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British School  
of Bucharest

# Safeguarding and Child Protection Policy

Reviewed & Approved by

Senior Leadership Team

Last reviewed on

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## 1: INTRODUCTION

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We promote an environment where children and staff feel secure and are encouraged to talk, and are listened to when they have a worry or concern. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all school staff and any community members working with BSB children. The policy applies to all BSB pupils throughout EYFS and Key Stages 1, 2, 3, 4 and 5.

At BSB, we:

- recognise that the responsibility to safeguard and promote the welfare of children is of paramount importance;
- recognise that safer children make more successful learners;
- involve designated senior staff, teaching staff and governors in policy development and review;
- will review policies annually, unless an incident or new legislation or guidance suggests the need for an interim review.

## 2. AIMS

The school aims to ensure that:

- all staff are aware of their statutory responsibilities with respect to safeguarding;
- all staff are properly trained in recognising and reporting safeguarding issues have the necessary information and documentation to enable them to meet their child protection responsibilities;
- all staff are vigilant and focused acutely upon the wellbeing of the children in our care, observing their behaviour, listening to them attentively (including their silent voice) and ensuring that early help is given when required;
- all children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- all staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- pupils and staff involved in child protection issues will receive appropriate support;
- the school actively and continually promotes, to pupils, parents and the wider community, its commitment to providing thorough and regularly monitored and scrutinised safeguarding and child protection procedures.

## 3. CONTEXT

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2014 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are pupils at the school.

*'It is essential that the standards reflect the most up to date legislative and policy position on safeguarding and ensure that as effective a safeguarding environment as possible is in place to protect children.'*

Education (Independent Schools Standards) England Regulations 2014

Research suggests that over 10 per cent of all children will suffer some form of abuse, regardless of their background and upbringing. Due to their day-to-day contact with pupils, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that school staff are alert to the signs of abuse and understand the procedures for reporting their concerns.



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#### 4. LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#). We comply with this guidance and the procedures set out by the Association of British Schools Overseas.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils;
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the Single Central Record (SCR) and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques;
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school;
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children;
- Section 5B(1) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover (either through disclosure by the victim or through observation) that female genital mutilation (FGM) appears to have been carried out on a girl under 18;
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM;
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children;
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children;
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism;
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children;
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

British School of Bucharest's safeguarding and child protection policy and procedures also comply fully with Romanian law and legislation.

#### 5. TERMINOLOGY

Safeguarding and promoting the welfare of children means:

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

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

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in



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the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Children** includes everyone under the age of 18.

**Staff** refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Children's social care services** is referring specifically to Ilfov Child Protection - Direcția Generală de Asistența Socială și Protecția Copilului - Ilfov (D.G.A.S.P.C). See Appendix 9 for contact information.

## 6. 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;
- 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

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 pastoral support for children with SEN and disabilities in accordance to their individual needs.



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## 7. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff and volunteers. Our policy and procedures also apply to extended school and off-site activities.

### 7.1 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, 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 (see Section 19);
- 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 radicalisation;
- 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 and the role they might be expected to play following any referral (e.g. assessment meetings).

Section 10 of this policy outlines in more detail how staff are supported to do this.

### 7.2 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 DSL is Dan Batson. The DSL takes lead responsibility for child protection and wider safeguarding matters within the school, aligning policy and procedure in line with up-to-date UK 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 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;
- 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 code of ethical practice, 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 2018), 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;



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- keep the Headmaster informed of any issues, and liaise with any relevant external organisations (e.g. embassies, 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, relevant embassy, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- 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;
- 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.
- 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;
- 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;

### 7.3 THE DEPUTY DESIGNATED SAFEGUARDING LEAD AND SAFEGUARDING OFFICERS

When the DSL is absent, the Deputy Designated Safeguarding Lead, Philip Walters, as well as the Safeguarding Officers, Jason Porter and Victoria Smith, will act as cover.

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

### 7.4 THE HEADMASTER

The Headmaster 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 leadership 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 (see Appendix 4);



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- ensuring that the relevant staffing ratios are met, where applicable;
- 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 2018);
- ensuring that they take leadership responsibility for the organisation's safeguarding arrangements.

#### 7.5 THE PROPRIETOR

- The Proprietor will ensure that the school's Headmaster and management team establish effective arrangements to safeguard and promote the welfare of pupils at the school, taking into
- account the local context (in line with the expectations of the Association of British Schools Overseas).
- The Proprietor will review the minutes from the termly safeguarding review meetings between the Headmaster and Safeguarding Team.
- The Proprietor will review the handling of specific child protection cases when required.
- The Proprietor will approve this policy at each review, and hold the Headmaster to account for its implementation;
- The Proprietor will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see Appendix 4).

#### 8. THE SAFEGUARDING TEAM: CONTACT INFORMATION

Designated Safeguarding Lead:

Contact details: Tel: +40 731 877 196

Deputy Designated Safeguarding Lead:

Contact details: Tel: +40 736 901 771

Safeguarding Officer:

Contact details: Tel: +40 728 133 436

Safeguarding Officer:

Contact details: Tel: +40 735 302 999

Dan Batson

email: [Dan.Batson@britishschool.ro](mailto:Dan.Batson@britishschool.ro)

Philip Walters

email: [Philip.Walters@britishschool.ro](mailto:Philip.Walters@britishschool.ro)

Jason Porter

email: [jason.Porter@britishschool.ro](mailto:jason.Porter@britishschool.ro)

Victoria Smith

email: [Victoria.Smith@britishschool.ro](mailto:Victoria.Smith@britishschool.ro)

#### 9. CONFIDENTIALITY

All staff will understand that child protection issues warrant 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



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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 the welfare, and protect the safety, of children.

Child protection information will be stored and handled fairly and lawfully and in line with GDPR principles. Additionally, Information must be:

- timely;
- necessary;
- processed for limited purposes;
- adequate, up to date, relevant and not excessive;
- accurate;
- kept no longer than necessary;
- processed in accordance with the data subject's rights;
- secure.

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 unauthorised 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' 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 Headmaster.

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 school's policy on confidentiality and information-sharing is available to parents and pupils on request.

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 designated safeguarding lead (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in Appendix 4.

## 10. RECOGNISING ABUSE AND TAKING ACTION

### 10.1 TYPES OF ABUSE AND INDICATORS

The Department for Education document 'Keeping Children Safe in Education' 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 Appendices 1 and 2. Please remember, however, it is our responsibility to report concerns. It is not our 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.



