



Safeguarding and child protection policy

The Chartwell International School, Belgrade (CIS) is committed to safeguarding and promoting the welfare of children, to safeguarding all children, irrespective of ability, ethnicity, faith, gender, sexuality and culture, and expects all staff and volunteers to share this commitment.

All children have equal rights to be protected from harm and abuse. Everyone has a responsibility to support the protection of children. All schools have a responsibility to build a community that values diversity, equity, and inclusion for each child. All schools have a duty of care to children enrolled in the school and those who are affected by the operations of the school. All actions on child protection are taken with consideration for the best interests of the child, which are paramount.

This policy provides clear guidance to staff and others about expected codes of behaviour in dealing with safeguarding and child protection issues, thus ensuring child protection concerns and referrals are handled sensitively, professionally, and in ways that support the needs of the child.

Staff responsible: Senior Leadership Team and Board member responsible for safeguarding children. To be read by all staff working with children at CIS.

This policy has been approved by

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Review date: August 2026

Next review date: August 2027

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Key points

The safety of our students is our number one priority

Safeguarding and promoting the welfare of our students is everyone's responsibility

We operate within a culture of openness and recognise and accept that abuse can happen in any organisation

We are a 'sharing organisation'-all concerns should be reported

All concerns about a student (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or Assistant Designated Safeguarding Lead (ADSL)

In the event that a student is in immediate danger or at risk of harm a referral should be made to Designated Safeguarding Lead and/or the police immediately

All low/high level concerns about a staff member should be referred to the Head of School or Executive Principal

All high level concerns about the Director/SLT should be referred to the DGS

All low- or high-level concerns about the child should be referred to the DSL or ADSL

Introduction

Chartwell International School fully recognises its moral and statutory responsibilities 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.

This policy applies to all teaching, non-teaching, support, peripatetic, contract staff, volunteers and any other adults working at the school. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated. For the purpose of this guidance children include everyone under the age of 18.

Safeguarding legislation and guidance

The following UK and Serbian safeguarding legislation and guidance has been considered when drafting this policy:

- General Policy for Protection of Children from Abuse and Neglect (Republic of Serbia, 2009)
- Special Policy for Protection of Children and Students from Violence, Abuse and Neglect in Educational Institutions (Republic of Serbia, 2017)
- Policy for Responding to Violence, Abuse, and Neglect in Educational Institutions (Republic of Serbia, 2024)
- The National Plan of Action for Children Against Violence (Republic of Serbia, 2009)
- Violence against children in Serbia, UNICEF Serbia - 2021
- Determinants and Risk Factors of Violence Against Children in Serbia, UNICEF Serbia - 2019.

This policy is also informed by UK regulations as follows:

- Keeping Children Safe in Education (KCSIE) - Sep 2026
- Working Together to Safeguard children (WTSC) - 2023
- What to do if you are worried a child is being abused - advice for practitioners - 2015.

In child protection matters the school will follow the inter-agency and child protection procedures laid down by the relevant Municipality Social Work Centre - Child Protection Office in Serbia.

Through this Policy, the School establishes its internal child safeguarding procedures, taking into account the above-mentioned legislative framework and relevant guidance.

This policy is available in English and Serbian and is published to all staff and volunteers and placed on the school website.

Contact details

The table below outlines the contact details of named staff in school and external agencies linked to child protection and safeguarding.

Where a child is in immediate danger or at risk of harm a referral should be made to the police immediately.

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In the unlikely event that the Designated Safeguarding Leads are not available, staff should raise concerns with a member of the Senior Leadership Team.

