

# Policy:

## Safeguarding and Child Protection

### 1. Introduction

At Thames British School, we are committed to maintaining a safe, inclusive, and supportive environment where all students, staff, and visitors feel valued and protected. Effective incident reporting and management are essential to ensuring that every member of our community can thrive. This commitment applies regardless of:

- origin, race, nationality, religion, sexual orientation, gender, or age,
- disability or special educational needs.

This policy outlines the mechanisms for reporting, documenting, and managing safeguarding incidents. It aligns with our commitment to excellence and transparency, as expressed in our guiding principles:

**At Thames British School Warsaw, we c | a | r | e**

Our Principles:

We care:

- that every one of our students reaches their full potential, academically, socially and emotionally;
- that every student is safe and feels safe at school, and this means we are all responsible all of the time;
- that communication and our choice of language is inclusive and respectful;
- about our behaviour and what it may communicate to others. We conduct ourselves in an ethical manner and with integrity at all times;
- about our communities culture, behave in a manner that fosters our values and insist that all members of our community do the same; and

- about learning first and foremost. Teachers are considered facilitators of learning and models for our community and its culture.

The school is committed to safeguarding and promoting the welfare of all children and young people. It strives to provide every student with a safe and supportive educational environment, free from harm, discrimination, prejudice, and inequality. This commitment applies regardless of:

- origin, race, nationality, religion, sexual orientation, gender, or age,
- disability or special educational needs.

**Our values:**

<b>c</b>	<b>Collaborative &amp; Compassionate</b>	We work together when needed to get the job done. We value the work of others, are compassionate, and recognise that success is mutually beneficial
<b>a</b>	<b>Authentic</b>	We are real, genuine and honest. We are true to ourselves and our community and represent our-selves as such with integrity
<b>r</b>	<b>Responsible &amp; Resilient</b>	We have an obligation to reach our potential and fight to do so. We are accountable for our actions and utterances, and demonstrate respect for others needs and our environment. We don't give up.
<b>e</b>	<b>Enlightened</b>	We act on evidence, are factually well-informed, tolerant of alternative opinions, and guided by rational thought.

**2. Purpose**

This policy implements the principles and practices of the Safeguarding of young people at Thames British School. It outlines our approach to child protection and safeguarding, aligning with:

- Polish child protection standards (the Act of July 28, 2023, amending the Family and Guardianship Code and certain other acts (Journal of Laws of 2023, item 1606), pursuant to which the Act of May 13, 2016, on counteracting threats of sexual crime and protecting minors (Journal of Laws of 2024, item 560) introduced provisions concerning child protection standards.
- International best practices, and the UK's *Keeping Children Safe in Education (KCSIE) 2024* regulations.

- Guidelines provided by The International Task Force on Child Protection (ITFCP) and COBIS.

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.

### 3. Scope

#### 3.1 Application

This policy applies to:

- All staff and volunteers,
- Owners, governors and all other members of the executive leadership,
- All visitors and guests,
- All contractors and partners.

It must be read alongside:

- the Thames British School Staff and Volunteers Code of Conduct,
- the Safer Recruitment Policy,
- the *Niebieskie Karty* 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).

#### 3.2. Policy content

This policy outlines the principles for protecting minors from violence at Thames British School. It encompasses:

1. **Safe Relationships:** Guidelines for fostering safe interactions between staff and children, as well as behaviors prohibited towards minors.
2. **Action Procedures:** Steps to take in cases of suspected abuse or when information about the abuse of a minor is obtained.
3. **Reporting Responsibilities:** Procedures and designated individuals responsible for reporting suspected crimes against minors, notifying the family court, and initiating the "Blue Cards" procedure in applicable institutions.
4. **Standards Review and Updates:** Principles for periodically reviewing and updating the policy.

5. **Personnel Training:** Responsibilities and competencies of the designated person responsible for preparing staff to implement the policy, including methods for documenting this process.
6. **Parental and Minor Awareness:** Methods for making the policy accessible to parents/guardians and minors, ensuring their awareness and application.
7. **Incident Reporting and Support:** Designated individuals responsible for receiving reports of incidents that may represent a threat to young people and for providing appropriate support.
8. **Documentation and Record-Keeping:** Methods for documenting and securely storing reports and disclosed incidents that could threaten a minor's welfare.
9. **Safe Relationships Among Minors:** Fostering healthy interactions between minors, including prohibited behaviors.
10. **Use of Electronic Devices:** Guidelines for the acceptable use of electronic devices with internet access.
11. **Protection from Harmful Content:** Guidelines for safeguarding children from harmful content and threats both online and in other forms.
12. **Support Plans:** Guidelines for creating a support plan for a minor following the disclosure of abuse.
13. **Safe Staff Recruitment:** Rules for ensuring safe recruitment practices, as outlined in the Safer Recruitment Policy.
14. **Protection of Students' Images:** Rules for safeguarding young people when using images and personal data.

