful behaviour is normal or acceptable. Staff should recognise that children may not always report child-on-child abuse. The absence of reports does not mean that abuse is not occurring. Staff should remain professionally curious and report concerns to the DSL/ADSL.

BIS Belgrade seeks to minimise the risk of child-on-child abuse by:

▪ creating a safe, respectful and inclusive environment in which children feel able to raise concerns and know that they will be taken seriously;

▪ ensuring that children know how and where to report concerns and can identify trusted adults in school;

▪ providing age-appropriate education through the curriculum, PSHE, assemblies and other opportunities about healthy and respectful relationships, consent, appropriate boundaries, online safety and harmful behaviour;

▪ ensuring that staff understand, recognise and appropriately challenge child-on-child abuse, including sexual violence and sexual harassment;

▪ ensuring appropriate supervision and considering locations or situations within the school where children may be particularly vulnerable;

▪ responding promptly and appropriately to reports and concerns; and

▪ reviewing incidents and patterns of behaviour to identify whether changes to the school's safeguarding arrangements, supervision, curriculum or culture are required.

### Bullying/Safeguarding Threshold

BIS Belgrade takes all reports of bullying seriously. Bullying, including cyberbullying, discriminatory bullying and prejudice-based bullying, will be addressed in accordance with the school's Anti-Bullying and Behaviour Policies.

Where bullying raises a safeguarding concern, it must also be reported to the DSL/ADSL without delay. This

includes incidents involving or indicating child-on-child abuse, sexual violence or sexual harassment, harmful sexual behaviour, serious or repeated physical violence, coercion, exploitation, discriminatory abuse, significant emotional harm, or any other circumstances in which a child may be at risk of harm.

Staff should not wait for behaviour to become repeated or severe before reporting a safeguarding concern. If a member of staff is unsure whether an incident meets the safeguarding threshold, they should seek advice from the DSL/ADSL.

When responding to child-on-child abuse or other harmful behaviour between children, the DSL/ADSL and relevant school staff will consider:

▪ the nature and seriousness of the incident, including whether a safeguarding risk or potential criminal offence may be involved;

▪ the wishes and feelings of the child who has experienced the alleged harm, while recognising that these cannot override the school's responsibility to safeguard that child and other children;

▪ the ages and developmental stages of the children involved;

▪ any SEND, disability, communication need or other vulnerability of the children involved;

▪ any power imbalance between the children, including differences in age, development, social status, vulnerability or other circumstances;

▪ whether the incident appears to be isolated or forms part of a pattern of behaviour;

▪ whether harmful sexual behaviour may be involved;

▪ whether the incident occurred within an intimate personal relationship between children;

▪ the wider context in which the incident occurred, including online behaviour and possible links to CSE, CCE, grooming or other exploitation;

▪ whether there are ongoing risks to the child who experienced the alleged harm, the child alleged to have caused the harm, other children or members of the school community; and

▪ whether the behaviour may indicate unmet needs or safeguarding concerns affecting any of the children involved.

The immediate priority will be to ensure the safety and wellbeing of all children involved. Appropriate measures will be taken to prevent further harm, including consideration of supervision, contact arrangements, timetabling, movement around school, online contact and other proportionate safety measures where necessary.

The school will avoid language that unnecessarily criminalises children. Where appropriate, terms such as “the child who has experienced the alleged harm” and “the child alleged to have caused the harm” will be used while concerns are being assessed.

Where the behaviour constitutes a safeguarding concern, the DSL/ADSL will determine the appropriate safeguarding response in accordance with this policy and applicable Serbian child protection procedures. This may include school-based safeguarding and pastoral measures, support for the children involved, involvement

of parents/carers where appropriate, and consultation with or referral to relevant Serbian safeguarding, social care, police, health or other competent authorities.

Where behaviour also breaches the school's Behaviour Policy, appropriate disciplinary action may be taken. Safeguarding and disciplinary responses may take place alongside each other, but disciplinary action must not compromise a safeguarding or external investigation.

The child who has experienced the alleged harm will be offered appropriate support and their wishes and feelings will be taken into account when determining the school's response. They should be given as much control as is reasonably possible over decisions affecting them, while recognising that the school has a responsibility to protect them and other children.

The child alleged to have caused harm may also have safeguarding, welfare or additional support needs. Appropriate support and intervention will therefore be considered alongside any disciplinary response. Supporting a child alleged to have caused harm does not minimise the seriousness of the behaviour or the impact on the child who experienced it.

Parents/carers will normally be involved where it is safe and appropriate to do so. Parents/carers should not be informed where doing so may increase risk to a child, compromise a safeguarding response or external investigation, or otherwise be contrary to the child's best interests. The DSL/ADSL will determine the appropriate approach in such circumstances.

The DSL/ADSL will ensure that the response is kept under review. This should include consideration of ongoing safety and support, whether risks have changed, whether further action or referral is required and whether lessons can be learned to reduce the likelihood of similar incidents occurring.

All safeguarding concerns, decisions, actions and outcomes must be recorded promptly and securely in accordance with the school's safeguarding recording procedures.

## Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. It may include psychological, physical, sexual, financial or emotional abuse, as well as controlling, coercive or threatening behaviour.

Children may experience domestic abuse within their family environment or in their own intimate relationships. They may see, hear or otherwise experience the effects of domestic abuse, and such exposure can have a serious and long-lasting impact on their safety, health, wellbeing, development, behaviour and education.

Domestic abuse can occur inside or outside the home, may take place online or through technology, and can continue after a relationship has ended.

