



Safeguard policy

How do we ensure the safety and well-being of students at school? Measures related to protection and safeguarding.

Establishment: September 2020

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AUDIT

1.- POLICY FOR THE SAFEGUARDING AND PROTECTION OF MINORS

Safeguard

Safeguarding and promoting the welfare of children refers to the processes of protecting pupils from harm, preventing harm to their health and development, ensuring that we will always seek to improve the health and welfare of all pupils in our care and enabling every pupil to have the best opportunities and to reach adulthood successfully.

Child protection

Child protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or are likely to suffer harm as a result of abuse or neglect.

Abuse

Abuse is defined as any form of maltreatment of a child. It can manifest itself as direct harm to a child, or as a failure to act to protect a child who is at risk or already suffering harm.

Aravaca International School sets out in this policy the work that is done to ensure the safety and emotional, social, physical and academic well-being of all our pupils. The procedures contained in this policy apply to all staff, volunteers and contractors.

We recognise:

1. That the school is an important part of safeguarding our students; and that we are in the best position to identify their concerns early and provide them with the necessary support, and to prevent those concerns from escalating.
2. That it is the responsibility of all Aravaca International School (AI) staff to report any concerns they may have to the Designated Safeguarding Leaders (DSLs).
3. Our moral and legal responsibility to safeguard and promote the physical and emotional well-being of all pupils.

The IA School expects staff and partners, as well as any family, visitor or the staff of any contractor, to recognise instances where a pupil is at risk of being harmed, or indeed is being harmed, and to do everything possible to prevent further risk or harm.

We strive to provide a safe and nurturing environment where pupils are respected and valued. We are alert to signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

This policy is available on the school website.

2.- POLICY OBJECTIVES and PRINCIPLES

OBJECTIVES:

1. To provide a safe and happy environment to enable pupils to develop and learn.
2. Describe the systems and processes we follow to ensure that our pupils are safe in school.
3. Raise awareness of safeguarding/child protection issues among all staff and define their roles and responsibilities in reporting possible cases of abuse.
4. Identify those pupils who are suffering or are susceptible to harm.
5. Ensure effective communication between all staff members regarding child protection and safeguarding.
6. Establish effective procedures for staff/volunteers or individuals who encounter any child protection/safeguarding issues.
7. Be clear with all parties, including pupils and their parents/carers, about our approach to safeguarding and child protection through clear and well communicated policies.

PRINCIPLES:

1. The welfare of the child is paramount and every pupil has the right to be protected from harm or exploitation and to have his or her welfare safeguarded, regardless of race, religion, ability, sex or culture.
2. All pupils need to be and feel safe in school.
3. All students have the right to a rich and extensive curriculum that enables them to be prepared to protect themselves from harm.
4. All adults in the school should have a clear commitment to the protection of the pupils with whom they work.
5. We work together with parents/carers and/or other professionals to ensure the protection of pupils.
6. Our maxim is always "to look after the interests of the pupils".
7. All pupils have an equal right to be protected, but we recognise that we will need to pay particular attention to certain pupils with special educational needs, disability, gender, religion or sexual orientation.

In view of our international context, IA recognises and accepts its responsibility to safeguard all pupils in accordance with the United Nations Convention on the Rights of the Child (1989) and acknowledges its obligation to protect our pupils from harm and, in particular, recognises its obligation in respect of the following articles of the United Nations Convention:

Article 3: states that the best interests of children should be the primary concern when decisions affecting them are taken.

Article 13: states that children have the right to obtain and share information as long as it is not harmful to them or to other children.

Article 14: states that children have the right to think and believe what they want and to practise their religion.

Article 19: states that children have the right to be protected from physical or mental harm or abuse.

Article 34: requires governments to protect children from sexual exploitation and abuse.

Article 35: requires governments to take all necessary measures to ensure that children are not abducted, sold or trafficked.

Article 36: states that children must be protected from any activity that takes advantage of them or is likely to affect their well-being or development.

Article 37: states that no one is allowed to punish children in a cruel or harmful way.