#### 4. Key Principles

1. **Internal reporting** of any suspicion, knowledge or declaration of: harm to a young person in our community; OR any breach of this policy including the code of conduct for Staff Volunteers and Contractors to the DSL, HoS or DESL as appropriate inline with this policy **IS MANDATORY**.
2. Reporting any suspicion or knowledge of harm to the police is mandatory for all members of the community.
3. **Safeguarding is everyone's responsibility:** All staff, volunteers, and other stakeholders are accountable for the safety and welfare of children.
4. **A child-centred approach:** The protection of the child or young person is paramount in all decisions and actions.
5. **Early identification and intervention:** Early intervention is crucial in preventing harm and providing timely support.
6. **Transparency and accountability:** Safeguarding practices must be clear, well-documented, and subject to regular review.
7. **Inclusion and diversity:** Safeguarding practices must be inclusive, respecting the diverse cultural backgrounds and needs of all students.

8. **Mental health and well-being:** Integral to safeguarding, with proactive measures to support students' mental health.
9. **Online safety:** Addressing the risks associated with digital environments is essential.
10. **Compliance with laws and procedures:** Adherence to Polish law, *Keeping Children Safe in Education (KCSIE) 2024*, and relevant international standards.
11. **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.

## 5. 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 Act of July 28, 20 23, amending the Family and Guardianship Code:** Introduces enhanced legal protection for children against violence.
10. **Niebieskie Karty (Blue Cards) 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.
12. **Managing Allegations of Child Abuse by Educators and Other Adults,** Protocol for International Schools (ITFCP) 2018.

## 6. Blue Cards (*Niebieskie Karty*) Procedure

### 6.1 Overview of Blue Cards procedure

The Blue Cards is a procedure established under Polish law to identify and support victims of domestic violence (e.g. physical, psychological, sexual and economic), including children. The procedure involves:

1. **Initiation:** Any professional (including teachers, medical staff, or police officers) who suspects domestic violence must initiate the Blue Cards procedure.
2. **Documentation:** The *Niebieskie Karty* form is filled out to document the suspected violence. This form is an official record that initiates further investigation and support.
3. **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.
4. **Support:** The process ensures that the victim, particularly a child, receives the necessary support, including legal protection, psychological counseling, and other relevant services.
5. **Confidentiality:** All information recorded on the *Niebieskie Karty* form is confidential and shared only among the relevant authorities involved in the case management.

### 6.2 School's Role in *Niebieska Karta*

In any case that requires the Blue Cards procedure, the school's Safeguarding and Child Protection Policy will be followed as needed.

1. **Mandatory 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.
  - If harm is caused by one parent, and the other is not involved, the Head of School or DSL must immediately inform the non-offending parent of the legal actions the school must take.
  - Reporting includes the obligation to report the crime to the police. The Head of School or designated person will file the report on behalf of the school.
2. **Documentation:**
  - The DSL will document the concern in CPOMS and ensure that the "Blue Card A" form is completed in the presence of the non-offending parent, and the "Blue Card B" form is provided to the parent.
  - If both parents are perpetrators, or if the child is solely under the guardianship of the offending parent, similar actions are taken - the "Blue Card A" form is

filled out in the presence of an adult relative or a designated adult, and the "Blue Card B" form is given to the non-offending adult.

- If the child has no non-offending parent, the police and a social worker must be contacted to ensure the child's safety.
3. **Collaboration:** The DSL will work closely with the multidisciplinary team involved in the Niebieska Karta procedure to ensure that the student receives the necessary support.
  4. **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.

## 7. Safeguarding Governance Structure

### 7.1 Designated Safeguarding Lead (DSL)

To ensure comprehensive oversight and management of safeguarding, Thames British School assigns a **Designated Safeguarding Lead (DSL)** to each campus, responsible for managing all safeguarding and child protection matters. Additionally, the DSL ensures that staff within their campus are trained and well-informed about the requirements and practices outlined in this policy.