Staff should be alert to possible indicators that a child may be experiencing or affected by domestic abuse. These may include:

▪ changes in behaviour, mood or emotional presentation;
▪ becoming withdrawn, anxious, fearful or unusually aggressive;
▪ sleep difficulties or persistent tiredness;
▪ unexplained physical symptoms or injuries;
▪ changes in attendance, punctuality, engagement or educational performance;
▪ low self-esteem or feelings of worthlessness;
▪ self-harm or other concerning coping behaviours;
▪ substance misuse;
▪ fear or anxiety about going home or about a particular family member or partner;
▪ taking on inappropriate caring responsibilities for siblings or family members; or
▪ controlling, coercive, threatening, violent or abusive behaviour within a child's own intimate relationship.

Staff should recognise that a child may be affected by domestic abuse even where they do not directly witness a particular incident. A child may blame themselves for the abuse, attempt to protect a parent, carer or sibling, or be reluctant or afraid to disclose what is happening.

Domestic abuse within children's own intimate relationships, sometimes referred to as teenage relationship abuse, must also be recognised as a safeguarding concern. This may include physical, sexual, emotional or psychological abuse, coercive or controlling behaviour, harassment, stalking and technology-facilitated abuse.

Any concern or suspicion that a child is experiencing, witnessing or otherwise affected by domestic abuse must be reported to the DSL/ADSL without delay. Staff must not investigate the concern themselves.

The DSL/ADSL will assess the child's immediate safety and safeguarding needs and determine the appropriate response in accordance with this policy, applicable Serbian law and national and local child protection procedures.

Where there is information or reasonable suspicion that domestic abuse has occurred or there is an immediate risk of domestic abuse, the school will act without delay and, where required, notify or make a referral to the competent Serbian authorities. Depending on the circumstances, this may include the police, the competent Centre for Social Work and/or other relevant services.

Where a child is in immediate danger or urgent protection or medical assistance is required, appropriate emergency action must be taken without delay. Internal school reporting procedures must not delay action necessary to protect the child or another person from immediate harm.

BIS BELGRADE will cooperate with the competent Serbian authorities and services in accordance with applicable law and child protection procedures, including the multi-agency arrangements for the prevention of domestic abuse and protection and support of victims.

Parents/carers must not be contacted where doing so may increase the risk to the child or another person, alert an alleged perpetrator, or compromise safeguarding or external authority action. The DSL/ADSL will determine whether, when and how parents/carers should be informed, taking advice from the competent

authorities where necessary.

All concerns, decisions, referrals, advice received, actions and outcomes must be recorded promptly, factually and securely in accordance with the school's safeguarding recording procedures.

## Honour or Faith-Based Abuse

Honour or faith-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the perceived honour of a family and/or community, or where abuse is justified by reference to faith or belief. It may include Female Genital Mutilation (FGM), forced marriage and other harmful practices.

Abuse committed in the context of preserving perceived honour may involve a wider network of family or community pressure and may involve multiple people. All forms of honour or faith-based abuse are safeguarding concerns and must be treated seriously. Staff should be alert to the possibility that a child may be at risk of such abuse or may already have experienced it.

Any concern that a child may be at risk of honour or faith-based abuse must be reported to the DSL/ADSL without delay. Staff must not investigate the concern themselves or contact family or community members where doing so could increase the risk to the child.

The DSL/ADSL will consider the child's immediate safety and determine the appropriate safeguarding response in accordance with this policy, applicable Serbian law and local child protection procedures. Where necessary, this will include consultation with or referral to the relevant Serbian police, Centre for Social Work, health service or other competent authority.

## Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises procedures involving the partial or total removal of the external female genitalia, or other injury to the female genital organs, for non-medical reasons.

FGM is a form of child abuse and can have serious immediate and long-term physical and psychological consequences.

Staff should be alert to indicators that a girl may be at risk of FGM or may have undergone FGM. These may include:

- a child talking about or expressing concern about a special procedure or ceremony;
- plans for an extended trip or unexplained absence, particularly where the child expresses concern about the visit;
- a child saying that she is expected to undergo a procedure or that something has happened to her;
- difficulty walking, sitting or standing, or other unexplained physical discomfort;
- frequent or prolonged visits to the toilet;
- a noticeable change in behaviour or emotional wellbeing; or
- other information suggesting that the child may be at risk of, or may have experienced, FGM.

Any concern or disclosure relating to FGM must be reported immediately to the DSL/ADSL. The DSL/ADSL will determine the appropriate response and, where required, make or coordinate a referral to the relevant Serbian safeguarding, social care, police, health or other competent authority.

Where a child may be in immediate danger, emergency action must not be delayed by internal school reporting procedures.

Forced Marriage

A forced marriage is a marriage in which one or both people do not freely and fully consent to the marriage and where pressure, coercion, abuse or other means are used to cause the marriage to take place.

Coercion may include physical, psychological, emotional, sexual or financial pressure, threats, intimidation or other forms of abuse.

A forced marriage is different from an arranged marriage. In an arranged marriage, families may take a role in introducing or arranging a potential marriage, but both individuals retain the freedom to decide whether or not to marry.

Staff should be alert to possible indicators of forced marriage, including:

- a child expressing concern about an upcoming marriage or engagement;
- a child expressing concern about being taken abroad or not being allowed to return;
- a sudden announcement of an engagement;
- unexplained or extended absence from education;
- restrictions on the child's freedom, friendships, education or communication;
- family or community pressure relating to marriage; or
- other changes in behaviour or circumstances that raise safeguarding concerns.

Any concern that a child may be at risk of forced marriage must be reported to the DSL/ADSL without delay. Staff must not attempt to mediate with the family or contact family or community members where doing so may increase the risk to the child.