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### 10.2 IF A CHILD IS SUFFERING OR LIKELY TO SUFFER FROM HARM, OR IN IMMEDIATE DANGER

Make a referral to children's social care services (contact information in Appendix 9) 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.

### 10.3 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 green Welfare Concern Form and report the matter to the DSL (or another member of the Safeguarding Team if the DSL is not available). 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

### 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.

### 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 (see section 10.2), 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.

Iflov Child Protection 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 Iflov 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 Iflov Child Protection and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

### 10.4 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.



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During your conversation with the pupil:

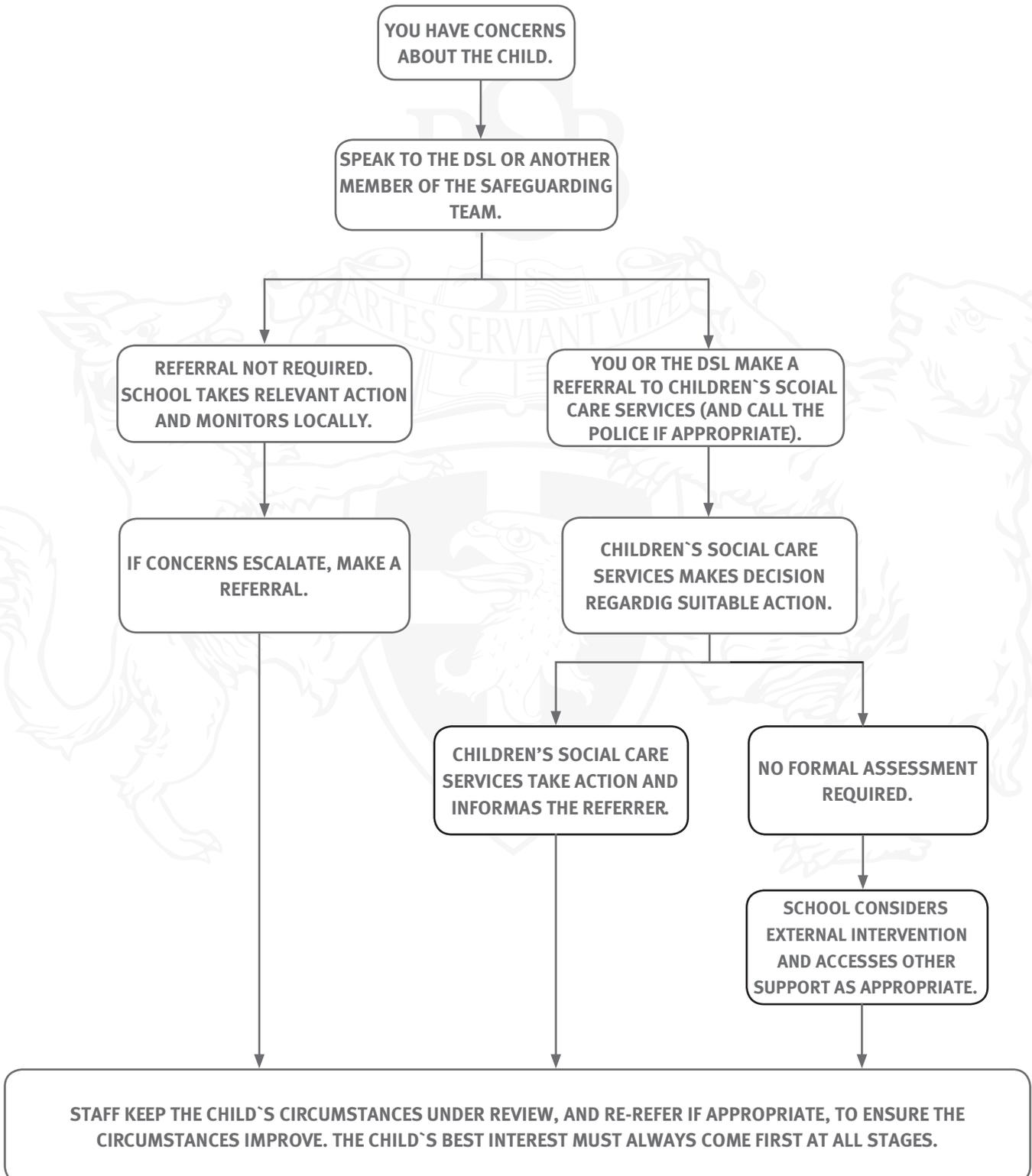
- allow them to speak freely;
- remain calm and do not overreact – the pupil may stop talking if they feel they are upsetting you;
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’;
- 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. It may be anything but comforting to a child who has been abused;
- 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 Welfare 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 (see section 10.2), and tell the DSL as soon as possible that you have done so;
- seek support if you feel distressed.

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.



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**FIGURE 1: PROCEDURE IF YOU HAVE CONCERNS ABOUT A CHILD'S WELFARE (AS OPPOSED TO BELIEVING A CHILD IS SUFFERING OR LIKELY TO SUFFER FROM HARM, OR IN IMMEDIATE DANGER)**





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### 10.5 CONCERNS ABOUT A STAFF MEMBER OR VOLUNTEER

The school's Code of Ethical Practice sets out our expectations of staff and their conduct whilst working at the school (see Appendix 5). 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), 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 Penal 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 jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount.

The school's whistleblowing procedures (see Whistleblowing Policy below) 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 fall short of the expectations of the school's Code of Ethical Practice by colleagues should be reported to the Headmaster, Philip Walters. Concerns of this nature relating to the Headmaster should be reported to the DSL, Dan Batson, and the Proprietor, Corina Corda.

### 10.6 ALLEGATIONS OF ABUSE MADE AGAINST OTHER PUPILS (PEER ON PEER 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.

Peer on peer 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 2 for further information), teenage relationship abuse, peer-on-peer 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 peer on peer abuse we:

- provide a developmentally appropriate PSHCE curriculum 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 Welfare Concern Form (Green Form), but do not investigate it.
2. The DSL and Safeguarding Team will agree on an action plan based on what has been alleged and what is known.



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3. Parents of those involved will be met.
4. Relevant external agencies contacted if required (children's social care services, embassies, mental health organisations, police - if criminal offence committed, etc)
5. 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.

## CHILDREN WITH SEXUALLY HARMFUL BEHAVIOUR

Up to 30 per cent of child sexual abuse is committed by someone under the age of 18. The management of children and young people with sexually harmful behaviour is complex and the school will work through the pastoral programme and curriculum, including relevant external agencies, to maintain the safety of the whole school community. Safeguarding through pastoral programmes and the curriculum is deliberately pre-emptive and 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.

