



Thames British School Safeguarding and Child Protection Policy

Reviewed by Izabela Ryzak August 2024

1. Introduction

Thames British School (TBS), located in Warsaw, Poland, serves international students across six campuses: one pre-school, two primary schools, two primary and lower secondary schools, and one high school. TBS is committed to safeguarding and promoting the welfare of all children and young people. This policy outlines our approach to ensuring student safety and well-being, aligning with Polish law, international best practices, and the UK's *Keeping Children Safe in Education (KCSIE) 2024* regulations.

2. Purpose and Scope

This policy aims to:

- Protect children from maltreatment.
- Prevent impairment of children's mental and physical health or development.
- Ensure children grow up in circumstances consistent with the provision of safe and effective care.
- Take action to enable all children to have the best outcomes.

The policy applies to all staff, volunteers, and governors at TBS. It must be read alongside the Thames British School Staff and Volunteers Code of Conduct, the Safer Recruitment Policy, the Niebieska Karta procedure, and other relevant policies. CPOMS is the primary tool for safeguarding record-keeping and information flow, while SchoolBase manages staff records and the Single Central Record (SCR).

3. Key Principles

- **Safeguarding is everyone's responsibility:** All staff, volunteers, and stakeholders are accountable for the safety and welfare of children.

- **A child-centred approach:** The welfare of the child is paramount in all decisions and actions.
 - **Early identification and intervention:** Early intervention is crucial in preventing harm and providing timely support.
 - **Transparency and accountability:** Safeguarding practices must be clear, well-documented, and subject to regular review.
 - **Inclusion and diversity:** Safeguarding practices must be inclusive, respecting the diverse cultural backgrounds and needs of all students.
 - **Mental health and well-being:** Integral to safeguarding, with proactive measures to support students' mental health.
 - **Online safety:** Addressing the risks associated with digital environments is essential.
 - **Compliance with laws and procedures:** Adherence to Polish law, *Keeping Children Safe in Education (KCSIE) 2024*, and relevant international standards.
 - **Effective use of CPOMS and SchoolBase:** Ensuring all safeguarding concerns and actions are accurately recorded, tracked, and managed within CPOMS, with staff records maintained within SchoolBase.
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4. Legal Framework

This policy is based on the following laws and regulations, ensuring comprehensive protection for all students in alignment with Polish, UK, and international legal standards:

1. **The Polish Constitution (1997):** Ensures the protection of the rights of the child.
2. **The Family and Guardianship Code (1964):** Regulates the care and protection of children.
3. **The Act on the Education System (1991):** Outlines the responsibilities of educational institutions in safeguarding children.
4. **The Act on Counteracting Domestic Violence (2005):** Provides measures for protecting children from domestic violence.
5. **The Act on Social Assistance (2004):** Includes provisions for supporting children in need.
6. **The Penal Code (1997):** Criminalizes various forms of abuse and exploitation of children.
7. **The Act on Health Care Services Financed from Public Funds (2004):** Ensures access to medical care for children.
8. **The Regulation of the Minister of National Education on Psychological and Pedagogical Assistance (2013):** Details the support systems for children in educational settings.
9. **The Amendment to the Family and Guardianship Code (2023) - Ustawa "Kamilka":** Introduces enhanced legal protection for children against violence.
10. **Niebieska Karta (Blue Card) Procedure:** A Polish legal procedure that ensures the protection of victims of domestic violence, including children.

11. **Keeping Children Safe in Education (KCSIE) 2024:** UK statutory guidance for schools and colleges on safeguarding children and safer recruitment.
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5. Niebieska Karta (Blue Card) Procedure

5.1 Overview of Niebieska Karta

The Niebieska Karta (Blue Card) is a procedure established under Polish law to identify and support victims of domestic violence, including children. The procedure involves:

- **Initiation:** Any professional (including teachers, medical staff, or police officers) who suspects domestic violence must initiate the Niebieska Karta procedure.
- **Documentation:** The Niebieska Karta form is filled out to document the suspected violence. This form is an official record that initiates further investigation and support.
- **Intervention:** The procedure triggers the involvement of a multi-disciplinary team (MDR - Multi-Disciplinary Response) comprising social services, law enforcement, education, and healthcare professionals, who collaborate to support the victim and address the situation.
- **Support:** The process ensures that the victim, particularly a child, receives the necessary support, including legal protection, psychological counseling, and other relevant services.
- **Confidentiality:** All information recorded on the Niebieska Karta form is confidential and shared only among the relevant authorities involved in the case management.