The DSL/ADSL will assess the child's immediate safety and, where necessary, consult with or make a referral to the appropriate Serbian safeguarding, social care, police or other competent authority.

All concerns, decisions, referrals and actions relating to honour or faith-based abuse, FGM or forced marriage must be recorded promptly and securely in accordance with the school's safeguarding recording procedures.

## Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This may include **self-harm, signs of an eating disorder, suicidal ideation or risk of suicide**. Mental health concerns may also indicate that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to diagnose a mental health condition. However,

school staff are well placed to observe children on a day-to-day basis and identify changes that may indicate that a child is experiencing mental health difficulties or may be at risk.

Possible warning signs may include:

▪ significant changes in behaviour, mood or emotional presentation;

▪ ongoing difficulty sleeping or significant changes in sleep patterns;

▪ withdrawing from friends, peers or social situations;

▪ losing interest in activities the child would normally enjoy;

▪ significant changes in eating patterns or signs of an eating disorder;

▪ physical signs of self-harm;

▪ neglect of personal care or wellbeing;

▪ expressions of hopelessness, worthlessness or wanting to die;

▪ suicidal thoughts, plans or behaviours;

▪ significant changes in attendance, engagement or educational performance; or

▪ other significant changes in presentation or behaviour that cause concern.

The presence of one or more of these indicators does not necessarily mean that a child has a mental health condition or is suicidal. However, staff must take concerns seriously and report them appropriately.

**Where a member of staff has a mental health concern about a child that is also a safeguarding concern, they must report the concern to the DSL/ADSL without delay and follow the school's safeguarding procedures.**

Where there is concern about self-harm, suicidal ideation, an eating disorder or another significant mental health risk, the DSL/ADSL will consider the child's immediate safety, safeguarding needs and the need for appropriate support or referral.

**Where a child is in immediate danger, has made or is making plans to end their life, has sustained a serious injury through self-harm, or otherwise requires urgent medical or psychiatric assistance, emergency action must be taken without delay.** This may include contacting the appropriate Serbian emergency medical, health, police or other competent service. Internal school procedures must not delay action necessary to protect the child from immediate harm.

BIS BELGRADE will ensure that any mental health support or intervention provided by the school is appropriate to the child's needs and delivered by suitably trained staff or professionals. Where specialist assessment or treatment is required, the school will support referral to appropriate Serbian health, mental health or other specialist services.

Where it is safe and appropriate to do so, the DSL/ADSL will consider involving parents/carers in supporting the child's mental health and wellbeing. Parents/carers should not be informed where doing so may place the child at additional risk or compromise a safeguarding response.

Where appropriate, the DSL/ADSL will work with relevant pastoral staff, the SENCO, school leadership and

external professionals to ensure that the child's safeguarding and mental health needs are considered holistically.

Individual safeguarding or wellbeing risk assessments may be used where appropriate. These should identify the nature and level of risk, protective measures, responsible staff, agreed actions and review arrangements. Risk assessments must be reviewed when circumstances change or new information becomes available.

All significant concerns, decisions, actions, referrals and outcomes must be recorded promptly, factually and securely in accordance with the school's safeguarding recording procedures.

### Nude or semi-nude images/videos

Sharing nude or semi-nude images, videos or live streams involving children is a safeguarding concern. This includes consensual and non-consensual sharing, coercion or pressure to create or share imagery, sexual exploitation, blackmail or financially motivated sexual extortion (“sextortion”), and digitally manipulated or AI-generated sexual imagery involving a child.

Any concern involving nude or semi-nude imagery must be reported to the DSL/ADSL without delay. Staff must not investigate the incident themselves.

Staff must not:

▪ ask a child to send, forward, download or show them the imagery;

▪ copy, print, screenshot, photograph, save, upload or share the imagery;

▪ search a child's device for the purpose of investigating the incident; or

▪ delete imagery or potential evidence without direction from the DSL/ADSL or relevant competent authority.

Staff should avoid viewing the imagery. Where viewing is considered necessary for a clear safeguarding purpose, this decision should normally be made by the DSL/ADSL, appropriately justified and recorded.

The DSL/ADSL will assess the safeguarding risk, including the ages and vulnerabilities of the children involved; consent; coercion, grooming, threats or exploitation; power imbalances; whether an adult is involved; the extent of distribution; sextortion or blackmail; AI-generated or manipulated imagery; and any immediate risk of harm.

Where there is concern that a child has been harmed, exploited, coerced, threatened or is otherwise at risk, the DSL/ADSL will take appropriate safeguarding action and, where required, consult with or refer to the relevant Serbian police, Centre for Social Work, health service or other competent authority in accordance with applicable Serbian law and child protection procedures.

Parents/carers should normally be involved where it is safe and appropriate to do so. They should not be informed where this may increase risk to the child or compromise safeguarding action or an external investigation.

Children involved should be treated sensitively and without blame or unnecessary criminalisation and provided with appropriate safeguarding and pastoral support.

All concerns, decisions, actions, referrals and outcomes must be recorded securely. The imagery itself must

not be copied into or attached to the school's safeguarding record.

### Serious Violence

All staff should be aware of indicators that may signal that a child is at risk from, or involved in, serious violence. These may include increased or unexplained absence from education, changes in friendships or associations with older individuals or groups, a significant decline in educational performance, signs of self-harm or changes in wellbeing, unexplained injuries, and unexplained gifts, money or new possessions.

Staff should also be aware of factors that may increase a child's vulnerability to serious violence, including previous abuse or neglect, persistent absence or exclusion from education, involvement in offending, exploitation, peer or group pressure, and exposure to domestic or community violence.

Children involved in serious violence may themselves be victims of **child criminal exploitation (CCE), coercion, grooming or abuse**. Their behaviour should therefore not be viewed solely as a disciplinary matter.

