

SAFEGUARDING AND CHILD PROTECTION POLICY

1. INTRODUCTION

The International School of Bucharest (ISB), in partnership with our parent community, is committed to safeguarding and promoting the well-being of our young people. We expect all ISB community members including administrators, faculty, staff, trustees and volunteers to share this commitment. We believe that our children have a right to grow in a supportive, caring and safe environment, which includes the right to protection from all types of abuse and other safeguarding concerns. School personnel are vigilant for signs of any young person in distress, and are confident about applying our safeguarding processes to intervene when necessary.

Our child safeguarding policy and procedures are in accordance with the recommendations of the International Task Force on Child Protection, endorse the UN Convention on the Rights of the Child, of which Romania is a signatory, and in accordance with Romanian law.

The International School of Bucharest is committed to providing a safe and secure environment for pupils, staff and visitors and to promoting a climate where children and adults feel confident about sharing concerns they have about others or their own safety and well-being.

The school has analysed the alignment of the mission statement with the CIS Code of Ethics and the UN Convention of the Rights of the Children. "Providing broad and balanced education in a safe and supportive environment" aligns with CIS's "nurture a culture of care in which the education, safety and well-being of students and others are paramount" and the Article 19 of the UN Convention. CIS's "global citizenship and striving for excellence" is aligned with ISB mission "reaching full potential and contributing to global society as successful and caring adults" and the Article 21 of the UN Convention. ISB points out "being proud of the multitude of cultural, religious, and ethnic backgrounds of our students, diversity and the importance of "embracing the ideals of international understanding and responsible citizenship" in its philosophy which lines up with the CIS code of "respect, dignity and equality of all individuals, groups and communities" as well as the UN Articles 2, 14, 29, and 30.

ISB values "the truth, freedom, justice, human rights, the law and collective effort for the common good" and this is in line with several articles of the UN Convention (12, 13, 14, 29) and also CIS's core principle of "complying with applicable laws and regulations".

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone**

who comes into contact with children, their families and carers have a role to play in safeguarding children. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. In order to fulfil this responsibility effectively, all professionals should make sure their approach is vigilant and child centred. This means that, at all times, we will **act in the best interest of the child**.

2. AIMS

International School of Bucharest recognises the responsibility to safeguard and promote the welfare of children and understands how this is crucial to improving outcomes for children. We acknowledge that child abuse occurs in all communities regardless of the gender of the child or perpetrator, wealth, religion, culture or ethnicity.

ISB Safeguarding and Child Protection Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school. This policy should be read in conjunction with the Whistleblowing Policy, Safer Recruitment Policy, Internet Safety Policy, Acceptable Use Policy, Risk Assessment, Health and Safety Policy and Anti Bullying Policy.

Safeguarding and promoting the welfare of children is defined for the purpose of this guidance as:

- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development.
- ensuring children grow up in circumstances consistent with the provision of safe and effective care.
- and taking action to enable all children to have the best educational outcomes and life chance.

Safeguarding applies to all children at school and is a central consideration when planning in changes to the school's organisation, schemes of work, pastoral organisation and activities.

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

Children in this document and in the school's context includes everyone under the age of 18, and will also extend to those over the age of 18 still on the school roll until they graduate.

Safeguarding is not just about reacting to child protection concerns but is integral to:

- The provision of a safe learning environment
- Systems to ensure an effective equalities policy
- Safe recruitment practices, staff induction and training
- Effective behaviour management and anti-bullying strategies
- The recording of attendance, reporting of absence, and exclusion
- Information sharing protocols
- Supporting vulnerable children
- Systems to support children with medical needs
- Substance abuse policies
- The curriculum and ensuring all children are taught about safeguarding
- Online safety and the use of technology

Safeguarding needs to take account of many influences on children, including those out of our control, and emerging events in local, national and international environments.

3. LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2022 and Working Together to Safeguard Children 2018.

Our child safeguarding policy and procedures are in accordance with the recommendations of the International Task Force on Child Protection, endorse the UN Convention on the Rights of the Child, of which Romania is a signatory, and in accordance with Romanian law.

- The policy is also based on this relevant legislation including Romanian Law 272/2004

regarding Child protection (see Appendix 1).

We comply with this guidance and the procedures set out by the relevant organisations and we review and revise our policy every year or when a significant change of legislation appears.

4. EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- are under 5 years of age;
- have special educational needs or disabilities;
- are young carers;
- are vulnerable to being bullied, or engage in bullying;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- have English as an additional language;
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence; chaotic and/or unsupportive home situations;
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- are asylum seekers;
- living transient lifestyles;
- are at risk due to either their own or a family member's mental health needs;
- are looked after or previously looked after (e.g. children subjected to care orders)

Children with special educational needs (SEN) and disabilities also fall into the category of children with special consideration.

When we are considering the identification of abuse and neglect, safeguarding risks or issues pertaining to children with special education needs (SEN) and disabilities we consider that:

- assumptions may be made that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these students may be more prone to peer group isolation than other pupils;
- SEN students and students with disabilities may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- these students may have communication barriers and difficulties in overcoming these barriers.

The school offers extra support for children with SEN and disabilities in accordance with their individual needs.

5. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff and volunteers as well as to extended school and off-site activities.

5.1 All staff

All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, *Keeping Children Safe in Education 2022*, and review this guidance at least annually. All staff will be aware of:

- the role of the Designated Safeguarding Lead (DSL), the Deputy DSLs and the Safeguarding Team.
- our systems which support safeguarding and child protection, including all policies within our safeguarding portfolio.
- the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), Female Genital Mutilation (FGM) and radicalization.
- how to respond if they identify a safeguarding issue or a student discloses that they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with the designated members of staff and/or relevant professionals.

- the safeguarding response to children with poor attendance or those who go missing from education.

- the process for making referrals to children's social care services.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the Senior Leadership Team whose full responsibilities are set out in their job description. Our school's DSL is *Camelia Howard*. The DSL takes lead responsibility for child protection and safeguarding matters within the school (including online safety), aligning policy and procedure in line with up-to-date UK and local legislation and expectations. The DSL will be available during and outside of school hours for staff and volunteers to discuss any safeguarding concerns.

The DSL will be given the additional time, funding, training, resources and support to:

- ensure that the safeguarding and child protection policy is in line with UK legislation and expectations, as well as relevant to the school's unique and specific context in the country.
- ensure that all staff (including temporary staff) and volunteers sign to indicate that they have read and understood the safeguarding and child protection policy, on an annual basis.
- ensure that all staff (including temporary staff) and volunteers sign to indicate that they have read and understood the staff handbook, on an annual basis.
- ensure that all staff (including temporary staff) and volunteers sign to indicate that they have read and understood Part One of *Keeping Children Safe in Education (DfE 2022)*, including Annex A, on an annual basis.
- keep a record of staff safeguarding training (e.g., who has received which training and completed which course);
- regularly update all staff on specific safeguarding and child protection matters and issues (e.g., through safeguarding circular, email, bulletin);
- provide advice and support to other staff and to the school community on safeguarding and child protection matters.
- keep written records of all concerns, in the form of child protection files, ensuring that such records are stored securely, but kept separate from the pupil's general file.
- maintain an up-to-date child protection register, which is also stored securely and digitally encrypted (e.g., password protected);
- communicate/relay concerns to the appropriate people and agencies; keep the Director informed of any issues, and liaise with any relevant external organisations (e.g., children's social care services, police, etc) for child protection concerns as appropriate.