### 11. 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 or overseas agencies, or a decision may be taken for school to contact an extended family member.

### 12. 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. Personal devices should be stored discreetly when not being used, locked with a pin code 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. All staff should be aware that all use of personal devices is open to scrutiny.

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:

- seek parental/carer consent as appropriate for photographs and videos to be taken or published (for example, on our website or in newspapers or publications);
- 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;
- ensure pupils and staff are appropriately dressed;
- ensure pupils are undertaking an official BSB activity only.

The Image Consent form and updated information is available from school office.

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** policies.



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## 13. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING PRACTICES

### 13.1 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 Headmaster.

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 4).

### 13.2 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 below).

## 14. 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.

## HOW AND WHAT RECORDS ARE KEPT

When a welfare concern form (Appendix 6) has been submitted to the DSL, the DSL will open and complete a Child Protection File (Appendix 7), 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 Welfare 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 DSL. 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 8). 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 digital register is kept on two separate external memory drives, they are password protected and locked securely within the child protection filing cabinet. This register is updated each time a child protection file is amended.



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## 15. TRAINING

### 15.1 ALL STAFF

All staff members will undertake safeguarding and child protection training at their induction and then on a regular ongoing basis, thereafter. A register of attendees is recorded and kept. All staff are also required to read and familiarise themselves with the school's safeguarding and child protection 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 'Confirmation of Receipt of Safeguarding Documents' form (see Appendix 5). This training will be regularly updated and will be in line with BSO expectations.

The training will include completing specified Educare courses.

**Child Protection for International Schools** must be completed during the induction period and renewed every two years. Child Protection Refresher, which is a slightly lighter course, should be completed before the beginning of the new academic year, every alternate year.

**Online Safety for International Schools** (for all teaching and IT staff), must be completed within the first four weeks of joining the school and renewed every two years.

The courses **The Prevent Duty** (UK government's anti-radicalisation strategy) and **Female Genital Mutilation Awareness** must be completed during the first year of recruitment and renewed every two years.

**Safer Recruitment for International Schools** must be completed by all members of SLT and renewed every two years.

Some staff are also asked to complete particular Educare courses which are not necessarily related to safeguarding and child protection, e.g. **SEND Code of Practice** (all Learning Support Staff) and **Food and Hygiene Safety** (all staff intending to use the Food Technology Room).

Once the mandatory courses have been completed, staff have a choice of many other Educare courses available, with the agreement that all staff complete at least one course every half-term and one during the summer break or August INSET (a minimum of six courses per year). These courses include:

- ADHD Awareness
- Autism Awareness
- Administration of Medication in Schools
- Dyslexia Awareness
- First Aid Essentials for International Schools 2018
- Raising Awareness of Honour-Based Abuse and Forced Marriage
- Dealing with Bereavement and Loss
- Mental Well-Being in Children and Young People 2018
- Sexual Violence and Harassment between Children and Young People
- How to be an Effective Fire Warden or Fire Marshal
- Moving and Handling
- Equality and Diversity (May 2018)
- Concussion Awareness
- A Practical Guide to the GDPR for Education
- Safeguarding Young People (Sept 2018)
- Child Neglect for International Schools
- Child Protection in Sport and Active Leisure
- Child Sexual Exploitation for International Schools
- Fire Safety for International Schools
- Health and Safety for International Schools
- Preventing Bullying for International Schools
- Domestic Abuse: Children and Young People
- Child Exploitation
- Raising Awareness of Peer-on-Peer Abuse
- Raising Awareness of Trafficking and Modern Slavery
- Understanding Anxiety
- Understanding Low Mood and Depression
- Understanding Self-Harm
- Use of Reasonable Force in Schools 2018



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Although staff can choose which courses they do, there may be occasions whereby certain staff are asked to complete specific courses in order to support them with their particular responsibilities at the time.

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.

Non-English speaking staff will be provided with a translated version of the Child Protection for International Schools Educare course during their induction, in the form of a PDF document. This will be accompanied with a group training session scheduled at an appropriate date within the year. This will be led by the DSL and a member of HR or Romanian speaking member of the Safeguarding Team.

Volunteers will need to apply to be on the 'Green List' (see Visitor and Volunteer Policy for further details regarding the different levels of visitors in school). In order to fulfil the school's requirements of becoming a 'Green List' member, volunteers will need to complete the **Child Protection for International Schools** Educare course. The DSL will also meet each 'Green List' 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.

### 15.2 THE DSL AND DEPUTIES

The DSL and deputies will undertake child protection and safeguarding training at least every two years, suitable for leading safeguarding and child protection throughout the school (DSL Level 3 training).

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).

### 15.3 PROPRIETOR

The Proprietor (or nominated Vice-President) will receive appropriate safeguarding training (e.g. Level 3 DSL training) to ensure that she has the knowledge and information needed to perform their functions and understand their responsibilities.

As the Proprietor (or nominated Vice-President) may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

### 15.4 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 post 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, 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;



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- 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 familiarisation with the school's child protection policy and identification of their child protection training needs.

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

- BSB Staff Code of Ethical Practice
- BSB Safeguarding and Child Protection Policy
- BSB Whistleblowing Policy
- BSB Online Safety Policy & Acceptable Use Policy
- BSB Behaviour Policy
- Keeping Children Safe in Education – Sept 2019 (Section 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. Where a referral has been made to the DBS, a referral will also be made to the National College, even though information is shared between the two bodies. Where a dismissal (or resignation) does not reach the threshold for DBS referral, separate consideration will be given to a National College referral since a teaching prohibition order may be deemed necessary.

For further information regarding recruitment, see the school's recruitment policy.

### 15.5 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.

### 16. ONLINE SAFETY

The effective use of technology is a focus and a strength at BSB. 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 Computing. Staff receive training and receive 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.

Staff should contact students only through the official school-sanctioned platforms, such as Google Classroom. 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.

As stated in the Acceptable Use Policies, all student and staff internet and email activity is subject to monitoring.



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Furthermore, BSB also uses 'Securly' (a filtering and monitoring tool designed for schools) which is active when students are logged into their BSB Online accounts. Activity is monitored by and reported to the DSL, as well as Key Stage Coordinators (Primary) and Heads of Key Stage (Secondary).