**Any concern that a child may be at risk of, involved in, or being exploited through serious violence must be reported to the DSL/ADSL without delay.** Where there is an immediate risk of serious harm, appropriate emergency action must be taken without delay.

Threats involving weapons, including threats to bring, possess or use a weapon in school or against another person, must be treated as a serious safeguarding and safety concern. Any such threat must be reported immediately to the DSL/ADSL and Head of School. Where there is an immediate or credible risk of serious harm, appropriate emergency action, including contacting the police, must be taken without delay.

The DSL/ADSL will determine the appropriate safeguarding response and, where necessary, liaise with or refer to the relevant Serbian authorities in accordance with applicable Serbian law and child protection procedures.

### Supporting Those Involved

BIS Belgrade will provide appropriate safeguarding and pastoral support to children who have experienced harm, taking account of their individual needs, wishes and circumstances and the nature and impact of the incident. Support may include pastoral support, counselling, mentoring, family support or referral to appropriate external services.

Children who are alleged to have caused harm may also have safeguarding, welfare or additional support needs. The school will consider the underlying factors contributing to their behaviour and provide appropriate support and intervention alongside any proportionate disciplinary response.

Support for a child alleged to have caused harm does not minimise the seriousness of the behaviour or the impact on the child who has experienced it.

The DSL/ADSL will keep safeguarding and support arrangements under review and consider whether further action is required to protect the children involved and other members of the school community.

### Preventing Radicalisation and Extremism

Children may be vulnerable to extremist ideology and radicalisation. Protecting children from this risk forms part of the school's wider safeguarding responsibilities.

Radicalisation is the process through which a person comes to support terrorism or extremist ideology associated with terrorist groups. Extremism includes the promotion or advancement of an ideology based on violence, hatred or intolerance that seeks to negate or destroy the fundamental rights and freedoms of others or undermine democratic principles.

There is no single indicator that a child is being radicalised. Staff should be alert to concerning changes in behaviour, relationships, attitudes or online activity, particularly where these occur alongside other vulnerabilities or suggest that a child may be being influenced, groomed or exploited.

Radicalisation may occur through family or peer relationships, community influences or online environments, including social media, gaming and other digital platforms.

Any concern that a child may be vulnerable to radicalisation or extremist influence must be reported to the DSL/ADSL without delay. Staff must not investigate the concern themselves.

The DSL/ADSL will assess the concern and determine the appropriate safeguarding response in accordance with this policy, applicable Serbian law and local safeguarding procedures. Where necessary, this may include consultation with or referral to the relevant Serbian competent authorities.

BIS BELGRADE supports prevention through safeguarding education, online safety, critical thinking and the active promotion of fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. The curriculum provides age-appropriate opportunities for children to develop resilience to extremist narratives, challenge prejudice and intolerance, evaluate information critically and understand how to seek help where they are concerned about themselves or others.

## Online Safety

BIS BELGRADE recognises that safeguarding children online is an essential part of its safeguarding responsibilities. Technology is a significant component of many safeguarding issues, and children may experience abuse and other risks both online and offline.

The school takes a whole-school approach to online safety, including appropriate education, staff training, parental engagement, supervision, filtering and monitoring, and clear procedures for identifying, reporting and responding to online safeguarding concerns.

Staff should understand that online safeguarding risks can be considered within four broad areas:

- **Content** – being exposed to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm and suicide content, misinformation, disinformation, conspiracy theories and extremist material;
- **Contact** – being subjected to harmful online interaction with other users, including peer pressure, grooming,

exploitation and contact from adults posing as children;

▪ **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, including bullying, the consensual or non-consensual sharing of nude or semi-nude images, and other harmful online behaviour; and

▪ **Commerce** – risks such as online gambling, inappropriate advertising, phishing and financial scams.

Staff must report online safeguarding concerns to the **DSL/ADSL without delay** in accordance with the school's safeguarding procedures.

BIS Belgrade provides age-appropriate online safety education through the curriculum and wider school activities. Children are taught how to recognise online risks, behave safely and responsibly, critically evaluate online information and seek help where they are concerned about themselves or another child.

The school works with parents/carers to support children's online safety and communicates relevant information about the school's expectations, systems and procedures.

BIS BELGRADE maintains appropriate filtering and monitoring arrangements, which are set out in the following section and supported by the school's E-Safety/Online Safety and Acceptable Use policies.

## Filtering and Monitoring

The school internet access is provided by two local internet providers ‘MTS’ and ‘SBB’. Our blocking and filtering system is appropriate to the age of students. We use ‘OpenDNS’ for both Wi-Fi and the school’s cable network in each building. ‘OpenDNS’ system is the member of Internet Watch Foundation and blocks illegal and inappropriate content such as pornography, gambling, hacking, malware, terrorist and extremist material.

Internet access is filtered using the ‘OpenDNS’ for all users within the school (both teachers and students). This filtering of Internet traffic is set up at each school location by BIS BELGRADE administrators by selecting the categories offered and by blocking explicitly specified website names.

Access to websites that are not blocked, private emails and social networks is free, but is monitored using dedicated ‘Net Support DNA Safeguarding’ software. This software monitors text input on school computers by both students and teachers and compares it with terms from its own database of potentially dangerous words and phrases. The software then generates reports twice a day (at 12:00 & 15:00), which are sent by email to the E-Safety Lead, who responsible for monitoring the Internet activity of students and employees. E-Safety Lead will forward the potentially dangerous searches to the DSL for further assessment.

