Group Child Protection and Safeguarding Policy

Approved by: Raúl Fernández Pascual, Principal, Colegio CEDES	**Date:** 27 July 2026
Next review due by: Annual or Following Critical Incident	

1. Introduction and Purpose

This Group Child Protection and Safeguarding Policy ('Policy') establishes the framework, standards and mandatory requirements that apply across all schools and services operated by the Group ('Group Schools'). The Group is committed to the highest standar ds of child protection and safeguarding in every jurisdiction in which it operates.

Every child has the right to learn, grow and thrive in a safe, nurturing environment free from abuse, neglect, exploitation and harm. This is not merely a legal obligation, it is a fundamental ethical commitment that underpins the Group's mission and values.

This Policy should be read in conjunction with the appendices and the suite of ancillary policies listed in Appendix L. It has been compiled from a wide range of regional, international and best practice guidance, including UK statutory guidance (Keeping Children Safe in Education, Working Together to Safeguard Children) and other applicable national frameworks.

This Policy applies whether or not a specific local jurisdiction mandates a particular requirement. Where local law exceeds this Policy, local law shall govern. Where this Policy exceeds local legal requirements, this Policy shall govern.

Our Safeguarding Commitment
The safety and welfare of every child in our schools is the Group's highest priority.
No business, reputational, or operational consideration will ever override a child
protection concern.
We operate a zero-tolerance approach to abuse, exploitation and the failure to act on
concerns.

2. Scope of This Policy

This Policy applies to:

- All Group Schools, whether wholly owned, majority-owned, managed, or operated under licence
- All permanent, temporary, supply, contract and volunteer staff
- All third-party contractors, vendors and service providers who work on school premises or with students
- All board members, trustees, governors and advisory body members at group, regional and school level
- All students enrolled at Group Schools (from Early Years through Grade 12 / Year 13)
- All school visits, trips, residential experiences and online learning environments
- All extended school activities, after-school clubs, and services provided on school premises by external organisations

3. Policy Principles

The following principles underpin this Policy and all safeguarding practice across the Group:

- The child's welfare is paramount. In all decisions and actions, the best interests and safety of the child take precedence.

- Safeguarding is everyone's responsibility. Every adult working with children in Group Schools has an active duty to recognise, report and respond to concerns.
- Early intervention matters. Proactive identification of vulnerability and early help reduces harm and long-term impact.
- Children must be listened to. Children's voices are central to safeguarding. All staff must listen to and take seriously children who disclose concerns.
- No culture of silence. Staff are protected and supported when raising legitimate concerns in good faith.
- Safeguarding transcends jurisdiction. Group standards apply globally; local law defines the minimum floor, not the ceiling.
- Diversity and inclusion are integral to safeguarding. Cultural norms, language barriers, disability and social factors must never inhibit the reporting or investigation of safeguarding concerns.
- An attitude of 'it could happen here' must be maintained at all times. Any child in any family in any school could become a victim of abuse.
- Professional curiosity is expected. Staff should always be alert to signs of concern and should not wait for certainty before reporting.

4. Definitions

Term	Definition
Child / Minor	Any person under the age of 18, or under the applicable age of majority in the relevant jurisdiction, whichever provides greater protection.
Safeguarding	The action taken to promote the welfare of children and protect them from harm, including all measures to prevent abuse, neglect, exploitation and any threat to a child's health, development, or safety.
Child Protection	The processes and procedures to protect children who are suffering, or at risk of suffering, significant harm.
Abuse	Physical abuse, emotional/psychological abuse, sexual abuse, neglect, exploitation, domestic abuse, and any other act or omission that causes significant harm.
DSL	Designated Safeguarding Lead – the appropriately trained senior staff member at each school designated to lead on safeguarding matters.
DDSL	Deputy Designated Safeguarding Lead – trained to the same standard as the DSL and able to act in the DSL's absence.
Global Designated Safeguarding Lead (Global DSL)	The Group-level executive responsible for safeguarding standards, cross-border coordination, statutory referrals, governance and compliance across all Group Schools.
Regional Head of Schools (RHoS)	The regional leader responsible for ensuring safeguarding standards are met across their cluster of schools.
Director of Education	Oversee the Regional Heads of School to ensure a robust and meaningful safeguarding policy, process and practice is in place, fit for purpose, and sufficiently implemented and adhered to across all schools.
CPOMS	Child Protection Online Monitoring System, used to track safeguarding incidents
Early Help	Support provided as soon as a problem emerges at any stage in a child's life, to prevent escalation to a child protection referral.

Term	Definition
Regulated Activity	Work involving direct or unsupervised contact with children on a frequent, intensive, or overnight basis.
Position of Trust	Any role where the professional is in a position of authority or status over a child or vulnerable person.
YPSI	Youth Produced Sexual Imagery – the consensual or non-consensual sharing of nude or semi-nude images by children.
FGM	Female Genital Mutilation – any procedure that intentionally alters or causes injury to the female genital organs for non-medical reasons.
Honour-Based Abuse (HBA)	A collection of practices used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour.

5. Governance and Accountability Structure

The Group operates a three-tier governance model for safeguarding: Group level, Regional level and School/Local level. This ensures strategic oversight, operational consistency, and local responsiveness.

5.1 Group Level

The Group Board holds ultimate accountability for safeguarding across all Group Schools. The Group Board shall:

- Appoint a Global DSL for Safeguarding and Child Protection
- Have a designated Safeguarding Board member (trained to Level 3).
- Ensure safeguarding performance is a standing agenda item at every Board meeting
- Ensure the Board complies with strategic responsibilities and oversight for safeguarding
- Review and approve this Policy annually and following any significant incident
- Ensure adequate resources and training are allocated to safeguarding across the Group
- Ensure annual training is provided to all Board members
- Receive and review an annual Group Safeguarding Report
- Maintain separation between operational safeguarding (DSLs) and Board strategic safeguarding oversight

5.1 Global DSL for Safeguarding and Child Protection

The Global DSL for Safeguarding is responsible for the development and strengthening of all safeguarding activities across the Group. This includes:

- Setting, maintaining and communicating safeguarding standards Group-wide
- Writing and leading the overall development, implementation, and monitoring of the organisational safeguarding strategy, policy, and practice
- Overseeing the network of DSLs across all schools
- Leading on cross-jurisdictional safeguarding incidents, escalations, and serious case reviews
- Providing real-time advice and guidance to regional and school safeguarding teams on casework
- Maintaining a Group-level register of safeguarding concerns and outcomes
- Ensuring regulatory compliance across all jurisdictions
- Providing termly reports to the Group Board
- Providing annual training to the Group Board
- Ensuring RHoS are appropriately trained
- Ensuring Head Office maintain compliant Single Central Record for the Board
- Coordinating with external regulators, government bodies, and inspection authorities

5.2 Regional Level

The Director of Education, oversees and monitors the Regional Heads of School to ensure a robust and meaningful safeguarding policy, process and practice is in place, fit for purpose, and sufficiently implemented and adhered to across all schools. The Director of Education (DoE) and Regional Heads of Schools (RHoS) are responsible for:

- Ensuring all aspects of the Group Safeguarding Policy are delivered effectively across their region
- Providing oversight, monitoring, and intervention across regional schools
- Ensure monthly meetings with DSLs
- Conducting regular QA visits with a safeguarding focus ensuring all reports and records including the SCR are compliant with best practice and local jurisdictional regulations
- Ensure appropriate training is provided to Principals and senior leadership teams
- Acting as escalation point for Principals and DSLs
- Acting as case manager in the event of allegations against a Principal or DSL (see Section 9)
- Ensuring schools maintain compliant Single Central Records
- Reporting to the Global DSL for Safeguarding on regional safeguarding performance

5.3 School / Local Level

5.2 School Board / Local Advisory Board (LAB)

Each school's governing body is responsible for monitoring and advising the school on safeguarding governance. This includes appointing a named safeguarding governor/RHoS who contributes to strategic discussions and ensures the school's safeguarding framew ork is appropriate and compliant.