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

## 17. CORPORAL PUNISHMENT AND PHYSICAL INTERVENTION

Corporal punishment is banned in schools in the UK and therefore would be considered a safeguarding issue. The prohibition applies to all 'members of staff'. This includes all those acting in loco parentis, such as unpaid, volunteer supervisors. Teachers may use 'physical intervention' 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 and has been shared with staff. For further information relating to discipline and sanctions, please refer to the school's Behaviour Policy.

## 18. MONITORING ARRANGEMENTS

Each term, the DSL and Safeguarding Team will meet with the Headmaster and Heads of Schools 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 either the Proprietor or one of the Vice Presidents is present. 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 level of concern (Serious and Urgent, Ongoing Low to Moderate, No Apparent Further Concern) will also be re-evaluated case by case (see Appendix 8 for an explanation of the Child Protection Register). These meetings are minuted in detail.

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

Further to this, the school's contracted Critical Friend will dedicate a proportion of his or her annual visit to reviewing the effectiveness of the school's safeguarding procedures.

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).

## 19. LINKS WITH OTHER POLICIES

This policy links to the following policies and procedures:

- Whistleblowing
- Behaviour
- Staff Code of Ethical Practice
- Complaints
- Health and Safety
- Attendance
- Online Safety
- Acceptable Use
- Prevent Duty
- Sex and Relationship Education
- Visitors and Volunteers
- Toileting and Intimate Care Policy
- Recruitment
- First Aid
- Curriculum
- PSHCE
- Sex and Relationship Education
- Anti-Bullying
- Equality and Diversity
- Drugs, Alcohol and Tobacco



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# Whistleblowing Policy

Reviewed & Approved by

Senior Leadership Team

Last reviewed on

July 2019

Next review due by

July 2020

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## 1. INTRODUCTION

This policy details how BSB staff can report concerns about co-worker's behaviour and/or actions towards children and young people.

## 2. AIMS

The school adheres to the UK whistleblowing policy advice and procedures that enable staff to raise and report concerns relating to:

- crime;
- a miscarriage of justice;
- illegality;
- health and safety;
- environmental or property damage;
- unauthorised use of public funds;
- concealing or attempting to cover up any of the above.

This code provides additional information to help staff to understand the role of whistleblowing in the context of poor practice and unacceptable conduct and attitudes towards children.

## 3. WHEN TO USE THE POLICY

The whistleblowing policy and procedures may be used by anyone employed by the school in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a pupil is inappropriate.

Inappropriate conduct includes, but is not confined to:

- bullying or humiliation;
- contravening health and safety guidelines;
- serious breaches of the school's code of ethical practice;
- professional practice that falls short of normally accepted standards;
- compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention.

## 4. REASONS FOR REPORTING A CONCERN

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that pupils are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects pupils, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Whistleblowing can also support the member of staff who is the subject of the concern. Their conduct may result from inexperience or lack of training that can be addressed by the school, or they may be under stress and be relieved when their conduct is questioned.

Staff who deliberately fail pupils and show no remorse or desire to improve are unlikely to welcome being exposed, but their conduct has to be confronted for the sake of the pupils and the reputation of the whole school.

## 5. BARRIERS TO WHISTLEBLOWING

You may worry that you have insufficient evidence to raise a concern that you will set in motion an unstoppable chain of events, that there will be adverse repercussions for your career, that you may suffer harassment or victimisation, or that your suspicion or concern might be totally misplaced.



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These concerns are entirely understandable, but you can be reassured that whistleblowing procedures addresses these issues. The Public Interest Disclosure Act 1998 (UK) protects employees from reprisals for public interest whistleblowing. A local solicitor or non-government organisation can provide you with information about your legal position in Romania. A UK based professional union, or a UK based local authority legal services can provide advice from UK legal perspective.

## 6. CONFIDENTIALITY AND ANONYMITY

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an investigation, you are required to provide a witness statement or attend a court hearing.

You can, if you prefer, raise your concern anonymously. The school would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.

The school will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistleblowing.

Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

## 7. REPORTING CONCERNS PROCEDURE

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

You may raise your concern verbally or in writing.

You should report your concern directly to the Head of School – Philip Walters

Tel: +40 736 901 771

email: [philip.walters.britishschool.ro](mailto:philip.walters.britishschool.ro)

If the Head of School is the subject of your concern, speak to: Dan Batson (Designated Safeguarding Lead)

email: [dan.batson@britishschool.ro](mailto:dan.batson@britishschool.ro)

Tel: +40 731 877 196

Mrs. Corina Corda (President of Crawford House)

Tel: +40 21 267 89 19

email: [corina.corda@britishschool.ro](mailto:corina.corda@britishschool.ro)

## 8. GUIDANCE FOR STAFF WHEN REPORTING A CONCERN

- A friend or colleague may accompany you to the meeting if you wish.
- Ensure the Head of School or President of Crawford House informs you of their proposed action and sets a date for a second meeting.
- Timescales will depend on the complexity of the initial inquiry but the case should not be allowed to stall and you should receive initial feedback within 10 working days.
- The timescale for subsequent feedback should then be agreed.
- Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.



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## 9. PROCESS AND OUTCOMES

1. The Head of School or President of Crawford House will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred.
2. Members of the school community may be asked to provide information or advice.
3. External advice, for example, from legal or human resources or children's services may be sought.
4. A written record of the conduct, established facts and outcome of the inquiry will be kept.
5. The whistleblower will be kept informed of the progress of the inquiry.
6. The outcome of the inquiry will be one of the following:
  - » No poor practice or wrongdoing is established and the case is closed
  - » The concern has some substance and the subject of the concern will receive advice and support from the Head of School to improve practice
  - » Poor practice or wrongdoing is established and disciplinary proceedings are initiated
  - » The concern is more serious and an investigation is initiated. This investigation may involve the local authority's legal team, children's social care or the police.

If, at any stage in the process, there is reason to believe that a child is at risk of significant harm, children's social care will be immediately involved, and relevant staff members may be suspended (according to staff disciplinary policy).

## 10. FURTHER ACTION

If you raise a concern and you are dissatisfied with the way it is managed, or the outcome, you may contact COBIS for advice.

Alternatively you can seek advice from your union (if member) or UK based professional association, a solicitor, the police, children's social care.