- refer suspected cases, as appropriate, to the relevant body (e.g., children's social care services, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

- attend and/or contribute to child protection conferences.
- coordinate the school's contribution to child protection plans.
- develop effective links with relevant agencies (e.g., children's social care services, embassies, etc).
- take part in strategy discussions and inter-organisational meetings and/or support other staff to do so.
- contact parents/carers if a child with a child protection plan is absent for more than two days without explanation, and if necessary, notify extended family, or even children's social care services and police if there is genuine concern for the child's safety.
- promote the school's commitment to safeguarding and child protection to parents and the wider community in all areas of the organisation, including ensuring that the child protection policy is easily available to all.
- promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- ensure that relevant safeguarding issues are addressed through the curriculum in an effective and appropriate manner.
- ensure that when a pupil with a Child Protection File leaves the school, their information is passed to their new school and all appropriate agencies are informed.
- DSL and deputy will listen to all parts involved during school time and excuse students from classes when necessary to investigate a safeguarding issue.

5.3 The Designated Safeguarding Deputies

When the DSL is absent, the Deputy Designated Safeguarding Leads *Sinead Costello* for Primary and *TBC* for Secondary will act as cover.

The full responsibilities of the Deputy Designated Safeguarding Leads are set out in their job description.

5.4. The Head of School/ Director

The Head of School is responsible for the implementation of this policy, including:

- *ensuring that there is a DSL for safeguarding and child protection*, who is a member of the senior management team and who has undertaken appropriate training (e.g., Level 3 DSL training, and training relating to specific child protection issues, such as Prevent Duty, FGM,

etc);

- that *there is a training strategy* that ensures all staff, including the senior leadership team, receive ongoing safeguarding and child protection training each year. The DSL should receive refresher training specific to his or her duties (e.g., Level 3 DSL training) at two-yearly intervals.

- ensure that the safeguarding and child protection policy and procedures are implemented and followed by all staff and volunteers;
- overseeing the monitoring of the effectiveness of this policy and the school's safeguarding and child protection procedures, alongside the Safeguarding Team, on a termly basis;
- arranging for an external critical friend to further scrutinise and offer feedback regarding the effectiveness of this policy and the school's safeguarding and child protection procedures on an annual basis; overseeing the monitoring of all active child protection cases on a termly basis, alongside the Safeguarding Team;
- communicating this policy to all parents and the wider community, via the school website;
- ensuring that the DSL has appropriate time, funding, training and resources to carry out their roles effectively, and that there is always adequate cover if the DSL is absent;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- ensuring that there are procedures for dealing with allegations of abuse made against members of staff;
- ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures;
- ensuring that there are safer recruitment procedures that include the requirement for appropriate checks;
- ensuring that there are clear systems in place to ensure that all visitors and volunteers to the school are identified and supervised sufficiently;
- ensuring that appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material - additional support information is provided in Annex C of Keeping Children Safe in Education (DFE 2022);
- ensuring that they take leadership responsibility for the organisation's safeguarding arrangements
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

5.5 The Board

- The Board will ensure that the Heads of School/Director, and leadership team establish effective arrangements to safeguard and promote the welfare of pupils at the school, considering the local context.
- The Board will review the minutes from the termly safeguarding review meetings between the Head of School and Safeguarding Team.
- The Board will review the handling of specific child protection cases when required.
- The SLT will approve this policy at each review and hold the Director to account for its implementation.
- The Board will act as the 'case manager' if an allegation of abuse is made against the Head of School, where appropriate (see Appendix 5).

5.6 The Safeguarding and Child Protection Team

Role	Name	Email	Phone number
DSL	Camelia Howard	camelia.howard@isb.ro	0727 335 675
Director	Serdar Sakman	Serdar.sakman@isb.ro	0770 602 353
Head of Primary	Mustafa Soydemir	Mustafa.soydemir@isb.ro	0770 600 878
Deputy DSL	Sinead Costello	sinead.costello@isb.ro	0770 603 856
Deputy DSL	TBC		0770 599 669

5.6 Confidentiality

All staff will understand that child protection issues require a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that any information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with a designated person. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. It is important to note that consent to share information is not required if a child is suffering, or at risk of, serious harm. Staff should never promise a child (and or their family where appropriate), that they will not tell anyone about an allegation, as this may not be in the child's best interests. Staff should be open about why, what how and whom information will, or could be shared with and seek their agreement, unless it is unsafe or inappropriate to do so.

If staff are in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children.

Child protection information will be stored and handled fairly and lawfully and in line with GDPR principles.

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

Every effort should be made to prevent un-authorized access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a flash drive, these items should also be kept in locked storage.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' with an orange A4 paper to indicate that separate information is held.

Data Protection legislation and human rights laws do not prevent the sharing of information related to safeguarding, but rather provide a structure to ensure that the personal information is shared appropriately. Information relating to child safeguarding concerns may be shared with the relevant parties if based on the facts of a case, a staff member deems there to be a lawful basis to do so. The decisions pertaining to the sharing of information will be made in consideration of the safety and wellbeing of the individual and others who may be impacted by the information being shared.

Furthermore, child protection records are normally exempt from the disclosure provisions of GDPR expectations, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they should refer the request to the Head of School.

GDPR does not prevent school staff from sharing information with the Safeguarding Team and/or relevant agencies or persons, in accordance with this policy, where that information may help to protect a child.

The government's 'Information sharing advice for safeguarding practitioners' includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing safeguarding information, they should speak to the DSL (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff.

6. RECOGNISING ABUSE AND TAKING ACTION

6.1 Types of abuse and indicators

The Department for Education document *'Keeping Children Safe in Education 2022'* references all relevant forms of abuse that school workers should be aware of and provides links to far more detailed information regarding each abuse type and the indicators that we should be familiar with. For an explanation of the most common forms of abuse and a list of many typical indicators that could suggest abuse may be occurring, see Appendix 2.

Please remember, however, it is your responsibility to report concerns. It is not your responsibility to investigate or decide whether a child has been abused or not.

Staff and volunteers must follow the procedures set out below in the event of a safeguarding issue.

6.2 If a child is suffering or likely to suffer from harm, or is in immediate danger

Make a referral to children's social care services (contact information in Appendix 10) and/or the police immediately if a child is suffering or likely to suffer from harm, or in immediate danger, and the DSL or a member of the Safeguarding Team cannot be contacted in sufficient time. Anyone can make a referral.

As soon as able, contact the DSL if you make a referral directly.

6.3 If you have a concern about a child (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

Complete a Record of Concern Form and report the matter to the DSL (or another member of the Safeguarding Team if the DSL is not available) as soon as possible but not later than 24 hours. Record of Concern Forms can be found in the staffroom, in each office of Safeguarding team members, and on the ISB drive.

Within the form, identify as clearly as possible what your concern is and why, what you have observed and/or what has been disclosed to you. It may also be helpful to include any context which may be relevant. The DSL will then open a Child Protection File or add this

information to an existing one and establish an appropriate action in order to follow up this concern. This may require the DSL to discuss the matter with other members of the Safeguarding Team. As action is taken, the DSL will ensure that the person who raised the concern is kept informed.

Figure 1 also illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

6.4 External intervention

If some form of external intervention is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care services if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

6.5 Referral

If it is appropriate to refer the case to children's social care services or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

The child's parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Sector 3 Child Protection Services (DGASPC) should then make a decision about what course of action will be taken and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with sector 3 Child Protection if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact sector 3 Child Protection Services and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

6.6 If a child makes a disclosure to you

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

If a pupil talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. Children and adults need to be aware that nothing is so awful or embarrassing that it cannot be talked about.