We are aware that:

- filtering and monitoring are important parts of safeguarding students and staff from potentially harmful and inappropriate material
- we have overall strategic responsibility for filtering and monitoring
- we must ensure a safe learning and working environment for both students and school personnel,

including when online

The Safeguarding team liaise with the E-Safety Lead & IT department regularly to review the effectiveness of school filters and monitoring systems in order to manage the content available to students, who can contact our students and the personal conduct of our students online.

### Mobile Phone Use

Our BIS EYFS Use of Cameras & Mobile Phones or Devices Policy establishes clear protocols regarding the use of personal mobile phones, devices, and cameras within the Early Years Foundation Stage (EYFS) setting, including Reception and Foundation Classes. This policy outlines the appropriate use of such devices to safeguard children's privacy, maintain a secure learning environment, and ensure compliance with safeguarding regulations.

Secondary school students are required to hand in their phones each morning during registration to their form tutor. The phones are securely stored in designated boxes labeled with class numbers and kept in the staff room for safekeeping. Students can collect their phones at the end of the school day.

### Disinformation, misinformation, conspiracy theories & generative AI

BIS Belgrade recognises that misinformation, disinformation, conspiracy theories and the rapidly developing use of generative artificial intelligence (AI) may create or amplify safeguarding risks for children.

**Misinformation** is false or misleading information shared without an intention to deceive, while **disinformation** is false or misleading information deliberately created or shared to deceive or influence others. Children may also encounter conspiracy theories and other harmful or manipulative online content.

Generative AI may create safeguarding risks through inappropriate or harmful content, inaccurate or misleading information, simulated interactions, impersonation, manipulation of images or videos, deepfakes, sexualised or abusive AI-generated content, and other forms of online abuse or exploitation.

BIS BELGRADE will take appropriate steps to ensure that the use of generative AI by staff and students is considered within the school's wider **online safety, filtering and monitoring, data protection and safeguarding arrangements**.

Students will be supported to develop age-appropriate **digital and media literacy**, including the ability to critically evaluate online and AI-generated information, recognise potentially harmful or misleading content and know how to report concerns.

**Any safeguarding concern arising from the use of generative AI or exposure to harmful or manipulative online content must be reported to the DSL/ADSL in accordance with the school's safeguarding procedures.**

## Part E: Roles and Responsibilities

The School Director, in their capacity as the Proprietor, collaborates closely with the Board of Governors to ensure the effective implementation of policies, procedures, and training, ensuring ongoing compliance with legal requirements and the highest standards of practice.

The school has a Designated Safeguarding Lead (DSL) and two Assistant Designated Safeguarding Leads (ADSLs) – one for the Primary School and one for the Secondary School. **The DSL holds lead responsibility for safeguarding and child protection across the school, while the ADSLs support the DSL and carry out delegated safeguarding responsibilities.** In addition, the school has appointed four Safeguarding Officers (two for Primary and two for Secondary) to ensure comprehensive coverage across all three campuses. The safeguarding team comprises both male and female members in both the Primary and Secondary schools, ensuring that students have the option to confide in a staff member they feel most comfortable with. This approach acknowledges the importance of gender considerations in the disclosure process and supports a safe and inclusive safeguarding environment.

The ADSLs are appropriately trained to carry out delegated safeguarding functions and may manage safeguarding concerns and cases as agreed with the DSL. However, the DSL retains lead responsibility for safeguarding and child protection across the school. Significant or complex safeguarding concerns should be escalated to the DSL, while recognising that urgent action to protect a child must never be delayed. Safeguarding Officers support the school's safeguarding arrangements but do not hold the same responsibilities or authority as the DSL or ADSLs. They must report safeguarding concerns to and work under the direction of the DSL/ADSL and must not investigate safeguarding concerns independently.

The DSL and ADSLs are Serbian native. Staff and students are encouraged to communicate in either English or Serbian when discussing concerns, depending on which language makes them feel more comfortable. While the school’s policy generally requires staff to communicate with students in English, this formality is set aside in matters of student well- being and safety. In such situations, the priority is ensuring that all information is conveyed accurately and that there is a clear mutual understanding.

The DSL and ADSL work closely with the Head of School and School Director on safeguarding matters when referring cases of suspected abuse to social services and/or the police. In emergency situations, the DSL or ADSL may escalate a case directly to the relevant local authorities without prior consultation with the school leadership, prioritizing the child’s safety. In such instances, the school directors are informed immediately after the referral has been made.

## The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team and takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. The DSL has the appropriate status, authority, time, funding,

training, resources and support to carry out the duties of the role effectively.

The school has two named Assistant Designated Safeguarding Leads (ADSLs), who are trained to the same standard as the DSL and provide appropriate safeguarding cover. The DSL and ADSLs undertake role-specific safeguarding training **at least every two years** and receive regular safeguarding updates between formal training sessions.

The responsibilities of the DSL/ADSL include:

**Taking lead responsibility for safeguarding and child protection across the schoo**

- Understand the filtering and monitoring systems and processes in place
- Ensuring the child protection and safeguarding policies are known, understood and used appropriately by staff, reviewed annually and publicly available
- Advising and supporting staff on child protection and safeguarding matters
- Encouraging a culture of listening to children
- Taking part in strategy discussions and inter-agency meetings
- **Managing and coordinating safeguarding referrals to the competent Centre for Social Work, police, health services and other relevant Serbian authorities or agencies, as appropriate**
- Ensuring all staff receive regular safeguarding training whether it be internal or online
- Transferring the child protection file to a child's new school
- Undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training

## Opportunities to Teach Safeguarding

As a school, we will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This may include covering relevant issues for schools through Relationships and Sex Education. Further details regarding these subjects can be found in 'Relationships Education, Relationships and Sex Education (RSE) and Health Education'.