### Public Concern at Work

Suite 301, 16 Baldwin Gardens, London, EC1N 7RJ

020 7404 6609

whistle@pcaw.co.uk

www.pcaw.co.uk

## 11. LINKS WITH OTHER POLICIES

This policy links to the following policies and procedures:

- Whistleblowing
- Behaviour
- Staff Code of Ethical Practice
- Complaints
- Health and Safety
- Attendance
- Online Safety
- Acceptable Use
- Prevent Duty
- Sex and Relationship Education
- Visitors and Volunteers
- Toileting and Intimate Care Policy
- Recruitment
- First Aid
- Curriculum
- PSHCE
- Sex and Relationship Education
- Anti-Bullying
- Equality and Diversity
- Drugs, Alcohol and Tobacco



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## APPENDIX 1: RECOGNISING TYPES OF ABUSE

Abuse, including neglect, and safeguarding issues are rarely standalone 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 is 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. They may be abused by an adult or adults or another child or children.

There are four main categories of abuse:

Physical abuse

Emotional abuse

Sexual abuse

Neglect

### PHYSICAL ABUSE

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

### EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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;
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- seeing or hearing the ill-treatment of another;
- serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

### SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing;
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

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



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## NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment.

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





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## APPENDIX 2: SPECIFIC SAFEGUARDING ISSUES AND TOPICS

Through safeguarding training tools, such as Educare, as well as current government publications, the DSL will ensure that all staff are regularly and frequently informed about other specific safeguarding issues and what the indicators for these often are.

These could include:

- affluent neglect
- bullying
- children missing from education
- child criminal exploitation
- child sexual exploitation
- children and the court system
- children with family members in prison
- domestic violence
- drugs
- eating disorders
- fabricated or induced illness
- faith abuse, gangs and youth violence
- forced marriage
- female genital mutilation
- gender-based violence/violence against women and girls
- hate
- homelessness
- (so called) honour-based violence
- mental health
- peer-on-peer abuse
- preventing radicalisation
- private fostering
- relationship abuse
- self-harming
- serious violence
- sexting
- trafficking
- upskirting

### 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.

Furthermore, for children from affluent families, where achievement and pressure to shine has been instilled from a young age, ways to escape that pressure could be very appealing, often leading to issues such as substance abuse. These high expectations can lead to depression and anxiety, and sometimes self-harm and eating disorders.

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.



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As with any safeguarding issue, the child's voice needs to be central to the process. If the child can have some input as to how things can be improved for them, it is considered good practice and the child's right to be listened to and heard.

## **BULLYING**

All incidents and allegations of bullying are taken extremely seriously at BSB. 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 and Citizenship Education (PSHCE) 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.

## **CHILDREN MISSING FROM EDUCATION**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This may be a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- are at risk of harm or neglect;
- come from Gypsy, Roma, or Traveller families;
- come from the families of service personnel;
- go missing or run away from home or care;
- are supervised by the youth justice system;
- cease to attend a school;
- come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority or relevant embassy if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care services team, the relevant embassy and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

## **CHILD SEXUAL EXPLOITATION**

Child sexual exploitation (CSE) is a form of sexual abuse which 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 in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

CSE can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen



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online. Young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

It is essential to remember that the victim may have been sexually exploited even if the sexual activity appears consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care services team, relevant embassies and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections or becoming pregnant;
- displaying inappropriate sexualised behaviour;
- suffering from changes in emotional wellbeing;
- misusing drugs and/or alcohol;
- going missing for periods of time, or regularly coming home late;
- regularly missing school or education, or not taking part in education.

## HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL (and deputy) will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## SO-CALLED 'HONOUR-BASED' VIOLENCE (INCLUDING FGM AND FORCED MARRIAGE)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

## FEMALE GENITAL MUTILATION (FGM)

FGM is illegal in the UK. It is a practice that takes place worldwide in at least 28 African countries and in parts of the Middle and Far East. It also takes place within parts of Western Europe and other developed countries, primarily among immigrant and refugee communities. UK communities that are at risk of FGM include Somali, Kenyan, Ethiopian, Sierra Leonean, Sudanese, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish and Indonesian women and girls.

FGM has been classified by the World Health Organisation into 4 types:

- Type 1: Often referred to as clitoridectomy, this is the partial or total removal of the clitoris (a small, sensitive and erectile part of the female genitals), and in very rare cases, only the prepuce (the fold of skin surrounding the clitoris).
- Type 2: Often referred to as excision, this is the partial or total removal of the clitoris and the labia minora (the inner folds of the vulva), with or without excision of the labia majora (the outer folds of skin of the vulva).



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- **Type 3:** Often referred to as infibulation, this is the narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the labia minora, or labia majora, sometimes through stitching, with or without removal of the clitoris (clitoridectomy).
- **Type 4:** This includes all other harmful procedures to the female genitalia for non-medical purposes, e.g. pricking, piercing, incising, scraping and cauterizing the genital area. FGM is a complex issue - despite the harm it causes, many women and men from practising communities consider it to be normal to protect their cultural identity.

FGM is believed to be a way of ensuring virginity and chastity. It is used to safeguard girls from sex outside marriage and from having sexual feelings. Although FGM is practised by secular communities, it is most often claimed to be carried out in accordance with religious beliefs. FGM is not supported by any religious doctrine. FGM is illegal in the UK. In England, Wales and Northern Ireland, civil and criminal legislation on FGM is contained in the Female Genital Mutilation Act 2003 (the act). In Scotland, FGM legislation is contained in the Prohibition of Female Genital Mutilation (Scotland) Act 2005. The Female Genital Mutilation Act 2003 was amended by sections 70-75 of the Serious Crime Act 2015. In the UK it is also illegal to conspire to commit an FGM offence; aid, abet, counsel or procure a person to commit an FGM offence; encourage or assist a person to commit an FGM offence, or even knowingly fail to protect somebody from an FGM offence (whether in the UK or not). As such, it is a legal requirement for UK residents to report any concerns that they may have if they suspect that somebody may be at risk of FGM or they discover FGM has been carried out. Despite there not being the same specific laws in place in Romania, criminal charges would likely be sought through other means, such as grievous bodily harm or even domestic violence. As such, the normal protocol for reporting abuse would be followed (see Section 10 of Safeguarding and Child Protection Policy, as well as Figure 1).

