

CHILD PROTECTION AND SAFEGUARDING POLICY 2026

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Protecting Every Child, In Every School, Across Every Jurisdiction

Safeguarding is everyone's responsibility

This is a controlled document. Always refer to the Group intranet for the current approved version.

VERSION HISTORY

Ver sion	Date	Author	Summary of Changes
1.0	27 July 2026	Interim Global Designated Safeguarding Lead	Initial Group-wide policy
1.1	August 2026	DSL and Principal BISL	Local contextualisation

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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 standards 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.
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

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

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 framework is appropriate and compliant.

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

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 (CPOMS)
- Make referrals to statutory children's services or law enforcement and 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 and be aware of Slovenian child protection legislation, referral pathways and social service procedures.
- Participate in inter-agency case meetings and ensuring follow-up support plans are implemented.
- Ensure all staff, LAB members, and volunteers are trained in line with expected standards (change to all volunteers and contract staff) and undergo suitable checks.
- 5.3 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
- Ensure safe transfer of safeguarding records when children move schools.
- Attends local training in safeguarding where opportunities arise.

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

5.4 Preventative Education

Schools and colleges play a crucial role in preventative education. At BISL, we recognise that preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in the current world and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Preventative education at BISL is promoted through:

- BISL Caring for Each Other Statement and BISL Values upheld and demonstrated throughout all aspects of school life.
- Positive Behaviour Policy and Anti-Bullying Policy, with outlined procedures on supporting students within the pastoral care system.
- Relationships Education (for all primary pupils), and Relationships and Sex Education (for all secondary pupils) and Health Education (for all primary and

secondary pupils) delivered in weekly timetabled Assemblies, PSHE /Citizenship lessons and reinforced throughout the whole curriculum.

- The school takes part in various events such as Mental Health Day/Awareness Week, Anti-Bullying Week, Pride Week and Online Safety Day, promoting awareness

and the school values .

- E-Safety education (linked to the BISL E-safety Policy, the Online Safety policy and the student ICT Contract) on using technology safely, securely and responsibly (online behaviour) in order to prevent exposure to potentially harmful and inappropriate online material or harmful online interaction. Additional guidance and advice to support schools and colleges to help keep pupils, students and staff safe whilst learning remotely.
- All programmes are fully inclusive and developed to be age and stage of development appropriate (considering the needs of children with SEND and other vulnerabilities).
- Speakers/visitors from different organisations leading assemblies or workshops for students, staff and parents.
- Involving parents in effective education: raising awareness of child-protection and safeguarding matters, providing guidance and educational resources for parents to further support, safeguard and educate their children at home, and communicating with parents and carers how children can stay safe online and what filtering and monitoring systems the school uses.

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 (CPOMS) 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: In Slovenia, if there are concerns that a child may be at risk or requires support, the school contacts the local CSD.
- Internal monitoring and pastoral support and wellbeing support.
- Referral to statutory child protection services (after consultation with Global DSL / RHoS unless child is in immediate danger).
- Safeguarding concerns are referred to the local social services (CSD), with police involvement where there is immediate risk or suspected criminal activity (without waiting for parental consent). CSD has statutory powers relating to the protection of children and can take urgent protective actions when required
- 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

The BISL Online Safety and Social Media Policy addresses the full range of online risks. Online safety is a core safeguarding policy within a whole school approach, is embedded within the curriculum and reinforced through teaching and pastoral provision. See Appendix C: Online Safety and Acceptable Use Policy. The policy addresses 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

At BISL, most of our students use mobile phones and computers for communication, education and entertainment and all students and staff must sign-up to the school's Acceptable Use of IT rules. However, we know that some individuals may use these technologies to harm children. This harm may range from sending hurtful or abusive messages or e-mails to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

Chat rooms and social networking sites are among the most obvious sources of inappropriate and harmful behaviour, and students are not allowed to access these sites in school.

Cyber-bullying, via messages, posts or e-mails, is treated as seriously as any other type of bullying and any instances will be managed through our Positive Behaviour Policy and Anti-Bullying strategy. The school both filters and monitors the use of computers by students. Parents will be informed if a student is using technology inappropriately.

Mobile phones may not be used during lessons or formal school time. The school provides lockable phone pouches which students in Years 4-11 are required to use to prevent mobile phone use. The Bluetooth functionality of a mobile phone or tablet should always be switched off. Mobile phones, personal recording devices, cameras and videoing equipment are not permitted in certain areas within the school site such as changing rooms and toilets.

