



**British International School**  
of Ljubljana  
an Orbital Education School



# Child Protection & Safeguarding Policy

## 2024-25



**British International School**  
of Ljubljana  
an Orbital Education School



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## Section 1

### 1.1 Child Protection Statement

**At BISL, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We are committed to providing a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.**

#### Guiding Principles

- the welfare of the child is paramount: the approach is child-centred and considers what is in the *best interests of the child* at all times;
- all children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection in line with BISL's *Caring For Each Other* statement and the values inherent in the [European Convention on Human Rights \(ECHR\)](#), the [Human Rights Act 1998](#) and the [Equality Act 2010 Advice for schools](#).
- all staff are expected to share this commitment and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- students and staff involved in Child Protection issues will receive appropriate support.

### 1.2 Introduction

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

British International School of Ljubljana is committed to the welfare of its students. To ensure this, our core Safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance;
- safer children make more successful learners;
- representatives of the whole-school community of students, parents, staff and Orbital Education will be involved in policy development and review;
- policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an interim review.

#### 1.2.1 Legislative Context

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

Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations, 2003 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are students at the school.

Current UK guidance is taken from the UK Department for Education (DfE) document: (1) [Working Together to Safeguard Children](#) and (2) [Keeping Children Safe in Education \(KCSIE\) 2024](#). We continuously research and implement child abuse procedures in accordance with Slovene law, as outlined in the Appendix 6.

### **1.2.2 Terminology**

- **Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, abuse or neglect, preventing the impairment of child's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and undertaking that role so as to enable all children to have optimum life chances.
- **Child Protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm
- **Staff** refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.
- **Child** refers to all young people who have not yet reached their 18th birthday.
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

## **1.3 Aims**

The procedures contained in this policy apply to all staff, including volunteers, and to all visitors, including those from Orbital Education and outside contractors.

This Policy lays out clear guidelines to:

- Provide clear direction to staff and others about expected codes of behaviour in dealing with Child Protection cases and provide the necessary information to enable them to meet their Safeguarding responsibilities;
- Ensure that any concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child, through the development of good practice and sound procedure.
- Make clear the school's commitment with regard to Child Protection to students, parents and other partners.

This Policy should be read in conjunction with:

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

## **1.4 Roles and Responsibilities**

BISL's Designated Safeguarding Lead (DSL) is **Ms. Katarina Zelezinger** (Director of Student Welfare).

The Deputy DSL is Ms. Mel Hitchcocks, who is also the School Principal.

The Designated Safeguarding Governor (DSG) for Child Protection issues is Orbital Education's Regional Head of Schools, **Mr. Karl Wilkinson**.

Contact details for each of these key personnel are listed inside the front cover of this policy document.

### **1.4.1 School Staff**

All members of the school staff

- are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in **the best interests** of the child.
- understand that safeguarding and promoting welfare of children is **everyone's responsibility** and are fully committed to every aspect of the schools' Child Protection and Safeguarding Policy.
- are expected to build on trusted relationships and provide a safe and caring environment in which children can develop the confidence to voice ideas, feelings and opinions. Children should be treated with respect within a framework of agreed and understood behaviour.
- should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- are aware of symptoms of abuse and have a responsibility to identify and report suspected abuse, in order to ensure the safety and wellbeing of the students in the school. In doing so, they should seek advice and support as necessary from the DSL.
- follow the referral and local early help processes set out in this policy and should expect to support other agencies and professionals in early help assessment following any referral.
- keep clear, dated, factual and confidential records of child protection concerns.
- Are required to know about (and feel confident to use) school safeguarding systems, including: the Child Protection and Safeguarding policy and protocols, Staff Code of Conduct (Appendix 1), the standards in the Staff Handbook; and the student Positive Behaviour policy and Anti-Bullying policy. They are aware of the role and identity of the designated safeguarding lead (DSL) and any deputies.
- Should be familiar with the school's safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, as outlined in the BSL Attendance Policy.
- are expected to partake in appropriate safeguarding and child protection training and professional development sessions considered appropriate by the Principal/DSL. They must complete and regularly review any online courses in Child Protection and ensure that they have followed the required guidelines for any updates (reading of relevant documentation), as required, to provide them with relevant skills on effective safeguarding.
- must forward a copy of the certificate of completion of any courses to the HR department and DSL to be kept on staff records.

#### **1.4.2 Designated Safeguarding Lead (DSL)**

The Designated Safeguarding Lead

- is appropriately trained and has an understanding of Child Protection procedures and legislation in Slovenia (Appendix 6) and the UK;
- keeps written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from, the student's general file;
- acts as a source of support and expertise to the school community;
- ensures all volunteers and contract staff undergo suitable checks;
- ensures that all staff have undergone approved in-school and National College Child Protection training and renew this training at least every two years;
- ensures that all staff sign to indicate that they have read and understood the Child Protection & Safeguarding policy;
- ensures that the Child Protection & Safeguarding policy is updated annually;
- ensures that the Child Protection & Safeguarding policy is available to parents;
- is responsible for reporting suspicions of child abuse directly to the principle and ensures that important parties such as the Principal, tutor and teachers are informed of any suspicion or allegations of abuse that have been made regarding a student;
- liaises directly with Orbital Education and (if necessary) the local authorities and other agencies in the event of an allegation being made against the Principal;
- is aware of how to make referrals to children's social care, the statutory assessments that may follow a referral, and their role in these assessments.

- develops and maintains effective links with relevant statutory and voluntary agencies;
- refers cases of suspected abuse to the appropriate authorities or police as appropriate;
- coordinates the school's contribution to Child Protection plans;
- attends and/or contributes to Child Protection conferences;
- notifies Children's Social Care if a child with a Child Protection Plan is absent for more than two days without explanation;
- ensures that when a student with a Child Protection Plan leaves the school, their information is passed to their new school and the student's social worker is informed (if one is appointed).

**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.

#### **4.4.1 Deputy Designated Safeguarding Lead (DDSL)**

In the absence of the DSL, the Deputy DSL carries out those functions necessary to ensure the ongoing safeguarding of students. In the event of the long-term absence of the designated DSL, the deputy will assume all of the functions above.