### Safeguarding Team Training

The safeguarding team undergoes training every two years to ensure they remain equipped with the latest safeguarding practices and regulations. The following certifications and training programs are completed every two years:

- *Advanced Certificate in Child Protection and Safeguarding for Leaders in International Schools* by The Safeguarding Alliance - for the DSL & ADSL
- *Advanced Certificate in Online Safety for Child Protection and Safeguarding Leads in International*

*Schools* - for the E-Safety Lead

- Other specified training for relevant staff, including *Safeguarding Officers, SENCo, Designated Safeguarding Governor, and Safer Recruitment*.

In addition to formal training, the safeguarding team receives ongoing updates between training sessions as needed to stay informed on best practices and emerging safeguarding concerns. The School Leadership team (including the Head of School, Head of Primary, Head of Secondary, and the School Director/Proprietor) has also completed Level 3 Safeguarding training to ensure the highest standards of child protection and safety.

## Staff Training

As part of their induction, all newly appointed staff, including temporary staff and other adults working with children as appropriate to their role, receive safeguarding and child protection training. This includes online safety and an understanding of staff responsibilities in relation to the school's filtering and monitoring arrangements.

Safeguarding induction is coordinated by the DSL/ADSL and ensures that staff understand the school's safeguarding procedures, their individual responsibilities and how to recognise, report and respond to concerns without delay.

The induction covers, as appropriate:

▪ the role and identity of the DSL/ADSL and how to contact them;

▪ the principle that safeguarding is everyone's responsibility and that staff should maintain an attitude of "it could happen here";

▪ recognising signs and indicators of abuse, neglect, exploitation and other safeguarding concerns;

▪ how to respond to a disclosure and how to report and record safeguarding concerns;

▪ Family Help/early intervention and the school's referral procedures;

▪ child-on-child abuse, including sexual violence and sexual harassment;

▪ online safety and staff responsibilities relating to filtering and monitoring;

▪ staff conduct, professional boundaries, low-level concerns and allegations against adults; and

▪ whistleblowing and how to raise concerns about safeguarding practice.

All staff are provided with and required to read, as appropriate to their role:

▪ BIS BELGRADE Safeguarding and Child Protection Policy;

▪ Keeping Children Safe in Education 2026 – Part One;

▪ Staff Code of Conduct, including professional boundaries and low-level concerns;

▪ Whistleblowing Policy;

▪ Behaviour and Anti-Bullying Policies;

▪ E-Safety/Online Safety and Acceptable Use requirements; and

▪ other relevant safeguarding procedures and guidance applicable to their role.

All staff receive regular safeguarding and child protection updates, including online safety, as required and at least annually. Formal refresher training is provided in accordance with the school's training programme, and records of induction, training, updates and completion are maintained.

### Abuse of Position of Trust

All adults working with children at BIS BELGRADE are in a position of trust and have a responsibility to maintain appropriate professional boundaries. A relationship between a member of staff and a student is not a relationship between equals because of the adult's position, authority, influence and responsibility for the child's education, welfare and safety.

Staff must never use their position, authority or influence to establish or pursue an inappropriate, intimate or sexual relationship with a student, or for personal advantage, gratification or gain. **Sexual or romantic relationships between staff and students are prohibited by the school, regardless of the student's apparent consent.**

Staff must also maintain appropriate professional boundaries in all communication and contact with students, including online communication, social media, messaging, physical contact and contact outside school.

Serbian criminal law provides specific protections against sexual activity involving the abuse of a position of authority, trust, subordination or dependency, including provisions relating to teachers, educators and other persons entrusted with the education, upbringing, care or supervision of a minor.

**Any concern that a member of staff may have abused their position of trust, breached professional boundaries or behaved in a way that may pose a risk of harm to a child must be reported immediately in accordance with the school's procedures for allegations and low-level concerns about adults.**

### Proprietorial Oversight

The Proprietor, Aleksandra Keserović, carries a legal responsibility in relation to all matters of BIS BELGRADE, including safeguarding and legal matters. The Board of Directors are the proprietors responsible for the school. The Proprietor completes the training for Designated Safeguard Lead (level 3), conducted by The Safeguarding Alliance, as well as the Head of School. The Designated Safeguarding Governor, Stefan Slijepčević, completes the Safeguarding training for Governors and is part of the whole school safeguarding team and has an advisory role on all safeguarding matters at BIS BELGRADE. The Advisory Board meeting is scheduled once a term, where the Designated Safeguarding Lead and Safeguarding Governor submit a report to the Board and relevant safeguarding matters are discussed.

Weekly safeguarding meetings are held to review procedures, assess serious incidents and cases—particularly those involving siblings across both schools—and identify emerging trends. These meetings ensure a coordinated approach to child protection, facilitate information-sharing among key staff, and support proactive risk management.

The DSL provides a safeguarding update at each Governor's/Advisory Board meeting and prepares a formal Annual Safeguarding Report for the Governing Body.The DSL prepares an Annual Safeguarding Report for the Governing Body. These updates and the Annual Safeguarding Report support oversight of safeguarding practice, emerging themes and trends, training, referrals, online safety, filtering and monitoring, and other relevant safeguarding matters, while maintaining appropriate confidentiality. These reports support oversight of safeguarding practice, emerging themes and trends, training, referrals, online safety, filtering and monitoring, and other relevant safeguarding matters, while maintaining appropriate confidentiality.

The Governing Body, School Director/Proprietor and Head of School use this information to provide appropriate oversight and challenge and to ensure that safeguarding policies, systems and practices are effective and continuously reviewed and improved.