In EYFS all mobile phones should be kept out of the reach of children in the storage room which is kept locked and the key kept out of reach of students on a hook on the doorframe. Photographs or video recordings should only ever be taken with school tablets and uploaded to the school OneDrive as soon as practicably possible.

The camera and filming functions of personal mobile devices must not be used in school, on school trips or on official school business. If staff receive permission from the Principal to use these devices for a specific purpose, the content should be deleted after use from the mobile and transferred to a more appropriate medium of storage. A school mobile can be used for videos and images.

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.

The DSL should take lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place - this is part of their role in taking the lead responsibility for safeguarding.

This includes overseeing and acting on:

- 2 Filtering and monitoring reports
- 3 Safeguarding concerns
- 4 Checks to filtering and monitoring systems

The DSL will work with the Tech Lead and the IT Manager as regards online safety.

Staff training includes online safety and understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

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.

Staff training includes online safety and understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

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).
- Any incidents involving E-abuse online including online grooming, child sexual abuse footage, sexting and blackmail with intimate shots, will be reported to the local online safety organisation- The Online Eye , which is part of the framework of the Safer Internet Centre in Slovenia.

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:
 - never copy, print, share, store, or save the imagery (doing so is illegal; if it has already happened, contact police);
 - the DSL or a delegated safeguarding-team member views it, with a second staff member present, and with the headteacher's authority;
 - view on the setting's premises wherever possible, and ideally by a staff member of the same sex as the child; and
 - record 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. Staff should be familiar with the Wellbeing and Mental Health Policy and use the tools in the policy, such as:

A. **Student Wellbeing Warning Signs Checklist** to help identify concerns early and respond appropriately.

B. **Guidance (Staff and Parents): How to Talk to a Student You Are Concerned About**

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. Prolonged or repeated absence can be a vital warning sign to a range of safeguarding issues.

Where a child has **prolonged** 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.

The school's safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods is outlined in the BISL Attendance Policy:

In Slovenia, there is a legal obligation for all children from the **age of 6 to 15** to be enrolled in full-time education. Students may not be absent for more than **5 days** without medical certification and may face investigation by Social Services and the Inspektorat RS za solstvo in sport (Inspectorate of the Republic of Slovenia for Education and Sport) and may be fined.

The DSL will notify Children's Social Care if a child with a **Child Protection Plan** is absent for more than **two days** without explanation;

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.

17. 1 Homestay Arrangements

Where the school arranges for students to stay with host families during educational visits, exchanges, cultural programmes, sporting events or similar activities, the school will take reasonable steps to ensure that appropriate safeguarding arrangements are in place.

The school will:

- Work closely with partner schools, organisations, or programme providers to establish a shared understanding of safeguarding expectations and host family suitability requirements.
- Seek assurance that appropriate background, identity, and suitability checks have been completed on host adults in accordance with local laws and regulations.
- Ensure that parents and students are informed of the homestay arrangements, including the processes used to assess host families.
- Provide students with clear information about who to contact during the homestay if they have concerns, feel unsafe, or require emergency assistance.
- Ensure that students have access to school contact details and local emergency contacts throughout the placement.
- Consider any known safeguarding, medical, behavioural, or welfare needs when placing students with host families, sharing information on a need-to-know basis and with appropriate consent.
- Maintain clear reporting procedures for safeguarding concerns arising before, during, or after the homestay placement.

Where parents or students independently arrange accommodation with a host family, this is considered a private arrangement and falls outside the school's direct responsibility.

However, the school will continue to respond appropriately to any safeguarding concerns that come to its attention.

Overseas Host Families

As criminal record checks and vetting processes vary between countries, the school may not be able to obtain the equivalent of UK DBS information for overseas host families. In these circumstances, the school will seek reasonable assurance from partner organisations or schools that suitable screening, references, and safeguarding measures have been completed in accordance with local requirements and best practice.

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.

In Slovenia, there is **no single retention period that applies to all student records**. The retention period depends on the type of record and is determined by education regulations, archival legislation, and data protection rules. The records typically fall into one of three categories:

1. **Official student records required by education law.**
2. **School counselling and welfare records.**
3. **Records of child protection concerns, investigations, referrals, and communications with CSD, police, courts, or health authorities.**

The retention period depends on which category the record belongs to.