The point at which you do this is a matter for professional judgement. If you jump in immediately the pupil may think that you do not want to listen, if you leave it until the end of

the conversation, the pupil may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the pupil DO:

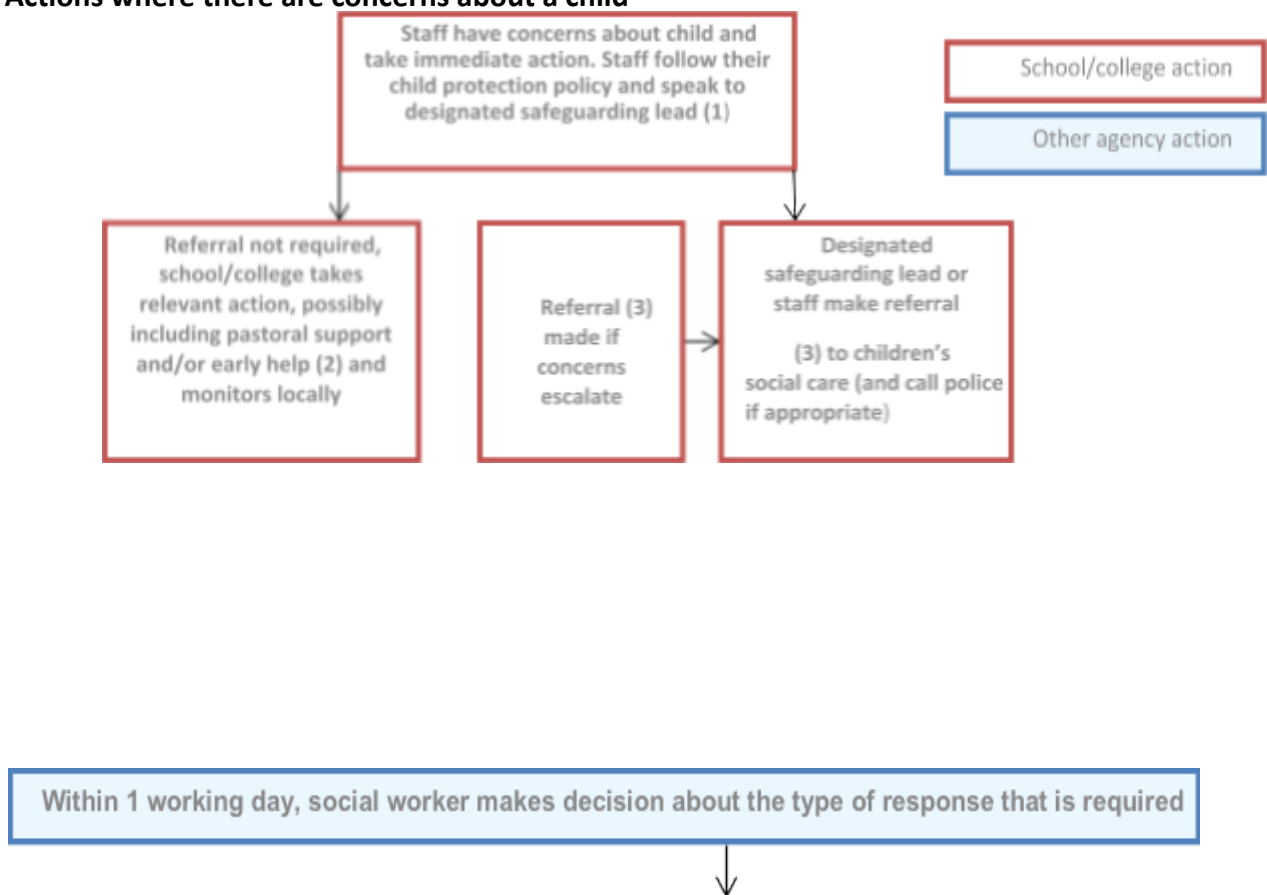
- allow them to speak freely;
- remain calm and do not overreact – the pupil may stop talking if they feel they are upsetting you;
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’;
- do not be afraid of silences – remember how hard this must be for the pupil;
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what the pupil’s mother thinks about all this;
- at an appropriate time tell the pupil that in order to keep them safe and to help them you must pass the information on;
- do not automatically offer any physical touch as comfort.
- avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive, but the child may interpret it as though they have done something wrong;
- tell the pupil what will happen next. The pupil may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day;
- report verbally to the designated person – do not discuss with colleagues, friends or family unnecessarily;
- write up your conversation as soon as possible on a green Concern Form (stick to the facts, and do not put your own judgement on it);
- sign and date the write-up and pass it on to the DSL or another member of the Safeguarding Team. Alternatively, if appropriate, make a referral to children’s social care services and/or the police directly, and tell the DSL as soon as possible that you have done so;
- seek support if you feel distressed.

1. It is important to note, that although it is not our job to investigate, you may need to

initiate a conversation, particularly if the concern is regarding a young person (aged 12 or over) rather than a young child. This is to let the student know that you are there if they need someone to talk to.

Figure 1

Actions where there are concerns about a child



6.7 Concerns about a staff members or volunteer

The ISB's *Staff Handbook* and *Staff Code of Conduct* set out our expectations of staff and their conduct whilst working at the school. All school staff are made aware that inappropriate behaviour towards students is unacceptable and that their conduct must be beyond reproach.

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

Article 220 of the new *Romanian Criminal Code* also stipulates that it is an offence to engage in sexual activity with a minor.

Staff who are concerned about the conduct of a colleague towards a pupil, or who become aware of allegations of a staff member or volunteer posing a risk of harm to children, are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could put in danger their colleague's career. All staff must remember that the welfare of the child is paramount.

The school's whistleblowing procedures (see *Whistleblowing Policy*) enable staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice, possible child abuse or any other action that may not follow the expectations of the *Staff Handbook* and *Staff Code of Conduct* by colleagues should be reported to the Head of School, Serdar Sakman or the DSL, Camelia Howard, in case of child abuse.

6.7 Allegations of abuse made against other pupils (Child on child abuse)

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

- whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- whether the perpetrator has repeatedly tried to harm one or more other children; or

- whether there are concerns about the intention of the alleged perpetrator.

Child-on-child abuse can manifest itself in many ways and different gender issues can be prevalent. It can be gender natured (i.e. that it is more likely that girls will be victims and boys will be perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously.

Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual or emotional and can include gender-based violence/ sexual assaults, sexting (see *Appendix 3* for further information), teenage relationship abuse, child on child exploitation, serious youth violence, sexual bullying or harmful sexual behaviour.

Staff should recognise that children are capable of abusing their peers and should not be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.

In order to minimise the risk of child-on-child abuse we:

- provide a developmentally appropriate PSHE curriculum and Character Education which develops students understanding of acceptable behaviour and keeping themselves safe;
- have systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued;
- develop robust risk assessments, where appropriate; and
- have relevant policies in place.

If a pupil makes an allegation of abuse against another pupil:

1. You must tell the DSL and record the allegation using a Concern form, but do not investigate it.
2. DSL and deputy will listen to all parts involved during school time and excuse students from classes when necessary.
3. The DSL and Safeguarding Team will agree on an action plan based on what has been alleged and what is known.
4. Parents of those involved will be met.
5. Relevant external agencies contacted if required (children's social care services, mental health organisations, police - if criminal offence committed, etc)
6. The DSL is responsible for establishing a risk assessment and specific support plan for

all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed.

6.8 Children with sexually harmful behaviour

The management of children and young people with sexually harmful behaviour is complex and the school will work through Counselling sessions, pastoral programme and curriculum, including relevant external agencies, to maintain the safety of the whole school community.

Safeguarding through pastoral interventions and the curriculum is deliberately preventative. Young people who display sexually harmful behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

7. NOTIFYING PARENTS

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

However, in exceptional circumstances the DSL and school may feel that that notifying parents could increase the risk to the child or exacerbate the problem. In such cases, advice may be sought from other local agencies.