#### **4.4.2 Principal**

The Principal

- has overall responsibility for safeguarding and child protection.
- will appoint a Designated Safeguarding Lead (DSL) and deputy for safeguarding and child protection.
- must do all that s/he can ensure that all those working with children at BISL school are suitable people. This involves scrutinizing applicants, after school instructors, volunteers and other agencies connected with the school by verifying their identity, obtaining references and obtaining comprehensive background checks. This involves DBS checks for all UK staff appointments and Police checks for employees.
- ensures that training for Designated Safeguarding Lead (and deputy) is up to date and includes knowledge of local procedures. Training with National College (advanced course) must be updated at least every two years. All staff to receive annual training regarding the safeguarding and child protection policy and procedures. A record of attendance must be maintained and kept on file.
- is responsible for reviewing and amending the policy where necessary to be approved on an annual basis.
- ensures that students' safety and welfare is addressed through the curriculum;
- ensures that the Child Protection & Safeguarding policy and procedures are implemented and followed by all staff;
- allocates sufficient time and resources to enable the DSL (or deputy) to carry out their role effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice, and that such concerns are handled sensitively and in accordance with appropriate 'whistle blowing' procedures.
- will consult the RHoS and then may proceed by contacting Social Services and/or Police,

when abuse is detected. This does not require parental consent for referral. This will be done by contacting them and requesting that they come to the school. A record will be kept of that meeting by the Designated Safeguarding Lead.

The Principal and DSL ensure that the school has:

A Child Protection policy and procedures that are reviewed annually and approved by Orbital Education, and made available to parents on request;

- procedures for dealing with allegations of abuse made against members of staff, including allegations made against the Principal;
- Safer Recruitment procedures that comply with UK and international standards, including the requirement for and use of appropriate background checks;
- a training strategy that ensures all staff, including the Principal, receive child protection training upon appointment, with refresher training every two years. The DSL should also receive advanced refresher training at two-yearly intervals;
- arrangements to ensure that all temporary staff and volunteers are made aware of, and comply with, the school's arrangements for Child Protection.

#### **4.4.3 Human Resources Coordinator, Security and Reception Staff**

It is the responsibility of the Human Resources Coordinator to keep up to date and accurate records of Police and DBS checks for all employees and that all employees have completed the relevant online Child Protection course.

Reception staff and security personnel are required to be vigilant and adhere to the procedures governing the access, detailed record-keeping, provision of a Visitor's Pass to be worn for ease of identification and monitoring of visitors to the school.

#### **4.4.4 RHoS**

Orbital Education's representative, the RHoS,

- ensures that the school has a robust Child Protection & Safeguarding policy and that the policy and procedures are implemented and followed by all staff and visitors;
- is made aware of any and all on-going Child Protection issues;
- liaises between the school and Orbital Education's head office regarding any Child Protection or Safeguarding concerns.

#### **Policy Review**

This policy is to be reviewed annually, though any deficiencies or weaknesses in safeguarding and child protection arrangements will be remedied without delay. The Principal and Regional Head of Schools (on behalf of the Board) will undertake an annual review of the school's Child Protection/ safeguarding policies and procedures and of the efficiency with which the related duties have been discharged.

### **1.5 Good Practice Guidelines**

To meet our responsibilities towards our students all staff must maintain agreed standards of good practice. These include:

- treating all students with respect;
- setting a good example by conducting ourselves appropriately;
- involving students in decisions that affect them;
- encouraging positive and safe behaviour among students;
- being a good listener;
- being alert to changes in students' behaviour;
- recognising that challenging behaviour may be an indicator of abuse;
- reading and understanding the school's Child Protection & Safeguarding policy and guidance documents on wider safeguarding issues (e.g., bullying, physical contact and information-sharing);



- asking the student's (and/or parents) permission before doing anything for them of a physical nature, such as assisting with dressing, providing physical support during PE or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language;
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.

## **1.6 Support for those involved in a Child Protection issue**

Abuse - and the allegation of abuse - is devastating for the child and causes distress and anxiety for families and staff who become involved. We will support students, their families and our staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest;
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support; • following the procedures laid down in our whistle blowing, complaints and disciplinary procedures;
- cooperating fully with relevant statutory agencies.

Section 2

## **2.1 Complaints Procedures**

Where a student or parent raises a concern about poor practice towards a student, the school's Complaints and Concerns policy and procedures will be followed. Poor practice includes unfairly singling out a student, using sarcasm or humiliation as a form of control, bullying or belittling a student or discriminating against them in some way. Complaints are managed by senior staff and the Principal in accordance with this policy.

Complaints from staff are dealt with through the school's Complaints and Concerns policy and through disciplinary and grievance procedures.

If the concern raises safeguarding issues rather than poor practice, then the Child Protection procedures should be followed.

## **2.2 Child Protection Procedures**

### **2.2.1 Key Points**

All employees are required to report to the DSL (or DDSL in the absence of the DSL) in the event that they suspect child abuse or neglect.

If a child or young person tells you that they are being abused, it is important that you know how to respond.

- Be available and amenable;
- Listen carefully and at the child's pace; avoid too many questions;
- Take what is said seriously;
- Reassure the child that they are right to tell;
- Tell the child that you have to pass this information on;
- Make a careful, handwritten record of what was said verbatim; complete a record of your

concern and report this to the DSL as soon as possible;

You should NEVER:

- Take photographs or examine a child;
- Investigate a disclosure or allegation;
- Make promises to a child;
- Speculate or accuse anybody;
- Forget to record what you have been told;
- Fail to pass the information on to the correct person (share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family)

Appendix 5 provides a detailed flowchart for reporting a concern.

### **2.2.2 If you suspect a student is at risk of or experiencing abuse or harm**

There will be occasions when you suspect that a student may be at risk, but you have no 'real' evidence. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or you may have noticed physical but inconclusive signs. In these circumstances, you should try to give the student the opportunity to talk. The signs you have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine to ask the student if they are OK or if you can help in any way.

Use the Welfare Concern Form (Appendix 7) to record these early concerns.

If, following your conversation, you remain concerned, you should complete a record of your concern, report this to the DSL as soon as possible and complete the Record of Concern Form (Appendix 8) by the end of the day.

If the student does begin to reveal that they are being harmed, follow the guidance in the section 'If a student makes a disclosure to you' below.

### **2.2.3 If a student makes a disclosure to you**

It takes a lot of courage for a child to disclose that they are being abused. They may not feel ready or know how to tell someone they are being abused, exploited or neglected. They may feel ashamed, embarrassed or humiliated, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a student talks to you about any risks to their safety or wellbeing, you must let them know that you will have to pass the information on - you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement: if you jump in immediately, the student may think that you do not want to listen; if you leave it until the very end of the conversation, the student may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the student,

- allow them to speak freely;
- remain calm and do not over-react – the student may stop talking if they feel they are upsetting you;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- do not be afraid of silences – remember how hard this must be for the student; • under no circumstances ask investigative questions (such as how many times this has happened, whether it happens to siblings too, or what does the child's mother think about all this);
- at an appropriate time, tell the student that in order to help them you must pass the

information on;

- do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the student for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive, but the child may interpret it that they have done something wrong.
- tell the student what will happen next. The student may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day;
- Report verbally to the DSL immediately;
- Write up your conversation as soon as possible on the Record of Concern Form (Appendix 8) and hand it to the DSL in person;
- Seek support if you feel distressed.