For an independent international school in Slovenia, safeguarding files should generally be retained **at least until the student reaches adulthood and for a substantial period thereafter**, because:

- allegations may be raised years later;
- civil claims can arise after a student leaves school;
- safeguarding decisions may need to be evidenced long after the educational relationship ends.

For cases involving:

- abuse allegations,
- police involvement,
- social work centre (CSD) involvement,
- court proceedings,
- serious welfare concerns,

I would strongly advise against destruction immediately after the student leaves school. Such files should be retained significantly longer than ordinary welfare notes because they may be required to demonstrate that the school acted appropriately. This is generally consistent with GDPR's provisions allowing retention where necessary for legal claims and compliance obligations.

Below is a **draft retention schedule** for a British international school operating in Slovenia, taking account of GDPR, ZVOP-2, Slovenian education recordkeeping principles, and international safeguarding best practice-

Student Welfare, Safeguarding and Support Records Retention Schedule

Record Type	Recommended Retention Period	Trigger Date	Rationale
Child protection concerns (low-level concerns, disclosures, referrals, chronology)	Until student reaches age 25	Student leaves school	Protection of legal claims and safeguarding accountability
Child protection investigations involving external agencies (CSD, police, court, health authorities)	Age 30 or 15 years after leaving school, whichever is later	Student leaves school	Serious risk cases may be revisited years later
Allegations against staff relating to a student	At least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.	Date of allegation/ staff pension age	Defence of legal claims and regulatory compliance
Welfare concern records	7 years after leaving school	Student leaves school	Educational and duty-of-care justification
Pastoral notes of routine significance	3 years after leaving school	Student leaves school	Limited ongoing necessity
Counselling records (non-clinical school counselling)	10 years after leaving school	Student leaves school	May be needed to evidence support provided
Records of risk assessments concerning student welfare	10 years after leaving school	Student leaves school	Demonstrates safeguarding decisions

Student support plans	10 years after leaving school	Student leaves school	Evidence of accommodations and interventions
SEN / Learning Support files	10 years after leaving school	Student leaves school	Educational support history
Educational psychologist reports	10 years after leaving school	Student leaves school	Reference for previous provision and potential claims
Individual Education Plans (IEPs)	10 years after leaving school	Student leaves school	Educational support documentation
Behaviour and disciplinary records (minor incidents)	3 years after incident or leaving school, whichever is later	Incident date	Limited continuing relevance

Suspensions, exclusions, serious misconduct	10 years after leaving school	Student leaves school	Potential legal and regulatory relevance
Anti-bullying investigations	10 years after leaving school	Student leaves school	Welfare and safeguarding relevance
Attendance intervention records	7 years after leaving school	Student leaves school	Educational and welfare justification
Records of communication with parents regarding safeguarding matters	Same as safeguarding file	Student leaves school	Integral component of safeguarding record
Student medical alerts linked to safeguarding concerns	Same as safeguarding file	Student leaves school	Necessary context for decision-making

Records involving litigation or anticipated litigation	Until final resolution plus 10 years	Closure of matter	Defence of legal claims
Core educational records required by law (transcripts, matriculation records, final academic outcomes)	Permanent	Creation date	Required to evidence educational attainment and issue replacement documents Pravilnik o šolski dokumentaciji v srednješolskem izobraževanju (PISRS)

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

Additional Training for Local Compliance DSL and

relevant staff (HRI)

Training should include:

- Slovenian child protection legislation;
- Family Violence Prevention Act;
- local social services referral procedures;
- police referral procedures;
- Spletno Oko reporting mechanisms;
- inter-agency safeguarding practice within Slovenia.

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

Legislation

The school complies with applicable Slovenian safeguarding legislation outlined below, which can be accessed through the Slovenian Legal Information System (PISRS).

Local Cultural and Contextual Safeguarding Risks

The School recognises that safeguarding risks (outlined in the table below) may arise from local and international contextual, legal, economic, and environmental factors that may increase safeguarding risks or affect how children disclose concerns, seek help, or experience harm. Staff receive training to understand these contextual factors and consider them when assessing and responding to student welfare concerns.