5.3 Principal / Head of School

The Principal holds overall responsibility for fostering a culture of safeguarding at the school, incorporating all elements of the Policy and robust safeguarding practices. The Principal shall:

- Appoint a suitably trained DSL who is a member of the Senior Leadership Team
- Appoint at least one Deputy DSL to provide cover at all times
- Ensure that clear procedures are in place for managing allegations against staff, with the DSL, Senior member of staff or Principal acting as the responsible person (see Section 9)
- Ensure all staff receive mandatory safeguarding training before commencing work
- Ensure safeguarding is a standing agenda item in SLT, LAB, and pastoral meetings
- Provide regular (monthly) reports to the RHoS
- Report all serious safeguarding incidents to the RHoS, Director of Education and Global DSL within the timeframes detailed in the Group Safeguarding Tier Matrix
- Ensure safeguarding patterns and trends are monitored through data analysis

5.4 Designated Safeguarding Lead (DSL)

The DSL is a senior member of staff who takes lead responsibility for safeguarding and child protection in the school, including online safety and understanding the filtering and monitoring systems in place. The DSL shall:

- Receive and assess all safeguarding concerns raised within the school
- Maintain accurate, confidential, and chronological records of all concerns on the designated safeguarding platform
- Make referrals to statutory children's services or law enforcement where required, seeking advice from the Global DSL / RHoS prior to external referral
- Attends a monthly meeting with the RHoS and provides a report from the meeting
- Liaise with external agencies including social services, police, and health services
- Ensure all staff, LAB members, and volunteers are trained in line with expected standards
- Act as a source of support and expertise to the school community
- Encourage a culture of listening to children and taking account of their wishes and feelings

- Ensure pupils understand how to report their concerns by facilitating age-appropriate and child friendly literature and information, such as leaflets, posters and contact details for pastoral staff and/or independent listeners.
- Complete advanced DSL training (Level 3) and refresher training every two years
- Attend mandatory Group DSL forums and practice updates
- Be alert to the specific needs of vulnerable children, including those with SEND and EAL

5.5 All Staff

Every member of staff – regardless of role – has a duty to:

- Be vigilant for signs of abuse, neglect, or exploitation
- Report any concern, however minor it may seem, to the DSL without delay
- Record concerns on the designated safeguarding platform promptly
- Maintain appropriate professional boundaries at all times
- Never investigate a concern themselves or promise confidentiality to a child
- Complete all mandatory safeguarding training
- Never leave the school site with an undisclosed concern

6. Safer Recruitment

The Group operates a rigorous, multi-layered safer recruitment process. All employees and volunteers providing care, supervisory, and educational support to children are in a ‘position of trust’ and the appointment of any adult who will work with children must involve safeguarding considerations at every stage. See Appendix A: Safer Recruitment Policy for full detail.

6.1 Pre-Employment Checks

The following checks are mandatory for all appointments (subject to local legal availability):

- Enhanced criminal background check / police clearance certificate (national and international)
- Verification of identity using original documents
- Verification of all academic and professional qualifications
- Minimum of two professional references, including safeguarding-specific questions
- Prohibition and barred list checks as applicable per jurisdiction
- Right to work verification in the relevant jurisdiction
- Online presence and social media checks
- Self-declaration of relevant convictions, cautions, and investigations
- Employment history scrutiny, with satisfactory explanation for any gaps

6.2 Single Central Record (SCR)

All schools must maintain a Single Central Record documenting the completion of all pre- employment checks for every member of staff, governors/ Board members and volunteers. It proves compliance with safer recruitment, covering identity, right to work, enhanced police checks and barred list checks. It must be securely, regularly updated, and accessible for inspections. The SCR is subject to regular audit by the DSL, RHoS, DoE and Global DSLsafeguarding function.

6.3 Ongoing Monitoring

Staff are subject to ongoing checks through government entities in the school’s locality. All staff must self-declare any new conviction, caution, or investigation immediately. Repeat background checks are conducted at intervals determined by local regulation and when required by the DoE, Global DSL and School Board.

7. Recognising Abuse and Indicators of Concern

All staff must be able to recognise the signs that a child may be experiencing abuse or neglect. Knowing what to look for is vital to early identification. Full definitions and indicators are provided in Appendix I: Indicators of Abuse Quick Reference.

7.1 Categories of Abuse

The following categories are recognised by this Policy, consistent with international frameworks:

- **Physical Abuse**– inflicting physical harm, including hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or fabricated/induced illness.
- **Non-Accidental Injuries (NAI)**– injuries where the explanation given is inconsistent with the injury, or where there is a pattern of unexplained injuries. Staff should be alert to bruising in non-mobile babies, injuries on soft tissue areas, and bilateral injuries.
- **Emotional / Psychological Abuse**– persistent emotional maltreatment including conveying to a child they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person.
- **Sexual Abuse**– forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening, including online.
- **Neglect**– persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of health or development.
- **Domestic Abuse**– children who see, hear, or experience the effects of domestic abuse in the home.
- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**– see Appendix M for detailed guidance.
- **Child-on-Child Abuse**– including bullying, sexual violence, sexual harassment, and YPSI. See Appendix N for detailed guidance.
- **Online Abuse**– grooming, cyberbullying, non-consensual image sharing, sextortion.
- **Female Genital Mutilation (FGM)**– see Appendix M for detailed guidance.
- **Honour-Based Abuse (HBA) and Forced Marriage**– see Appendix M for detailed guidance.
- **Upskirting**– a criminal offence in many jurisdictions involving taking a photograph under a person's clothing without consent. See Appendix M.
- **Radicalisation and Extremism**– see Appendix M for detailed guidance.
- **Trafficking and Modern Slavery**

Remember: A Concern Does Not Require Certainty
Staff are not required to investigate or prove abuse before reporting. If you are
concerned, report it to the DSL.
It is always better to raise a concern that turns out to be unfounded than to fail to report
genuine abuse.
A pattern of small, seemingly minor concerns can together indicate significant risk.

8. Reporting and Responding to Concerns

8.1 Immediate Danger

If a child is suffering or likely to suffer harm, or is in immediate danger, make a referral to statutory child protection services and/or the police immediately. Anyone can make a direct referral. Inform the DSL as soon as possible afterwards.

8.2 Receiving a Disclosure

When a child discloses abuse or harm, the receiving staff member must:

- Listen calmly, openly, and without expressing shock or disbelief

- Demonstrate willingness to listen; allow the child to speak freely
- Use open, non-leading questions only
- Not promise to keep secrets or guarantee confidentiality
- Tell the child what will happen next – that you will need to tell someone who can help
- Record everything said by the child using their exact words as soon as possible
- Not automatically offer physical touch as comfort
- Not reprimand the child for not disclosing earlier
- Report to the DSL immediately, without delay
- Record the concern on the designated safeguarding platform on the same day

8.3 DSL Assessment and Referral

The DSL will assess the concern and determine the appropriate response, which may include:

- Early Help: referral to appropriate early help services (if they exist in your jurisdiction) where there is vulnerability but no immediate risk
- Internal monitoring and pastoral support
- Referral to statutory child protection services (after consultation with Global DSL / RHoS unless child is in immediate danger)
- Referral to law enforcement where a crime may have been committed
- Immediate action to ensure the safety of the child

8.4 Escalation and Reporting Lines

The reporting and escalation pathway is: DSL → Principal → RHoS / Director of Education → Group (Global DSL) Lead for Safeguarding → CEO / Board. No delays shall occur due to hierarchy or availability. If a staff member believes the DSL or Principal has failed to act appropriately, they have both the right and the obligation to escalate directly to the RHoS, Director of Education or Group (Global DSL) Lead. There is an internal Safeguarding Tier matrix that defines who needs informing for each of the four tiers.