That victims of abuse should know they will be taken seriously, be supported and kept safe. They should not be made to feel ashamed for making a report or that they are creating a problem.

The DSL may involve other members of staff as required in an investigation. In the absence of the DSL, incidents must be reported to the Deputy DSL/ the Principal.

### Concerns about Staff

#### **2.2.4 Abuse of Trust**

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff must understand that, under Slovenian and UK laws, it is an offence for a person over the age of 18, where that person is in a position of trust, to have a sexual relationship with a person under the age of 18, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a student under 18 may be a criminal offence, even if that student is over the age of consent. This principle is extended to all students at BISL and any sexual relationships between staff and students will result in the most severe disciplinary consequences, including the notification of international Child Protection agencies.

#### **Allegations that may meet the harm threshold**

This section applies to all cases in which it is alleged that anyone working in the school, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place inside or outside of school

As with any safeguarding allegation, the school will follow its child protection/safeguarding procedures as detailed in this policy (KCSIE 2023).

#### **2.2.5 If you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount.

The school's **Whistle-blowing Code** (Appendix 2A) enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

- Concerns of poor practice by colleagues should be reported to the Head of Department or Key Stage.
- Concerns of possible child abuse by colleagues should be reported to the DSL, who will

- inform and liaise with the Principal.
- An allegation against the Principal, the DSL or deputy DSL must be reported to the RHoS.

### **Low-level concerns about members of staff**

A low-level concern is a behaviour towards a child by a member of staff that does not meet the harm threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college 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 RHoS. The **Low-level concerns policy and procedures** are set out in Appendix 2B and included in the BSL Staff Behaviour/Code of Conduct policy as well.

#### **2.2.6 Staff who are the subject of an allegation**

Allegations against a member of staff or volunteer must be reported immediately to the DSL. An allegation of abuse by a teacher or volunteer will be taken very seriously and treated in accordance with child protection procedures.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that they or the children are protected.

### **2.3 Concerns about Students (Child on Child abuse)**

Children may be harmed by other children or young people, not only by adults.

Staff are aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there may be occasions when a student's behaviour warrants a response under Child Protection rather than anti-bullying procedure, known as Child on Child abuse.

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary/sixth form stage. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally), both inside or outside of school, and are never acceptable (KCSIE 2024). There is a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable, and it will not be tolerated.

It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys".

The school will challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising it.

Staff should be aware that students with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Girls and students who identify as LGBTQ are also more likely to be targeted.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. They should not be made to feel ashamed for making a report or that they are causing a problem by reporting sexual violence or sexual harassment.

If you suspect that a student is at risk of, or experiencing, child on child abuse you must follow the procedures set out in sections 2.2.1 – 2.2.3.

### **3.1 Staff Recruitment and Training**

#### **3.1.1 Safer Recruitment**

The school safer recruitment procedures will be followed for all staff employed by the school. All BISL staff (both teaching and non-teaching), including volunteers who apply to work at the school, will be subject to a rigorous recruitment process to ensure, as far as possible, their suitability to work with children.

Safer recruitment means that all applicants will:

- provide evidence of identity and qualifications;
- provide three referees, including the most recent employer, who can comment on the applicant's professional abilities and their suitability to work with children, and these referees will also be contacted and checked by the school; be checked through the ICPC, Disclosure and Barring Service, Criminal Records Bureau or the equivalent in each country they have worked or resided, as appropriate to their role;
- online searches may be conducted on the shortlisted candidates, as part of the shortlisting process and those to be interviewed.

Full details and procedures are laid out in the Recruitment and Retention policy.

All new members of staff will undergo an induction with the DSL that includes familiarisation with the school's Child Protection & Safeguarding policy and an identification of their child protection training needs. All staff sign to confirm they have received a copy of the Child Protection & Safeguarding policy (Appendix 4).

#### **3.1.2 Staff Training**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff, including volunteers, will receive training during their induction. All staff are required to complete an approved online training course in Child Protection (Child Protection for International Schools) and forward a copy of the certificate to HR for filing.

- All staff, including the Principal and the RHoS, will receive/complete safeguarding/child protection training annually. At BISL, the DSL will provide safeguarding training to all staff at the beginning of the academic year and all staff will complete a National College Child Protection online course. Staff training includes online safety and understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Student Teachers and other visiting staff will be informed of the Child Protection Policy (see Visiting Staff leaflet, Appendix 3).
- Staff receive further safeguarding updates as required via staff meetings, staff insets or email.
- In addition, the DSL and DDSL will also complete the Child Protection Advanced course every two years and receive further appropriate training needed to carry out their role effectively. The DSL will also receive training in inter-agency procedures in the Slovene context (Appendix 6).

### **3.2 Extended School and Off-Site Arrangements**

Where extended school activities are provided by and managed by the school, the school's Child Protection & Safeguarding policy and procedures apply. Activity teachers are required to provide Criminal Record clearance before working with our students. Allegations made against activity teachers will be treated according to sections 2.2.1-2.2.3 as above.

When our students attend off-site activities, we will check that effective child protection arrangements are in place.

### **3.3 Photography and Images**

**The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect students, we:**

- have parental consent for photographs to be taken or published of all students under 18 (consent is given at enrolment on an 'opt-out' basis);
- will not publish photographs that include children whose parents have opted out of giving consent;
- will seek the consent for photographs to be taken or published of students over 18;
- ensure students are appropriately dressed;
- encourage students to tell us if they are worried about any photographs that are taken of them.

### **3.4 e-Safety/ online safety**

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 and personally owned devices such as tablets may not be used during lessons or formal school time. 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.

### **3.5 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 also celebrates Pride Week. 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).
- E-Safety education (linked to the E-safety Policy) 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.
- 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.

## **Section 4**

### **4.1 Forms of Abuse and Neglect**

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

There is no single definition for abuse, neglect and safeguarding issues and in most cases, multiple issues will overlap. There are four main categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. (Definitions below are taken from *Working Together to Safeguard Children* [UK Government, 2018]).

#### **4.1.1 Physical Abuse**

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

#### **4.1.2 Emotional Abuse**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are

worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

#### **4.1.3 Sexual Abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse Sexual abuse can take place online,



and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### **4.1.4 Neglect**

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

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

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

#### **4.1.5 Specific forms of abuse and safeguarding issues**

##### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

In Slovenia, domestic violence is defined [by the Act on the Prevention of Violence in the Family](#), and at the same time it determines the procedures for dealing with violence, the duties of various bodies and organizations, and measures and services for the protection of victims. Authorities and organizations are obliged to treat cases of domestic violence as a matter of priority and to do everything to protect the victim.

##### **Child on child abuse (see section 2.4)**

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

##### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find

the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. If occurring online (either in isolation or in connection with face-to-face incidents), this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

It is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

### **Bullying**

Serious bullying causing a child to feel frightened or in danger is regarded as emotional abuse.