5.2 School's Role in Niebieska Karta

- **Reporting:** If a staff member suspects a student is a victim of domestic violence, they must immediately report the concern to the Designated Safeguarding Lead (DSL), who is responsible for initiating the Niebieska Karta procedure.
 - **Documentation:** The DSL will document the concern in CPOMS and ensure that the Niebieska Karta form is completed accurately.
 - **Collaboration:** The DSL will work closely with the multi-disciplinary team involved in the Niebieska Karta procedure to ensure that the student receives the necessary support.
 - **Follow-Up:** The DSL will monitor the student's situation and update CPOMS with any new developments. The school must ensure ongoing support for the student throughout the process.
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6. Safeguarding Governance Structure

To ensure comprehensive oversight and management of safeguarding across all campuses, the following roles have been established:

1. **Designated Safeguarding Governor (DSG)**
 - Oversees the implementation and effectiveness of the school's safeguarding policies at the Governing Body level.
 - Reviews complex or significant safeguarding cases.
 - Ensures compliance with legal requirements, including *KCSIE 2024*, the Code of Conduct, the Safer Recruitment Policy, the Niebieska Karta procedure, and the effective use of CPOMS and SchoolBase.
 2. **Executive Designated Safeguarding Lead (EDSL)**
 - Oversees safeguarding across all campuses, ensuring consistency in policy application.
 - Manages cross-campus or complex safeguarding cases.
 - Liaises with DSLs and reports significant issues to the DSG.
 - Ensures CPOMS is used effectively for tracking and managing safeguarding concerns, while staff data is accurately maintained in SchoolBase.
 3. **Designated Safeguarding Lead (DSL) – Campus Specific**
 - Manages safeguarding cases specific to their campus.
 - Leads the campus safeguarding team, ensuring actions align with the Safeguarding Policy, Code of Conduct, Safer Recruitment Policy, Niebieska Karta procedure, and *KCSIE 2024*.
 - Ensures all safeguarding concerns are recorded in CPOMS promptly.
 - Responsible for initiating the Niebieska Karta procedure when necessary.
 4. **Assistant Designated Safeguarding Lead (ADSL)**
 - Supports the DSL in managing safeguarding cases and acts as the DSL in their absence.
 - Assists in the management and continuity of safeguarding oversight.
 - Ensures that CPOMS is updated and utilized consistently across all cases.
 5. **Head of School**
 - Provides leadership and ensures that safeguarding practices align with the school's policies.
 - Participates in managing safeguarding cases and supports the DSL and ADSL.
 - Oversees the effective use of CPOMS for recording and tracking safeguarding issues and SchoolBase for managing staff records.
 - All allegations against staff must be reported to the Head of School and EDSL.
 6. **Additional Participants**
 - Specialists or other relevant personnel may be invited to join the case management team on a case-by-case basis.
 - These participants are required to document their involvement in CPOMS.
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7. Types of Abuse and Signs to Look For

7.1 Types of Abuse

In line with *KCSIE 2024* and Polish regulations, staff should be aware of the following types of abuse:

- **Physical Abuse:** Inflicting physical harm such as hitting, shaking, or burning.
- **Emotional Abuse:** Persistent emotional maltreatment leading to severe adverse effects on emotional development.
- **Sexual Abuse:** Forcing or enticing a child into sexual activities, not necessarily involving violence.
- **Neglect:** Persistent failure to meet a child's basic physical and psychological needs.
- **Child Sexual Exploitation (CSE):** Involves an individual or group taking advantage of an imbalance in power to coerce, manipulate, or deceive a child into sexual activity.
- **Child Criminal Exploitation (CCE):** Involves children being forced or manipulated into criminal activities.
- **Domestic Abuse:** Includes controlling, coercive, threatening behavior, violence, or abuse between intimate partners or family members.
- **Honour-Based Abuse:** Includes harmful practices such as Female Genital Mutilation (FGM).
- **Online Abuse:** Includes all types of abuse that occur through online platforms, including grooming, cyberbullying, and exploitation.