8.5 Non-Retaliation

Any member of staff who reports a safeguarding concern in good faith is protected from retaliation, adverse employment action, or professional penalty. The Group treats suppression of safeguarding concerns as gross misconduct.

9. Allegations Against Staff and Adults

All allegations or concerns about the conduct of staff, volunteers, or contractors towards children must be taken seriously and dealt with promptly, fairly, and consistently. An allegation arises when there is reason to believe a member of staff has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (transferable risk)

Low-level concerns

The term ‘low - level’ concern does not mean that it is insignificant. A low -level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the external/ regulatory agencies.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one -to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from becoming the subject of potential false low-level concerns or misunderstandings.

All staff should be made aware of the procedures for reporting allegations about adults and how to escalate concerns. See Appendix E: Allegations Management Protocol for full procedures.

9.1 Reporting Process

The following reporting process applies:

- Any allegation against a member of staff must be reported immediately to the DSL or Principal. This applies equally to historical allegations against current or past staff.
- If the allegation concerns the DSL, it must be reported directly to the Principal
- If the allegation concerns the Principal, it must be reported directly to the Regional Head of Schools (RHoS), Director of Education or the Global DSL for Safeguarding
- If the allegation concerns the RHoS, it must be reported directly to the Global DSL for Safeguarding
- The Principal (or RHoS/Global DSL as appropriate) must notify the next level in the escalation chain within the time limits set out in the Group Safeguarding Tier Matrix
- The staff member must not be informed of the allegation until appropriate guidance is received, unless there is immediate risk to a child
- Where there is an immediate risk, precautionary suspension may be applied as a neutral act pending investigation
- If unable to raise internally at any level, staff should contact the Global DSL for Safeguarding directly, or external regulatory bodies
- All complaints or concerns regarding a senior Group employee, Governor/ Board member should be made in writing to the Chair of Governors/ Board/. If the complaint concerns the Chair, it should be referred to the Vice-Chair. The Chair/ Vice Chair would seek the advice of the Global DSL for Safeguarding.

9.2 Low-Level Concerns

The Group requires schools to have procedures to manage any safeguarding concerns about staff that do not meet the harm threshold (low-level concerns). These should be recorded, assessed and monitored to identify patterns of behaviour. It is the responsibility of the Principal to maintain a formal record of low-level concerns and to notify the RHoS. Low- level concerns that form a pattern or escalate in seriousness must be treated as allegations and managed accordingly.

10. Whistleblowing

Whistleblowing is any disclosure of information made in the company and/or public interest relating to suspected wrongdoing or dangers at work. The Group expects all staff to feel able to voice concerns without fear of detriment. See Appendix F: Whistleblowing Policy for full procedures.

Concerns should normally be raised with the DSL. If the concern is about the DSL, raise it with the Principal. If about the Principal, raise it with the RHoS. Where staff feel unable to raise concerns internally, they may contact external reporting bodies as detailed in the Whistleblowing Policy.

11. Online Safety and Digital Conduct

All schools must have an Online Safety Policy addressing the full range of online risks. Online safety is a core safeguarding policy within a whole school approach and should be embedded within the curriculum and reinforced through teaching and pastoral provision. See Appendix C: Online Safety and Acceptable Use Policy. The policy must address four key categories of online risk, and be transparent, inclusive, and responsive to evolving digital and AI related risks:

- **Content**– exposure to illegal or harmful material including pornography, extremism, self-harm, misinformation, and AI-generated harmful content
- **Contact**– harmful interactions including peer pressure, grooming, and targeted advertising
- **Conduct**– harmful online behaviours including YPSI, cyberbullying, and sharing explicit content
- **Commerce**– online gambling, phishing, financial scams, and inappropriate advertising

11.1 Filtering and Monitoring

All schools must have appropriate filtering and monitoring systems for all school devices and networks. These systems must be reviewed annually. Leadership teams and staff must understand their expectations, roles, and responsibilities around filtering and monitoring. Governance (Group level, Regional level and School/Local level) hold the responsibility for ensuring appropriate filtering and monitoring systems are in place to protect children.

11.2 Staff Digital Conduct

Online communication between staff and children should only occur for purposes of coordinating education, through approved platforms. All users must accept an Acceptable Use Policy before accessing systems. All communications should be available on request to SLT. Staff must never communicate with students via personal social media or take images of students on personal devices.

11.3 Youth Produced Sexual Imagery (YPSI)

Initial response:

- All incidents of YPSI are safeguarding concerns and must be reported to the DSL; staff should not investigate or attempt to resolve it by themselves.
- If at any point a child is harmed or at immediate risk, refer to police and/or children's social care immediately.
- Staff must not view, copy, print, or share any imagery. Staff must not make their own judgements about severity, and record concerns factually.

Initial review:

- The DSL will conduct a review with relevant staff to establish: whether any child is at immediate risk; whether the case meets a referral threshold; how widely the imagery has been shared, and on what platforms; what containment, removal, or deletion steps are needed; and whether and when to inform parents/ carers

Referral threshold:

- Refer to police and/or children's social care if any of the following apply :
  - An adult is involved in any way (including an adult posing as a child to groom, exploit, or extort).
  - A child has been, or may have been, coerced, blackmailed, or groomed, or there are concerns about their capacity to consent.
  - The imagery depicts sexual acts that are unusual for the child's developmental stage, or are violent.
  - The imagery involves sexual acts and any child in it is under 13.
  - A child is at immediate risk of harm because of the sharing (for example, presenting as suicidal or self-harming).

Viewing protocol:

- The default is not to view the imagery; base decisions on what the DSL has been told. Viewing may occur only where it is the sole way to decide on agency involvement, is necessary to report the image for removal, or is unavoidable because the image was presented directly to staff or found on a setting device or network. Never view

if doing so would cause significant distress to a child. Where viewing is necessary: onever copy, print, share, store, or save the imagery (doing so is illegal; if it has already happened, contact police); othe DSL or a delegated safeguarding-team member views it, with a second staff member present, and with the headteacher's authority; oview on the setting's premises wherever possible, and ideally by a staff member of the same sex as the child; and orecord how and why the decision to view was made, who was present, and any resulting actions — signed and dated.

Deletion:

- Where no agency involvement is needed, the imagery should be removed to prevent further sharing. Children are normally asked to delete it across all devices and accounts by a set deadline and reminded that possession is illegal and that failure to delete continues an offence. Any search-and- delete decision rests on the DSL's professional judgement and the setting's child -protection policy.

Record:

- Record every incident — both those referred to external agencies and those handled internally.
- Where an incident is not referred to police or social care, record the reason and have it signed off by the headteacher or setting manager.
- Log all decisions with dates, times, and reasons; never retain copies of the imagery.
- Keep records in line with statutory requirements and local safeguarding procedures.

Support:

- Provide tailored support to every child involved, regardless of role, and reassure them they were right to speak up. Help children use recognised takedown tools to remove imagery shared online. Inform and involve parents or carers at an early stage unless doing so would put a child at risk of harm; where it would, make that decision together with police and/or children's social care.