All UN member states have acceded to the 1989 Convention, except the USA. All UN articles can be found in the following link:

http://www.unicef.org/crc/files/Rights_overview.pdf

3.- SCOPE

The Safeguarding Policy is drawn up by the Aravaca International School Safeguarding and Child Protection Team, approved by ISP, signed by senior management and adopted by all levels of the organisation. The policy will also apply to any partner agency that has unsupervised access to pupils at the school, and to any contractor.

LEGAL FRAMEWORK:

1.- UN Convention on the Rights of the Child

2.- Spanish Constitution:

- o Article 27 (right to education)

- o Article 39 (protection of the family and children)

Organic Law 8/2021, of 4 June, on the comprehensive protection of children and adolescents against violence

4.- ROLES AND RESPONSIBILITIES

ROLES

SAFEGUARD EQUIPMENT:

- DSL Designated Safeguarding Lead ISP- Safeguarding and child protection lead
Miguel Angel Garrán email mgarran@ispschools.com
- Head teacher Marta Martinez email: m.martinez@ia.edu.es
- DSL Designated Safeguarding Lead - Safeguarding and child protection lead
Miriam Serrano email: m.serrano@ia.edu.es
- DDSL Deputy Designated Safeguarding Lead - Deputy Safeguarding and Child Protection Lead
Miguel Asensio email: m.asensio@ia.edu.es

LOCAL SAFEGUARD BODIES

1.- Children's Ombudsman

Telephone: 900 101 025 (free from Spain)

+34 91 432 62 91 (from abroad)

C/ Zurbano 42 28010 Madrid registro@defensordelpueblo.es

2.- Centro de Servicios Sociales Dehesa de la Villa (Moncloa - Aravaca District)

Calle Antonio Machado 22, 28035 Madrid Telephone: 913 730 224

3.- Mentoring agents

Address calle Francisco y Jacinto Alcantara, 2 28008 madrid

Phone 917 584 624 Mail: agtutormoncloa@madrid.es

4.- Educational Inspection

The Educational Inspection Service of the DAT Capital is located at Calle Isaac Peral, N° 23 - 28040 - Madrid.

Phone: 91 720 22 00 - Fax: 91 544 30 95 -

Email: jefatura.sie.mc@madrid.org

RESPONSIBILITIES

All staff working with children have a responsibility to safeguard them and to report concerns they have about the safety of any child in their care. Without prejudice to this duty the school also assumes a number of obligations and names certain individuals (DSL-DDSL) with specific roles and responsibilities in the implementation of its safeguarding policy.

The persons exercising this function at Aravaca International School have been properly trained and have the knowledge and authority to activate the procedures outlined here in order to ensure the welfare of pupils. In the absence of the DSL, the DDSL will take over the duties of the Safeguarding and Child Protection Officer. They will also be given the necessary time in their working day to carry out their duties and will be able to prioritise safeguarding when necessary.

DSL: The responsibilities of the safeguarding and child protection officer under these two principles:

The welfare of the child is always paramount.
Confidentiality shall be respected as far as reasonably possible.

1. It will play a key role in ensuring that the school takes the necessary steps to help any pupil who may be at risk.
2. Together with the Director, ensure that all staff, both teaching and non-teaching, are aware of their responsibilities with regard to safeguarding and child protection.
3. He or she shall receive appropriate training in addition to the basic training that all staff members receive.
4. Collect and keep accurate and confidential records of any concerns about children.
5. It will ensure that the whole school community knows who the school's Safeguarding team is.
6. Be familiar with local rules, procedures and agencies that can provide safeguarding assistance.
7. Ensure that the centre follows the policy of safeguarding and protection of minors, referring those cases it deems appropriate to the competent authorities.
8. Ensure that all staff have read the safeguarding and child protection policy and provide regular training to staff.
9. Ensure that the centre's safeguarding and child protection policy is reviewed and updated annually.
10. Ensure that the safeguarding policy is published on the school's website.
11. Ensure that the management of the centre is kept informed of any child protection concerns.
12. Provide guidance to parents, pupils and school staff on how to proceed and obtain help in

the area of child protection.

13. Decide on an appropriate response to child protection issues that arise, bearing in mind that such a response must always be in the best interests of the child and acting with speed, transparency and efficiency.