7.2 Signs to Look For

In accordance with *KCSIE 2024* and Polish law, staff should be vigilant for indicators of abuse, such as:

- **Physical Abuse:** Unexplained injuries, burns, or marks; reluctance to discuss injuries.
- **Emotional Abuse:** Sudden changes in behavior or mood; withdrawal or anxiety; fear of certain individuals.
- **Sexual Abuse:** Inappropriate sexual behavior or knowledge for the child's age; sudden changes in behavior or mood; pain or discomfort in the genital area.
- **Neglect:** Poor hygiene, frequent hunger, or unsuitable clothing; untreated medical issues; frequent absence from school.
- **CSE/CCE:** Unexplained gifts or new possessions; associating with individuals involved in exploitation; changes in emotional well-being.
- **Domestic Abuse:** Fear of going home; unexplained bruises or injuries; extreme changes in behavior or mood.
- **Online Abuse:** Secretive behavior about online activities; sudden changes in online habits; distress after using the internet or mobile devices.

8. Safer Recruitment

8.1 Recruitment Procedures

To ensure the safety of students, all staff and volunteers undergo rigorous vetting processes, compliant with *KCSIE 2024* and Polish law:

- **Background Checks:** Including criminal record checks (DBS in the UK or equivalent in Poland).
- **References:** At least two professional references must be obtained and verified.
- **Shortlisting and Interviews:** At least two people must be involved in the shortlisting and interviewing process to ensure objectivity.
- **Self-Declarations:** Candidates must complete self-declarations regarding any criminal convictions or safeguarding concerns.
- **Identity Verification:** Candidates must provide proof of identity, qualifications, and right to work.

8.2 Induction and Training

All new staff and volunteers receive safeguarding training during induction, covering:

- **Recognizing and responding to abuse.**
- **Use of CPOMS and SchoolBase.**
- **Understanding legal obligations, including the Niebieska Karta procedure and *KCSIE 2024*.**

9. Managing Allegations Against Staff

9.1 Procedures for Managing Allegations

In line with *KCSIE 2024* and Polish regulations:

- **Reporting:** Allegations against staff must be reported immediately to the DSL, Head of School, and EDSL.
- **Immediate Safety Measures:** Upon receiving an allegation, the DSL and Head of School must ensure that immediate steps are taken to protect the child or children involved, which may include removing the staff member from direct contact with students pending an investigation.
- **Investigation Coordination:** The DSL, in coordination with the Head of School and EDSL, will manage the investigation process, ensuring it is fair, transparent, and conducted promptly.
- **Referral to Authorities:** If the allegation may constitute a criminal offense or serious misconduct, the DSL must refer the matter to the appropriate local authorities, such as the police or social services, for further investigation.
- **Support for All Parties:** The DSL ensures support is provided to both the alleged victim and the accused staff member throughout the investigation process.

- **Record-Keeping:** Detailed records of the allegation, investigation process, and outcomes must be maintained in CPOMS.

9.2 Post-Investigation Actions

- **Outcomes:** Depending on the investigation's outcome, appropriate actions will be taken, which may include disciplinary measures or referrals to external agencies.
 - **Support for Victims:** Provide support and counseling services to any students affected by the allegation.
 - **Confidentiality:** All information regarding the allegation is to be kept confidential and shared only with those directly involved in the investigation.
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10. Support and Supervision

10.1 Providing Support

- **Children and Families:** Offer emotional and psychological support to children and families involved in safeguarding concerns.
- **Staff:** Provide supervision and support for staff managing safeguarding cases, including regular debriefing sessions and access to professional counseling.