#### FGM INDICATORS

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- a pupil confiding in a professional that FGM has taken place;
- a mother/family member disclosing that FGM has been carried out;
- a family/pupil already being known to social services in relation to other safeguarding issues;
- a girl:
  - » having difficulty walking, sitting or standing, or looking uncomfortable;
  - » finding it hard to sit still for long periods of time (where this was not a problem previously);
  - » spending longer than normal in the bathroom or toilet due to difficulties urinating;
  - » having frequent urinary, menstrual or stomach problems;
  - » avoiding physical exercise or missing PE;
  - » being repeatedly absent from school, or absent for a prolonged period;
  - » demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
  - » being reluctant to undergo any medical examinations;
  - » asking for help, but not being explicit about the problem;
  - » talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include:

- the girl's family having a history of practising FGM (this is the biggest risk factor to consider);
- FGM being known to be practised in the girl's community or country of origin;



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- a parent or family member expressing concern that FGM may be carried out ;
- a family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues;
- a girl:
  - » having a mother, older sibling or cousin who has undergone FGM;
  - » having limited level of integration within UK society;
  - » confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”;
  - » talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period;
  - » requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
  - » talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
  - » being unexpectedly absent from school;
  - » having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

### **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, relevant embassy and/or police;
- possibly seek advice from the UK Forced Marriage Unit on +44 20 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk);
- refer the pupil to the school counsellor, as appropriate.

### **PREVENTING RADICALISATION**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental ‘British’ values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils’ behaviour.

The UK government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:



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- refusal to engage with, or becoming abusive to, peers who are different from themselves;
- becoming susceptible to conspiracy theories and feelings of persecution;
- changes in friendship groups and appearance;
- rejecting activities they used to enjoy;
- converting to a new religion;
- isolating themselves from family and friends;
- talking as if from a scripted speech;
- an unwillingness or inability to discuss their views;
- a sudden disrespectful attitude towards others;
- increased levels of anger;
- increased secretiveness, especially around internet use;
- expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- accessing extremist material online, including on Facebook or Twitter;
- possessing extremist literature;
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If a child is not suffering or likely to suffer from harm or in immediate danger, where possible, if staff are concerned about a student, they will discuss their concerns with the DSL. Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in the school's Prevent Duty Policy.

## SEXTING

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.

British 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 '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);



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- 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, the relevant embassy and/or the police immediately.

Guidance on responding to and managing sexting incidents can be found at:

[http://www.thegrid.org.uk/info/welfare/child\\_protection/reference/index.shtml#sex](http://www.thegrid.org.uk/info/welfare/child_protection/reference/index.shtml#sex)

### PEER-ON-PEER ABUSE

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Peer-on-peer abuse can take various forms, including: serious bullying (including cyber-bullying), physical violence such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, sexting (youth produced sexual imagery), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, including sexual violence and sexual harassment and/or gender-based violence.

### CONTEXTUAL SAFEGUARDING

In order to prevent and tackle peer-on-peer abuse, schools can adopt a Contextual Safeguarding approach, which is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts.



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### APPENDIX 3: SAFER RECRUITMENT AND CRIMINAL RECORD CHECKS – POLICY AND PROCEDURES

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 made by the secretary of state;
- ask for written information about previous employment history and check that information is not contradictory or incomplete.

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 post that is not regulated activity to one that is.

We will refer to the DBS 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 be 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](#)



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[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.

#### **PROPRIETOR AND GOVERNORS**

- The Proprietor and 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.



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### **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.



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## APPENDIX 4: 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 or relevant embassy.

We 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.

## 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, we 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:

- redeployment 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;
- redeploying 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 Headmaster (or Proprietor where the Headmaster is the subject of the allegation) – the ‘case manager’ – will take the following steps:

1. Immediately discuss the allegation with the designated officer at the local authority or relevant embassy. 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 officer – 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 officer 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 officer (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.



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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 officer, police, relevant embassy 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 officer. 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 officer 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 officer to initiate the appropriate action in school and/or liaise with the police, relevant embassy 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 and the NCA via the Embassy, 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.

We will inform relevant agencies, such as Ofsted, 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.

If the school is made aware that a relevant body, such as the Secretary of State, has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency (TRA) or other relevant investigative body.

Where the police are involved, wherever possible the Proprietor 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 investigation, we will hold this within 15 working days.

## SPECIFIC ACTIONS



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### **ACTION FOLLOWING A CRIMINAL INVESTIGATION OR PROSECUTION**

The case manager will discuss with the local authority's designated officer 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 ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and HR will discuss with the designated officer whether to make a referral to the relevant agencies, including ACRO and the NCA via the Embassy, for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency (TRA) 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 Headmaster, or other appropriate person in the case of an allegation against the Headmaster, will consider whether any disciplinary action is appropriate against the pupil(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 local authority's designated officer, relevant embassy, 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 the Independent Inquiry into Child Sexual Abuse (IICSA), or other 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



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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.

## REFERENCES

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, we will review the circumstances of the case with the local authority's designated officer 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.



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## APPENDIX 5: CONFIRMATION OF RECEIPT OF SAFEGUARDING DOCUMENTS

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.

Name: \_\_\_\_\_

Date of joining school: \_\_\_\_\_

Post: \_\_\_\_\_

Date of last Child Protection & Safeguarding training (e.g. Educare):  
\_\_\_\_\_

I confirm that I have received and read the:

- BSB Staff Code of Ethical Practice
- BSB Safeguarding and Child Protection Policy
- BSB Whistleblowing Policy
- BSB Online Safety Policy & Acceptable Use Policy
- BSB Behaviour Policy
- Keeping Children Safe in Education – Sept 2018 (Section 1 & Annex A)

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.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Please sign and return this form to the school's Designated Safeguarding Lead:

**DAN BATSON**



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## APPENDIX 6: WELFARE CONCERN FORM

<b>Child's full name</b>			
<b>Child's date of birth</b>		<b>Current Class</b>	
<b>Person reporting concern (name and position)</b>			
<b>Date (dd/mm/yyyy)</b>			
<b>Details of the concern</b>			
Note the reasons for recording the incident. Ensure the following factual information is provided: who, what, when and where. Include names of witnesses, if relevant, and immediate actions taken. Offer an opinion where relevant (how and why this might have happened). Substantiate the opinion. Attach a body map or other information, if appropriate.			
<b>Signature of person reporting concern</b>		<b>Date</b>	
<b>RESPONSE TO THE CONCERN - TO BE COMPLETED BY THE DESIGNATED SAFEGUARDING LEAD (DSL).</b>			
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.