All incidences of bullying should be reported and will be managed through our Anti-Bullying Strategy. All students and parents are made aware of the subject of bullying, and it is addressed at regular intervals in the personal, social and health education (PSHE) curriculum and during Anti-Bullying Week. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Principal and the DSL will consider implementing Child Protection procedures.

### **Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

### **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour

suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

### Impact of Abuse

The impact of child abuse should not be underestimated.

Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## **4.2 Children who may be particularly vulnerable to abuse**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and Child Protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance, on the part of some adults to accept that abuse can occur.

To ensure that all of our students receive equal protection, we will give special consideration to defined classes of individuals. Staff should be particularly alert to the potential need for early help for children who are:

- disabled or have special educational needs.
- missing from school regularly.
- living challenging family circumstances or transient lifestyles (in foster care/temporary accommodation, domestic abuse, mental health problems etc);
- misuse drugs or alcohol or are affected by parental substance misuse.
- asylum seekers.
- vulnerable to being bullied or engaging in bullying.
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- at risk of prostitution, modern slavery, exploitation, radicalisation or trafficking.
- do not have English as a first language
- LGBT (lesbian, gay, bi or trans) may be at higher risk if they do not have trusted adult who they can be open with.

Staff should be aware that children can be at risk of abuse or exploitation in situations outside of their families (e.g. sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation), and consider when this might be the case.

## **4.3 Indicators of Abuse**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting

from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused. A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is most important that you report your concerns – you do not need 'absolute proof' that the child is at risk.

## **Section 5**

### **5.1 Taking Action**

#### **5.1.1 First steps**

See Section 2 (above).

The key points for taking action If you have concerns about a Child Protection issue or if a child

makes a disclosure are:

- act **immediately** if you have any concerns about a child's welfare. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately.
- treat the student with courtesy and sensitivity, and inform them that you will have to share this information (never promise a student confidentiality);
- inform the DSL of your concerns as soon as possible and provide the DSL with either a completed Welfare Concern Form (Appendix 7) or Record of Concern Form (Appendix 8) by the end of the school day; if possible, reports should be managed with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy).
- do not discuss the issue with colleagues, friends or family. Maintain confidentiality and share information on a need-to-know basis only;
- When management and handling of reports that include an online element, **staff should not view or forward illegal images of a child**. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection (see [searching screening and confiscation](#) advice for schools).
- seek support for yourself if you are distressed.

Appendix 5 provides a detailed flowchart for reporting a concern.

### **5.1.2 Notifying parents**

The school will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the DSL, after consultation with the Principal, believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Social Care (CSD Ljubljana-Vič).

### **5.1.3 Notifying Children's Social Care and Other Child Protection Agencies**

The DSL will make a referral to Children's Social Care (Appendix 6) if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

In order to ensure a student's safety in an emergency, the DSL may also share information directly with the police or other Child Protection services if:

## **5.2 Confidentiality and Sharing Information**

All staff must understand that Child Protection issues warrant the highest levels of confidentiality, not only out of respect for the student and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, or with the Principal if the DSL is the subject of the concern. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The school's policy on confidentiality and information-sharing is shared with parents each year as part of the annual Terms & Conditions.

### **5.2.1 Storing Child Protection Information**

Child Protection information is stored separately from a student's general school file and the school file will be 'flagged' to indicate that separate information is held. The Child Protection information is handled and stored in line with the UK's Data Protection Act (1998) and Slovenia's Law on the Protection of Personal Data (ZVOP, 2004) and must be:

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

Written information, such as Record of Concern Forms and minutes of discussions are stored in a locked facility. Any electronic information is password protected and only made available to relevant individuals. Furthermore, to prevent unauthorised access to sensitive information, electronic information should not be stored on laptop computers which, by the nature of their portability, could be lost or stolen. If it is necessary to store Child Protection information on portable media, such as a backup device, these items should also be kept in locked storage.

### **5.2.2 Access to Child Protection Information**

Child Protection records are exempt from the disclosure provisions of the Data Protection Act and ZVOP, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see Child Protection records, they must refer the request to the Principal.

The Data Protection Act and ZVOP permit approved school staff to share the information with relevant agencies, where that information may help to protect a child.

### **5.2.3 Staff reporting directly to Child Protection Agencies**

Staff should follow the reporting procedures to the DSL outlined in this policy. The DSL is the person to report Child Protection concerns to outside agencies, after consultation with the Principal.

Staff may only share information directly with Children's Social Care or the police if:

- the situation is an emergency and the DSL, their deputy and the Principal are all unavailable;
- they are convinced that a direct report is the only way to ensure the student's safety;
- the situation directly involves the DSL, the Principal and the RHoS.

## **APPENDIX 1:**

### **Code of ethical practice for school staff**

All school staff are valued members of the school community. Everyone is expected to set and

maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for our students.

All school staff should:

- place the safety and welfare of students above all other considerations.
- treat all members of the school community, including students, parents, colleagues and others with consideration and respect;
- adhere to the principles and procedures contained in the policies in our Safeguarding portfolio and in Teaching & Learning policies;
- treat each student as an individual and make appropriate adjustments to meet individual needs;
- demonstrate a clear understanding of and commitment to non-discriminatory practice.
- recognise the power imbalances between students and staff and the different levels of seniority of staff, and ensure that power and authority are never misused;
- understand that school staff are in a position of trust and that sexual relationships with a student, even over the age of 18, are forbidden and may be a criminal offence;
- be alert to, and report appropriately, any behaviour that may indicate that a student is at risk of harm;
- encourage all students to reach their full potential.
- never condone inappropriate behaviour by students or staff.
- take responsibility for their own continuing professional development.
- refrain from any action that would bring the school into disrepute.
- value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice.

## **APPENDIX 2A:**

### **Whistle-blowing Code for issues relating to children and young people**

#### **Purpose of the Code**

The school adheres to whistle-blowing procedures to enable staff to raise concerns relating to:

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

This adapted version of the Code provides additional specific information to help staff to understand the role of whistle-blowing in the context of poor practice and unacceptable conduct and attitudes towards children.

#### **When to use the Code**

Whistle-blowing reports wrongdoing that it is "in the public interest" to report. Examples linked to safeguarding include:

- Pupils' or staff's health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing in the public interest

Whistle-blowing procedures may be used by anyone employed by the school in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a student is inappropriate. Inappropriate conduct includes, but is not confined to:

- bullying or humiliation.
- contravening Health & Safety guidelines.
- serious breaches of ethical practice.
- professional practice that falls short of normally accepted standards.
- compromising the students' welfare in a way that does not meet the threshold for Child Protection intervention.

### **Reasons for 'blowing the whistle'**

Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated, and their confidentiality will be respected. Staff should consider the examples above when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or school procedures, put people in danger or was an attempt to cover any such activity up.