10.2 Professional Supervision

- **Case Reviews:** Regular supervision sessions for staff involved in complex safeguarding cases to review actions taken and provide guidance.
 - **Continuous Improvement:** Ongoing professional development opportunities for staff to improve their safeguarding practices.
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11. Inter-Agency Collaboration

11.1 Positive Collaboration

- **Partnerships:** Establish formal partnerships with local authorities, health services, law enforcement, and other relevant agencies.
- **Joint Training:** Participate in joint training sessions with local agencies to enhance collaborative efforts.
- **Information Sharing:** Follow the seven golden rules for sharing information to ensure effective collaboration while maintaining confidentiality, in line with *KCSIE 2024*.

11.2 Coordination with External Agencies

- **Referrals:** Clear procedures for referring cases to external agencies, including social services and the police, ensuring timely and appropriate support.
 - **Multi-Agency Meetings:** Participate in multi-agency meetings and case conferences to ensure coordinated support for victims and alleged perpetrators.
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12. Volunteer Management

12.1 Supervision and Checks

- **Vetting:** All volunteers must undergo background checks (e.g., DBS or equivalent) and provide references.
- **Supervision:** Volunteers will be supervised at all times, particularly when working directly with children.
- **Training:** Volunteers receive safeguarding training as part of their induction and ongoing development.

12.2 Roles and Responsibilities

- **Clarity of Roles:** Ensure that volunteers understand their safeguarding responsibilities and reporting lines within the school.
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13. Information Sharing and Confidentiality

13.1 Who Needs to Know

- **Need-to-Know Basis:** Only individuals directly involved in managing a safeguarding concern should be informed of the details.
- **Roles:** The DSL, ADSL, Head of School, and relevant staff members should be informed as needed.

13.2 What Information Can Be Shared

- **Legal Requirements:** Information can be shared with statutory agencies when necessary for the protection of the child, in compliance with *KCSIE 2024* and GDPR.
- **Accuracy and Relevance:** Ensure that the information shared is accurate, relevant, and necessary.

13.3 Managing Speculation, Leaks, Gossip, and Press Interest

- **Confidentiality:** All staff must maintain confidentiality to protect the privacy of those involved.

- **Media Handling:** Develop a media handling policy to manage press inquiries related to safeguarding incidents.

13.4 Legal Requirements for Confidentiality

- **Compliance:** Adhere to the Education Act 2002, Data Protection Act 2018, *KCSIE 2024*, and GDPR when handling and sharing information.
 - **Exemptions:** Understand that child protection records are generally exempt from disclosure provisions but may be shared without consent in certain circumstances.
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14. Escalation of Concerns

14.1 Reporting Lines

- **Clear Reporting Lines:** Staff, students, and parents should understand the reporting lines for safeguarding concerns.
- **DSL as the First Point of Contact:** All concerns should initially be reported to the DSL or ADSL.

14.2 Escalation Process

- **Unresolved Concerns:** If concerns are not adequately addressed, there is a clear process for escalating the issue up the chain of command, including to the Head of School or DSG if necessary.

14.3 Step-by-Step Guide

- **Process Documentation:** A step-by-step guide for escalating unresolved concerns should be included in staff training materials and accessible to all staff.
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15. Training and Awareness

15.1 Staff Training

- **Regular Training:** All staff, volunteers, and governors must undergo regular safeguarding training.
- **Specialized Training:** Provide additional training on specific safeguarding issues such as online safety, CSE, and FGM.
- **CPOMS Training:** Ensure all staff are proficient in using CPOMS for recording and managing safeguarding concerns.

15.2 Parental and Student Awareness

- **Information Sessions:** Organize regular sessions to educate parents and students about safeguarding practices and the importance of confidentiality.
 - **Educational Materials:** Distribute materials that outline the school's safeguarding procedures and how to report concerns.
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16. Local Authority and Social Care Involvement

16.1 Coordination

- **Involvement:** The school will work closely with local authority children's social care services for assessments and to coordinate support for victims and alleged perpetrators.
- **Case Conferences:** Participate in multi-agency case conferences to ensure coordinated care and support.

16.2 Communication

- **Timely Communication:** Ensure timely and effective communication with social care services and other relevant agencies, documenting all interactions in CPOMS.
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17. Monitoring and Continuous Improvement

17.1 Regular Audits and Feedback

- **Safeguarding Audits:** Conduct regular audits of safeguarding practices to ensure compliance and identify areas for improvement.
- **Feedback Mechanisms:** Solicit feedback from staff, students, and parents to continually refine safeguarding practices.