DDSL: Is trained to the same level as the DSL and, in the absence of the DSL, performs the functions necessary to ensure the continued safety and security of students.

5.- TYPES OF ABUSE

There are many ways in which a learner can be exposed to risk or danger. All of them require a response. Abuse is defined as any form of maltreatment of a child. It can manifest itself as direct harm to a child, or as a failure to act to protect a child who is at risk or already suffering harm.

The most common types of abuse are as follows:

- **Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise causing physical harm to a child.
- **Emotional abuse:** Persistent emotional abuse of a child with serious detrimental effects on the child's emotional development. For example, conveying to a child devaluation or contempt, or valuing a child only to the extent that he or she meets the needs of another person.
- **Sexual abuse:** involves forcing or inducing a child to take part in sexual activities, whether or not the child is aware of what is happening. This abuse can involve physical contact, but can also manifest itself in activities without physical contact, through social networks or the internet.
- **Neglect:** is a continued failure to meet a child's basic physical and psychological needs, resulting in serious impairment of the child's health and development.

Although the above are the four most common forms of abuse, abuse can occur in many different ways involving one or more of these points.

See annex with indicators of abuse [INDICATORS OF ABUSE](#)

ADULTS CONCERNED ABOUT A PUPIL

Staff should disclose any concerns that a pupil may be experiencing or at risk of bullying. It is better to share such concerns, which may ultimately prove to be unfounded, than to keep secret

information that could have helped to protect a pupil from real harm.

Where a member or members of staff have a suspicion that a pupil in their care may be a victim of bullying, or is at risk of bullying or other harm, they should not attempt to investigate on their own. They should report it as soon as possible to the School's Safeguarding team.

On many occasions the pupil will not report it directly, but staff members will be concerned about the existence of physical or emotional indicators. Even so, staff should complete a concern in [My Concern](#) or fill in the concerns log document (yellow sheets) and body map (if appropriate) in order to submit a report to the designated safeguarding lead.

See annexes [BODY MAP RECORDING OF CONCERN](#)

6.- STAFF CODE OF CONDUCT

Good practices include:

- Treat all pupils with respect.
- Set a good example by behaving appropriately.
- Involve students in decisions that affect them.
- Encourage positive, respectful and safe behaviour among pupils.
- Be a good listener.
- Be alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation.
- Recognise that challenging behaviour can be an indicator of abuse.
- Read and understand the intimate care policy, staff behaviour policy and guidance documents on broader protection issues.
- Be aware that the personal and family circumstances and lifestyles of some pupils carry a higher risk of abuse.
- Refer all concerns about a pupil's safety and welfare to the DSL or, if necessary, directly to the police or social services.
- Never use the toilets for pupils. Do not enter the P.E. changing rooms when pupils are changing, unless you suspect that a conflict is taking place between pupils.
- Prohibit games that are provocative or may have sexual connotations.
- Do not use language, attitude or conduct that may lead to an improper relationship or that the child may interpret in that light.
- In case of being left alone with a pupil, always do so with the door of the room open and in an easily visible and accessible place.
- In the event of a fight between two students, use as little force as possible to separate the students in conflict and return the situation to normal.
- On school trips lasting more than one day, never share a room with pupils and prevent them from entering your room. On those exceptional occasions when the safety of the pupil may be compromised, the protection of the pupil's privacy must take precedence, after informing the pupil's legal guardians of the situation.
- Do not share social networks, email or personal telephone numbers with students. Communications with families and students will be through the platforms established by the school at .
- Staff telephones may not be used in classrooms or in areas where pupils are present unless required in response to an emergency plan.

6.A.- ABUSE OF THE POSITION OF CONFIDENCE

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

Staff understand that, under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a person under 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of school staff and a pupil under the age of 18 can be an offence.

6.B.- WHISTLEBLOWING AND ACCUSATIONS AGAINST STAFF MEMBERS.

Whistleblowing policy [LINK](#)

6.B.1.-CONCERNS AND ALLEGATIONS:

The school's whistleblowing code allows staff to raise concerns or allegations, initially in confidence and for a sensitive investigation to be carried out.

All staff members and volunteers should be aware of their duty to raise concerns about the behaviour or attitude of their colleagues.