The Designated Safeguarding Lead (DSL) must:

- be committed to the protection of young people;
- possess Level 3 Safeguarding training;
- demonstrate a thorough understanding of the safeguarding policy.

A comprehensive list of the DSL's responsibilities is provided in the Job Description for the Designated Safeguarding Lead.

### 7.2 Safeguarding structure

To maintain vigilant supervision and strong safeguarding protocols 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. **Designated Executive Safeguarding Lead (DESL)**
    - 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 DESL.
  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.

## 8. Types of Abuse and Signs to Look For

### 8.1 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.

## 8.2 Signs to Look For

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

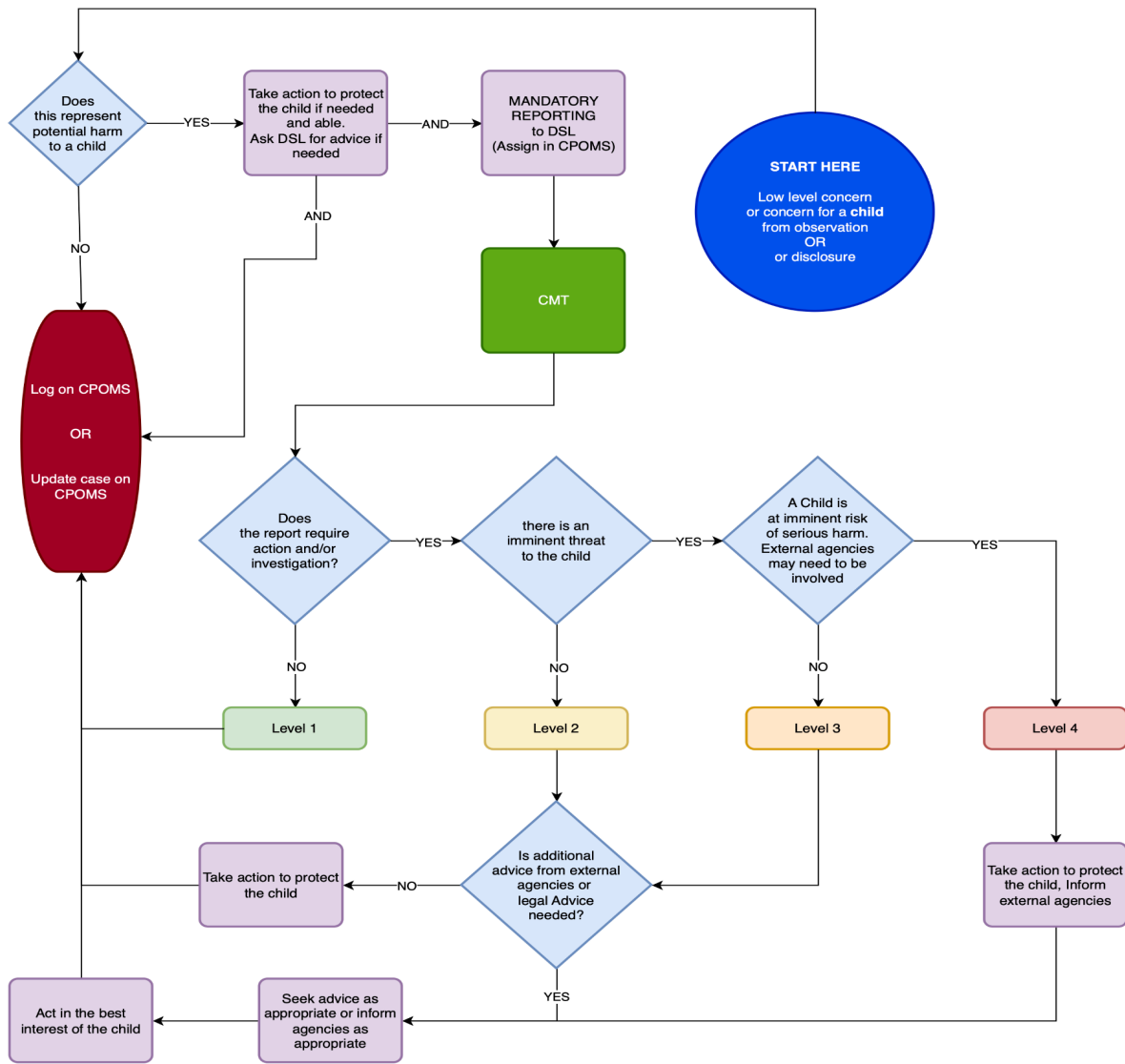
- **Physical Abuse:** Unexplained injuries, burns, or marks; reluctance to discuss injuries.
- **Emotional Abuse:** Sudden changes in behavior or mood; withdrawal or anxiety; fear of certain individuals.
- **Sexual Abuse:** Inappropriate sexual behavior or knowledge for the child's age; sudden changes 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.
- **Child-on-child abuse:** any form of abuse where a child or a young person causes harm to another child or a young person. This type of abuse can occur in various settings, such as schools, online, or at home, and may involve physical, emotional, sexual, or financial harm.