17.2 Incident Analysis

- **Incident Review:** Analyze safeguarding incidents to identify patterns or areas of concern, using this information to improve policies and practices.
 - **Continuous Improvement:** Foster a culture of continuous improvement in safeguarding across all campuses.
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18. Reporting and Case Management Procedures

18.1 Recognizing and Reporting Safeguarding Concerns

Step 1: Recognize a Concern

- **What to Look For:** All staff should be vigilant in recognizing signs of abuse, neglect, or any other safeguarding concern, including physical signs, behavioral changes, or disclosures made by the student or others.
- **Immediate Action:** Any concern, no matter how small, must be reported immediately. Staff should not attempt to investigate the concern themselves.

Step 2: Record the Concern in CPOMS

- **Immediate Logging:** As soon as a concern is identified, it must be logged into CPOMS by the person who identifies it. This should be done within **30 minutes** of recognizing the concern.
- **Details to Include:**
 - Date and time of the incident or disclosure.
 - Full names of the child or children involved.
 - Details of the concern, including what was observed, heard, or disclosed.
 - Actions taken immediately, including any protective measures.
 - Any witnesses or additional relevant information.

Step 3: Notify the Designated Safeguarding Lead (DSL)

- **Notification:** Once the concern is logged in CPOMS, the system will automatically notify the relevant Designated Safeguarding Lead (DSL) and the Assistant Designated Safeguarding Lead (ADSL) at the respective campus.
- **Follow-Up:** The reporting staff member should verbally confirm with the DSL that the concern has been logged and received. This should be done within **1 hour** of the concern being raised.

Step 4: Initial Assessment by DSL

- **Review in CPOMS:** The DSL will review the concern in CPOMS as soon as possible, but no later than **2 hours** after being notified.
- **Action Plan:** The DSL will determine the initial action plan, which may include further information gathering, immediate protective measures, or referrals to external agencies. This action plan should be documented in CPOMS.
- **Parental Involvement:** The DSL will decide if and when parents should be informed, documenting this decision in CPOMS.

Step 5: Escalation if Necessary

- **Referral to External Agencies:** If the DSL determines that external intervention is necessary (e.g., social services or police involvement), they will make the referral within **24 hours** of the concern being logged.

- **Involvement of Executive DSL:** For complex cases or those involving multiple campuses, the Executive Designated Safeguarding Lead (EDSL) should be informed and involved within **24 hours**.
- **Documentation:** All actions, decisions, and communications must be documented in CPOMS.

Step 6: Monitoring and Review

- **Ongoing Review:** The DSL will monitor the situation and review the case regularly, updating CPOMS with any new developments. The frequency of reviews will depend on the severity of the case but should occur at least once every **72 hours** for ongoing cases.
- **Closure:** Once the concern is resolved, the DSL will document the outcome in CPOMS and formally close the case. This should be done as soon as possible after the resolution is confirmed.

18.2 Case Management Team (CMT) Procedures

Structure of the Case Management Team (CMT)

The CMT at TBS includes:

1. **Designated Safeguarding Lead (DSL)** - Chair of the CMT.
2. **Assistant Designated Safeguarding Lead (ADSL)** - Supports the DSL.
3. **Head of School** - Provides leadership and aligns practices with school policies.
4. **Executive Designated Safeguarding Lead (EDSL)** - Provides strategic guidance.
5. **Designated Safeguarding Governor (DSG)** - Provides governance oversight.
6. **Other Participants (as needed)** - Specialists brought in for specific cases.

Case Management Process

Step 1: Initial Assessment

- **DSL Role:** Upon receiving a safeguarding concern, the DSL will conduct an initial assessment to determine the severity of the issue and whether it requires immediate action or escalation to the CMT.

Step 2: Convening the CMT

- **Notification:** The DSL will notify all relevant members of the CMT, including the ADSL, Head of School, and EDSL, and schedule a meeting as soon as possible, ideally within **24 hours**.
- **Agenda Preparation:** The DSL will prepare an agenda for the CMT meeting, including a summary of the concern, initial actions taken, and key decisions that need to be made.