12. Children Who May Be Particularly Vulnerable

All schools must recognise that some children require additional safeguarding support. Children may be vulnerable due to a wide range of factors including but not limited to:

- Special educational needs and/or disabilities (SEND) or health conditions – who are three times more likely to be abused than their peers
- Communication difficulties or language barriers
- Adversity and trauma
- Looked-after and previously looked-after children
- Children with a social worker
- Young carers
- Children living in difficult circumstances such as domestic violence or substance abuse
- Children at risk due to their own or a family member's mental health needs

Staff must not assume that indicators of possible abuse relate to a child's condition without further exploration. Any abuse involving students with SEND requires close liaison between the DSL and the SENDCO.

13. Mental Health, Wellbeing, and Care Protocols

Mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff must be alert to behavioural signs that suggest a child may be experiencing a mental health problem.

13.1 Suicide Ideation / Suicide Attempt

When dealing with disclosures of suicide ideation or attempt, schools must follow the Group Care Protocol (see Appendix H), including the implementation of a risk assessment and risk management plan created in conjunction with the child (where appropriate) , the child's parents, and key school staff. In the event of a disclosure, staff must ensure the student is supervised and safe while the DSL is informed immediately.

13.2 Contextual Safeguarding

Schools must be alert to the wider context of children's lives – including communities, peer groups, online environments, and family circumstances – and recognise that harm can occur outside the school.

14. Attendance and Children Missing from Education

Regular attendance is important to the wellbeing and safety of all children. Every school must have an Attendance Policy reviewed regularly. Prolonged or repeated absence can be a vital warning sign to a range of safeguarding issues.

Where a child has**[number to be determined locally]**consecutive school days of unexplained absence and all reasonable steps have been taken to establish their whereabouts without success, the school will record the concern on the safeguarding platform and follow the requirements of local regulators for reporting non-attendance. (This will be determined by local regulations or taken to be 10 consecutive school days, whichever is shortest).

15. Bullying and Child-On-Child Abuse

Every school must have an Anti-Bullying Policy (see Appendix D). Abuse will never be tolerated or passed off as 'banter' or 'part of growing up.' Children should be involved in the creation, implementation, and review of the Anti-Bullying Policy.

Child-on-child abuse may include bullying, abuse in personal relationships, physical abuse, sexual violence and harassment, YPSI, upskirting, and initiation/hazing-type violence. Schools must take proactive action to minimise the risk of child-on-child abuse and create a supportive environment where victims feel confident in reporting incidents.

For detailed guidance on preventing and responding to child-on-child abuse, see Appendix N: Child-on-Child Abuse Policy.

16. Intimate Care

When providing intimate care, schools must follow the Group Intimate Care Policy (see Appendix G) including the provision of a risk assessment and risk reduction plan created in conjunction with the child's parents and key school staff.

17. Extended School Activities and Off-Site Visits

All extended and off-site activities are subject to a risk assessment that must include a safeguarding component. The Principal is responsible for ensuring effective safeguarding arrangements for all trips, including residential visits. Staff-to-student ratios must meet or exceed local regulatory requirements and the School's Board own requirements . The Group Safeguarding Policy and school-specific procedures apply to all trips. There is a Group Trips policy that provides further guidance.

18. Site Security

Visitors to school, including contractors, must be appropriately supervised. They are required to sign in and be given an identity badge confirming permission to be on site. All visitors including contractors must follow the school's safeguarding and health and safety regulations, including wearing the relevant school lanyard. Where possible, contractors will be engaged outside regular school hours.

19. Confidentiality and Information Sharing

Information will be shared on a 'need to know' basis. Timely information sharing is essential to effective safeguarding. Fears about sharing information must not stand in the way of protecting children. Staff should never promise a child that they will not tell anyone about a report of abuse.

When a child transfers to another Group school, safeguarding records will be transferred to the new school DSL subject to local regulations and data protection requirements. When transferring to a school outside the Group, the DSL should contact the receiving DSL to share appropriate information in the best interests of the child. When transferring outside the Group and/or country the DSL should refer to the RHoS to check for any specific jurisdiction regulations or requirements.

20. Record Keeping

All safeguarding concerns, discussions, decisions, and actions must be recorded in writing on the designated safeguarding case management platform (CPOMS). Records must include a clear and comprehensive summary of the concern, details of follow-up and resolution, actions taken, decisions reached, and outcomes. All records must be factual, dated, timed, and signed.

Written records of disclosures should use the child's exact words wherever possible. All records may be required as part of subsequent investigations or court proceedings. School staff must not photograph children to document injuries – staff may document injuries in writing or use a body map but must not take photographs.

Only authorised personnel (Global DSL, RHoS, Director of Education, Principals, DSLs) shall have access to safeguarding files. Records must be retained for a minimum of 25 years (or in compliance with local jurisdiction requirements) from the child's date of birth, or in accordance with applicable local law if longer.

21. Training and Competency

Effective safeguarding depends on a well-trained, knowledgeable, and confident workforce. All training requirements are mandatory. All training should involve an element of assessment and a completion log and safeguarding training records must be held by all schools.

Audience	Training Requirement	Frequency
All Staff	Level 1 Safeguarding Awareness – recognising and reporting concerns, online safety	Induction (before first working day) + Annual
All Staff	Online basic awareness module	Annual
Key Pastoral Staff	Level 2 + Enhanced Understanding of Safeguarding	Every 3 years
DSL, DDSL, Principals, Senior Leadership Team	Level 3 Designated Safeguarding Lead training	Induction + Every 2 years
DSLs	Group DSL Forum attendance	Mandatory – as scheduled
Recruiting Staff	Safer Recruitment training	Before participating in recruitment and renewed every two years
Group Board / Regional Leaders	Executive Safeguarding Governance	Annual
Contractors / Volunteers / LAB Members	Level 1 Safeguarding Essentials	Before commencing work / Annual
Site Users / External Providers	Level 1 training with register signed	Annual + Termly updates

Non-completion of mandatory training within the required timeframe must be escalated to the relevant Principal and may result in restricted duties.

22. Jurisdictional Compliance Framework

The Group operates schools across multiple countries and jurisdictions. This Policy establishes the Group floor standard. Each school is additionally required to comply with all applicable national and local child protection legislation.

22.1 Jurisdiction-Specific Addenda

Each Group School must maintain a Jurisdiction-Specific Safeguarding Addendum documenting applicable national legislation, statutory reporting thresholds and agencies, local inspection frameworks, local background check requirements, cultural and contextual risk factors, and local emergency contact numbers. See Appendix J for the template.

22.2 Highest Standard Applies

Where local law is stricter than this Policy, local law governs. Where this Policy is stricter than local law, this Policy governs. Schools must seek guidance from the Global DSL where there is ambiguity.

23. Quality Assurance, Monitoring, and Continuous Improvement

The following quality assurance activities are required:

- Annual safeguarding audit/checklist at each school using the Group audit framework
- Safeguarding self- evaluation submitted by each school's DSL and Principal annually
- Quarterly Group Safeguarding Dashboard reviewed by the Global DSL
- Annual Group Safeguarding Report to the Board
- Regular QA visits and audits by RHoS, Director of Education and Global DSL for Safeguarding with safeguarding focus
- External validation through inspection and accreditation (BSO, ISI, CIS, MOE, etc.)
- Learning review following any serious incident, referral, or allegation
- Regular sampling of safeguarding records and case management quality
- Monitoring of safeguarding patterns and trends through data analytics
- Peer review visits between schools
- Internal QA Unit and/ or an independent safeguarding audit of schools joining the group as part of our due diligence process, followed by a detailed safeguarding integration plan.

Safeguarding is embedded within school development planning, quality management and assurance standards, and leadership performance management.

24. Policy Review

This Policy will be reviewed annually and following any significant safeguarding incident, change in relevant legislation, or material change to the Group's operational structure. All revisions must be approved by the Group Board. Previous versions must be archived with effective dates recorded.