## Part F: Other Safeguarding Policies and Procedures

### Safer Recruitment

BIS BELGRADE is committed to a culture of safer recruitment as an essential part of safeguarding and preventing unsuitable individuals from working with children. Recruitment procedures are carried out in accordance with applicable Serbian law, BSO requirements and the safeguarding principles set out in Keeping Children Safe in Education 2026.

Appropriate pre-employment checks are undertaken according to the role and the applicant's circumstances. These include verification of identity, qualifications and employment history, appropriate criminal record and overseas checks, references and other relevant suitability checks. Any gaps or inconsistencies in employment history are explored as part of the recruitment process.

**As part of the school's due diligence, an online search will be carried out on shortlisted candidates to help identify any publicly available information that may need to be explored further in relation to the candidate's suitability to work with children.**

The BIS BELGRADE Safer Recruitment Policy set out the process in full and can be found on the school website. Candidates must complete the application form, as curriculum vitae (CV) is not sufficient.

The school checks the identity of all contractors working on site and requests the Serbian Police Check where required. Contractors who have not undergone checks will not be allowed to work unsupervised during the

school day.

Volunteers and visitors will receive a Visitor tag, and always be accompanied around the school & never be left unsupervised unless they have undergone the appropriate checks, which allows them to do so.

## Good Practice Guidelines and Staff Code of Conduct

All staff are expected to maintain the highest standards of professional conduct and to act at all times in the best interests of children. Staff must be familiar with and follow the school's Staff Code of Conduct and Safeguarding and Child Protection procedures.

Staff should ensure that their behaviour, communication and relationships with students are appropriate, professional and transparent. This includes maintaining appropriate boundaries in one-to-one situations, physical contact, communication with students, social contact and the use of technology.

All staff must report safeguarding concerns about a child to the DSL/ADSL without delay and follow the school's safeguarding and referral procedures. Where a child is in immediate danger or urgent action is required to protect a child, appropriate emergency action must be taken without delay.

Any concern about the conduct of an adult working with children, including behaviour that may constitute a low-level concern or may meet the harms threshold, must be reported and managed in accordance with the school's Safeguarding and Child Protection Policy, Staff Code of Conduct and Whistleblowing Policy.

## The Rooms Without Windows in Doors Protocol

Due to the design of some school rooms and classrooms, there may not be clear visibility into a room when the door is closed. Staff must therefore take appropriate safeguarding precautions when working one-to-one with a student.

Staff should:

- Avoid, as far as possible, being alone in a room with a pupil.
- Where possible, ensure that you wait until more than one pupil or another adult is present before entering a classroom.
- When working alone with a pupil is an integral part of your role, conduct and agree full risk assessments with a senior colleague.
- Keep the door open, and inform a colleague that the lesson/meeting is taking place.
- Arrange the meetings during normal school hours when there are plenty of other people about. If a meeting out of school hours is required, a member of the Senior Management Team should be informed.
- Do not continue the meeting for any longer than is necessary to achieve its purposes.
- Avoid sitting or standing in close proximity to the pupil, except as necessary to check work.

- Avoid using "engaged" or equivalent signs on doors or windows.
- Avoid idle discussion.
- Avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact.
- Avoid any conduct that could be taken as a sexual advance.
- Report any incident that causes you concern to the DSL under the School's child protection procedures, and make a written record (signed and dated).
- Report any situation where a pupil becomes distressed or angry to a senior colleague.

### Physical Intervention / Restraint

There may be circumstances in which staff, in the course of their duties, need to intervene physically in order to prevent a child from harming themselves or others. Any physical intervention or restraint must be reasonable and proportionate to the circumstances and limited to the minimum necessary to manage the immediate risk.

Wherever possible, staff should use preventative and de-escalation strategies to minimise the need for physical intervention. Physical intervention or restraint must never be used as a form of punishment.

Any significant incident involving physical intervention or restraint must be reported promptly to the Head of School and appropriately recorded. The child should be offered an opportunity to discuss the incident with an appropriate member of staff, and consideration should be given to any injuries, safeguarding needs or additional support required. Parents/carers should normally be informed.

Any concern that physical intervention or restraint may have been unnecessary, excessive or inappropriate, or may have caused harm to a child, must be reported without delay as a safeguarding concern in accordance with this Policy.

Further procedures relating to behaviour management and the use of physical intervention or restraint are set out in the School's Behaviour Policy and related procedures.

## Whistleblowing

BIS Belgrade is committed to a culture in which staff feel able to raise concerns about unsafe, inappropriate or unlawful practice without fear of retaliation.

All staff have a responsibility to raise concerns about the conduct or safeguarding practice of another adult working with children, **no matter how small the concern may appear**. Staff must not assume that another person will report the concern.

Concerns should be reported promptly in accordance with the school's **Whistleblowing Policy and procedures for managing concerns and allegations about adults**. Staff who raise genuine concerns in good faith will be supported and protected from retaliation.

Where a concern relates to a person who would normally receive or manage the concern, it must be reported to the appropriate alternative senior person identified in the school's Whistleblowing Policy.

**Nothing in the school's internal reporting procedures should prevent or delay immediate action where this is necessary to protect a child from harm.**

## Allegations Against Staff

BIS Belgrade takes all safeguarding concerns and allegations about adults working with children seriously. This applies to staff, supply staff, volunteers, contractors and any other adults working in or on behalf of the school.

Concerns and allegations about adults are considered under two categories:

**1. Concerns that do not meet the harms threshold (Low-Level Concerns)**

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, but which does not meet the harms threshold.

A low-level concern may arise from a specific incident or behaviour, information received from another person, or a sense of unease about an adult's behaviour towards or around children.