Justified allegations that have good grounds are considered a disclosure of protected information and, even when they turn out to be unfounded suspicions, no action will be taken against the whistleblower.

However, where wrongdoing is **maliciously** reported, it will be treated as a potential disciplinary matter. The school has a *specific policy on whistleblowing* which should be followed in the event of such incidents.

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

- All **concerns** about inappropriate practices or possible child abuse **by peers** should be reported **to the principal** by completing the following sheet: [LINK](#) It is important that these allegations are treated seriously and that the appropriate procedures are followed.
- The same **concerns about the director** should be reported **to the immediate superior.** Deputy Regional Director. Migue Ángel Garrán: mgarran@ispschools.com
- Allegations relating to **staff who no longer work at the school**, or historical allegations, will be reported to the **police.**

In cases where staff have been involved in reporting and responding to abuse, PSI will be in a position to offer or arrange for appropriate external assistance or advice.

An investigation into alleged abuse will never be carried out unless receives specific directions to do so. It may be the work of a highly specialised professional and could interfere with a criminal investigation, if required and appropriate under local law.

6.B.2.- COMPLAINT:

A complaint is not the same as a grievance and can be defined in the following ways:

- When someone behaves in a way that has harmed or could have harmed a child.
- When someone may have committed a crime against a child.
- When someone has behaved towards a child or children in a way that could pose a risk to them.

In the event of a complaint being made against a member of school staff (or volunteer), the matter will be dealt with by the Headteacher unless a criminal offence has been committed, in which case the complaint will be passed to the local authorities, if appropriate.

In any case (whether it is a criminal act or not), the Head of School: Marta Martinez m.martinez@ia.edu.es and the ISP Director of Health and Safety Andy Duffied should be informed: aduffield@ispschools.com as soon as possible, but always within 48 hours. In the event that the complaint is made against the Head of School, the Regional Director Miguel Angel Garrá should be informed: mgarran@ispschools.com

No action will be taken to investigate a suspicion without prior consultation with the ISP Director of Health and Safety Andy Duffied and agreement on how best to proceed in accordance with both national and local guidelines on these matters.

If after this first consultation it is considered that there are grounds for further investigation, then the staff member may be suspended from duty. Suspension is a neutral act and in no way implies that the person is guilty of any offence. It is recognised that this situation could be distressing for the person concerned and the school will do its best to strike a balance between the interests of any individual and the need to ensure the safety of the children.

"Staff members will minimise the likelihood of allegations being made by ensuring they are aware of what is expected of them under the code of conduct for staff and the guide to safety at work".

7.- PREVENTIVE MEASURES

7.A.- STAFF TRAINING

It is important that all staff receive training to enable them to recognise possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

Each year, at the beginning of the school year, an internal training on Child Protection will be held in September for all teachers and staff at the school.

Onboarding: When new teachers are recruited, they carry out the following before starting work::

- Safeguarding Essentials course [Safeguarding Essentials](#) via the OneLogin platform (3 - 4 hours). The course uses case studies and interactive learning activities to help you develop and enhance your knowledge, skills and understanding of safeguarding and child protection.
- New staff will receive a briefing on arrival, which includes the school's child protection policy and code of conduct, information about documents and records, and details of the DSL. Training for new staff members must be completed before they can have unsupervised contact with pupils.

Upgrades:

All staff, including the Safeguarding team, will receive training which is regularly updated. An updated **Safeguarding Newsletter** is sent out once a term (October, January and April approximately) via our Whatsapp Staff IA group to all school staff.

The Safeguarding team have appropriate and up to date knowledge and receive appropriate additional and specialised training (approved by the Health and Safety Manager). This training will be **updated every two years**.

Recruitment staff are trained in safe recruitment techniques. This **training is renewed every five years**.

The Onelogging Learning Hub training platform has resources to keep you up to date:

- Wellbeing Resource: via the OneLogin platform (1 Hour): practical exercises and information to positively influence your wellbeing and therefore your learning. Available in English with Spanish subtitles (Stress management, Mindfulness, Tapping, Active participation exercises).
- Microlearning Safeguarding Update, designed as a self-paced experience to consolidate your learning from the [Safeguarding Essentials course](#).