Field	School Entry
School Name	British International School of Ljubljana
Country / Jurisdiction	Slovenia
Applicable National Legislation (Safeguarding)	1. Family Violence Prevention Act (Zakon o preprečevanju nasilja v družini - ZPND) [Zakon o pr...D] - PisRS

	2. Family Code (<i>Družinski zakonik - DZ</i>) [Družinski...Z] (PISRS) 3. Personal Data Protection Act (<i>Zakon o varstvu osebnih podatkov - ZVOP-2</i>) [Zakon o va...2] (PISRS) 3. Criminal Code of the Republic of Slovenia (<i>Kazenski zakonik - KZ-1</i>)- contains the offences relating to child abuse, neglect, sexual offences against children, and exploitation. Kazenski zakonik (KZ-1) (PISRS)
Related Safeguarding Resources	1. Slovenian Safer Internet Centre (Safe.si) https://www.safe.si 2. TOM Child Helpline https://www.e-tom.si 3. Spletno Oko (Online Eye) Reporting service for child sexual abuse material and online exploitation. https://www.spletno-oko.si
Statutory Reporting Agencies	CSD (Social Work Centre), Police, Online Eye organisation for E-abuse cases (recommended).
Local Regulatory / Inspection Framework	Slovene Ministry of Education Health and Safety / Fire safety inspection Playground/equipment inspection HR/employment records? Finance inspection Labour inspection (every few years-unannounced to the company)
Local Background Check Requirements	For non EU citizens, strict rules apply for obtaining a work permit. Background checks and police checks are done by the Slovene Government, before the right to work in the country is obtained.
Cultural / Contextual Risk Factors	-Online safety and cyberbullying -Domestic abuse and family violence -Mental health and wellbeing pressures -Cultural Expectations Around Family Privacy (leading to delayed disclosure or reluctance to seek support) -International and Mobile Families (frequent relocation, family separation; information lost in transition; - Family circumstances (experienced trauma due to war etc) - Child Trafficking and Exploitation Risks (due to Slovenia being a transit country within parts of EU)

	- Experience of Discrimination based on nationality, language, religion and other differences.
Emergency Contact Numbers	Police emergency and intervention number: 113 (local) or 112 (international)
Local Referral Pathways	1. Local Authority - Children's Social Care CSD Ljubljana Bežigrad, Einspielerjeva 6, Ljubljana, Tel: 01 300 1800
	2. Local Authority - Allegation Manager
	3. Police Ljubljana Bežigrad v Ljubljana Posavskega ulica 3, Tel: 01 589 60 00
	4. Health Authority Zdravstveni dom Ljubljana Črnuče, Primožičeva 2, Ljubljana-Črnuče, Tel: 01 530 8100
	5. Local Authority - Safeguarding Manager (also out of hours duty team) Krizni Center za Mlade (Crisis Centre for Children and Young People) Ljubljan, Podmilščakova ulica 20, 1000 Ljubljana Telefon: 01 236 1222, 041 419 121 and 041 419 122
Date of Last Review	August 2026
Reviewed By	Katarina Železinger

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.

This Policy should be read in conjunction with:

- Equal Opportunities Policy and Caring For Each Other Statement;
- Positive Behaviour Policy and Anti-Bullying Policy
- Wellbeing and Mental Health Policy
- Complaints and Concerns Policy;
- Recruitment and Retention Policy;
- Staff Handbook and Staff Code of Conduct;
- Allegations Against Staff Policy

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.

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.

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 Wellbeing Team 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.

Slovenian Child Protection Procedures

In Slovenia referrals may include:

- Center za socialno delo (Social Work Centre)
- Police
- Crisis Centres
- Healthcare Providers
- Other specialist child protection agencies

Parents will normally be informed of referrals unless doing so may increase risk to the child. Where this risk exists, advice should first be sought from social services or police.

For international families, consultation with embassies or consular services may be considered where lawful and in the child's best interests.

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

Purpose: Template to be completed by each school documenting local legal requirements and jurisdiction-specific safeguarding information. This information should be included in every school's main Safeguarding Policy (not as an appendix).

Completed table inserted into section 22.1 Jurisdiction-Specific Addenda

Appendix K: Safeguarding Concern Reporting Information

Purpose: Standardised information for documenting and reporting safeguarding concerns.

Please note that BISL uses CPOMS to record any safeguarding incidents. Therefore, this form should only be used if CPOMS is unavailable.