Appendices

The following appendices form part of this Policy and must be read in conjunction with it. Each ancillary policy/procedure below is provided in draft form and**must**be contextualised by each school to reflect local legislation, practice, and context.It is the responsibility of the Principal to ensure all policies are contextualised. The Regional Head of Schools will hold the Principal to account for the appropriate contextualisation of policies.

Appendix A: Safer Recruitment Policy

Purpose: To ensure that all adults who work with children in Group Schools are suitable to do so and that robust processes prevent unsuitable individuals from gaining access to children.

This is a summary of the scope and remit of the Safer Recruitment Policy. Each school is expected to have its own full, detailed and contextualised Safer Recruitment Policy.

1. Scope

This policy applies to the recruitment of all staff, including teaching and non-teaching staff, supply staff, contractors, and volunteers who will have direct or unsupervised access to children.

2. Recruitment Advertising

All recruitment advertisements must include a statement of the Group's commitment to safeguarding and child protection, and a note that successful candidates will be subject to enhanced background checks.

3. Application Process

- A full employment history must be provided with satisfactory explanations for any gaps
- Self-declaration of any criminal convictions, cautions, or ongoing investigations
- Candidates must provide details of at least two professional referees

4. Shortlisting and Interview

- At least one member of every interview panel must have completed safer recruitment training
- Interview questions must explore the candidate's understanding of safeguarding and child protection
- Any concerns arising from references, gaps in employment, or interview responses must be explored and resolved before appointment

5. Pre-Employment Checks

Before any individual begins work, the following checks must be completed and documented on the Single Central Record:

- Identity verification (original documents)
- Right to work in the relevant jurisdiction
- Enhanced criminal background check / police clearance (national and international)
- Qualification verification
- Professional references (minimum two, including most recent employer)
- Prohibition / barred list checks as applicable
- Online presence check
- Medical fitness declaration

6. Single Central Record

Each school must maintain a Single Central Record documenting the completion of all checks for every member of staff, governor/ board member and volunteer. The SCR is subject to regular internal audit and external inspection. Head Office personnel and Board members will also be included in a Single Central Record with relevant checks, including those for management.

7. Ongoing Suitability

All staff must self-declare any change in circumstances that may affect their suitability to work with children. Repeat checks will be conducted at intervals defined by local regulation and/or School Board policy.

Please refer to individual schools' full policies for further details and localised context.

Appendix B: Staff Code of Conduct

Purpose: To set mandatory professional standards for all staff working with children, providing guidance on safe practice and reducing the risk of allegations.

This is a summary of the scope and remit of the Staff Code of Conduct. Each school is expected to have its own full, detailed and contextualised Staff Code of Conduct.

1. Professional Boundaries

All staff must maintain appropriate professional boundaries with students at all times. Personal relationships with students outside the remit of the school are prohibited. Adults should avoid behaviours which might be misinterpreted by others and should report and document any incident with this potential.

2. Physical Contact

Physical contact with students must be appropriate, proportionate, and have a clear professional purpose. Staff should not automatically offer physical touch as comfort.

3. Communication

All communication with students must occur through official school channels. Personal social media, messaging, and email accounts must never be used to communicate with students.

4. Photography and Images

Staff must not take photographs or recordings of students on personal devices. School photography must follow school policy and parental consent procedures.

5. Confidentiality

Staff must maintain confidentiality regarding safeguarding matters and share information only on a need-to-know basis or as directed by the DSL.

6. Reporting Obligations

All staff must report any concern about a child's welfare, any concern about the behaviour of another adult, and any situation in which they find themselves that could be misinterpreted.

7. Whistleblowing

Staff are protected when raising safeguarding concerns in good faith. See Appendix F for full whistleblowing procedures and schools are expected have their own Whistleblowing policies.

Appendix C: Online Safety and Acceptable Use Policy

Purpose: To protect children from harmful or inappropriate online content and to set expectations for safe digital conduct across the school community.

This is a summary of the scope and remit of the Online Safety and AUP. Each school is expected to have its own full, detailed and contextualised Online Safety and AUP.

1. Filtering and Monitoring

All school devices and networks must have appropriate content filtering and monitoring software. Systems must be reviewed annually and meet applicable national standards.

2. Acceptable Use

All students, staff, and visitors must adhere to the school's Acceptable Use Agreement. Staff and students will sign an agreement regarding acceptable use at the start of each academic year.

3. Four Categories of Online Risk

The school addresses online risks across four categories: Content, Contact, Conduct, and Commerce, as defined in the main Policy.

4. YPSI Procedures

Detailed procedures for handling incidents of youth-produced sexual imagery, including initial review, assessment criteria, referral thresholds, viewing protocols, and recording requirements as set out in the main Policy Section 11.3.

5. Artificial Intelligence

Principles

- The welfare of the child is paramount; AI must never compromise safeguarding.
- All AI use must be ethical, transparent and subject to human oversight.
- AI must comply with data protection, legal and regulatory requirements.
- No critical decisions (e.g., safeguarding, grading, admissions) are made solely by AI.
- AI is treated within the wider safeguarding framework, including online risk categories (content, contact, conduct, commerce).
- Schools adopt a precautionary, risk based approach to emerging AI technologies and misuse.

Practice Standards

- Only approved AI tools may be used, subject to risk assessment and governance approval.
- Robust filtering and monitoring must prevent access to harmful or inappropriate AI generated content
- Human oversight is mandatory for all AI supported activity.
- AI generated content must be checked for accuracy, bias and appropriateness and labelled where used.
- Age appropriate use, staff training and clear student guidance must be in place.
- All AI use, incidents and concerns must be logged, reported and escalated in line with safeguarding procedures.

6. Mobile and Smart Technology

Clear expectations and boundaries around mobile and smart technology use must be set for staff, students, and visitors.

7. Education and Curriculum

Online safety must be embedded in the curriculum, including the safe use of social media, keeping personal information private, recognising unacceptable behaviour online, and reporting cyber-bullying.

Appendix D: Anti-Bullying Policy

Purpose: To prevent and respond to bullying in all forms, creating a safe and inclusive school environment.

This is a summary of the scope and remit of the Anti-Bullying Policy. Each school is expected to have its own full, detailed and contextualised Anti-Bullying Policy.

1. Definition

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. It includes cyberbullying, prejudice-based bullying, and discriminatory bullying.

2. Responsibilities

- The school will communicate the Anti-Bullying Policy to the whole community
- Disciplinary measures will be applied fairly, consistently, and reasonably
- Students will be involved in the creation, implementation, and review of the policy
- Parents/carers will be encouraged to work in partnership with the school

3. Prevention

Proactive prevention through curriculum, assemblies, PSHE, and a culture of respect and inclusion.

4. Response

All incidents will be taken seriously, investigated, and recorded. Support will be provided to both victim and perpetrator. Serious incidents may be treated as safeguarding concerns.

Appendix E: Allegations Management Protocol

Purpose: To provide step-by-step guidance for managing allegations against staff, volunteers, and contractors. The DSL or Principal acts as the responsible person for managing allegations at school level, with escalation to the RHoS or Global DSL for Safeguarding as appropriate.

This is a summary of the scope and remit of Allegations Management. Each school is expected to have its own full, detailed and contextualised protocols for dealing with allegations – these may be included in the safeguarding policies, other policies, or as a standalone policy.

1. Immediate Actions

- Ensure the child is safe
- Report to the DSL or Principal (or to the RHoS / Global DSL if the allegation concerns the DSL or Principal)
- Do not inform the person against whom the allegation is made until directed
- Record all information factually and securely

2. Assessment and Referral

The DSL or Principal, in consultation with the RHoS and Global DSL, will determine whether the allegation meets the threshold for referral to statutory authorities. Where a criminal offence may have been committed, police must be contacted. Where a child is in immediate danger, action and reporting to external agencies must happen prior to any internal consultation.