7.B.- SECURE RECRUITMENT

All employees who will be working unsupervised with children or adolescents will be recruited following safe recruitment procedures (see the recruitment policy, its background check policy and any relevant implementation notes).

7.C.- SCHOOL REGISTRATION

Visitors to the school, including contractors, are asked to register and are issued with a badge, which confirms that they have permission to be on the school premises. Despite having the badge, visitors must be accompanied at all times. We have a notebook in which their name and surname, ID card number, time of arrival with signature and time of departure with signature are recorded. Families who are simply dropping off or picking up their children do not need to register.

All visitors are expected to observe the school's health and safety and safeguarding rules.

The director will exercise professional judgement in determining whether a visitor should be

escorted or supervised while on site.

For events attended by families or people from outside the school, we have an [event registration protocol](#) which also ensures that all our students and staff are safeguarded at all times.

7.D. EXTRACURRICULAR ACTIVITIES

All extra-curricular and out-of-school activities are subject to a risk assessment to meet health and safety and security requirements.

Where school activities are provided and managed by the school, our own child protection policies and procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures.

In addition, we have installed video surveillance cameras in the vehicles used by the school for school transport.

7.E. SCHOOL EXCHANGES

On school exchanges, the school will ensure that host families provide a suitable and safe environment for our pupils and that they are aware of the school's safeguarding and child protection policy. Similarly, the families of school pupils who host visiting pupils in their homes will take appropriate precautions to provide them with a suitable and safe environment and

ensure that they are aware of the school's child protection and safeguarding policy.

8.-SPECIFIC SAFEGUARD ISSUES

SEE THE [MOBILE DEVICES AND SECURITY POLICY](#)

8.A.- CYBERSECURITY

The increase of electronic media in everyday life and the wide variety of devices that are continually evolving mean that new dangers for children are emerging. Risks and dangers of surfing the Internet include:

- Inappropriate content.
- Ignoring age limits and communicating with adults or other unknown children (which makes children vulnerable to bullying and grooming).
- Corruption of minors and sexual abuse.
- Exchange of personal information.
- Gambling or indebtedness.
- Cyber-bullying.

Cyberbullying is a form of bullying behaviour that is on the rise and is often linked to social networks and mobile phones.

We believe that the best way to protect our students is to raise awareness of the risks they face, especially through personal, social, sexual and health education and wellness-oriented programmes. The school curriculum has appropriate and frequent opportunities to teach children to recognise when they and other peers are at risk and to provide them with the skills, strategies and language they need to act appropriately. The school has software that helps us to monitor and alert on digital devices such as teachers' and pupils' computers and ipads.

8.B.- PHOTOS TAKEN WITH MOBILE PHONES OR CAMERAS

Our policy states that no visitor within our premises may use personal use DEVICES to take photographs.

The school has a number of devices for taking photographs and videos of school activities and outings. In the event that it is necessary to use personal mobile phones to take photographs, such photos should be downloaded onto the school's computer systems as soon as possible and immediately deleted from the personal device. It is the responsibility of each member of the school to remove photos from the personal device to avoid any harm to children.

8.C.- PHOTOGRAPHS FOR SCHOOL PUBLICATIONS

Photographs of pupils used by staff for teaching or marketing purposes will be taken only with school cameras or devices.

Images should be stored on a secure server or database and hard copies should only be used within the school for exhibitions, recordings or educational publications. Where these images are to be used for commercial purposes, prior consent must be obtained from parents/carers. All parents/carers must give permission for photographs to be used for publicity purposes and sign the appropriate document if they do not wish images of their children to be used externally. The school will inform staff of those pupils who do not have permission for this to be done.

8.D.- AGAINST SCHOOL BULLYING

Bullying is a safeguarding issue which if left unresolved can lead to a serious child protection problem. Members of staff at all levels will take seriously any concerns raised in relation to the bullying of any pupil. In any case, steps will be taken to investigate suspicions and to prevent the recurrence of incidents or behaviour. Bullying can occur face to face or through the inappropriate use of social media or technology. We have a school [bullying policy](#) which is also published on the school website.