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

Whistle-blowing may not only protect students, but also deter suggestions that an individual has colluded with poor practice that they knew was occurring but chose to ignore.

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

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

### **Barriers to whistle-blowing**

An individual may worry that they have insufficient evidence to raise a concern, that they will set in train an unstoppable chain of events; that there will be adverse repercussions for their career, that they may suffer harassment or victimisation, or that their suspicion or concern might be totally misplaced.

These concerns are entirely understandable, but each individual can be reassured that the whistle-blowing procedures take account of and address these fears.

One useful way to decide whether the concern should be reported is to write down what has been observed or heard to cause concern and then consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

The school will fully support an individual and do all it can to protect them from any harassment



or adverse repercussions that may arise from whistle-blowing.

No action will be taken against a member of staff who raises a genuine concern that proves to be unfounded. However, allegations that prove to be deliberately fabricated or malicious will be severely dealt with through staff disciplinary procedures.

### **Confidentiality and anonymity**

All concerns are treated in confidence and, as far as possible, the identity of the 'whistle-blower' will not be revealed. However, absolute confidentiality cannot be guaranteed (if, for instance, as a result of the investigation the whistle-blower is required to provide a witness statement or attend a court hearing).

Individuals may, if they wish, raise their concern anonymously. However, anonymous complaints may not be followed up as the school leaders would have to consider whether the credibility or seriousness of the concern warrants investigation if the source - and therefore key evidence - is not readily available.

### **'Whistle-blowing' procedures and process**

#### **Raising the concern:**

- Concerns should be raised directly with the principal either verbally, or wherever possible, in writing. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.
- If the Principal is the subject of the concern, the concern should be raised in writing with the Regional Head of Schools from Orbital Education.
- A supportive friend or colleague may accompany the whistle-blower to meet with the Principal if desired.
- The Principal (or RHoS) will clarify and record issues of and requests for confidentiality and the protection of the whistle-blower's identity.
- The Principal (or RHoS) will outline any proposed actions to be taken and set a date for a follow-up meeting.

#### **Investigation:**

- The Principal (or RHoS) will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred.
- Members of the school community may be asked to provide information or advice.
- Specific advice, e.g., legal guidance, may be sought internally (e.g., from Human Resources) or from outside (e.g., Children's Social Care).

#### **Record-keeping and feedback:**

- A written record of the conduct established facts and outcome of the inquiry will be kept.
- The whistle-blower will be kept informed of the progress of the inquiry. Timescales will depend on the complexity of the initial inquiry, but the case should not be allowed to stall. Initial feedback will be given to the whistle-blower within 10 working days. The timescale for any subsequent feedback will then be agreed.

#### **Outcome:**

The outcome of the inquiry will be one of the following:

- No poor practice or wrongdoing is established, and the case is closed.
- The concern has some substance, and the subject of the concern will receive advice and support from the Principal to improve practice;
- Poor practice or wrongdoing is established, and disciplinary proceedings are initiated. Orbital Education will be informed.
- The concern is more serious, and an investigation is initiated. This investigation may involve Orbital Education, Children’s Social Care, or the police.

If, at any stage in the process, there is reason to believe that a child is at risk of significant harm, Children’s Social Care will be immediately involved.

### **Further action**

If an individual has raised a concern but is dissatisfied with the way it has been managed or with the outcome, the school’s Concerns and Complaints and Grievance procedures should be followed. The individual may also contact the RHoS at Orbital Education for advice. The individual may also seek guidance from a professional association, a solicitor, the police, or a Children’s Social Care organisation.

## **APPENDIX 2B:**

### **Low-level concerns about members of staff**

A low-level concern is a behaviour towards a child by a member of staff that does not meet the harm threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a ‘nagging doubt’. Examples of low-level concern may include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device (without specific permission from the Principal)
- Engaging in 1-to-1 activities where they can’t easily be seen
- Humiliating pupils

Low-level concerns can include inappropriate conduct **inside and outside of work**.

Staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

It is crucial that any such concerns, including **those which do not meet the harm threshold** (see section 2.3 of the Child Protection and Safeguarding Policy) are shared responsibly and 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 and colleges from potential false allegations or

misunderstandings.

### **Reporting low-level concerns**

Where a low-level concern has been identified, this will be reported as soon as possible to the Principal, who will inform the DSL, as necessary. It is never too late to share a low-level concern.

Low-level concerns about the Designated Safeguarding Lead will be reported to the Principal and those about the Principal will be reported to the RHoS. Where the low-level concern has been reported to the Designated Safeguarding Lead, he/she will inform the Principal of the details as soon as possible.

### **Recording concerns**

A summary of the low-level concern should be written down, signed, timed, dated (see the **Reporting Low-Level Concerns form** below) and shared by the person bringing the information forward. Where

concerns are reported verbally to the Principal, this will be recorded in writing and will be signed, timed and dated.

### **Responding to low-level concerns**

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Principal will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the RHoS or police.
- Where necessary, further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine the next steps. If they:
  - are consistent with the school's Staff Behaviour/Code of Conduct Policy: no further action will be required
  - constitute a low-level concern: additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g., via the Disciplinary Procedures.
  - are serious enough to consult with or refer to the RHoS: a referral should be made to the RHoS.
- When allegations raise a safeguarding concern, procedures within the school's Child Protection and Safeguarding Policy and Disciplinary Policy will be followed: allegations will be considered alongside any other low-level concerns that have previously been raised about the same individual. They will then be referred to the RHoS or Police if deemed necessary by the Principal and DSL. If the concern is referred to the RHoS or Police, the school's safeguarding procedures will be followed. When considered with any other low-level concerns that have previously been made, records will be made of:
  - all internal conversations including any relevant witnesses
  - all external conversations, e.g., with the RHoS
  - the decision, and the rationale used to make that decision
  - any action taken

All reports will be handled in a responsive, sensitive, and proportionate way. Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust, and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### **Can the reporting person remain anonymous?**

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

### **Should the low-level concerns file be reviewed?**

The records will be reviewed periodically, as well as when a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the RHoS if required.

A record of these reviews will be retained. References Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the RHoS and found to be substantiated.

**Low Level Concern Form**

Please use this form to share any concern, no matter how small.

You should provide a concise record – including a brief context in which the low-level concern arose, and details which are chronological, and be as precise and accurate as possible – of any such concern and relevant incident(s). Please use a separate sheet if necessary. The record should be signed, timed and dated.