All staff must stay vigilant for signs of abuse including the following:

- the child shows reluctance to participate in lessons involving physical exercises;

- the child excessively covers their body, inappropriately to the situation and weather;
- the child flinches when approached by an adult;
- the child is passive, withdrawn, submissive, or frightened.
- The child suffers from recurrent somatic complaints: stomach aches, headaches, nausea, etc.;
- the child wets themselves without reason or in specific situations or at the sight of certain people;
- there is a sudden and significant change in the child's behavior.

## 9. Managing Declarations and Concerns Involving Young People



## 9.1 Recognising and Reporting Safeguarding Concerns or Declarations

### Step 1: Recognise a Concern

- **What to Look For:** All staff should be vigilant in recognising signs of abuse, neglect, or any other safeguarding concern, including physical signs, behavioral changes, or disclosures made by the student or others.
- A declaration is made
- **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 ASAP after recognising the concern and certainly during the same day.
- **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) or the Assistant Designated Safeguarding Lead (ADSL) as appropriate 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 day** 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.
- **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: 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.
- **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 with agreement of the CMT during regular briefing with the HoS and DESL.

### 9.2 Case Management Team (CMT) Procedures

The purpose of the case management team is to evaluate any declaration or report as a group so that no one person is making decisions regarding the case. This is to ensure there's a variety of expertise and experience and that individual members are not making decisions solely. It should be noted that the role of the DSL is not a decision-making one beyond very low level concerns or where a case clearly has no merit. The DSL's responsibility is to convey a case management team and manage the case.

The case management team will use the following three lenses in this order of priority when viewing and considering possible courses of action.

1. Protect the child/children - from present harm and potential future harm;
2. Protect our community - from present harm and potential future harm;
3. Protect our school, the institutional, our staff, our reputation.

#### 9.2.1 Structure of the Case Management Team (CMT)

The Case Management Team includes:

1. **Designated Safeguarding Lead (DSL) or Assistant Designated Safeguarding Lead (ADSL)** as appropriate,
2. **Head of School** - Provides leadership and aligns practices with school policies.
3. **Designated Executive Safeguarding Lead (DESL)** - Provides strategic guidance and liaise with the DSG.
4. **Other Participants (as needed)** - Specialists brought in for specific cases.

#### 9.2.2 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 CMT.

## Step 2: Convening the CMT

- **Notification:** The DSL will notify all relevant members of the CMT, the Head of School, and DESL, 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.
- **Classification for cases involving children:**

**Level 1** - Low level concern manageable by the DSL and school leadership. Immediate action is not required OR the case is not deemed to be a safeguarding or child protection concern. The DSL MAY classify a report as Level 1 with-out concerning a CMT however is doing so is taking personal responsibility of the case. If in any doubt, the DSL should seek advice from the HoS or convene a CMT. Level 1 cases must be included in safeguarding briefings with the DESL.

**Level 2** - Action needs to be taken to protect a child OR there needs to be an investigation to gather more evidence to determine if action is needed. The case is manageable by the DSL and school leadership in partnership with parents. Actions needed are longer term and strategic in nature, not reactionary. There is not a clear and present threat of harm to a child. DSL must convene a CMT

**Level 3** - Immediate action is needed to protect a child from harm from a clear and present threat. The DSL must convene a CMT. The case is manageable by the DSL and school leadership in partnership with parents and may involve advice from external agencies. Cases may also be classified as level 3 if repetitive behavior indicates an ongoing or escalating threat.

**Level 4** - Immediate action is needed to protect a child from harm from a clear and present threat. External agencies must be involved and or reporting is mandatory. The case may involve criminal activity. The DSL must convene a CMT.

- **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.

### **9.3 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 as soon as possible.
- **Access and Storing:** Physical documentation is accessed only by authorised staff and it is stored securely in line with GDPR regulations. Authorised agencies will be granted access to safeguarding documentation upon request and with the consent of the Head of School. When necessary, the Data Protection Officer (DPO) will be consulted.