3. Internal Investigation

Internal investigation must not commence until statutory processes are complete or permission is granted by the investigating authority. In situations where schools will investigate allegations, HR will be included directly and/ or in an advisory/ support role. At all times, HR would closely liaise with the Principal, Designated Safeguarding Lead and the Regional Head/ Global DSL

4. Precautionary Suspension

Where there is an immediate risk to children, the individual may be suspended pending investigation. This is a neutral act and does not imply guilt.

5. Outcome and Follow-Up

Following investigation, where a person is found to have caused harm or is deemed unsuitable to work with children, the Global DSL must notify the relevant regulatory or barring authority. All allegations must be recorded even if unfounded.

6. Escalation Matrix

Allegation Against	Report To	Case Manager
Any staff member	DSL or Principal	Senior member of staff appointed by the Principal
DSL	Principal	Principal
Principal	RHoS or Global DSL	RHoS
RHoS	Global DSL	Global DSL

Appendix F: Whistleblowing Policy

Purpose: To enable staff to raise concerns about safeguarding practice, wrongdoing, or dangers without fear of reprisal.

This is a summary of the scope and remit of the Whistleblowing Policy. Each school is expected to have its own full, detailed and contextualised Whistleblowing Policy.

1. Scope

This policy covers disclosures relating to criminal offences, safeguarding failures, health and safety risks, breaches of legal obligation, and deliberate concealment of any of these matters.

2. How to Raise a Concern

- Raise with the DSL or Principal in the first instance
- If the concern is about the DSL, raise with the Principal
- If the concern is about the Principal, raise with the RHoS
- If unable to raise internally, contact the Global DSL for Safeguarding or external bodies

3. Protection for Whistleblowers

No one who raises a genuine concern in good faith will suffer harassment, victimisation, or any other detrimental treatment. Malicious or vexatious allegations may be subject to disciplinary procedures.

4. Confidentiality

All concerns will be treated in confidence. Every effort will be made not to reveal the whistleblower's identity without consent, except where required by law.

Appendix G: Intimate Care Policy

Purpose: To promote best practice and safeguard children and practitioners during intimate care routines.

This is a summary of the scope and remit of the Intimate Care Policy. Each school is expected to have its own full, detailed and contextualised Intimate Care Policy.

1. Principles

This Intimate Care Policy has been developed to safeguard children and staff. It applies to everyone involved in the intimate care of children. The following are the fundamental principles:

- Every child has the right to be safe
- Every child has the right to personal privacy
- Every child has the right to be valued as an individual
- Every child has the right to be treated with dignity and respect
- Every child has the right to be involved and consulted in their own intimate care to the best of their abilities
- Every child has the right to express their views on their own intimate care and to have such views taken into account
- Every child has the right to have levels of intimate care that are as consistent as possible

2. Practice Standards

- Intimate care must be carried out by trained, designated staff
- The child's dignity, privacy, and wishes must be respected at all times
- A record of intimate care provision must be maintained
- Parents must be informed and give consent for intimate care arrangements
- Staff must never carry out intimate care alone where avoidable

Appendix H: Care Protocol (Suicide Ideation / Suicide Attempt)

Purpose: To outline procedures for supporting students who have attempted suicide or who express suicidal ideation.

Schools are expected to have their own suicide prevention and postvention protocols or policies and they will aim to prevent, intervene, and respond to suicidal behaviour through a whole-school approach, focusing on staff training, pupil safety, and postvention planning.

1. Immediate Response

- Ensure the student is supervised and safe at all times
- Inform the DSL immediately
- Do not leave the student alone

2. Risk Assessment

The DSL, in conjunction with the school counsellor and relevant mental health professionals, will conduct a risk assessment and create a risk management plan. This should be developed in collaboration with the child (where appropriate), the child's parents , and key school staff.

3. Referral Pathways

Schools should establish and maintain referral pathways to local mental health services (e.g., CAMHS, Sidra, or equivalent). The DSL will coordinate referrals and liaise with external professionals.

4. Return-To-School Plan

Following any crisis intervention, a clear return-to-school plan must be developed, including pastoral support, monitoring arrangements, and ongoing communication with parents and external services.

Appendix I: Indicators of Abuse Quick Reference

Purpose: A reference guide for all staff providing a concise summary of the key indicators of abuse.

This is a summary of the possible indicators. Schools are expected to have their own full list of indicators in either a standalone policy or as an appendix to their safeguarding policy that is contextualised to their setting and locality.

A child who is being abused or neglected may display one or more of the following indicators. Individual indicators will rarely provide conclusive evidence in isolation – they should be viewed as part of a wider picture.

Physical Indicators

- Unexplained bruises, burns, fractures, or other injuries
- Injuries inconsistent with the explanation given
- Keeping arms and legs covered, even in warm weather
- Signs of pain or discomfort

Behavioural Indicators

- Sudden changes in behaviour or mood
- Withdrawal, fearfulness, or aggression
- Difficulty making or sustaining friendships
- Age-inappropriate sexual knowledge or behaviour
- Self-harm or expressions of self-harm
- Reluctance to go home or be alone with specific adults
- Frequent absence or lateness
- Acquiring unexplained gifts, money, or a mobile phone

Neglect Indicators

- Poor hygiene, inadequate clothing, or persistent hunger
- Untreated medical conditions
- Constant tiredness or fatigue
- Appearing unkempt and uncared for

Appendix J: Jurisdiction-Specific Safeguarding Addendum Template

Colegio CEDES – Spain / Castilla-La Mancha

Field	Local Information
School Name	Colegio CEDES
Country / Jurisdiction	Spain – Castilla-La Mancha
Applicable National Legislation	Organic Law 8/2021 (LOPIVI); Organic Law 1/1996 on the Legal Protection of Minors; Organic Law 3/2020 (LOMLOE); applicable child protection legislation and safeguarding protocols of Castilla-La Mancha.
Statutory Reporting Agencies	Social Services and Child Protection Services in Albacete/Castilla-La Mancha; National Police; Guardia Civil; Public Prosecutor's Office for Minors, where appropriate.
Local Regulatory / Inspection Framework	Regional Ministry of Education, Culture and Sports of Castilla-La Mancha and the Education Inspection Service.
Local Background Check Requirements	Negative certificate from the Central Registry of Sex Offenders and Human Trafficking for staff and volunteers whose roles involve regular contact with children.
Cultural / Contextual Risk Factors	Language, cultural and communication barriers; pupils with SEND and other additional vulnerabilities; domestic violence and family vulnerability; mental health and emotional wellbeing concerns; social disadvantage and family instability; online and social media risks; school absenteeism and disengagement from education; cultural or family practices that may create safeguarding concerns.
Emergency Contact Numbers	112 – Emergency Services; National Police / Guardia Civil; Social Services and Child Protection Services in Albacete/Castilla-La Mancha.
Local Referral Pathways	Social Services and Child Protection Services in Albacete/Castilla-La Mancha. Child and Adolescent Mental Health and healthcare services. Police/Guardia Civil and emergency services where there is immediate risk. Castilla-La Mancha education protocols for bullying, suicidal behaviour, self-harm and absenteeism.
Date of Last Review	August 2026
Reviewed By	Principal: Raúl Fernández Pascual DSL: Verónica Carrión López

Appendix K: Safeguarding Concern Reporting Information

Purpose: Standardised information for documenting and reporting safeguarding concerns.

Schools need to ensure their reporting forms, either as docs or through a platform (e.g. CPOMS) contain adequate information, including actions and follow-ups.