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	

Body Map Guidance

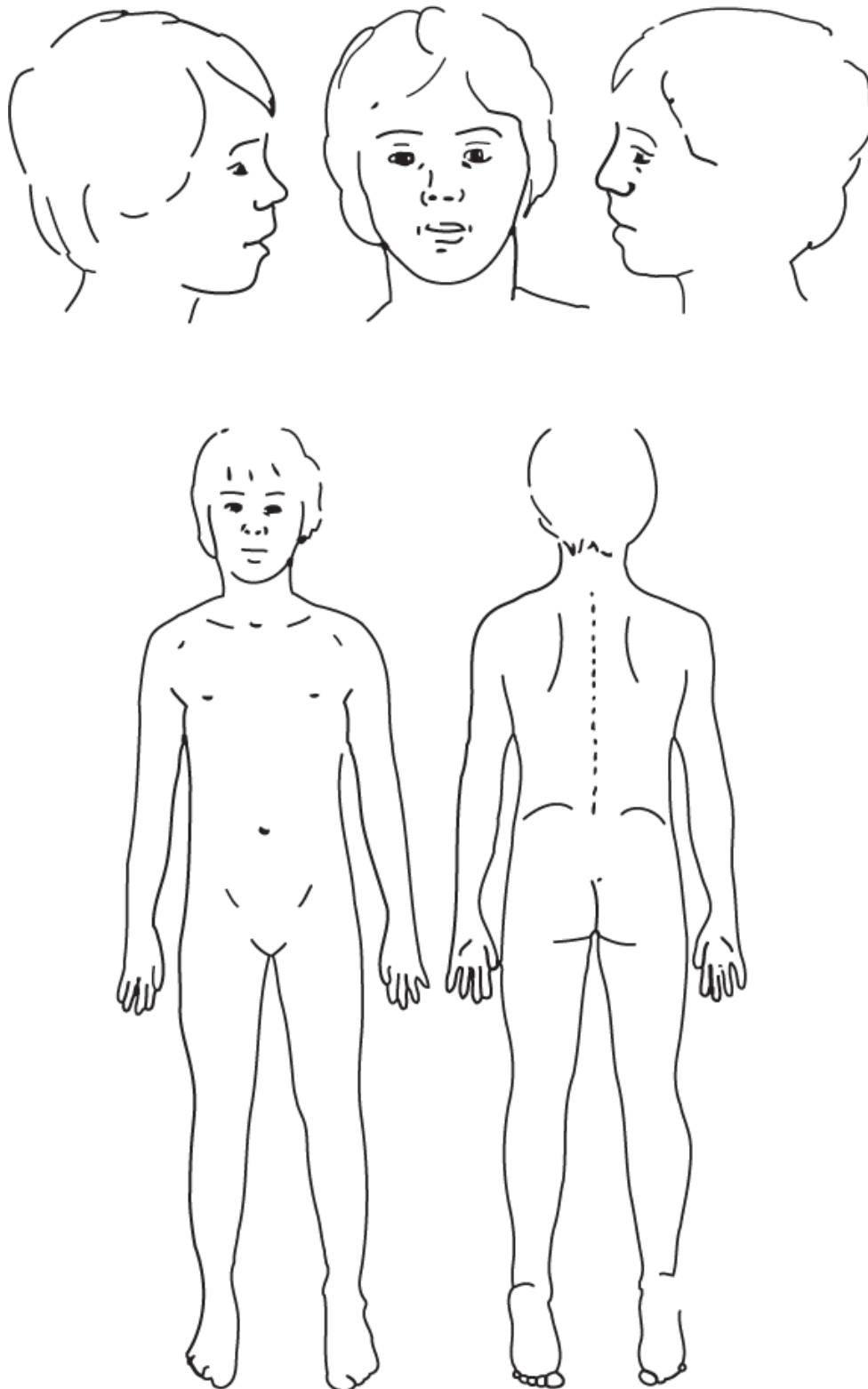
The Body Map may only be completed by the DSL, DDSL, School Nurse or another authorised safeguarding professional.

The Body Map should be used:

- to accurately document visible injuries;
- to record indicators of potential physical abuse;
- to support referrals to external agencies;
- to assist factual record keeping.

Photographs must not be taken by staff unless authorised by statutory authorities. A simple front and rear body map template should be included for safeguarding documentation and uploaded to CPOMS where appropriate.