<b>Name Staff Member – Department and Role</b>	<b>Name of child/young person/adult involved</b>
<b>DETAILS OF CONCERN/INCIDENT (use separate sheet if needed)</b>	
<b>Time and place of incident:</b>	<b>Other witnesses present:</b>
<b>Circle as appropriate the nature of low-level concern:</b> Health and safety Safeguarding (Behaviour/general wellbeing) Complaint	
<b>ANY ACTION ALREADY TAKEN IN RELATION TO CONCERN/INCIDENT</b>	
<b>WHAT FURTHER ACTION IS REQUIRED? (IF APPLICABLE)</b>	
<b>(WHO WILL ACTION / OBSERVE, MONITOR)</b>	

<b>Report written by:</b> Name and signature		<b>Witness to the incident (if relevant):</b> Name and signature	

**APPENDIX 3:**

**Child Protection Leaflet for Visiting Staff**

Welcome to BISL.

School Child Protection Statement

**At BISL, we recognize our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.**

While working in our school we expect you to take care of our students and follow our procedures.

Key facts about child abuse

Abuse and neglect can happen to any child, boy or girl, of any race, culture, ethnicity or sexuality. Disabled children and children with Special Educational Needs are particularly vulnerable.

Many children are unable to disclose what is happening to them and rely on us to interpret their behaviour and spot signs of abuse.

A student may:

- have a bruise, burn or injury that seems suspicious;
- show signs of pain or discomfort;
- be unnaturally passive or withdrawn;
- be unpredictable and challenging;
- seem anxious, fearful or distressed;
- provide an unlikely explanation for their injury or their behaviour.

What to do if you are concerned about a child’s welfare or safety

If you are concerned for a child’s health, welfare or safety in any way, you must raise this as soon as possible with the **Designated Safeguarding Lead (DSL), Ms Katarina Železinger (040 618 361)** [or, if she is unavailable, to the Deputy DSL, at least before you leave the school site. If the DSL and deputy are not available, the Principal should be informed directly (or a designated member of the SLT).

Do not question the student or try to secure evidence. Your responsibility is to report your concern, not to investigate.

If a student tells you something that suggests they are at risk of harm, allow them to tell you as much as they wish and let them know that you must pass the information on to the DSL.

If you become concerned about a student's immediate safety, notify the nearest member of staff and tell them why you are concerned.

You should complete either a Welfare Concern Form or Record of Concern Form (available from the Child Protection & Safeguarding policy or from the DSL) and deliver this in person to the DSL before you leave the school site. Ask a senior member of staff if you would like help to complete the form.

If you have any questions or wish to see our Child Protection & Safeguarding policy, please contact the DSL.

## **APPENDIX 4:**

### **Confirmation of receipt of the Child Protection & Safeguarding policy**

Name:

Date of joining BISL:

Post:

Date of induction:

Name and designation of staff

Staff member responsible for induction:

I confirm that I have received and read the school's Child Protection & Safeguarding policy. I have been made aware of my duty to safeguard and promote children's welfare. The procedures for reporting concerns about a student have been explained to me.

Signature:

Name:

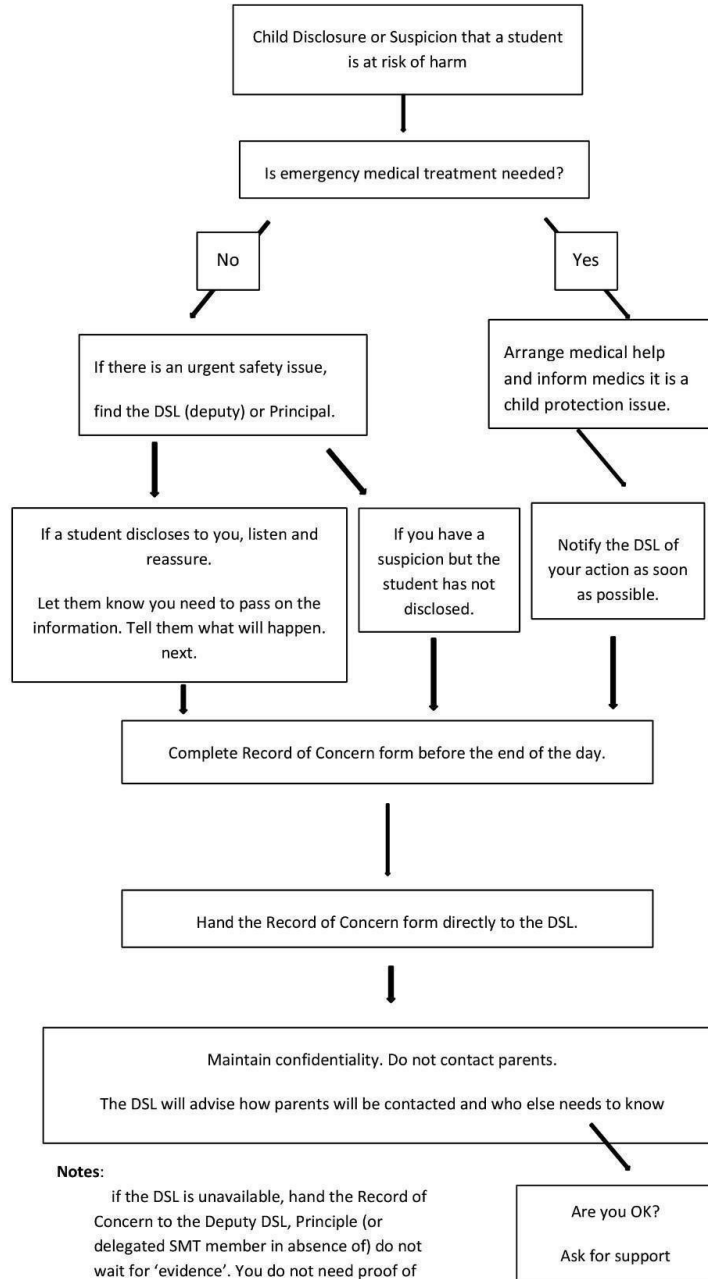
Date:

Please sign and return this form to HR.