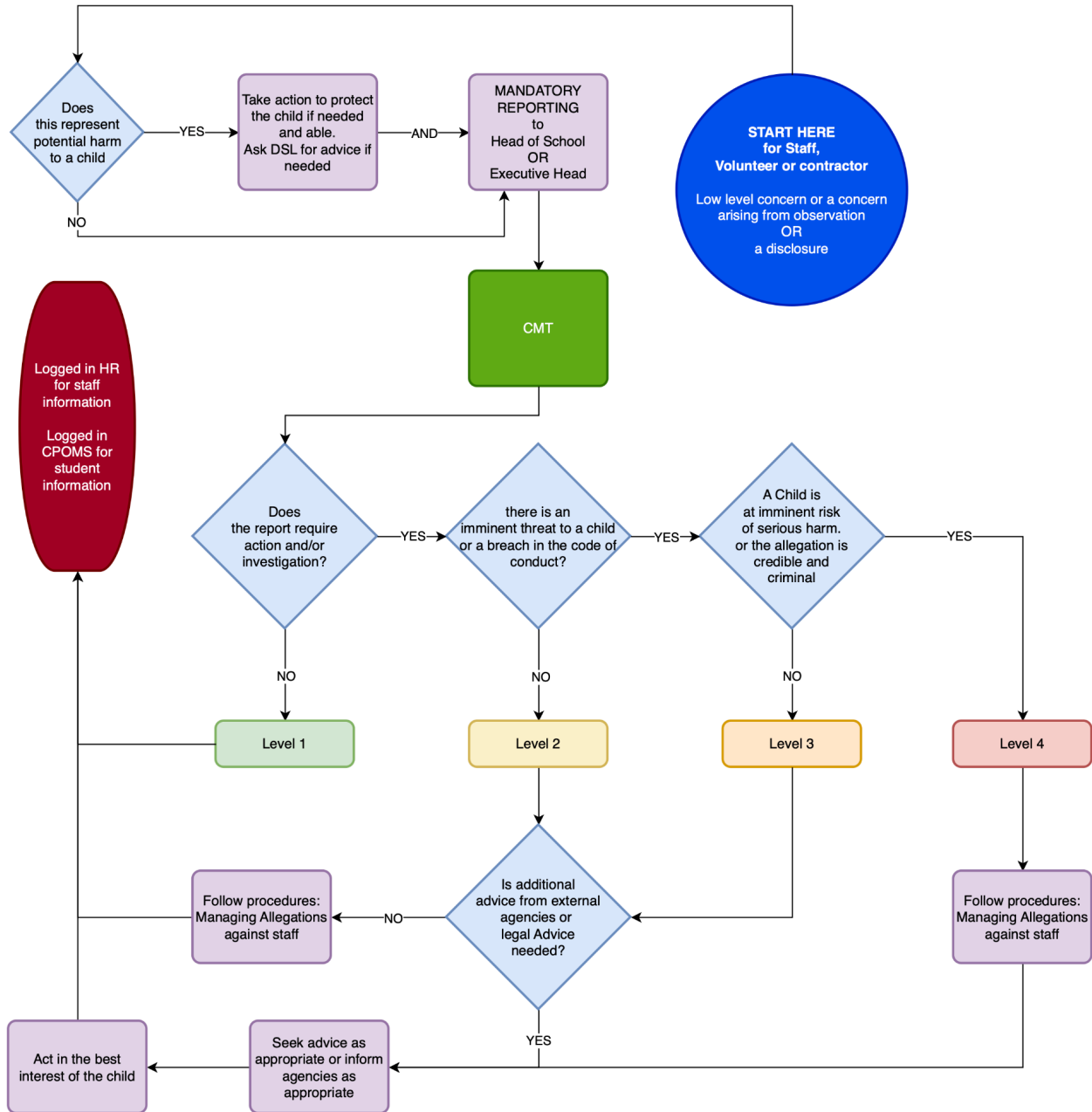
### **Fallback Step 3: Temporary Record-Keeping**

- **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.