8. PERSONAL DEVICES: TABLETS, SMARTPHONES AND CAMERAS

Staff, including EYFS staff, are to use personal devices appropriately and to be alert to any potential misuse of them and always follow the Acceptable Use Policy and Online Policy. Personal devices should be stored discreetly when not being used and accessed only when necessary.

Staff are responsible for their own behaviour regarding the use of personal devices and should avoid putting themselves into compromising situations which could be misinterpreted and lead to potential allegations.

Any images or videos taken for school use should be uploaded, sent or transferred to the relevant school system (e.g. school social media account, assessment database, cloud system) as soon as possible and then deleted from the device.

When taking photographs and videos for school purposes we:

- a. seek parental/carer consent as appropriate for photographs and videos to be taken or published (for example, on our website or in Insight magazine or publications);
- b. do not identify a student by name when his or her image appears on the school website or on social media, unless specific permission has been granted by the parents/carers;
- c. ensure pupils and staff are appropriately dressed;

d. ensure pupils are undertaking an official ISB activity.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

For further information, please refer to the Online Safety Policy and Acceptable Use Policy.

9. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING PRACTICES

9.1 Complaints against staff

Our complaints procedure (see the school's Complaints Policy) will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action.

Poor practice examples include unfairly singling out a pupil, using sarcasm or humiliation as a form of control, bullying or belittling a pupil or discriminating against them in some way.

Complaints are managed by senior staff and the Director.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 5).

9.2 WHISTLEBLOWING

If a member of staff judges that it is necessary to report a concern about a co-worker's behaviour and/or actions towards children and young people, they are then required to follow the procedures outlined in the whistleblowing policy (see the Whistleblowing Policy).

10. RECORD-KEEPING

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that a full copy of their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the DSL considers it

would be appropriate to share any information with the new school or college in advance of the child leaving (where concerns are significant or complex, and/or social services are involved), the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. A record of the transfer would be detailed within both the original and the copy of the file. Details of the transfer will also be minuted at the next termly safeguarding meeting.

10.1 HOW AND WHAT RECORDS ARE KEPT

When a Record of Concern Form (*Appendix 7*) has been submitted to the DSL, the DSL will open and complete a Child Protection File (*Appendix 8*), if there is not already one established, detailing pertinent background information relating to the child, e.g. date of birth, preferred language, contacts, family information, etc.

All action taken must be explained and recorded in the relevant sections of submitted Record of Concern Form, together with any ongoing updates. This is maintained and kept securely by the DSL in a locked filing cabinet, accessible only by the DSL and Deputy DSLs. The child protection files are updated when new information is available (e.g. through monitoring and observations) including any other relevant information relating to the child (e.g. incidents, family background changes, etc).

Further to these records, the DSL maintains a digital child protection register (see Appendix). This information gives a summary of the known concerns, current and historic, detailing when a concern was first raised for each child, as well as when the last concern was registered. This register is updated each time a child protection file is amended.

11. TRAINING

11.1 ALL STAFF

All staff members will undertake Safeguarding and Child Protection training at their induction and then on a regular ongoing basis, according to the CPD safeguarding calendar ([Safeguarding CPD Calendar 2021-2022](#)) **-to be updated in September**. A register of attendees is recorded and kept for the induction training.

All staff are also required to read and familiarise themselves with the school's Safeguarding and Child Protection Policy, Behaviour Policy, Staff Handbook, Staff Code of Conduct, Staff Disciplinary Procedure and Policy, AUP, Online Safety Policy, Risk Assessment Policy and Whistleblowing Policy before the start of each new academic year, with any new

amendments to these policies being discussed specifically. This is to ensure that all staff understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. After reading the policies, all staff are required to complete and submit a Staff Declaration for Safeguarding form (see Appendix).

DSLs – attend training every two years; and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually.

Advanced Certificate in Safer Recruitment for International Schools must be completed by all members of SLT and the HR officer and renewed every two years.

During each induction, the DSL will lead sessions to ensure that all staff are aware:

- who the Safeguarding Team is.
- what their roles are specifically.
- how to contact them.
- how to submit a concern.
- how these concerns will be recorded and processed; and
- how the referrer will be kept informed of any actions and outcomes. The DSL will also clarify the school's whistleblowing procedures.

Throughout the year, staff will receive regular safeguarding and child protection updates from the DSL (for example, through emails, e-bulletins and staff meetings) as required. School departments are expected to discuss these matters when information is shared, as part of their department meetings.

A Safeguarding CPD planning is in place starting 2021-2022 to provide extensive training to all staff, according to their role in the school. The courses are on www.nationalonlinesafety.com and are available to all English speaking teachers across the year.

Non-English-speaking staff will be provided with a translated version of KCSIE 2022 and the Safeguarding and Child Protection training during their induction and this will be accompanied with a group training session scheduled at an appropriate date at the beginning of the school year. This will be led by the DSL who speaks Romanian.

Volunteers and collaborators will need to complete the **Safeguarding and Child Protection** training. The DSL will also meet each applicant to explain the school's safeguarding procedures and expectations, hand over the relevant policies and documents for reading, as well as answer any questions relating to safeguarding.

11.2 THE DSL AND DEPUTIES

The DSL and deputies will undertake Safeguarding and Child Protection training at least every two years, suitable for leading safeguarding and child protection throughout the school (DSL Level 3 training). The members of the Safeguarding and Child Protection Team will also need to complete the relevant CPD according to the calendar.

In addition, they will update their knowledge and skills at regular intervals (for example, through meeting other DSLs and taking time to read and digest current safeguarding developments).

11.3 The Board

The Board must complete the **Certificate in Safeguarding for Governors**. One member of the Board will receive appropriate safeguarding training (e.g. Level 3 DSL training) to ensure that he has the knowledge and information needed to perform his functions and understand his responsibilities.

As the member of the Board may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Director, he will receive training in managing allegations for this purpose.

12. RECRUITMENT – INTERVIEW / APPOINTMENT PANELS

Our school endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Safeguarding Children and Safer Recruitment in Education together with the school's individual procedures. Furthermore, at least one person on any interview/appointment panel for a role/position at the school will have undertaken Safer Recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, *Keeping Children Safe in Education 2021*, and be in line with local safeguarding procedures.

Safer recruitment means that all applicants will:

- complete a school-specific application form;
- provide two referees, including at least one who can comment verbally, on the applicant's suitability to work with children;
- provide evidence of identity and qualifications;
- be checked through police records certification and the Disclosure and Barring Service as appropriate;

- be interviewed, preferably in person, and by video conference if not, and be specifically asked if the applicant has any reason why they could not take the job or should not be working with children. They will also be asked specific questions relating to safeguarding issues during the interview.

All new members of staff will undergo an induction that includes the introduction with the school's Child protection policy and identification of their child protection training needs.

All staff sign to confirm they have acknowledged and read a copy of the:

- ISB Staff Handbook
- Staff Code of Conduct
- ISB Disciplinary Policy and Procedures
- ISB Safeguarding and Child Protection Policy
- ISB Low-Level Concern Policy
- ISB Whistleblowing Policy
- ISB Online Safety Policy & Acceptable Use Policy
- ISB Behaviour Policy
- ISB Risk Assessment Policy
- Keeping Children Safe in Education – Sept 2022 (Part 1 & Annex A) (See Appendix 5).

The school has a duty to report to the DBS - Disclosure and Barring Services - (within 1 month of leaving) any person whose services are no longer required by the school because they are considered unsuitable to work with children. Referrals on this basis are where the school has concerns that a person has caused harm or poses a future risk of harm to vulnerable groups, including children.

For further information regarding recruitment, see the school's Safer recruitment policy (Appendix 4).

13. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

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

When our pupils attend off-site activities, we will check that effective safeguarding procedures and arrangements are in place.