Field	Entry
Date and Time of Concern	
Name of Child	
Year Group / Class	
Date of Birth	
Name of Staff Member Reporting	
Nature of Concern (factual description)	
Child's Own Words (if disclosed)	
Any Visible Injuries (describe – do not photograph)	
Action Taken	
Who Has Been Informed	
DSL Name and Signature	
Date Received by DSL	
DSL Assessment and Outcome	

Appendix L: Register of Ancillary Policies and Procedures

Purpose: A comprehensive list of all policies and procedures referenced in or supporting this Group Safeguarding Policy.

Review cycles have been categorised as follows: policies with a direct safeguarding function are reviewed annually; supporting operational policies are reviewed biennially (every two years) unless a significant change or incident necessitates earlier review.

#	Policy / Procedure	Owner	Review Cycle
1	Safer Recruitment Policy (Appendix A)	Group / School HR	Annual (Direct Safeguarding)
2	Staff Code of Conduct (Appendix B)	Group / Principal	Annual (Direct Safeguarding)
3	Online Safety and Acceptable Use Policy (Appendix C)	DSL / IT Lead	Annual (Direct Safeguarding)
4	Anti-Bullying Policy (Appendix D)	Principal / Pastoral Lead	Annual (Direct Safeguarding)
5	Allegations Management Protocol (Appendix E)	Global DSL / RHoS	Annual (Direct Safeguarding)
6	Whistleblowing Policy (Appendix F)	Group / Principal	Biennial (Supporting)
7	Intimate Care Policy (Appendix G)	DSL / SENCO	Biennial (Supporting)
8	Care Protocol – Suicide Ideation (Appendix H)	DSL / Counsellor	Annual (Direct Safeguarding)
9	Indicators of Abuse Quick Reference (Appendix I)	Global DSL / DSL	Annual (Direct Safeguarding)
10	Jurisdiction-Specific Addendum (Appendix J)	DSL / Principal	Annual (Direct Safeguarding)
11	Safeguarding Concern Reporting Form (Appendix K)	DSL	Biennial (Supporting)
12	Other Safeguarding Issues (Appendix M)	Global DSL / DSL	Annual (Direct Safeguarding)
13	Child-on-Child Abuse Policy (Appendix N)	DSL / Pastoral Lead	Annual (Direct Safeguarding)
14	Lockdown Procedures (Appendix O)	Principal / H&S Lead	Biennial (Supporting)
15	Physical Intervention and Restraint Policy	Principal	Biennial (Supporting)
16	Data Protection and Records Retention Policy	Data Protection Officer	Biennial (Supporting)
17	Complaints Policy	Principal	Annual (Supporting)
18	Health and Safety Policy	Principal/ H&S Lead	Annual (Direct Safeguarding)
19	Attendance Policy	Principal / Pastoral	Biennial (Supporting)

#	Policy / Procedure	Owner	Review Cycle
20	Behaviour Policy	Principal	Biennial (Supporting)
21	PSHE / Curriculum Policy	Principal	Biennial (Supporting)
22	Equality,Diversity and Inclusion Policy	Principal / HR	Biennial (Supporting)
23	Off-Site Visits and Educational Trips Policy	Principal	Biennial (Supporting)
24	First Aid Policy	H&S Lead / Nurse	Annual (Supporting)
25	Safer Working Practice Guidance	Group / DSL	Biennial (Supporting)
26	Mobile Phone Use Policy	Principal	Biennial (Supporting)
27	Teacher Standards and QA Framework	Director of Education	Biennial (Supporting)

Appendix M: Other Safeguarding Issues

Purpose: To provide guidance on specific safeguarding issues that may be encountered across the Group's international school network. These issues require particular awareness due to cultural, regional, or legal factors. Schools must contextualise this guidance to their setting and jurisdiction.

This is a summary of the scope and remit of each issue. Each school is expected to include detailed, contextualised guidance within their own safeguarding policy or as a standalone appendix.

1. Female Genital Mutilation (Fgm)

FGM comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. FGM is illegal in many jurisdictions and is recognised internationally as a violation of the human rights of girls and women.

Staff should be alert to the following risk indicators:

- A family member or close relative has undergone FGM
- A family is from a community known to practise FGM, particularly if preparing for the child to take a trip abroad
- A child talks about a special procedure or celebration to 'become a woman'
- A child confides that she is to be taken abroad for a special procedure
- Prolonged absence from school with noticeable behaviour changes on return
- A child has difficulty walking, sitting, or standing, or has frequent urinary or menstrual problems

In jurisdictions where mandatory reporting of FGM is required, staff must report directly to external authorities in addition to the DSL. The DSL must immediately consult with the Global DSL for Safeguarding on any suspected FGM case.

2. Honour-Based Abuse (Hba)

Honour-based abuse is a collection of practices used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. It cuts across all cultures and communities. HBA can include physical abuse, emotional abuse, forced marriage, threats to kill, sexual abuse, forced suicide, and FGM.

Indicators may include:

- Fear of forced marriage or being taken abroad
- Withdrawal from peers, absence from school, or drop in performance
- Self-harm, eating disorders, depression, or isolation
- Sibling or family member previously subjected to HBA or forced marriage
- Running away from home, or being reported missing
- Surveillance or restrictions imposed by family members

Staff must not approach family members or community leaders in cases of suspected HBA, as this may place the child at further risk. All concerns must be reported to the DSL, who will consult with the RHoS and Global DSL before any external referral is made.

3. Forced Marriage

A forced marriage is one in which one or both parties do not (or cannot) consent to the marriage and duress is involved. Duress includes physical, psychological, financial, sexual, and emotional pressure. It is recognised as a form of domestic abuse and child abuse. It is a criminal offence in many jurisdictions.

Forced marriage must be distinguished from an arranged marriage, in which both parties have given free and full consent. A child under the age of 18 cannot legally consent to marriage in many jurisdictions.

Warning signs may include:

- Absence or fear of absences from school, particularly before or after school holidays

- Request for extended leave or fear of upcoming holiday
- Decline in behaviour, engagement, attendance, or punctuality
- Being withdrawn and having low self-esteem
- Being subject to excessive restrictions and domestic chores

As with HBA, staff must never attempt to mediate, speak to family members, or involve community leaders. The DSL must refer to the RHoS and Global DSL immediately.

4. Non-Accidental Injuries (Nai)

Non-accidental injuries are injuries where the explanation given is inconsistent with the injury itself, or where there is no explanation. They are a key indicator of physical abuse.

Staff should be particularly alert to:

- Bruising in non-mobile children (babies who cannot yet crawl or walk)
- Injuries to soft tissue areas (neck, ears, cheeks, buttocks, inner arms/thighs)
- Bilateral injuries (e.g., bruising on both sides of the face or body)
- Patterned injuries (e.g., marks from belts, hands, or objects)
- Burns or scalds with clear demarcation lines, particularly on hands and feet
- Multiple injuries at different stages of healing
- Injuries inconsistent with the child's developmental stage

Any unexplained injury must be reported to the DSL immediately. Staff must record the injury in writing and/or using a body map but must never photograph the child. The DSL will determine whether a referral to external agencies is required.

5. Upskirting

Upskirting involves taking a photograph under a person's clothing without their consent with the intention of viewing their genitals or buttocks, or the clothing covering them. It is a criminal offence in many jurisdictions (including the UK under the Voyeurism (Offences) Act 2019).

Incidents of upskirting are safeguarding concerns and must be reported to the DSL. The DSL will assess the incident and may refer to law enforcement. Schools should ensure students are educated about the illegality and harm of such behaviour as part of PSHE/relationships education.