**APPENDIX 5:**

**Reporting A Concern**

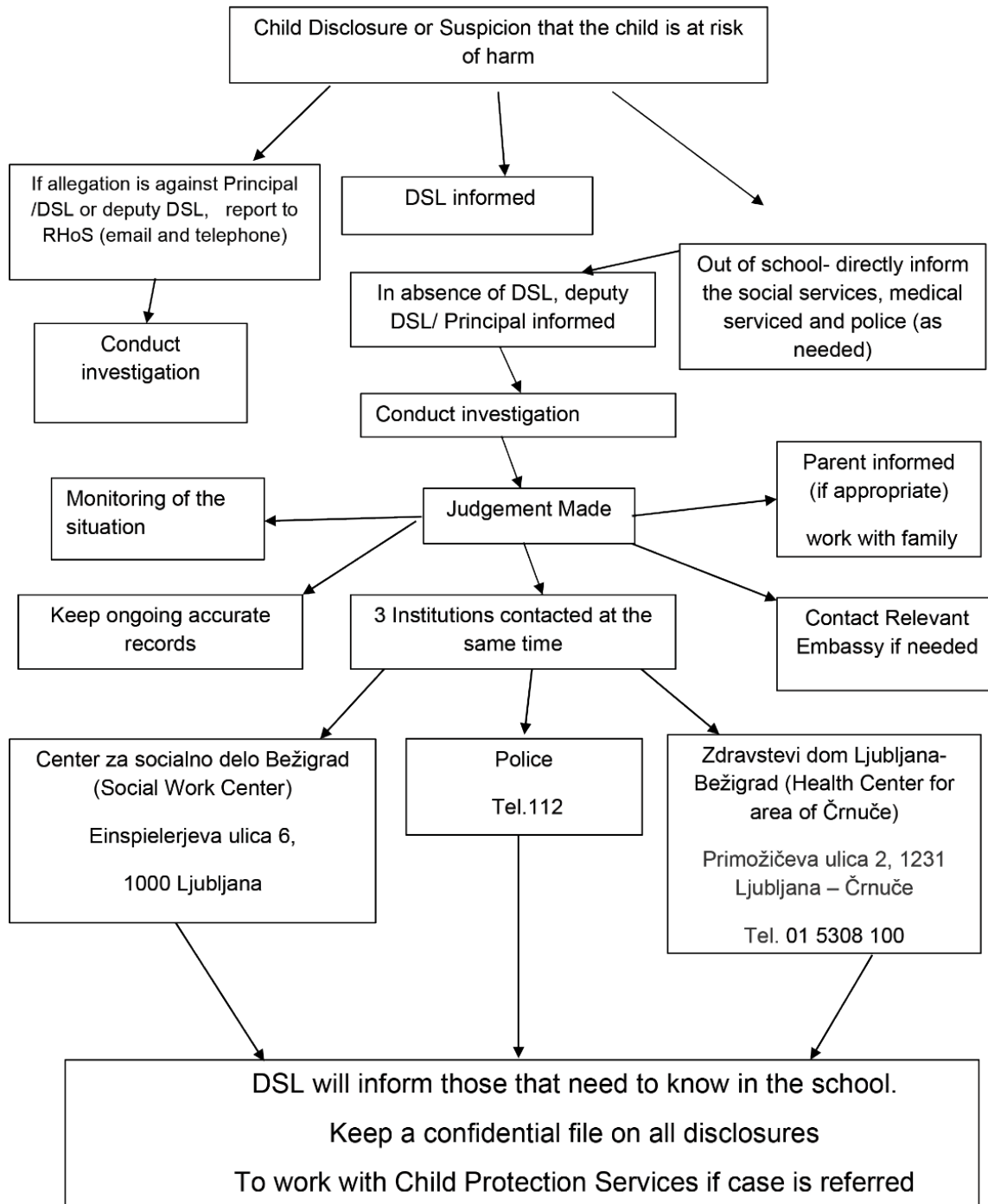






**APPENDIX 6: Child Protection Legislation and Procedures in Slovenia**

Information and documentation can be found [here](#).



## **APPENDIX 7: Welfare Concern From**

Use this form to record any concern about a student's welfare and give it to the Designated Safeguarding Lead.

If you suspect the student may be suffering abuse or neglect, or you have received a disclosure of abuse from a student, or you have heard about an allegation of abuse, you must complete the Child Protection Record of Concern form instead, and hand it to the Designated Safeguarding Lead today.

<b>Student's Full Name</b>	_____		
<b>Student's Year Group</b>	_____ <b>Class/Form Teacher</b>	_____	
<b>Reporting Staff's Name</b>	_____		
<b>Date of this record</b>	_____	<b>Time given to DSL</b>	_____

<b>Why are you concerned about this student?</b>
--

<b>What have you observed and when?</b>
<b>What have you heard and when?</b>
<b>What have you been told and when?</b>

<b>Have you spoken to the student?</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
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**If yes, what did they say?** (use the student's own words)

**Are the parents aware of your concern?**

**Yes**  **No**

**If yes, what did they say?** (use the student's own words)

**Have you discussed your concern with anyone else?**

**Yes**  **No**

**If yes, who?**

**Is this the first time you have been concerned about this student?**

**Yes**  **No**

**Please give further details**

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

**Received by Designated Safeguarding Lead:**

**Name** \_\_\_\_\_ **Date** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Time** \_\_\_\_\_



**British International School**  
of Ljubljana  
an Orbital Education School



## **APPENDIX 8: Child Protection and Safeguarding Record of Concern Form**

Use this form to record any concern or suspicion that a student may be suffering abuse or neglect, or if you have received a disclosure of abuse from the student, or if you have heard about an allegation of abuse. You must give this form to the Designated Safeguarding Lead before you leave the school today.

If you have a more general concern about the student's welfare, please complete the Welfare Concern form instead, and hand it to the Designated Safeguarding Lead.

<b>Student's Full Name</b> _____
<b>Student's Year Group</b> _____ <b>Class/Form Teacher</b> _____

<b>Student's details</b>	
(If you do not have certain information, do not delay handing in the form. The designated DSL will complete the information)	
<b>Date of Birth:</b> _____	<b>Gender:</b> <b>Male</b> <input type="checkbox"/> <b>Female</b> <input type="checkbox"/>
<b>Nationality:</b> _____	<b>Religion:</b> _____
<b>Native Language:</b> _____	
<b>Is EAL support required to converse with the student?</b>	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/>
<b>Does the student have any Special Educational Needs?</b>	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/>
<b>If yes, please specify:</b>	_____ _____
<b>Date of enrolment at BISL:</b>	_____
<b>Details of any siblings:</b>	_____ _____
<b>Address :</b>	_____ _____
<b>Telephone:</b>	_____

**Parents' details** (to be completed by the Designated Safeguarding Lead)

**Preferred contact:**      **Father**                         **Mother**                         **Other**  

**Contact 1:**

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

**Relationship to student:** \_\_\_\_\_

**e-mail:** \_\_\_\_\_

**telephone:** \_\_\_\_\_

**Contact 2:**

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

**Relationship to student:** \_\_\_\_\_

**e-mail:** \_\_\_\_\_

**telephone:** \_\_\_\_\_

**Contact 3:**

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

**Relationship to student:** \_\_\_\_\_

**e-mail:** \_\_\_\_\_

**telephone:** \_\_\_\_\_

**Preferred language of those with parental responsibility:** \_\_\_\_\_

**Is translation support required to converse with the parents?**                      **Yes**                         **No**  

**Student resides with**      **both parents**                         **Father**                         **Mother**                         **Other**  

**If other, please give details:** \_\_\_\_\_  
\_\_\_\_\_

**Any important home/background information:**

(e.g., any legal arrangements affecting residence and parenting; any Special Needs or disabilities of the parents which may impact the student; any ethnic/cultural background of the parents which may impact the student)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**To be completed by the person raising the concern:**

**Why are you concerned about this student?**

Please provide a description of any incidents/conversations and the dates they occurred. You must make clear what is fact and what is opinion or hearsay. You must not ask the student leading questions or try to investigate the concern yourself.