See the Risk Assessment Policy

14. ONLINE SAFETY

The effective use of technology is a focus and a strength at ISB. Nevertheless, technologies can be abused and, as a result, take advantage of vulnerable people and cause upset and harm.

Cyber-bullying by pupils, via messaging, emails, or social media, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

The school is committed to ensuring staff, children and parents are kept well-informed with up-to-date e-safety information and risks. For students, this is primarily achieved through the school curriculum, e.g., PSHE and ICT. Every year we organise activities and assemblies on Safer Internet Day. Staff receive training and regular email bulletins highlighting current online safety concerns. Parents are invited to an online safety workshop annually and, when required, advice is shared via email or posted as an online newsletter. Advice, tips and information are shared in the weekly newsletter too. Also, posters about online safety are displayed in both primary and secondary areas for students and staff.

Staff should contact students only through the official school agreed platforms, such as Google Classroom or school email addresses. Staff should never be in contact with a current school pupil or a group of pupils via a private social media platform such as Facebook and Instagram for instance (unless pupil is a close family member). Staff may face disciplinary procedures and action, up to and including dismissal and reported to local law enforcement authorities if appropriate, when found to be in breach of school policy.

Furthermore, ISB also uses Firewall, a filtering and monitoring tool, which is active when students are logged into their ISB Online accounts. Activity is monitored by and reported to the DSL, the Technology Leader, as well as Key Stage Coordinators (Primary) and Key Stage Leaders (Secondary).

*Please refer to the schools **Online Safety Policy** for further information on how we keep pupils and staff safe online.*

15. CORPORAL PUNISHMENT AND PHYSICAL INTERVENTION

Corporal punishment is banned in schools in the UK and Romania, and therefore would be considered a safeguarding issue. The prohibition applies to all 'members of staff'. This includes all those acting as unpaid, volunteer supervisors. Teachers may use 'physical intervention/restraint' to avert 'an immediate danger of personal injury to, or an immediate danger to the property of, a person' (including the child).

Difficulties can arise from the interplay between the rule against corporal punishment and the legitimate use of reasonable force. The DfE's advice for schools on the use of reasonable force provides a useful resource. For further information relating to discipline and sanctions, please refer to the school's Behaviour Policy. Positive behaviour leadership will reduce the need of using reasonable force in school.

16. MONITORING ARRANGEMENTS

Each term, the DSL and Safeguarding team will meet to review and evaluate the content and effectiveness of the Safeguarding and Whistleblowing policies, with the third term meeting being the Annual Safeguarding Review whereby one member of the Board will take part. During these meetings, the Child Protection Register will also be reviewed and updated, with each active case being evaluated in terms of the effectiveness of the interventions in place and actions taken.

The minutes of the Term 1 and Term 2 meetings are shared with the Board. The Director will then discuss any matters highlighted in the review with the Board during their next meeting when the effectiveness of the school's safeguarding procedures can be further discussed critically and evaluated.

Evaluating the effectiveness of school policy and the interventions in place for students may also take place outside of these scheduled termly meetings, in response to specific issues raised and highlighted (e.g. through complaints, or it is apparent to the Safeguarding Team that systems are not working as expected).

17. LINKS WITH OTHER POLICIES

This policy links to the following policies and procedures:

- Whistleblowing
- Behaviour
- Staff Handbook
- Staff Code of Conduct
- Disciplinary policy and procedures
- Low level concern policy
- Complaints
- Health and Safety
- Attendance

- Online Safety
- Acceptable Use
- Visitors and Volunteers
- Toileting and Intimate Care Policy
- Safer Recruitment
- Risk assessment
- First Aid
- Curriculum
- PSHE

- Anti-Bullying
- Equality and Diversity

Approved by:	Whole School SLT
Date:	August 2022
Review:	August 2023

APENDIX 1

Law 272/2004 regarding Child protection

The law 272/2004 addresses to (Art 3) :

- a) Romanian citizens who live in Romania.
- b) Romanian citizens who live abroad.
- c) Foreign children that live in Romania.
- d) Refugees' children who benefit from legal protection.
- e) Foreign children that live in Romania and are in an emergency situation approved by Romanian public authorities.

Art 33.

(1) The child has the right to be respected his/her personality as well as his/her individuality and is forbidden to be exposed to corporal punishment or other types of humiliating treatments.

(2) The disciplinary measures for a child have to be established in agreement with respecting the child's dignity. Corporal punishments or any other type of punishment that are affecting the physical, mental, social and emotional development of a child are totally forbidden.

Art. 85

(1) The child has the right to be protected against any form of violence, abuse, neglect, exploitation, human trafficking, illegal migration, kidnapping, violence, internet pornography, as well as any form of violence, regardless of the environment where he is: family, educational institutions, medical institutions, protection environment, detention/rehabilitation and offence research institutions, internet, mass-media, work place, sports environment, community etc.

(2) Any individual or legal entity, as well as the child, can notify the Child Protection Services (Directia Generala de Asistenta si Protectia Copilului) of the county/sector where they live to act in order to protect the child against any forms of violence including exploitation, abandonment or neglect.

(3) The employees of public or private institutions which through their profession come in contact with the child and are suspecting that there might be a case of abuse, neglect or bad treatment have the obligation to urgently notify the General Directorate for Social Assistance and Child Protection.

Art.91

Any individual who through the nature of their profession or occupation work directly with a child and is suspecting that there might exist a case of abuse or neglect of the child, has the obligation to notify the social services (serviciul public de asistenta sociala) or Child Protection Services in the area where the case has been identified.

(1) In order to facilitate the notification of child abuse or neglect cases, for every Child Protection branch it is mandatory the existence of a child telephone, who's number will be communicated to the population.

APENDIX 2 – RECOGNISING SIGNS OF ABUSE

Abuse, including neglect, and safeguarding issues are rarely separate events that can be covered by one definition or label. In most cases, multiple issues will overlap. To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: 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.

Emotional abuse: 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 or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images,

watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect: 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 care-givers); or ensure unresponsiveness to, a child's basic emotional needs

APPENDIX 3: SPECIFIC SAFEGUARDING ISSUES

Bullying

All incidents and allegations of bullying are taken extremely seriously at ISB. Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All pupils and parents have open access to the school's anti-bullying procedures and the subject of bullying is addressed at regular intervals in the Personal, Social Health Education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Head of School and the DSL will consider implementing child protection procedures.

Affluent neglect

Affluent neglect is used to describe unmet needs in children from affluent families, needs which do not come under the basic categories of food, shelter, warmth, education.

Typically, in families where both parents work and/or are away regularly, the children can spend significant periods of time at home alone (if old enough), or with staff who work for the family, such as nannies and drivers. These hours can be isolating, especially if there have been issues during the school day that the child may need support to process. The absence of the emotional support a parent offers is difficult, if not impossible, to substitute, and although these children may never be lacking material wealth, there is undoubtedly a deficiency elsewhere. Although these children appear well-cared for, there can be an emptiness within which can create issues later in adulthood, if left unaddressed.

Parents with affluence can present a challenge for professionals when safeguarding issues need to be addressed. Any parent can respond to safeguarding concerns defensively, in the belief that they are doing the best they can, and the feeling of being judged can be hurtful.

However, it is essential that staff feel able to raise concerns and not feel intimidated. Staff may need additional training on how to have difficult conversations with parents/guardians around affluent neglect and safeguarding generally.

Once a concern around affluent neglect has been identified, it is important that conversations happen with the child and the parents or carers, provided this will not put the child at increased risk of harm.

With a safeguarding issue like this, parental support is most beneficial, and to promote the home-school relationship is a great starting point.