## 10. Managing Allegations Against Staff



### 10.1 Procedures for Managing Allegations

In line with *KCSIE 2024* and Polish regulations:

- **Reporting:** Allegations against staff or volunteers must be reported immediately to the Head of School or the DESL.
- **Immediate Safety Measures:** Upon receiving an allegation, the Head of School must ensure that immediate steps are taken to protect the child or children involved. If this includes removing the staff member from direct contact with students pending an investigation the DESL must be consulted.
- **Investigation Coordination:** The HoS, in coordination with DESL, will manage the investigation process, ensuring it is fair, transparent, and conducted promptly. Classification for cases involving allegations against staff or adults:

**Level 1** - Low level concern manageable by school leadership. Immediate action is not required OR the case is not deemed to be a safeguarding or child protection concern. The HoS MAY classify a report as Level 1 with-out concerning a CMT however is doing so is taking personal responsibility of the case. If in any doubt, the HoS should seek advice from the Executive Head of School or convene a formal CMT. Level 1 cases must be included in safeguarding briefings with the DESL.

**Level 2** - Action needs to be taken to protect a child or children OR there may be breach of the Code of conduct for Staff Volunteers and Contractors OR there needs to be an investigation to gather more evidence to determine if action is needed The case is manageable by the HoS and school leadership. Actions needed are longer term, strategic and preventative in nature, not reactionary. There is not a clear and present threat of harm to a child. HoS must convene a CMT

**Level 3** - Immediate action is needed to protect a child from harm from a clear and present threat from a member of staff; OR there is a serious, clear and repetitive breach of the Code of conduct for Staff Volunteers and Contractors; OR there needs to be an investigation to gather more evidence to determine what action is needed; OR if supported by evidence the case represents criminality on behalf of a member of Staff, Volunteer and Contractor. The HoS must convene a CMT. The case is manageable by the HoS and school leadership may involve advice from external agencies. Cases may also be classified as level 3 if repetitive behavior indicates an ongoing or escalating threat.

**Level 4** - Evidence shows immediate action is needed to protect a child from harm from a clear and present threat from a member of Staff Volunteer and Contractor; OR evidence suggests the accused may well have committed a criminal act OR evidence shows serious, clear or repeated breach of the code of conduct that

requires action to protect children from future acts. External agencies must be involved and or reporting is mandatory. The case may involve criminal activity. The HoS must convene a CMT.

- **Referral to Authorities:** If the allegation may constitute a criminal offense or serious misconduct, the HoS must refer the matter to the appropriate local authorities, such as the police or social services, for further investigation.
- **Support for All Parties:** The HoS 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 for the child and HR records for the staff.

## 10.2 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.

## 11. Safer Recruitment

### 11.1 Recruitment Procedures

To ensure the safety of students, all staff and volunteers undergo rigorous vetting processes, in line with **Thames British School Safer Recruitment Policy**, which are compliant with *KCSIE 2024*, Polish law, and recommendations outlined in the ITFPC Recommended Screening and Assessment Practices for International School Recruitment, 2017:

1. **Background Checks:** Criminal record checks from all countries where candidates have lived in the past 20 years including:
  - Disclosure and Barring Service (DBS) in the UK;
  - Polish Register of Sexual Offenders;
  - National Criminal Register in Poland;

2. **References:** At least three professional references must be obtained and verified; one must be from a current Head of School, Principal, Superintendent, Director. one from a former Head of School or Principal, and one from another direct supervisor.
3. **Shortlisting and Interviews:** At least two people must be involved in the shortlisting and interviewing process to ensure objectivity.
4. **Self-Declaration:** A signed statutory declaration stating that the candidate has no history of behaviour or conviction that would disqualify them from working with young people.
5. All declarations are made under penalty of criminal liability for false statements.
6. **Identity and Qualifications:** Candidates must provide proof of identity and certificates verifying their qualifications.

## 11.2 Induction and Training

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

- **Recognising and responding to abuse.**
- **Use of CPOMS and SchoolBase.**
- **Understanding legal obligations, including the *Niebieskie Karty* procedure and *KCSIE 2024*.**

## 12. Code of Safe Staff-Child Relationships

Thames British School has established clear guidelines for maintaining safe and respectful relationships between staff and children, detailed in the **Thames British School Staff and Volunteers Code of Conduct**.

These guidelines specify prohibited behaviors and outline best practices for appropriate and supportive interactions with children.

## 13. Code of Safe Child-Child Relationships

At Thames British School, we are committed to providing a supportive, caring, and safe environment where all students can thrive. Bullying in any form is strictly prohibited and will not be tolerated.