6. Child Sexual Exploitation (Cse)

CSE is a form of child sexual abuse in which a child or young person is manipulated or coerced into sexual activity in exchange for something – such as gifts, money, affection, status, or accommodation – that the victim needs or perceives they need. The victim may not recognise the exploitative nature of the relationship.

Warning signs may include:

- Acquiring unexplained gifts, money, or a new mobile phone
- Association with older individuals or gang involvement
- Going missing or being found in unfamiliar places
- Sexually transmitted infections, pregnancy, or substance misuse
- Changes in emotional wellbeing, self-harm, or withdrawal
- Evidence of grooming behaviour from adults or peers

Any suspicion of CSE must be reported immediately to the DSL, who will consult with the RHoS and Global DSL and consider referral to statutory authorities.

7. Preventing Radicalisation and Extremism

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies. Extremism is vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to have due regard to preventing children from being drawn into terrorism. Staff should be alert to changes in behaviour that may indicate radicalisation, including:

- Expressing extremist views or sympathies
- Accessing or distributing extremist literature or online content
- Showing intolerance of others' faiths, cultures, or beliefs
- Changes in friendship groups and isolation from previous friends
- Glorifying violence or expressing a desire to cause harm
- Contact with known extremist recruiters or groups

All concerns should be reported to the DSL. Where appropriate, the DSL will make a referral to the relevant national programme (e.g., Prevent/Channel in the UK) or equivalent local authority. Schools must include radicalisation awareness in staff training and age- appropriate education for students.

Appendix N: Child-On-Child Abuse

Purpose: To provide a framework for preventing, identifying, and responding to all forms of child-on-child abuse. This appendix should be read in conjunction with the Anti-Bullying Policy (Appendix D) and the main Safeguarding Policy.

This is a summary of the scope and remit of the Child-on-Child Abuse guidance. Each school is expected to have its own full, detailed and contextualised policy or procedures that address child-on-child abuse within their local context.

1. Scope and Definition

Child-on-child abuse is any form of abuse perpetrated by a child or young person against another child or young person. It can occur between children of any age and gender, and can take many forms, including but not limited to:

- Bullying (including cyberbullying, prejudice-based, and discriminatory bullying)
- Abuse in intimate personal relationships between children
- Physical abuse (hitting, kicking, shaking, biting, hair pulling)
- Sexual violence (rape, assault by penetration, sexual assault)
- Sexual harassment (sexual comments, jokes, taunting, online sexual harassment)
- Causing someone to engage in sexual activity without consent
- Youth Produced Sexual Imagery (YPSI) / 'sexting'
- Upskirting
- Initiation / hazing-type violence and rituals
- Prejudice-based abuse targeting protected characteristics

Staff must never dismiss child-on- child abuse as 'banter', 'just having a laugh', 'part of growing up', or 'boys being boys.' All incidents must be taken seriously regardless of the age or perceived intent of the perpetrator.

2. Prevention

Schools must take a proactive, whole-school approach to preventing child-on-child abuse, including:

- A curriculum that addresses healthy relationships, consent, respect, and online safety through PSHE, assemblies, and tutor time
- A culture of zero tolerance for harmful behaviours, supported by clear behaviour policies
- Staff training that enables early identification of concerning behaviours
- Robust supervision arrangements, particularly in less structured times and spaces
- Student voice mechanisms that encourage children to speak up
- Clear and accessible reporting systems

3. Recognising Indicators

Indicators that a child may be experiencing child-on-child abuse include:

- Withdrawal from social groups, reluctance to attend school, or avoidance of specific areas
- Sudden changes in behaviour, mood, or academic performance
- Physical injuries without adequate explanation
- Anxiety, self-harm, or suicidal ideation
- Disclosure or partial disclosure of abuse
- Inappropriate sexual behaviour or language
- Evidence of coercion or control by another child

4. Responding to Incidents

When child-on-child abuse is reported or suspected:

- Report immediately to the DSL – do not investigate or attempt to mediate

- The DSL will undertake a risk assessment considering the nature and severity of the incident, the ages and developmental stages of the children involved, any power imbalance, and whether the behaviour is a one-off or pattern
- Both the alleged victim and the alleged perpetrator will be provided with appropriate support
- Referral to statutory authorities will be made where the DSL determines the threshold is met, in consultation with the RHoS and Global DSL
- Parents/carers of all children involved will be informed unless doing so would place a child at further risk
- All incidents must be recorded on the safeguarding platform

5. Supporting Children Involved

Schools must provide support to all children involved, including:

- Pastoral support, counselling, or therapeutic intervention for victims
- Risk assessment and safety planning for victims, including consideration of shared spaces and timetabling
- Appropriate consequences and rehabilitative support for perpetrators
- Education for perpetrators to develop empathy, understanding, and behaviour change
- Ongoing monitoring and review of both victim and perpetrator wellbeing
- Support for witnesses who may also be affected

Appendix O: Lockdown Procedures

Purpose: To provide a framework for protecting students, staff, and visitors in the event of a serious security threat on or near school premises. Schools must develop their own detailed, site-specific lockdown procedures based on this framework.

This is a summary of the scope and remit of Lockdown Procedures. Each school is expected to have its own full, detailed and contextualised Lockdown Procedures that are practised regularly and known to all staff.

1. When to Initiate a Lockdown

A lockdown may be initiated in response to any situation that poses a serious threat to the safety of students, staff, or visitors, including but not limited to:

- An intruder on site (armed or unarmed) who poses a threat
- A reported incident or civil disturbance in the local area
- A dangerous animal on site
- A nearby chemical, biological, or environmental incident
- Notification from police or emergency services to secure the premises
- Any other situation where free movement around the site would increase the risk of harm

2. Types of Lockdown

Schools should distinguish between:

- Partial Lockdown (Alert) – a precautionary measure to restrict movement. Outdoor activities cease, students and staff move indoors, external doors and windows are closed and locked, the school operates as normally as possible within the building, no one enters or leaves the building until the all-clear is given.
- Full Lockdown (Emergency) – an emergency response to an immediate threat. An agreed signal/alarm is activated, students and staff move immediately to the nearest lockable room, doors are locked, lights turned off, students move away from windows and doors, students and staff remain silent, mobile phones are on silent, no one opens doors until the all-clear signal is given by a designated person.

3. Roles and Responsibilities

- The Principal (or designated deputy) is responsible for initiating and coordinating the lockdown
- Reception/front office staff must secure entry points and stop admitting visitors
- All staff must follow the lockdown protocol and account for all students in their care
- The DSL must be contactable during any lockdown to manage any safeguarding implications
- The Principal or designated person must liaise with emergency services

4. Communication

Schools must establish:

- A clear and unambiguous lockdown signal or alert system (distinct from fire alarm)
- A communication protocol for informing all areas of the school, including outdoor spaces and satellite buildings
- A method for communicating with parents during and after a lockdown (e.g., text messaging system) – parents must be advised not to come to school during a lockdown
- A process for communicating the all-clear signal

5. Drills and Preparedness

- Lockdown drills must be practised at least once per academic year
- All staff and students must be familiar with lockdown procedures
- New staff and students must be inducted on lockdown procedures as part of their induction
- A debrief must follow every drill and every actual lockdown event

- Lockdown procedures must be reviewed annually or following any incident

6. Post-Incident

Following any actual lockdown:

- The Principal must notify the RHoS and Global DSL for Safeguarding immediately
- A full incident report must be completed within 24 hours
- Emotional and psychological support must be made available to students and staff
- Parents/carers must be informed and briefed on the incident and school's response
- A review of the lockdown procedures must be conducted to identify any improvements

25. Document Approval

Role	Name and Signature	Date
Global DSL for Safeguarding	_____	_____
Director of Education	_____	_____
Chief Executive Officer	_____	_____
Chair, Group Board	_____	_____