The DSL will advise on next steps to address the concern, but it will be in the best interest of the child to ensure a positive working relationship with parents if the situation is going to be managed successfully.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a

range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

Some of the following signs may **be indicators of child sexual exploitation**:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- 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.

Female Genital Mutilation

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman.

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit

an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs.

The **Serious Crime Act 2015** sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

So-called '**honour-based**' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL (or member of the Safeguarding Team) will:

- speak to the pupil about the concerns in a secure and private place;
- contact local authority children's welfare services, and/or police;
- refer the pupil to the school counsellor, as appropriate.

Children Missing Education (CME)

Knowing where children are during school hours is an extremely important aspect of Safeguarding. All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2019) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age

- d. are in custody for four months or more (and will not return to school afterwards); or
- e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Prevent Duty

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality

- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti- British views

- advocating violence towards others.

Child on Child Abuse

Staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At ISB we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature.

Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence

- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student.

Sexting/Nude Sharing

In cases of nude sharing / 'sexting' (youth produced sexual imagery) we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2021: '*Sexting in schools and colleges, responding to incidents, and safeguarding young people*'.

Sexting is one of a number of risk-taking behaviours associated with the use of digital devices, social media and the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with online activity can never be completely eliminated.

International School of Bucharest recognises its duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

There are various **definitions for nude sharing/'sexting'** (also known as youth produced sexual imagery) but in this policy we will define it as:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;
- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

* For the purpose of this policy, the term 'imagery' includes, but is not limited to, photographs, videos, animations and other depictions.

As these incidents can differ, we recognise the importance of responding to each case in a manner appropriate to the situation. If a staff member becomes aware of a sexting incident:

- the incident should be referred to the DSL and as soon as possible.
- the DSL should hold an initial review meeting with appropriate school staff.
- there should be subsequent interviews with the young people involved (if appropriate).
- parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk

of harm.

If there is any concern that the young person has been harmed or is potentially in a position to be harmed, a referral should be made to the local children's social welfare services, and/or the police immediately.

APPENDIX 4: SAFER RECRUITMENT AND CRIMINAL RECORD CHECKS – POLICY AND PROCEDURES

Safer recruitment is a set of practices to help make sure the staff and volunteers are suitable to work with children and young people. It's a vital part of creating a safe and positive environment and making a commitment to keep children safe from harm.

ISB is committed to:

- safeguarding and protecting all children and young people by implementing robust safer recruitment practices
- identifying and rejecting applicants who are unsuitable to work with children and young people
- responding to concerns about the suitability of applicants during the recruitment process
- responding to concerns about the suitability of employees and volunteers once they have begun their role
- ensuring all new staff and volunteers participate in an induction which includes child protection.

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

APPOINTING NEW STAFF

When appointing new staff, we will:

- verify their identity;
- obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate or equivalent, including barred list information for those who will be engaging in regulated activity (see definition below);
- obtain a separate barred list check if they will start work in regulated activity before the DBS (or similar) certificate is available;
- verify their mental and physical fitness to carry out their work responsibilities;
- verify their right to work in Romania;
- verify their professional qualifications, as appropriate;
- ensure they are not subject to a prohibition order if they are employed to be a teacher;

- carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent;
- check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction;
- ask for written information about previous employment history and check that information is not contradictory or incomplete.
- Check their social media activity.

We will seek references on all short-listed candidates, including internal candidates, before interview, with one reference coming from the most recent employer. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children. References are also verified by phone call.

REGULATED ACTIVITY means a person who will be:

- responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children;
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children;
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

EXISTING STAFF

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a position that is not regulated activity to one that is.

We will refer to the DBS/ Police anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant);
- where the individual has received a caution or conviction for a relevant offence;
- if there is reason to believe that the individual has committed a listed relevant

offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009;

- if the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

AGENCY AND THIRD-PARTY STAFF

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

CONTRACTORS

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS/ICPC check or relevant police check if non-UK.

This will be:

- an enhanced DBS check or equivalent with barred list information for contractors engaging in regulated activity;
- an enhanced DBS check or equivalent, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS/ICPC check (or relevant local police check for non-UK) for self-employed contractors.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

TRAINEE/STUDENT TEACHERS

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

VOLUNTEERS

We will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;
- obtain an enhanced DBS/ICPC check or equivalent with barred list information for all volunteers who are new to working in regulated activity;
- obtain an enhanced DBS/ICPC check or equivalent without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come

into contact with children on a regular basis, for example, supervised volunteers;

- carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity, and retain a record of that risk assessment;

- ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2018 and Childcare Act 2006.

THE BOARD

- The governors will have an enhanced DBS/ICPC check or equivalent without barred list information and section 128 check.
- They will have an enhanced DBS/ICPC check or equivalent with barred list information if working in regulated activity.
- Other checks deemed necessary if they have lived or worked outside the UK.
- For members of the Board living in Romania, they need to provide the police check and certificate of integrity.

STAFF WORKING IN ALTERNATIVE PROVISION SETTINGS

Where we place a student with an alternative provision provider, we obtain written confirmation from the alternative provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

ADULTS WHO SUPERVISE PUPILS ON WORK EXPERIENCE

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

PUPILS STAYING WITH HOST FAMILIES

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS/ICPC checks or equivalent with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to

ensure that similar assurances are undertaken prior to the visit.

APPENDIX 5: ALLEGATIONS OF ABUSE MADE AGAINST STAFF

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

ISB will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The designated lead(s) should be informed of all allegations that come to school's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate.

SUSPENSION

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, ISB will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- reassigning within the school so that the individual does not have direct contact with the child or children concerned;

- providing an assistant to be present when the individual has contact with children;
- reassigning the individual to alternative work in the school so that they do not have unsupervised access to children;

- moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.

DEFINITIONS FOR OUTCOMES OF ALLEGATION INVESTIGATIONS

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

PROCEDURE FOR DEALING WITH ALLEGATIONS

In the event of an allegation that meets the criteria above, the Director (or the Board where the Director is the subject of the allegation) – the ‘case manager’ – will take the following steps:

1. Immediately discuss the allegation with the designated leads. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated lead – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated lead as soon as practicably possible after contacting the police).
2. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated lead (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual

as has been agreed with those agencies.

3. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place.
Advice

will be sought from the designated lead, police, and/or children's social care services, as appropriate.

4. If immediate suspension is considered necessary, agree, and record the rationale for this with the designated lead. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern *within one working day, and the individual will be given a named contact at the school and their contact details.*
5. If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated lead what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
6. If it is decided that further action is needed, take steps as agreed with the designated lead to initiate the appropriate action in school and/or liaise with the police, and/or children's social care services as appropriate.
7. Provide effective and case-by-case support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate and available.
8. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
9. Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
10. Make a referral to relevant agencies, including ACRO, where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.



ISB will inform relevant agencies, such as Ofsted, Ministry of Education in Romania of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be

made as soon as reasonably possible and always within 14 days of the allegations being made.

Where the police are involved, wherever possible the Director will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

TIMESCALES

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 Week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further enquiry, we will hold this within 15 working days.

SPECIFIC ACTIONS

ACTION FOLLOWING A CRIMINAL INVESTIGATION OR PROSECUTION

The case manager will discuss with the designated lead whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

CONCLUSION OF A CASE WHERE THE ALLEGATION IS SUBSTANTIATED

If the allegation is substantiated and the individual is dismissed or the school stops to use their services, or the individual resigns or otherwise stops to provide their services, the case manager and HR will discuss with the designated lead whether to make a referral to the relevant agencies, including ACRO and Ministry of Education for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager will discuss with the designated lead whether to refer the matter to the Teaching Regulation Agency (TRA) or Ministry of Education in Romania to consider prohibiting the individual from teaching.