Body Map



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
	Safer Recruitment Policy (Appendix A)	Group / School HR	Annual (Direct Safeguarding)
	Staff Code of Conduct (Appendix B)	Group / Principal	Annual (Direct Safeguarding)
	Online Safety and Acceptable Use Policy (Appendix C)	DSL / IT Lead	Annual (Direct Safeguarding)
	Anti-Bullying Policy (Appendix D)	Principal / Pastoral Lead	Annual (Direct Safeguarding)
	Allegations Management Protocol (Appendix E)	Global DSL / RHoS	Annual (Direct Safeguarding)
	Whistleblowing Policy (Appendix F)	Group / Principal	Biennial (Supporting)
	Intimate Care Policy (Appendix G)	DSL / SENCO	Biennial (Supporting)
	Care Protocol – Suicide Ideation (Appendix H)	DSL / Director of Student Welfare	Annual (Direct Safeguarding)
	Indicators of Abuse Quick Reference (Appendix I)	Global DSL / DSL	Annual (Direct Safeguarding)
	Jurisdiction-Specific Addendum (Appendix J)	DSL / Principal	Annual (Direct Safeguarding)
	Safeguarding Concern Reporting Form (Appendix K)	DSL	Biennial (Supporting)
	Other Safeguarding Issues (Appendix M)	Global DSL / DSL	Annual (Direct Safeguarding)
	Child-on-Child Abuse Policy (Appendix N)	DSL / Pastoral Lead	Annual (Direct Safeguarding)
	Lockdown Procedures (Appendix O)	Principal / H&S Lead	Biennial (Supporting)
	Physical Intervention and Restraint Policy	Principal	Biennial (Supporting)

	Data Protection and Records Retention Policy	Data Protection Officer	Biennial (Supporting)
	Complaints Policy	Principal	Annual (Supporting)
	Health and Safety Policy	Principal/ H&S Lead	Annual (Direct Safeguarding)
	Attendance Policy	Principal / Pastoral	Biennial (Supporting)
	Behaviour Policy	Principal	Biennial (Supporting)
	Curriculum Policy (including PSHE)	Principal	Biennial (Supporting)
	Equality, Diversity and Inclusion Policy	Principal / HR	Biennial (Supporting)

	Off-Site Visits and Educational Trips Policy	Principal	Biennial (Supporting)
	First Aid Policy	H&S Lead / Nurse	Annual (Supporting)
	Safer Working Practice Guidance	Group / DSL	Biennial (Supporting)
	Mobile Phone Use Policy	Principal	Biennial (Supporting)
	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, (wellbeing support/check-in sessions) for victims
- Where necessary, 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
- Where appropriate, 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.

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

BISL Lockdown Procedures

A Lockdown should be initiated when a situation arises that requires the isolation (rather than evacuation) of staff and students from an identified threat. Possible threats to the safety of individuals on site include:

- animal on site
- aggressive or violent intruder on site
- robbery/siege/hostage incident
- hazardous materials/other contamination of site
- lightning/severe storms or other extreme weather conditions
- civil unrest
- terrorist activity

The purpose of the lockdown is to minimise the effects of any threat. It is unlikely that it will be able to completely eliminate the threat.

- A Lockdown can only be initiated by the Principal, Acting Principal (in absence of the Principal) or a member of SLT.
- A Lockdown will involve the whole school.
- Lockdown drills should be practiced just like fire drills, with appropriate prior training.

1. Initiation of lockdown procedure

If a situation arises that determines a Lockdown is necessary the following procedures will be followed:

- The Principal will announce 'This is a lockdown' 3 times over the tannoy.
- All staff members are to ensure that classroom or office doors are locked and lights are off. If it is safe to do so, close blinds and windows.
- Security Guard locks the main door to school and remains at Reception to unlock the main doors when the police arrive.
- Health & Safety Officer checks that all other external doors to school are locked.
- No person is allowed to leave the building.
- Finance Manager contacts the local police.
- HR Manager contacts PE teacher(s) (if they are offsite) to let them know that we are in lockdown and they should not return to the building. Once the all clear is sounded (see below), the PE teacher(s) should be informed that it is now safe to return to the building.

2. All teaching staff should follow these instructions - regardless of whether you are teaching or not.

- Stay in room or quickly go to nearest lockable room as appropriate.
- Lock all doors – using the key that is by the door frame.
- Turn off lights.
- If safe to do so - close all internal windows and blinds where fitted.
- If safe to do so - close all external windows and blinds.
- Sit under tables or desks (low visibility as well as physical protection). If there is a room within a room available this should be used.
- Maintain a calm, quiet and reassuring presence.
- Stay where you are until the 'All Clear' is sounded.
- Absolute silence should be maintained at all times.