1. Respect, dignity, and consideration for others' needs form the foundation of relationships between students and between minors and adult students.
2. Thames British School students are expected to set a positive example for younger peers through their actions and attitudes.
3. Every student is responsible for fostering an atmosphere of safety, understanding, tolerance, and accountability within the school community.
4. Students are encouraged to engage in activities that promote active participation, collaboration, and teamwork, while fostering positive relationships with peers, including those with special educational needs.
5. The following behaviors are strictly prohibited:
  - any form of violence against a child.
  - use of vulgar or offensive language.
  - humiliating, insulting, or offending others;
  - inappropriate conduct, including shouting, vulgar gestures, offensive jokes, or remarks, especially of a sexual nature.
  - intimidation, threats, or aggressive behavior, whether verbal or written.
  - recording or photographing others without consent, particularly in situations that may cause embarrassment.
  - possession, sharing, or use of tobacco, alcohol, electronic cigarettes, or psychoactive substances.

## 14. Support and Supervision

### 14.1 Providing Support

1. **Children and Families:**
  - Design a **Child Support Plan** to provide emotional and psychological support to children and families involved in safeguarding concerns.
  - Take intervention actions in cooperation with other institutions, when needed.
  - The DSL, in collaboration with the school psychologist, monitors and documents the implementation of the support plan.
2. **Staff:** Provide supervision and support for staff managing safeguarding cases, including regular debriefing sessions and access to professional counseling.

## 14.2 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.

## 15. Inter-Agency Collaboration

### 15.1 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*.

### 15.2 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.

## 16. Volunteer Management

### 16.1 Supervision and Checks

- **Vetting:** All volunteers are required to undergo background checks in accordance with the Safer Recruitment Policy 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.

### 16.2 Roles and Responsibilities

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

## 17. Information Sharing and Confidentiality

### 17.1 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.

### 17.2 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.

### 17.3 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.

### 17.4 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 and may be shared without consent in certain circumstances.

## 18. Escalation of Concerns

### 18.1 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.
- All concerns regarding staff members or volunteers must be reported to the Head of School or the Designated Executive Safeguarding Lead (DESL).

## 18.2 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 ⇒ the Designated Executive Safeguarding Lead (DESL) ⇒ the Designated Safeguarding Governor (DSG), if necessary.

## 18.3 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.

## 19. Training and Awareness

### 19.1 Staff Training

- **Regular Training:** All staff, volunteers, and governors must undergo regular safeguarding training. The Head of School and/or DSL conducts at least one training session per year to prepare staff in implementing this policy.
- **Specialized Training:** Provide additional training on specific safeguarding issues such as online safety, Child Sexual Exploitation (CSE), and Female Genital Mutilation (FGM).
- **CPOMS Training:** Ensure all staff are proficient in using CPOMS for recording and managing safeguarding concerns.

### 19.2 Parental and Student Awareness

- **Information Sessions:** Organise 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.

## 20. Local Authority and Social Care Involvement

### 20.1 Coordination

- **Involvement:** The school will work closely with local authority and 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.

## 20.2 Communication

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

## 21. Monitoring, Improvement and Updating the Policy

### 21.1 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.

### 21.2 Incident Analysis

- **Incident Review:** Analyse 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.

### 21.3 Review and Updates

- Thames British School regularly monitors and verifies compliance with child protection standards.
- The policy is reviewed annually to ensure it meets current needs and complies with relevant legislation.

## 22. Safe Use of the Internet and Electronic Media

### 22.1 General guidelines

Thames British School prioritises the safety and responsible use of the internet and electronic media by all students. The following guidelines are in place to ensure a secure digital environment:

1. **Network Security:** IT Department is responsible for installing and regularly updating antivirus software and firewalls.
2. **Educational Use:** Internet access is intended for educational and school-related activities only.

3. **Inappropriate Content:** Accessing, sharing, or creating content that includes violence, explicit material, illegal activities, or hate speech is strictly prohibited.
4. **Respectful Communication:** All online interactions, including emails, chats, and forums, must reflect respect and uphold the dignity of all participants.
5. **Reporting:** Students must report accidental exposure to inappropriate content to a teacher, who will escalate the concern to the Designated Safeguarding Lead (DSL).
6. **School Platforms:** School-provided accounts and platforms are strictly for educational use, and downloading unauthorised software, games, or content is prohibited.
7. **Digital Citizenship:** Students are encouraged to practice good digital citizenship, including maintaining privacy, avoiding cyberbullying, and protecting personal information.
8. **Parental Involvement:** Parents are encouraged to reinforce these principles and monitor their children's internet use to promote a safe online environment at home.