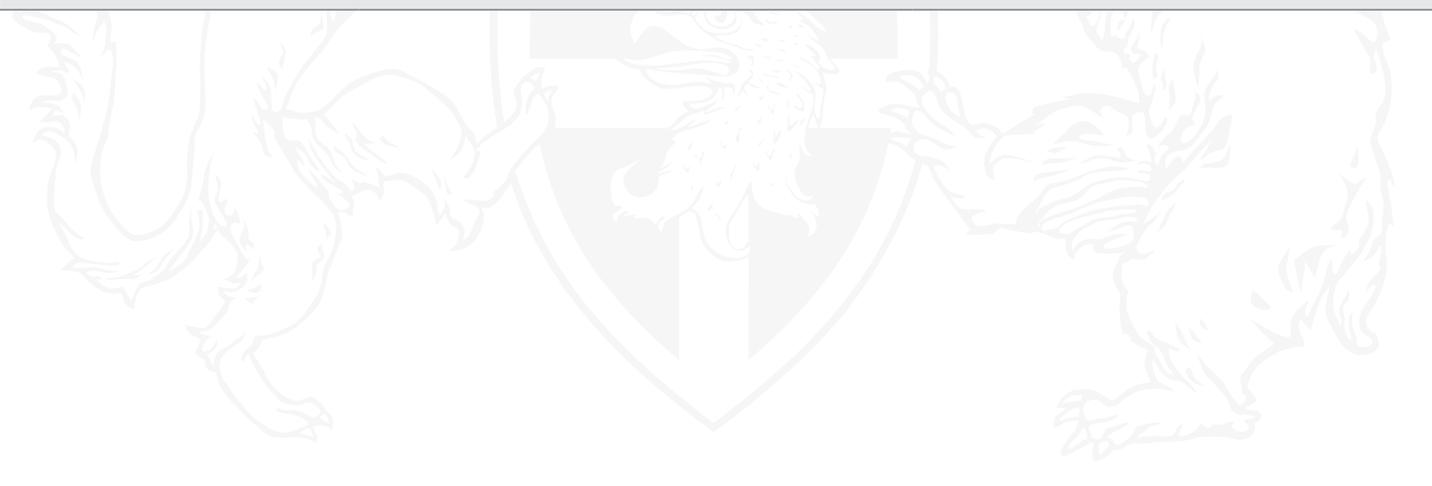
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BSB



### Outcomes

Record outcomes of the actions taken.



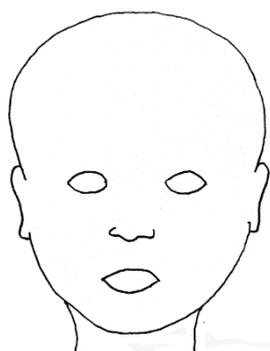
<b>Safeguarding Lead's name</b>		Tick here if this concern was considered 'Serious & Urgent' when reported.	
<b>Safeguarding Lead's signature</b>		<b>Date</b>	



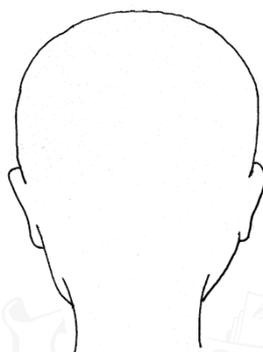
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### BODY MAP

If the concern relates to marks observed on the child, please indicate on the body map below where these marks are and describe them, e.g. bruises, welts, burns, etc.



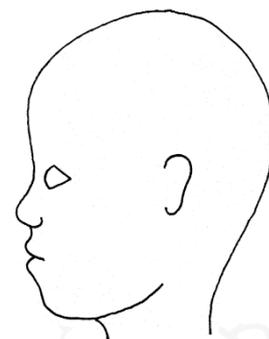
FRONT



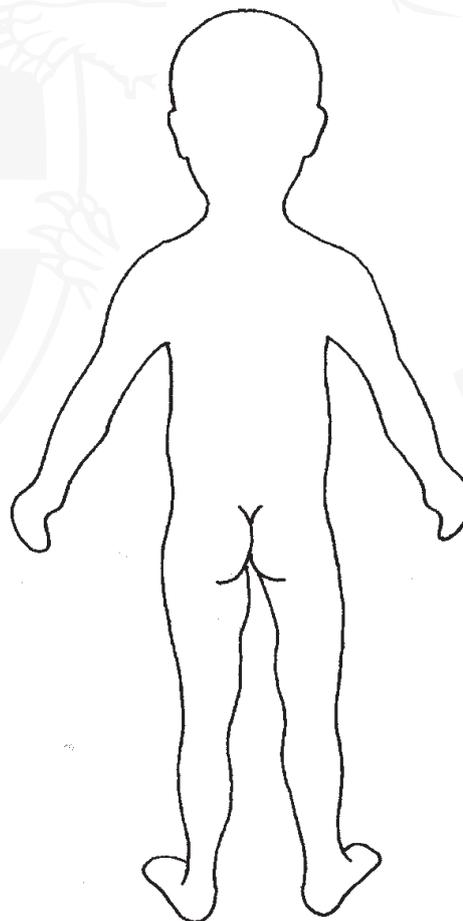
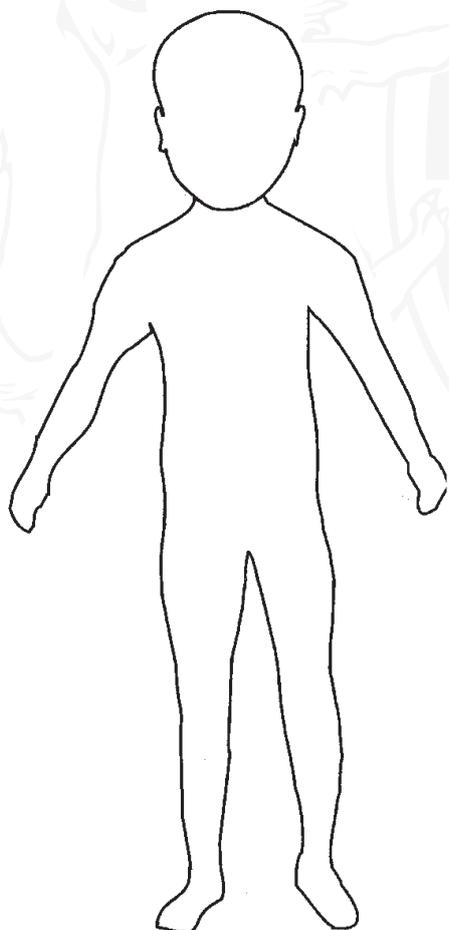
BACK



RIGHT



LEFT





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### 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.





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## APPENDIX 7: 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 the British School of Bucharest:

Nationality:

Ethnicity:

Religion (if known):

Preferred language of child 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 educational need?

Yes  No Please specify if yes:

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

Yes  No Please specify if yes:

Details of any siblings:

Include names and DOBs. Also include any pertinent information, such as if they live at a different address, disability or special educational need, etc.