3. Students

- Stay in the classroom.
- Students who are not in a classroom should quickly move to the nearest lockable room. This includes students who are in the assembly halls.
- If you are in the playground, please follow the advice given by the any member of staff.
- If applicable; lock all doors. The key to each room is located on the wall to the left hand side of the door. Turn off lights.
- If safe to do so - close all internal windows and blinds.
- If safe to do so - close all external windows and blinds.
- All students and staff to sit under tables or desks (low visibility as well as physical protection). If there is a room within a room available this should be used.
- All EY students should be taken into the small lockable classroom.
- Students or staff in the toilet – should remain in the toilet and lock the door until they hear the all clear.
- Maintain a calm and quiet atmosphere.
- Stay with the students at all times until the 'All Clear' is sounded. **DO NOT OPEN THE DOOR UNTIL THE ALL CLEAR IS SOUNDED – UNDER ANY CIRCUMSTANCES.**

4. Sixth Form

- Stay in the classroom.

- Students in the Sixth Form Common Room and room 51 should lock themselves in the room upon hearing the lockdown signal. The key is at the top of the door frame inside the door.

- Once the all clear is given, the Head of Sixth Form/Assistant Head of Curriculum and Assessment will check that all students in those rooms are safe and email the Principal that students are accounted for. Do not leave the room until you hear the All Clear.

5. During breaks

- If a Lockdown is called between lessons, staff should direct students To the nearest lockable room and wait for the 'All Clear' to be sounded.
- Students/staff who are in the playgrounds should stay outside and congregate in the wooded area as far away from the building as possible. They should wait there until instructed by a member of staff that lockdown is over.

6. During External Exams – Dragon Hall

- If an external exam is taking place (iGCSE, A Level), the invigilating teacher will lock both doors and direct students to the alcove area of Dragon Hall. Students should be kept away from the windows and congregate near the wall.
- All other procedures remain the same.

7. Administration staff (including cleaners and maintenance staff)

- Stay in admin area. Outer door leading to the admin area should be locked.
- Turn off lights.
- If safe to do so - close all internal windows and blinds.
- If safe to do so - close all external windows and blinds.
- All staff to sit under tables or desks (low visibility as well as physical protection). If there is a room within a room available this should be used.
- Cleaners and maintenance staff – should be told the wording of the tannoy announcement and lock themselves in the nearest available room – which could be a classroom.

8. Communication

- The Principal will, if at all possible, communicate the nature of the threat (who, what, where and when) via Teams. The message should be kept simple (e.g. possible intruder, external event, severe weather).
- After a lockdown procedure, the Principal will de-brief staff, students and inform parents as appropriate.

Please note: If the Fire Alarm sounds during a lockdown, it should be ignored unless a verbal instruction from the Principal has also been given to evacuate.

9. All Clear procedures

- Once the threat is determined to have been neutralised, the 'All Clear' will be given over the tannoy "This is the all clear - lockdown over' x 3.
- If the 'All Clear' is not as stated above, the Lockdown should continue. At this point, doors can be unlocked and students can sit at desks. Students can leave the room if it is breaktime or lesson change over.
- Once the lockdown is over, all teachers should take a register in the classroom. The teacher should immediately send an e-mail to mel.hitchcocks@britishschool.si.
- The security guard should send the Principal a list of students who have signed out and not returned.

No absences

- In the subject line write no absences and name of class, ie, 4A.

- In the main body of the email state the names of any additional members of staff who are present. You do not need state your own name. If you have no additional members of staff in the room, you do not need to write anything in the main body of the email.
- Absent students: In the subject line write – students absent and name of class.
- In the main body of the email state names of students who are absent.
- Teachers without class responsibility at the time of the lockdown should also send an e- mail to mel.hitchcocks@britishschool.si stating in the subject line ‘No absences.’

Appendix P: Confirmation of Receipt of Child Protection and Safeguarding Policy

Name:

Position:

Date Joined:

Date of Induction:

Induction Delivered By:

I confirm that:

- I have received and read the Child Protection and Safeguarding Policy.
- I understand my safeguarding responsibilities.
- I know how to report a concern.
- I know the identity of the DSL and Deputy DSL.
- I understand the school's requirement to use CPOMS for safeguarding concerns.
- I understand the Staff Code of Conduct and professional reporting obligations.

Signature:

Date:

Please sign and return this form to Human Resources for retention on personnel files.

Document Approval

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