**What have you observed and when?**

This relates to anything you have personally witnessed

**Does the student have any visible injury, or have they told you they have been injured?**

**Yes**  **No**

**If yes, has medical advice been sought?**

**What have you heard and when?**

This may be third-party information that is relevant but as yet unsubstantiated.

**What have you been told and when?**

Write here anything you have been told by the student or any other person. Be clear about who has said what.

**If an allegation has been made, give any details you have about the alleged abuser.**





**Is this the first time you have been concerned about this student?**

**Yes**

**No**

Please give further details

If you have used additional sheets to complete this Record of Concern, please staple them to this form and write the number of additional sheets here

If the student has a visible injury, please indicate the location on the body map and staple the body map to this form.

Hand this form to the Designated Safeguarding Lead before you go home. If the DSL is unavailable, hand it to their deputy, the Principal or your line manager. The person receiving the form should sign below.

**Reporting Person**

**Name**

**Position**

**Contact details - telephone**

**- e-mail**

If you are not a member of BISL staff, please provide details of your school, agency or service together with a business contact telephone number:

**Signature**

**Date of this report** \_\_\_\_\_

**Time given to DSL**

**Received by Designated Safeguarding Lead:**

**Name** \_\_\_\_\_

**Date** \_\_\_\_\_

**Signature** \_\_\_\_\_

**Time** \_\_\_\_\_

**If received by anyone other than the Designated Safeguarding Lead, please explain why:**

\_\_\_\_\_  
\_\_\_\_\_

**Received by:**

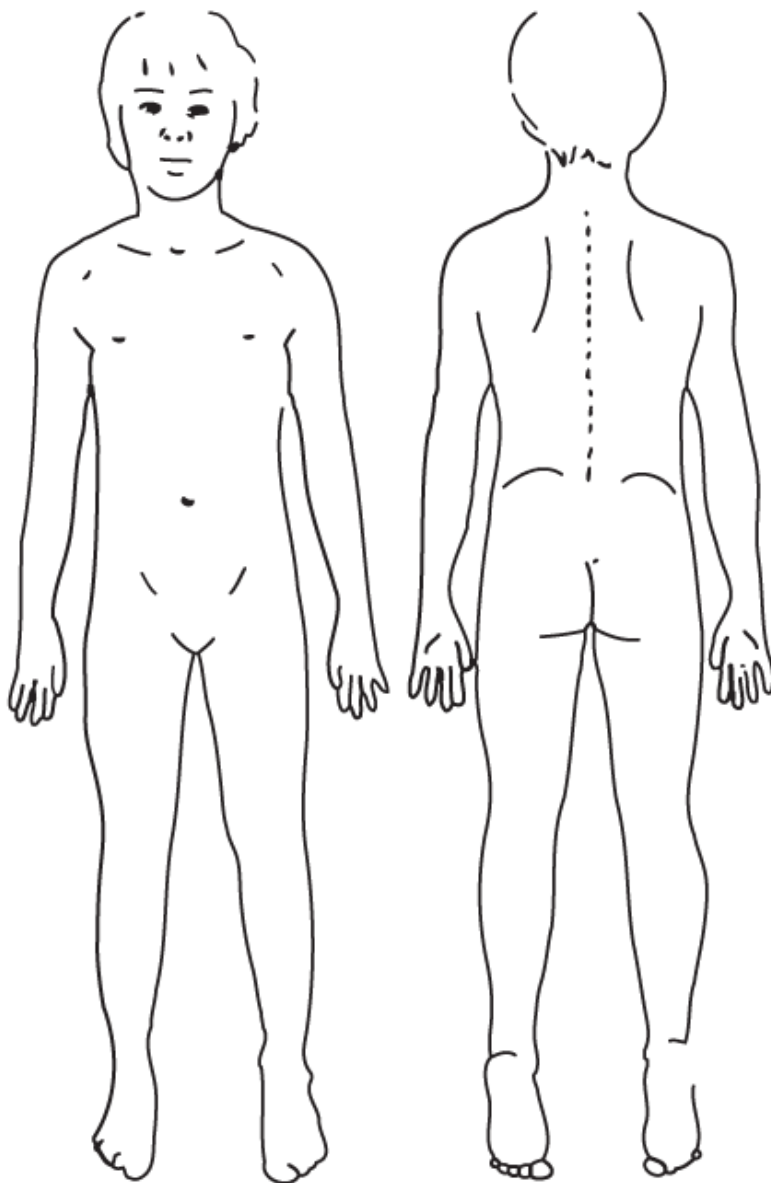
**Name** \_\_\_\_\_

**Date** \_\_\_\_\_

**Signature** \_\_\_\_\_

**Time** \_\_\_\_\_

## Body Map



## **APPENDIX 9: Child Protection Contacts**

Name and role:	Address, telephone and email address:
School's Designated Safeguarding Lead	<b>Ms Katarina Zelezinger</b> <a href="mailto:katarina.zelezinger@britishschool.si">katarina.zelezinger@britishschool.si</a> Tel: +386 40 486 548
School's Deputy Designated Safeguarding Lead and Principal	<b>Ms. Mel Hitchcocks</b> <a href="mailto:mel.hitchcocks@britishschool.si">mel.hitchcocks@britishschool.si</a> Tel: +386 40 486 548
Orbital Education RHoS	<b>Mr Karl Wilkinson</b> <a href="mailto:karl@orbital.education">karl@orbital.education</a> Tel: +44 161 485 7091
Local Authority - Allegation Manager	Police Tel: 113
Local Authority - Safeguarding Manager	Crisis Centre for Children and Youngsters in Ljubljana Tel: 012 361 222
Local Authority - Children's Social Care	Center za socialno delo Ljubljana Bežigrad Einspielerjeva ulica 6, 1000 Ljubljana Tel: 013 001 800
Local Authority - Out of Hours duty team	Crisis Centre Bežigrad Tel: 012 361 222
Health Authority (Health Centre)	Zdravstveni dom Ljubljana - BEŽIGRAD, PE Črnuče Primožičeva 2, 1231 Ljubljana-Črnuče Tel: 015 308 100
Police - Child Abuse Investigation Unit	Policijska Postaja Ljubljana-Bežigrad Tel: 113 Tel: 015 896 000
Helpline "Tom"	<a href="http://www.e-tom.si/">http://www.e-tom.si/</a> Tel: 116 111

**PREPARED/UPDATED BY:** Mel Hitchcocks, Principal – 20/ 06 / 2024

**REVIEWED BY:** Karl Wilkinson, Regional Head of Schools –

This Policy is to be reviewed **annually** and updated as and when changes occur.