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 made.

**DETAILS OF THOSE WITH PARENTAL RESPONSIBILITY FOR CHILD**

Full Name	Relationship to Child	Telephone numbers & Email Addresses	Level of spoken English (None, Limited, Reasonable, Fluent)	Nationality	Ethnicity	Religion (if known)
	Father					
	Mother					

Do those with parental responsibility have any disability or special need?  
 Yes  No Please specify if yes and explain how this may affect the pupil?

Address of where child resides:

Any other relevant addresses:



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## APPENDIX 8: THE BSB CHILD PROTECTION REGISTER

The BSB Child Protection Register is kept on a password protected spreadsheet, on two USB memory sticks (in case one is corrupted), which are locked in the same filing cabinet as the actual Child Protection Files. The register references all safeguarding referrals that have been submitted since 11th February 2009.

Below is a mock-example of what the BSB Child Protection Register looks like:

### BSB SAFEGUARDING & CHILD PROTECTION REGISTER

STATUS	FIRST NAME	SURNAME	DOB	CURRENT CLASS	DATE CP FILE OPENED	DATE OF MOST RECENT CONCERN	HAVE ANY CONCERNS EVER BEEN SERIOUS & URGENT?
A	DAVID	JONES	09/01/2003	10S	15/12/2017	15/12/2017	YES
B	SALLY	BROWN	26/08/2010	3W	05/12/2017	05/12/2017	NO
B	KATE	SMITH	30/01/2009	4T	09/05/2017	12/06/2017	NO
C	JONNY	THOMAS	20/05/2005	8A	05/12/2016	05/12/2016	NO
B	RACHEL	WOOD	17/03/2004	9V	06/09/2016	27/11/2016	YES
C	HAROLD	DEAN	14/05/2013	RI	19/08/2014	19/08/2014	NO
D	MARY	COOK	01/05/2002		09/11/2010	23/01/2011	NO

Note: the names and details above are made up.

KEY	
A	SERIOUS & URGENT CONCERN
B	ONGOING LOW TO MODERATE CONCERN
C	NO APPARENT FURTHER CONCERN
D	STUDENT HAS LEFT BSB



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## APPENDIX 9: SUPPORTING EXTERNAL AGENCIES

There may be occasions whereby the school is required to refer a safeguarding matter to an external agency for advice and support. Depending upon the particular case and the nationality of the students involved, the DSL, the Principle and/or the School Proprietor will determine which agency should be contacted. These external agencies include:

### ILFOV CHILD PROTECTION

Direcția Generală de Asistența Socială și Protecția Copilului - Ilfov (D.G.A.S.P.C)

Oraș Voluntari, Bulevardul Voluntari, nr.94-96, Județul Ilfov

Director Executiv - Bogdan Iulian PINTEA

Director Executiv Adjunct - Gabriela ZAMFIR

<http://protectiacopilului.ro>

[dgaspcf@gmail.com](mailto:dgaspcf@gmail.com)

Tel: 021.369.58.89

Tel: 021.369.58.90

Fax: 021.369.58.88

### BRITISH EMBASSY BUCHAREST

David Sutcliffe

NCA Liaison Officer

24, Jules Michelet St.

Sector 1, 010463

Bucharest

[www.gov.uk/world/romania](http://www.gov.uk/world/romania)

[David.Sutcliffe@nca.gov.uk](mailto:David.Sutcliffe@nca.gov.uk)

*The British Embassy is committed to supporting the school with safeguarding matters and where it is unable to support directly, will ensure that the relevant local, national or international agencies are contacted.*

### EMBASSY OF THE UNITED STATES OF AMERICA

Diplomatic Security Service

U.S. Embassy Bucharest

4-6 Dr. Liviu Librescu Blvd

Sector 1, 015118

Bucharest, Romania

Office Tel: 021.200.3366

Regional Security Officer: Patrick J. Keegan

Assistant RSO: Ciara Farquar

Assistant RSO: Shaun Westenberg

Assistant RSO Investigator: Giovanna Cavalier

*The American Embassy is to be contacted when a U.S. citizen is involved with a safeguarding matter.*

### SAFEGUARDING PLUS (UK)

Safeguarding Plus Ltd, 80 High Street, Sidcup, DA14 6DS

Tel: +44 020 3829 4989

Fax: +44 020 8302 8524

[info@safeguardingplus.co.uk](mailto:info@safeguardingplus.co.uk)

Safeguarding Plus has close links with several UK agencies and safeguarding experts. This organisation can be contacted in the same way a UK school may contact their Local Authority Designated Officer (LADO).



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## APPENDIX 10 ESSENTIAL CONTACTS

NAME AND ROLE	ADDRESS, TELEPHONE AND/OR EMAIL ADDRESS
Designated Safeguarding Lead (DSL)	Dan Batson 0731 877 196 <a href="mailto:dan.batson@britishschool.ro">dan.batson@britishschool.ro</a>
Headmaster	Philip Walters 0736 901 771 <a href="mailto:Philip.walters@britishschool.ro">Philip.walters@britishschool.ro</a>
President of Crawford House	Corina Corda +40 21 267 89 19 <a href="mailto:corina.corda@britishschool.ro">corina.corda@britishschool.ro</a>
Deputy Designated Child Protection Officer	Philip Walters 0736 901 771 <a href="mailto:Philip.walters@britishschool.ro">Philip.walters@britishschool.ro</a>
Designated Child Protection Officer	Jason Porter 0728 133 436 <a href="mailto:jason.porter@britishschool.ro">jason.porter@britishschool.ro</a>
Designated Child Protection Officer	Victoria Smith 0735 302 999 <a href="mailto:Victoria.Smith@britishschool.ro">Victoria.Smith@britishschool.ro</a>
Police	112
Child Protection Voluntari	021 270 4789 021 270 4790
ChildLineUK	0800 111 <a href="https://www.childline.org.uk/">https://www.childline.org.uk/</a>
NSPCC	<a href="https://www.nspcc.org.uk/">https://www.nspcc.org.uk/</a>
Disclosure and Barring Service (DBS) PO Box 181, Darlington, DL1 9FA, UK	+44 (0)1325 953 795
ACRO (ACPO Criminal Records Office) for ICPC (International Child Protection Certificates) PO Box 481, Fareham, Hampshire PO14 9FS, United Kingdom	+44 (0)2380 479 920 <a href="mailto:customer.services@acro.pnn.police.uk">customer.services@acro.pnn.police.uk</a>