INDIVIDUALS RETURNING TO WORK AFTER SUSPENSION

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

UNSUBSTANTIATED OR MALICIOUS ALLEGATIONS

If an allegation is shown to be deliberately invented, or malicious, the Director, or other appropriate person in the case of an allegation against the Director, will consider whether any disciplinary action is appropriate against the pupil(s)/ teacher(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

CONFIDENTIALITY

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the designated lead, police and children's social care services, as appropriate, to agree:

- who needs to know about the allegation and what information can be shared;
- how to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- what, if any, information can be reasonably given to the wider community to reduce speculation;
- how to manage press interest if, and when, it arises.

RECORD-KEEPING

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- a clear and comprehensive summary of the allegation.
- details of how the allegation was followed up and resolved.
- notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. Where records contain information about allegations of sexual abuse, we will



preserve these for relevant authorities and investigative bodies, for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

LEARNING LESSONS

After any cases where the allegations are substantiated, the school will review the circumstances of the case with designated lead and/or relevant people from police or child protection services, to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- issues arising from the decision to suspend the member of staff;
- the duration of the suspension;
- whether or not the suspension was justified;
- the use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

APPENDIX 6 – SAFEGUARDING DECLARATION OF STAFF

ISB Staff Declaration for Safeguarding

All school staff are valued members of the school community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for our pupils.

I declare that I have never been accused of or had any disciplinary action taken against me, in relation to any allegation of child abuse or inappropriate working practices involving children in any school or setting I have been involved with.

I further confirm there are no ongoing investigations into any inappropriate / illegal activity involving me.

Name:

Date of joining school:

Role:

Date of last Child Protection & Safeguarding training:

I have been made aware of my duty to safeguard and promote children's welfare and the procedure for reporting concerns about a pupil or staff member has been explained to

me.

I confirm that I have read and understood the key documents below, and that I will work in accordance with the guidance and statutory requirements.

- ISB Staff Handbook 2022-2023
- Keeping Children Safe in Education – Sept 2022 (Part 1 & Annex A)
- ISB Safeguarding and Child Protection Policy
- ISB Staff Code of Conduct
- ISB Disciplinary Policy and Procedures

- ISB Whistleblowing Policy
- ISB Online Safety Policy
- ISB Behaviour Policy
- Risk Assessment Policy
- Acceptable Use Policy

Signature: _____ Date: _____

Please sign and return this form to the school's Designated Safeguarding Lead - Camelia HOWARD

APPENDIX 7: RECORD OF CONCERN FORM

CHILD PROTECTION RECORD – Report of a concern

Child's full name:

Date of birth:

Current year:

SEND:

Person reporting the concern:

(name and role)

Date and time:

Details of concern: *Note the reasons for recording the incident. Ensure the following factual information is provided: who, what, when and where. Include names of witness, if relevant, and immediate actions taken. Attach a body map or other information, if appropriate.*

Signature of the person reporting the concern:

Response to the concern – to be completed by the Designated Safeguarding Lead

(DSL):

Note any actions taken, including the names of anyone involved and to whom your information was passed. Date where appropriate.

Justification of any action taken

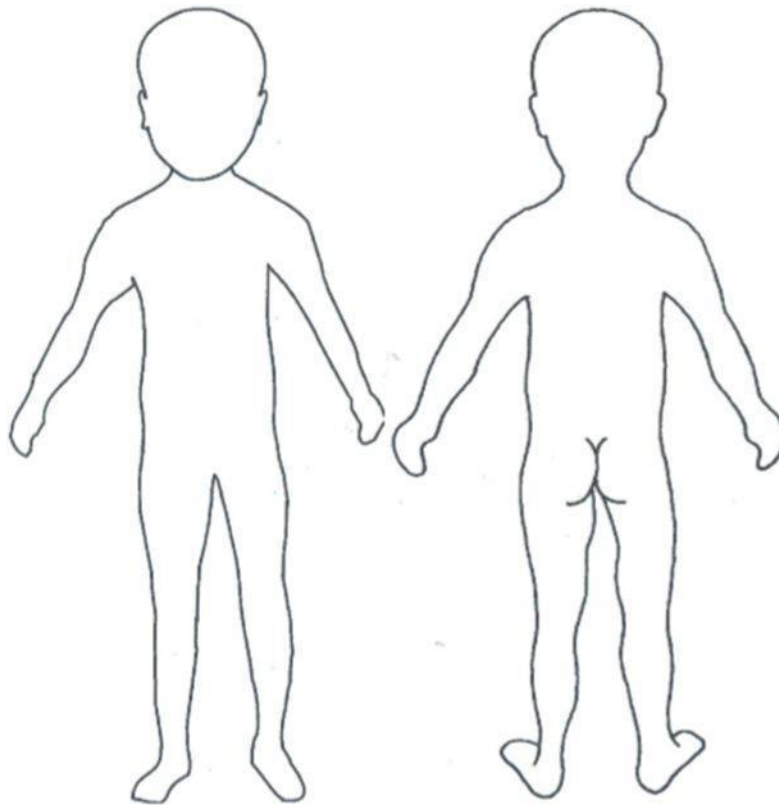
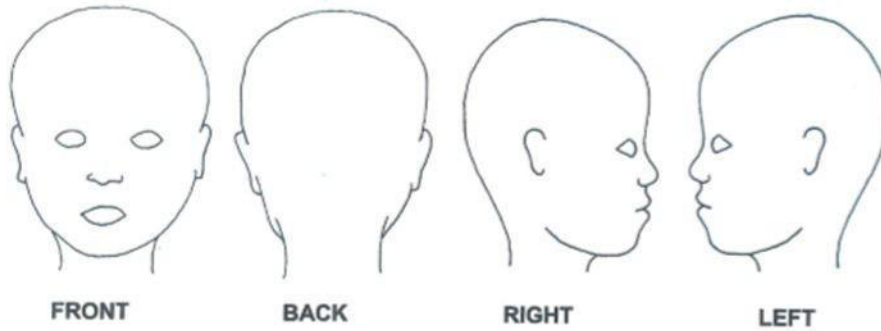
Outcomes

Record outcomes of actions taken

Safeguarding Lead's name and signature

Tick here if this concern was considered Serious & Urgent when reported if the concern relates to marks observed on the child, please indicate on the body map

below where these mark are and describe them, e.g. bruises, welts, burns, etc.



Continuation sheet

Use this sheet if you require more space or to add any other pertinent information. If this information is a result of further monitoring, please include the date this occurred. Extra paper should be stapled to this form if required, clearly headed with the child's name and the date the information was added.

APPENDIX 8: FRONT PAGE OF CHILD PROTECTION FILE

This document is attached to the inside of the card folder which forms the Child Protection File.

CHILD'S DETAILS

Full name:

Date of birth:

Gender: Male Female

Date when the child first joined ISB:

Nationality:

Preferred language at home:

Child's level of spoken English:

None (support required) Limited (support required) Reasonable (support maybe required) Fluent (no support required)

Write current date when child progresses in English

Does the child have any disability or special education needs?

No Yes Please specify if yes

Does the child regularly spend time with other carers (grandparents, siblings, domestic help, drivers etc) at home during weekdays, during weekends and holidays?

No Yes

Please specify if yes:

Details of any siblings (include names and DOBs; include any pertinent information, such as if they live at a different address, disability or special educational need):

Name of Designated Safeguarding Lead (DSL) who originally opened this Child Protection File and completed the information above:

Date:

If this record is updated at any time, please print your name and date below and initial and date the amendments

APPENDIX 9: TRANSFER OF CHILD PROTECTION RECORDS FORM

Transfer of Child Protection Records

Name of Child:

Date of birth:

Name of former school:.....

Address of former school:.....
.....