Step 3: Case Review and Action Planning

- **Case Presentation:** The DSL presents the case to the CMT, including all relevant information logged in CPOMS, initial assessments, and any immediate actions taken.
- **Discussion:** The CMT will discuss the case, considering all available information, the child's best interests, and potential risks.
- **Action Plan:** The CMT will develop a detailed action plan, which may include further investigations, protective measures, referrals to external agencies, and timelines for each action. This plan must be documented in CPOMS.
- **Assignment of Responsibilities:** Specific actions will be assigned to CMT members or other staff as appropriate, with clear deadlines and follow-up procedures.

Step 4: Implementation of the Action Plan

- **Execution:** The assigned CMT members will execute the action plan, ensuring that each step is completed within the agreed timelines.
- **Documentation:** All actions taken must be documented in CPOMS, including any communications with external agencies, the child's family, or other stakeholders.

Step 5: Ongoing Monitoring and Review

- **Regular Check-ins:** The CMT will meet regularly to review the progress of the case, assess the effectiveness of the actions taken, and make any necessary adjustments to the plan.
- **CPOMS Updates:** The DSL is responsible for ensuring that CPOMS is updated continuously with new information, developments, or changes in the action plan.
- **Escalation:** If the case becomes more complex or if initial actions are not effective, the CMT may escalate the case to higher authorities within the school or involve additional external experts.

Step 6: Case Resolution and Closure

- **Final Review:** Once the CMT determines that the case has been resolved, a final review meeting will be held to confirm that all actions have been completed and the child's safety is assured.
- **Documentation of Outcome:** The final outcome and all relevant details must be documented in CPOMS. The case will then be formally closed.
- **Post-Case Support:** The CMT will ensure that any ongoing support needed for the child, family, or staff involved in the case is provided, and that follow-up checks are scheduled if necessary.

18.3 Fallback Procedures

In the event that CPOMS or SchoolBase is temporarily unavailable, the following fallback procedures must be followed to ensure that safeguarding concerns are still reported and acted upon without delay:

Fallback Step 1: Immediate Verbal Reporting

- **Direct Report:** Any safeguarding concern must be reported immediately and verbally to the Designated Safeguarding Lead (DSL) or Assistant Designated Safeguarding Lead (ADSL).
- **Documentation:** The reporting staff member should write down all relevant details of the concern, including the date, time, individuals involved, and a description of the incident or disclosure.

Fallback Step 2: Written Documentation

- **Manual Recording:** The concern should be documented using the school's safeguarding incident reporting form, which is available in both paper format and electronically on shared drives.
- **Submission:** The completed form must be handed directly to the DSL or ADSL within **1 hour** of the concern being identified.

Fallback Step 3: Temporary Record-Keeping

- **Secure Storage:** Until CPOMS or SchoolBase is available, all manual records must be stored securely in a locked filing cabinet in the DSL's office, with access restricted to the safeguarding team.
- **Data Entry Upon Restoration:** Once CPOMS or SchoolBase is back online, all manually recorded concerns must be entered into the system by the DSL or ADSL within **24 hours** to ensure the continuity of the digital record.

Fallback Step 4: Continuous Monitoring

- **Monitoring Continuity:** The DSL should continue to monitor the situation and take necessary actions even during system downtime, ensuring that the safety of the student is not compromised.
- **Update Records:** Any actions taken during the system downtime should be documented and later updated in CPOMS when available.

19. Conclusion

The safeguarding structure at Thames British School ensures a comprehensive, coordinated, and consistent approach to protecting our students. By integrating the Safeguarding and Child Protection Policy with the Staff and Volunteers Code of Conduct, the Safer Recruitment Policy, the Niebieska Karta procedure, and additional key elements, including the effective use of CPOMS and SchoolBase, TBS is committed to maintaining a safe environment for all children, with clear expectations and accountability for all staff and volunteers.

This policy is a living document that will be regularly reviewed and updated to reflect changes in law, best practices, and the needs of the school community. All staff, volunteers, and stakeholders are expected to adhere to the policy and actively contribute to creating a safe and supportive environment for our students.