Where it is reported that one child has bullied another, the allegation will always be taken seriously and treated as a safeguarding matter. Any allegation that one child may have bullied another will not, under any circumstances, be treated as "childish" or "experimentation".

8.E.- CHILDREN WITH SPECIAL EDUCATIONAL NEEDS OR DISABILITIES.

Children with special educational needs and disabilities may face additional protection challenges. There may be additional barriers to recognising abuse and neglect in this group of children, which may include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injuries, are related to the child's disability without further exploration;
- The potential for children with special educational needs and disabilities to be disproportionately affected by behaviours such as bullying, without showing any outward signs, and ensuring that this group of children is adequately protected.
- Communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers and ensure that this group of children is adequately protected.

8.F.- SAFEGUARDING PUPILS WHO ARE VULNERABLE TO EXTREMISM

Both students and teachers have the right to speak freely and express their opinion. However, freedom requires some responsibility, and freedom of speech that is designed to manipulate the most vulnerable or that is directed at violence and harm to others runs counter to the moral principles on which freedom of expression is valued. Freedom of expression is not an unconditional privilege; it is subject to laws and policies that regulate equality, human rights and community safety and cohesion. Freedom of expression that promotes violence against anyone or anything will not be tolerated.

8.G.- PHYSICAL RESTRAINT INTERVENTION

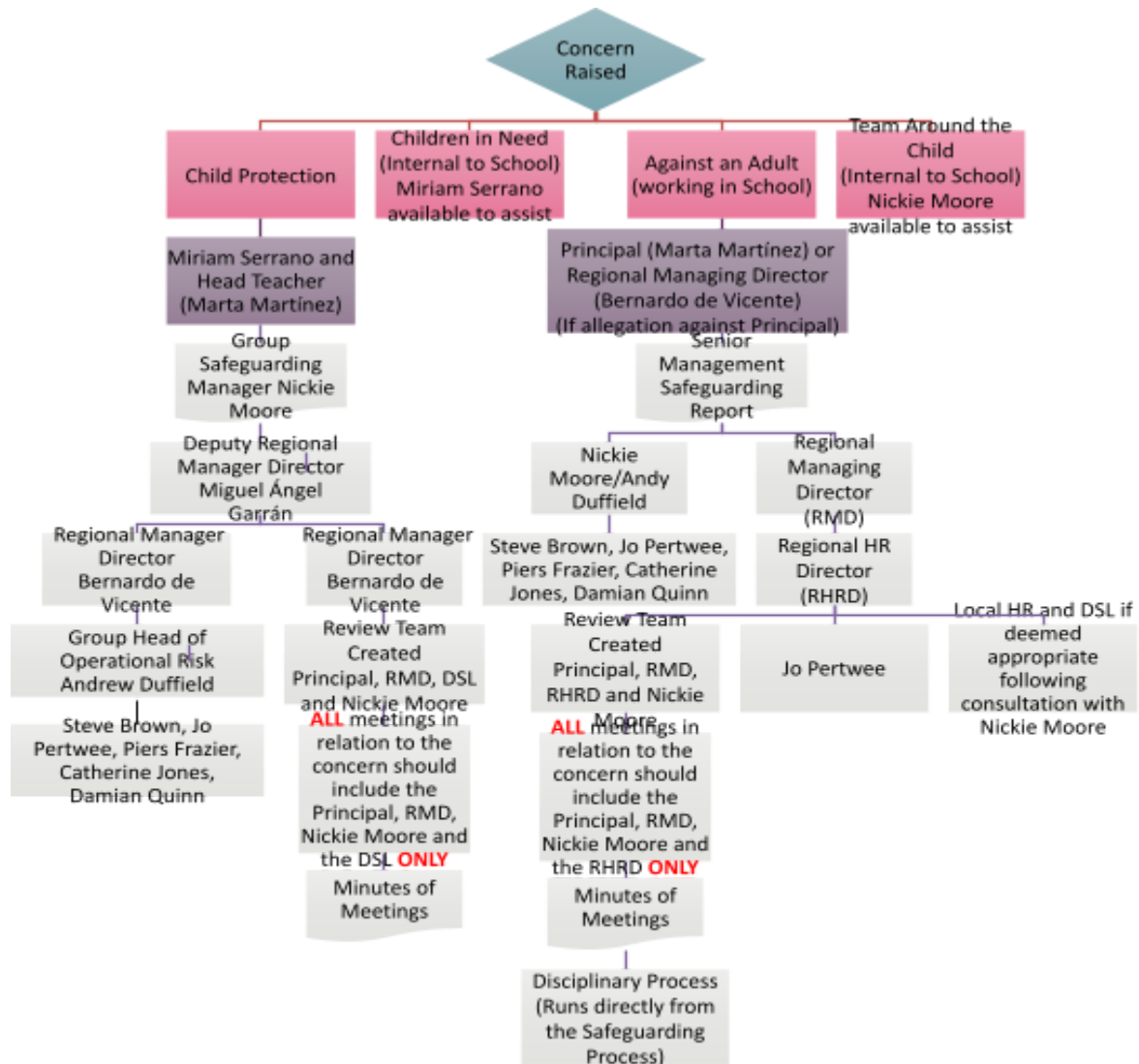
There may be situations where adults in schools, in the course of their school duties, have to intervene physically to restrain pupils and prevent them from harm. Such intervention should always be reasonable and proportionate to the circumstances and the minimum necessary to resolve the situation. The Headteacher shall require that any adult involved in such an incident report it to the Headteacher as soon as possible. The staff member shall document the incident in detail, giving an accurate description of what happened. Where possible, witnesses to the incident should be identified.