## 22.2 Use of Mobile Devices at Primary School

- Students may bring mobile devices to school but must leave them at reception at the start of the day and collect them before leaving.
- Devices should be in protective cases, clearly labelled with the student's name, and stored in a locked cupboard.
- The school takes reasonable care but accepts no responsibility for theft, loss, or damage. Parents are advised to insure devices, which should be security marked and password-protected.
- Exceptions to this policy may be made in exceptional circumstances (e.g., for students with disabilities, young carers, or those with medical conditions), with prior approval from the Head of School and Executive Head of Schools.
- Devices must only be used for the granted purpose and in a responsible, ethical manner. Misuse will result in the revocation of the exception.
- Mobile devices are not allowed in exams or tests. Any student using a mobile device during an exam will face disciplinary action as determined by the teacher or examination authority.

## 22.3 Use of Mobile Devices at High School

- High school students may bring phones to class, but they must be turned off and placed in a designated box during lessons.
- Devices may be retrieved after the lesson.
- Phones and the internet may only be used in class if the teacher has planned a lesson using these resources.

- Earphones with mobile devices are generally not allowed, but a teacher may permit them if it aids productivity, as long as it doesn't disrupt the lesson.
- Students may use mobile devices during breaks, following social norms and GDPR regulations, but not during lunch in the canteen or in sensitive areas like changing rooms or toilets.
- Acceptable uses during breaks and free periods and after school include texting, emailing, and browsing the internet.
- Mobile devices must not disrupt school activities. A Level and IB DP students (Years 12-13) may use devices for educational purposes in dedicated classrooms and the library during free periods.
- Devices are not allowed in examination rooms, and any student using a mobile device during exams will face disciplinary action.
- Phones are also prohibited in the sports hall during assemblies and events without the Head of School's permission.
- Students are not permitted to share their mobile devices with others.

#### **22.4 Procedure to Protect Children from Harmful Online Content**

For harmful content which includes e.g., pornography, hate speech, violence, self-harm), the following steps are taken:

- **Notifying site administrators:** The DSL reports illegal or non-compliant content to the site administrator(s).
- **Securing evidence:** The IT manager secures available evidence, blocks further access, and logs the actions on CPOMS.
- **Investigation:**
  - The DSL investigates the incident, identifies the perpetrator and witnesses, and documents the details on CPOMS.
  - If the content involves external individuals, the DSL consults with the Head of School and reports the incident to authorities, providing secured materials.
  - If Thames students are involved, the DSL and/or school psychologist conduct interviews with the perpetrator and victim, and the Case Management Team decides on further actions, documenting the process on CPOMS.
- **Notifying Parents/Guardians:** Parents/Guardians are notified of the findings and actions taken, with communications logged on CPOMS.
- **Engaging external institutions:** Cooperation with law enforcement or the family court will be undertaken for violations involving the distribution of child pornography or content promoting fascism, racism, or hate speech.

## 22.5 Child Image Protection

Thames British School is committed to safeguarding the privacy and personal rights of its students, ensuring the highest standards of protection for their personal data and images in compliance with applicable laws.

- **Consent for Media Use:** After enrolling their child in the school, parents or legal guardians are required to provide written consent for photographing, filming, and publishing a child's image for school-related activities at the time of enrollment.
- **Anonymity in Publications:** Any published photos or recordings will not be accompanied by identifying information, such as the child's first and last name.
- **Restrictions on Third-Party Media:** School staff are prohibited from permitting third parties to capture a child's image (including filming, photographing, or recording the child's voice) on school premises without prior consent from the child's guardian.
- **Protection of Contact Information:** The contact details of a child's guardian will not be shared with third parties without their explicit knowledge and consent.

Additionally, the school ensures that any media containing images or information about students is used responsibly, with consideration for the students' well-being and privacy. Any requests for media usage will be carefully assessed to align with the school's privacy standards and policies.

## 23. Rules and Procedures for Sharing the Policy with Children and Their Guardians

- The policy is available on the school's website and within the school premises.
- The school ensures parents and students are informed about the safeguarding and child protection practices.

## 24. 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.

## **25. Related documents**

- Safer Recruitment Policy
- Staff, Volunteers and Contractors Code of Conduct
- DSL's Job Description
- Online Policy
- Mobile Devices Policy
- Managing Allegations of Child Abuse by Educators and Other Adults (ITFCP)