Please confirm:

- There are no safeguarding/child protection concerns/records for this child

- Safeguarding/child protection concerns/records will be transferred as detailed below

Method of delivery: By hand Secure Post Electronically

Date file sent:
.....
.....
.....

Name of DSL transferring the file:
.....
.....
.....

Signature of DSL:
.....

Date:



Date received by recorded delivery:

.....OR

Date file received by hand:

.....

Name of receiving DSL

.....

.....

.....

Signature of receiving DSL

Date

Please ensure that the child protection file is passed to the DSL at the receiving school

APPENDIX 10

SAFEGUARDING LOW-LEVEL CONCERNS POLICY AND PROCEDURES

International School of Bucharest is committed to ensuring Low-Level Concerns are monitored, recorded, and dealt with appropriately to create a safer culture for all staff, students and visitors.

1. SCOPE AND REFERENCES

This Policy sets out good practice and provides guidance on how to deal with situations and put in safeguards where a low-level concern may be encountered to ensure promoting of a safe culture and preventing possible harm. It will work in conjunction with all ISB's policies and procedures, including Safeguarding and Child Protection, Staff Code of Conduct, Disciplinary Policy and Procedures.

This policy has been written with reference to *KCSIE 2022, Farrer & Co's "Developing and implementing a low-level concerns policy: A guide for organisations which work with children", September 2021.*

2. DISTINCTION BETWEEN AN ALLEGATION AND A LOW-LEVEL CONCERN

A culture encouraging reporting of Low-Level Concerns enables the staff to share any concerns they may have, no matter how small, about their own or their colleagues' behaviour.

Concerns should not be limited to Safeguarding but could relate to behaviour that does not meet the professional standards expected within ISB according to the relevant policies and procedures.

The term '**allegation**' means that it is alleged that a person who works with children 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;
- or behaved towards a child or children in a way that indicates they may pose a risk of harm to children;
- behaved or may behave in a way that indicates they may not be suitable to work with children.

An **allegation** can also relate to an adult's behaviour outside of work, and their relationships with others, if they:

- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon;
- have, as a parent or carer, become subject to child protection procedures;
- are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the

adult is responsible in their employment/volunteering.

A **low-level concern** is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above.

A **low-level concern** is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to meet the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head of School or by the DSL.

In light of KCSIE 2022, there is now a formal mechanism for schools to share, record and respond to concerns (including allegations) about adults working with children that do not meet the harm threshold – i.e. low-level concerns. The importance of such a mechanism is illustrated by research and reference to inquiries and serious case reviews.

KCSIE now requires low-level concerns to be shared with the Head of School – unless they relate to the Head of School's behaviour – as per paragraph 74. (However, it is possible for any organisation working with children to introduce a mechanism whereby low-level concerns are shared with the DSL).

3. IMPORTANCE OF SHARING LOW-LEVEL CONCERNS

It is necessary to ensure a culture of openness and trust is fostered within an organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

It is well documented that organisational child sexual abuse is often preceded by grooming, and that such conduct was observed and considered questionable. This could be targeted at protective adults, not just children or vulnerable adults.

Grooming behaviours included direct use of authority to offend, using material or practical benefits for the victims, providing support for isolated children, favouring particular children, and use of alcohol, videos or sexual imagery amongst others. The method of commencing the abuse included the erosion of boundaries, slow progression to abuse, use of trust and authority, meeting the child's needs and developing relationships with the child's family.

This behaviour was rarely reported to the relevant individual in the organisation, was not recorded, and not available later for evaluation of patterns emerging. Research has shown that it is not possible for individuals to accurately judge people, as there is no one profile to describe everyone who abuses a child, so focus should be placed upon specific behaviours.

To minimise the risk of situational offending, there needs to be a culture of allowing people the confidence to speak out. This requires a robust framework, policy, training, support and leadership to facilitate this and a willingness to accept that abuse could happen in any organisation.

4. IMPLEMENTING A WRITTEN LOW-LEVEL CONCERNS POLICY

Initial points to consider are first that a written policy is a necessary requirement under EFL Standards. It can be incorporated within an existing policy, or be written as a stand-alone, as this is. Implementation is key. To be effective, the policy must have a 'buy in' from all staff and managers across the organisation must be seen to adhere to and model the expected values and behaviour of the organisation as written in the policy.

For staff to understand and engage with the policy, it will be necessary to provide training. This will be incorporated in both the Safeguarding Induction Training for new staff and the Annual Safeguarding Training for all staff.

5. DATA PROTECTION

The Data Protection Act 2018 makes specific provisions for the processing of personal data necessary for safeguarding children from harm. The Information Sharing Code of Practice (Information Commissioner's Office 2019) specifically cites the safeguarding of children as a 'clear example of a compelling reason to share personal data. Where a concern is low-level, rather than an allegation, the balance between safeguarding the interest and personal data rights will be considered carefully to ensure it is a reasonably necessary measure that the data should be shared.

6. HOW SHOULD LOW-LEVEL CONCERNS BE HELD

Records should be retained (including those subsequently deemed to relate to behaviour that is entirely consistent with the Code of Conduct) in the Safeguarding Log. Where there are multiple low-level concerns relating to the same individual these will be kept in chronological order as a running record. These records should be kept confidential and held securely with only the DSL and the Safeguarding and Child Protection Team having access.

Where concerns also involve issues of misconduct or poor performance, or disciplinary, grievance or whistleblowing procedures are triggered, the normal records required would still be made and kept according to the procedure in addition to the low-level concerns records.

Where the low-level concern is serious enough the relating records will be placed and retained on the staff member's personnel file. Where a low-level concern is reclassified as an allegation, then the records relating to it will be treated accordingly.

Refer also to the Managing Allegations of Abuse Against Staff Policy.

7. REVIEW OF THE CENTRAL LOW-LEVEL CONCERNS FILE

The DSL will review the **Central Low-Level Concerns File** (incorporated in the Safeguarding Log) periodically to ensure such concerns are being dealt with promptly and appropriately and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews should be made.

8. HOW LONG TO KEEP RECORDS OF A LOW-LEVEL CONCERN

There is currently no guidance on the retention of Low-Level concerns, but the point at which an employee leaves the organisation would be considered a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

9. SHOULD LOW-LEVEL CONCERNS BE REFERRED TO IN A REFERENCE?

With reference to KCSIE guidance, which is only applicable to schools and colleges, allegations which are proven to be false, unsubstantiated or malicious, should not be included in employer references. Likewise, a history of repeated concerns which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

Misconduct or consistent poor performance, where relevant, may be included. This would not normally include Low-Level safeguarding concerns unless the threshold is met for referral and found to be substantiated, where it should then be referred to in a reference. Where KCSIE does not apply, consideration must be given to legal obligations and duty of care in giving accurate references.

APPENDIX 11: ESSENTIAL CONTACTS

DIRECTOR	SERDAR SAKMAN 0770 602 353 Email: serdar.sakman@isb.ro 0770 600 878
DSL	CAMELIA HOWARD 0727 335 675 camelia.howard@isb.ro
DSL Deputies	SINEAD COSTELLO sinead.costello@isb.ro 0770 603 856
TBC	0770 599 669
Serdar Sakman	+40(21) 306 95 30
<i>Head of Secondary</i>	
Mustafa Soydemir	+40(21) 306 95 30

Head of Primary

DGASPC sector 3

Adresa: str.Parfumului nr.2-4, sector 3

Telefon: 0372.126.100; 021.341.07.13

Website: www.dgaspc3.ro

E-mail: office@dgaspc3.ro

Police

112

ACRO (ACPO Criminal Records Office)

+44 (0)2380 479 920

Approved by:	Whole School SLT
Date:	August 2022
Review:	August 2023