Where intervention is necessary, a senior member of staff will be asked to debrief the pupil and allow the pupil to relate the incident from their point of view. Written notes of the conversation will be taken and the pupil will be examined for any injuries.

Parents/carers will be informed whenever intervention is necessary. [PHYSICAL INTERVENTION POLICY](#)

9.- PROCEDURES

Note: All staff will understand that child protection issues require a high level of confidentiality, not only out of respect for the pupil and staff involved, but also to ensure that information released into the public domain does not compromise evidence.



9.A.- ADULTS CONCERNED ABOUT A PUPIL

Staff should disclose any concerns that a pupil may be experiencing or at risk of bullying. It is better to share such concerns, which may ultimately prove to be unfounded, than to keep secret information that could have helped to protect a pupil from real harm.

Where a member or members of staff have a suspicion that a pupil in their care may be a victim of bullying, or is at risk of bullying or other harm, they should not attempt to investigate on their own. They should report it as soon as possible to the School's Safeguarding team.

On many occasions the pupil will not report it directly, but staff members will be concerned about the existence of physical or emotional indicators. Even so, staff should complete a concern in My Concern or fill in the concerns log document (yellow sheets) and body map (if appropriate) in order to submit a report to the designated safeguarding lead.

See annexes [BODY MAPRECORDING OF CONCERNS](#)

9.B.- THE PUPIL IS THE ONE WHO INFORMS

Secondary and Baccalaureate students have access to a digital form if they want to speak to someone from the DSL team or report a concern.

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, especially 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 fault. Sometimes they may not realise that what is happening is abusive.

If a pupil speaks to a member of staff about any risk to their safety or welfare, the member of staff will, at the appropriate time, let the pupil know that to help them they should pass the information on to the DSL. The timing of when the pupil is told this is a matter of professional judgement.

Note: Be aware that if a child asks to speak to someone confidentially about a problem, no one should promise confidentiality if what the child is telling, or is likely to tell, relates to any kind of abuse that the child or any other child is experiencing. In cases where a pupil makes a direct disclosure, the following guidelines should be followed:

B.1.- Receive

Whenever possible, stop to listen to a child who wants to talk in confidence. We are aware that in many cases children will seek out the least opportune moment to do so, but it is important that you make time to listen to the pupil, even if you have to say "I can't come to you now, but come to my office at...". As much as possible, while they are telling you about their problem, try to listen, allow for silences and try not to show astonishment or disbelief.

B.2.-Tranquilizar

Try to be calm, non-judgemental and empathise with the learner. Never make promises you cannot keep. Be as reassuring as possible and explain to the child what you are going to do. Reassure them that they are doing the right thing by telling you.