**All low-level concerns must be reported promptly to the relevant line manager or Head of Primary/Secondary, in accordance with the school's Whistleblowing Policy and low-level concerns procedure.** Where there is any doubt about the seriousness of the concern, it must be escalated to the School Director/Head of School for further consideration.

Low-level concerns will be recorded confidentially and reviewed appropriately. The school will consider whether there are any patterns of inappropriate or concerning behaviour and whether further action, including guidance, training, disciplinary action or escalation under the harms threshold procedure, is required.

Staff are also encouraged to **self-refer** where they believe that their own conduct may have fallen below the standards expected in the Staff Code of Conduct or could be misinterpreted by others.

**2. Allegations that may meet the harms threshold**

An allegation may meet the harms threshold where an adult working in or on behalf of the school has:

- **behaved in a way that has harmed a child, or may have harmed a child;**
- **possibly committed a criminal offence against or related to a child;**
- **behaved towards a child or children in a way that indicates that they may pose a risk of harm to children; and/or**
- **behaved or may have behaved in a way that indicates that they may not be suitable to work with children, including behaviour that may have occurred outside school.**

Any concern or allegation that may meet the harms threshold must be **reported to the Head of School without delay**.

Where the allegation or concern relates to the **Head of School**, it must be reported directly to the **Designated Safeguarding Governor**. Where the concern relates to another person involved in receiving or managing allegations, the school's Whistleblowing Policy and governance arrangements must be followed to ensure that the concern is referred to an appropriate person who is not involved in the matter.

The DSL will be informed where appropriate, particularly where there are safeguarding implications for a child. Staff must not investigate allegations themselves or question children or other individuals beyond what is necessary to establish the basic facts and ensure immediate safety.

The school will take immediate action where necessary to safeguard any child involved and will consider whether referral to the **competent Serbian police, Centre for Social Work or other relevant authority** is required. Internal procedures must not delay action necessary to protect a child.

Concerns about an adult's behaviour outside school will also be considered where the circumstances may indicate a **transferable risk** to children or otherwise raise concerns about the individual's suitability to work with children.

Appropriate confidentiality will be maintained throughout the process. The school will keep clear and comprehensive records of concerns and allegations, decisions made, actions taken and the reasons for those decisions, and will cooperate fully with any relevant external investigation.

## Site Security

All visitors to the school are required to sign in upon arrival and receive a visitor's lanyard, indicating their authorization to be on site. Any individual found on the premises without an ID badge must be directed to the nearest office to complete the sign-in process. All visitors require escorting or supervision while on site.

## Extended School and Off-site Arrangements

All extended school and off-site activities, including day visits, residential trips and work-related activities, are subject to appropriate **risk assessment and safeguarding arrangements**.

Where activities are organised and managed by BIS BELGRADE, the school's Safeguarding and Child Protection Policy and procedures continue to apply. Where an external organisation provides activities or services on behalf of the school, BIS BELGRADE will take appropriate steps to ensure that suitable safeguarding arrangements and safer recruitment procedures are in place.

For off-site activities and trips, the **Trip Leader is responsible for ensuring that staff and students are aware of the relevant safeguarding arrangements and emergency procedures**.

**Any safeguarding concern arising during a trip or off-site activity must be reported to the DSL/ADSL without delay.** The Trip Leader must not determine whether a safeguarding concern is sufficiently serious to be reported. The DSL/ADSL will advise on and coordinate appropriate safeguarding action.

Where a child is in **immediate danger or requires urgent protection or medical assistance**, staff must take appropriate action immediately, including contacting the relevant local emergency services or authorities

where necessary. **Action to protect a child must not be delayed while awaiting contact with the DSL/ADSL.** The DSL/ADSL must be informed as soon as practicable.

The DSL/ADSL or appropriate safeguarding cover will remain contactable during school-organised trips in accordance with the school's trip and safeguarding arrangements.

## Alternative provision

Where BIS BELGRADE places a student with an alternative provision provider, the school remains responsible for safeguarding the student and must ensure that appropriate safeguarding arrangements are in place. BIS BELGRADE must obtain written confirmation from the provider that appropriate safeguarding checks have been completed. They should keep records of provider addresses, including any subcontracted or satellite sites, and regularly review placements to ensure they remain safe and appropriate, ending them immediately if safeguarding concerns arise.

## Staff/Student and Parent Online Relationships

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students and parents Detailed expectations regarding online contact, electronic communication, social media and professional boundaries are set out in the school's Staff Code of Conduct and E-Safety Policy.. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

## Children Staying with Host Families during a Foreign Exchange

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

Where students stay with host families, BIS BELGRADE will work with the relevant partner school or organisation to obtain appropriate information and assurances regarding the suitability and safeguarding arrangements of the host family, including any checks that are available and appropriate in the relevant country. When students stay with host families in other countries, we will collaborate with partner schools to establish a shared understanding of the safeguarding arrangements in place. Staff will exercise their professional judgment to ensure these arrangements are appropriate, including confirming that students know who to contact in case of an emergency or if they feel uncomfortable in any situation. We will also make parents aware of these arrangements.

## Related Safeguarding Policies

All policies related to the Safeguarding can be found on our website:
https://www.british-int-school.org.uk/about-us/school-policies/

These policies include:

- Anti-bullying policy
- E-safety policy
- EYFS Safeguarding policy
- Health and Safety policy
- Primary school behavior policy
- RSE policy for Primary school
- RSE policy for Secondary school
- Safer recruitment policy
- Secondary school behavior policy
- Staff Code of Conduct
- Whistleblowing policy
- Safer Staff Recruitment and Selection Policy
- Missing child policy

# BRITISH INTERNATIONAL SCHOOL