B.3.-React

React to what the learner is telling you only if you need to do so to get more information. Avoid leading questions. Leave open questions, such as "is there anything else you need to tell me? Try not to criticise the alleged perpetrator, as this may be a family member for whom the child may have feelings.

B.4.- To record in writing

Take brief notes of what the child says during the conversation. If this is not possible, take notes as soon as possible and always within 24 hours of your conversation. Make sure you write down exactly what the child says and not your interpretation of what they have said. Also write down what you have said and the questions you have asked. Also write down the time, date and place.

B.5.- Reporting

As soon as possible the DSL will receive the registration of concerns document (yellow sheets) and the body map (if applicable). If this is done via My Concern the DSL will automatically receive an email.

The Designated Safeguarding Lead will gather all available evidence and ensure that notes taken by witnesses are available to any agency involved in the investigation. The DSL will take into account and consult as necessary on the information available. It is the responsibility of the safeguarding team to decide what action to take and whether it is appropriate to take the matter further within the local legal framework. It is important that there is a detailed and confidentially kept record of all information and decisions taken.

C.- NOTIFICATION OF FAMILIES

The school will normally seek to discuss any concerns about a pupil with their families. This should be handled sensitively and the DSL will contact parents in the event of a concern, suspicion or disclosure. Our focus is on the safety and welfare of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before contacting parents.

D.- ARCHIVING AND RECORDS OF REPORTS AND CONFIDENTIALITY

All reports of concerns, complaints or allegations relating to safeguarding children are treated as confidential information and filed securely and separately from the school's general student file. Information may be shared with all those who need to have it, either to take appropriate action to safeguard the child or to enable them to carry out their duties, but it is not shared beyond these cases.

Child safeguarding reports are kept in a secure (locked) file accessible via the DSL (or its attachment).

We are in the process of transitioning to registering concerns digitally through the My Concerns platform.

Reports of allegations filed by any child are clearly dated and filed with no future amendments.

Child safeguarding reports are separate from the general school file and do not need to be physically located in different places.

As soon as the school becomes aware that there are safeguarding concerns about a child, a safeguarding children file is opened for that particular child.

The reasons may be:

- If any member of staff raises a concern about the welfare of a child. This should be recorded in writing (see below for guidelines).
- If the school is alerted to a child by a child safeguarding association.
- If any information is forwarded to the school from another school where the child has previously studied.

In the event that it is necessary to communicate sensitive information about a child to a third person or entity (such as a new school, social services or subject matter experts), this would be based on the protection of the child's vital interests and, therefore, it would not be necessary to have obtained the consent of the parents or guardians. This is especially relevant for the exchange of information in safeguarding and child protection cases, any information that is shared should be archived and the reasons for sharing should be explicitly stated.

In any of the cases, before proceeding with the communication of personal data to third parties, unless there is an express authorisation from the person or his/her representative, please consult with this office by e-mail at dpo.external@ispschools.com or by telephone at +34663961924. Daniel Marcano Torres

(Data Protection Officer - ISP Group)

[INFORMATION CIRCULAR DATA COMMUNICATION](#)

In the case of a complaint, the report to be submitted shall include:

- Due account, as far as possible, of what the child tells (in his or her own words).
- An account of the questions asked to the child.
- Date and place of the complaint.
- Who were present at the time of the complaint.
- The child's behaviour, where the child was taken and where the child was left after the report was made.

10.- ANNEXES

The following annexes mentioned in this policy can be found at the link:

A.- INDICATORS OF ABUSE [INDICATORS OF ABUSE](#)

B.- BODY MAP [BODY MAP](#)

C.- INQUIETY RECORD SHEET - Yellow [sheetINQUIETY](#) RECORD SHEET

AUDIT, NOTIFICATION, REVIEW AND SIGNATURE

Elements on safeguarding practices in the IA school are included in the annual security audit and are reviewed in the event of a visit by the H&S team.

The H&S team, the Regional Director and the Directors will review the implementation notes on a regular basis, at least once every two years.

REVIEW DATE: JULY 2025

Signatures:

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DDSL Deputy Designated Safeguarding Lead

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