School details	
Designated Governor for Safeguarding (DGS)	Ognjen Stosic Email address: dgs@chartwell.edu.rs
Designated Safeguarding Lead (DSL)	Jelena Milicevic Contact telephone number: +381691505972 Email address: jelena.milicevic@chartwell.edu.rs
Assistant Designated Safeguarding Lead (ADSL): Upper Secondary	Jelena Krstic Contact telephone number: +381693675340 Email address: jelena.krstic@chartwell.edu.rs
Assistant Designated Safeguarding Lead (ADSL): Lower Primary and Lower Secondary	Jelena Savic Contact telephone number: +38163255118 Email address: jelena.savic@chartwell.edu.rs
Assistant Designated Safeguarding Lead (ADSL): Upper Primary	Ljubica Dimitrijevic Contact telephone number: +38163256508 Email address: ljubica.dimitrijevic@chartwell.edu.rs
Executive Principal	Aleksandar Ignjatovic Contact telephone number: +381693675340 Email address: aleksandar.ignjatovic@chartwell.edu.rs
Head of Green School	Natasa Savic Contact telephone number: +3169/4104 444 and 069/4234 000 Email address: natasa.savic@greenschool.edu.rs
Head of Chartwell Pre-school	Sandra Djordjevic Contact telephone number: +381 11 3671189 Email address: sandra.djordjevic@chartwell.edu.rs
Head of Chartwell Lower Primary	Marija Djuric Contact telephone number: +381 11 3675 299 Email address: marija.djuric@chartwell.edu.rs
Head of Chartwell Upper Primary	Biljana Arsenijevic Contact telephone number: +381 11 3675 340 Email address: biljana.arsenijevic@chartwell.edu.rs
Head of Chartwell Lower Secondary	Bojana Stosic Contact telephone number: + 381 11 2661858 Email address: bojana.stosic@chartwell.edu.rs
Head of Chartwell Upper Secondary	Bojan Milenkovic Contact telephone number: + 381 11 6350 996 Email address: bojan.milenkovic@chartwell.edu.rs

Authority Contacts		
NADEL-National child line	116111	24h
Cyber bullying (“Pametno i bezbedno”)	198 33	7:30am – 3:30pm
National platform for prevention of violence over children	https://cuvamte.gov.rs/	
Mental health support for children and young people (ages 13-30)	https://svejeok.rs/	Online support
Child helpline international: find a child helpline	https://childhelplineinternational.org/	
Online sexual exploitation/grooming	childprotection@mup.gov.rs	24h
Suicide prevention	011 7777 000	24h
Centre Heart-suicide prevention	0800 300 303	2pm – 11pm
Parental support (NADEL)	0800 007 000	2pm – 10pm
Victims of abuse	800 222 003	24h
Serbian association of victims (VDS)	011 630-3022; 011 2288-040	9am - 4pm
Women’s centre	0800-100-007	10am - 8pm
ASTRA-women trafficking	011 785-0000; 065 3347-817	24h
European number for missing children	116-000	24h
Incest trauma centre	011 3441-737; 011 3861-332	24h
Helpline against mobbing	064 2127-880	8am – 10pm
Police	192	
Fire and rescue service	193	
Emergency medical service	194	

Part A: Principles and aims

Our commitment is to safeguard and promote the welfare, health and safety of our students by creating and maintaining an open, safe, caring and supportive atmosphere.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment
- Preventing impairment of children’s mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Policy principles:

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff 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.

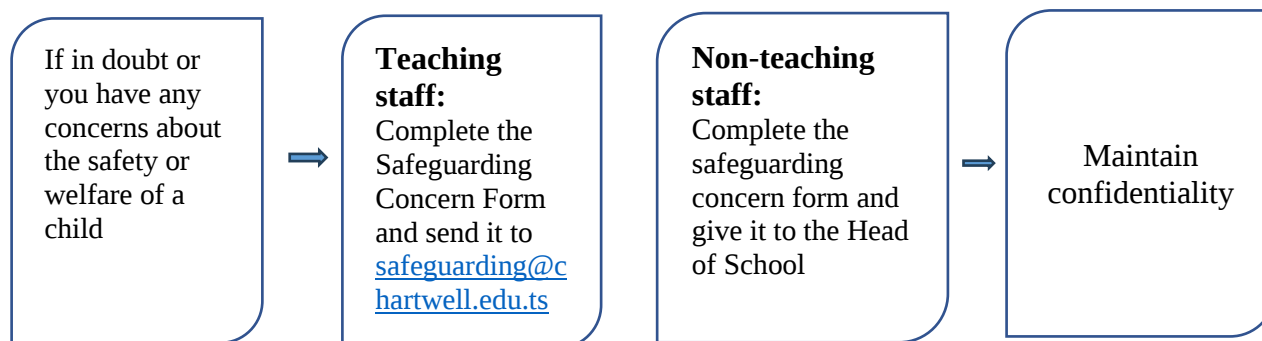
We aim to

- Provide all staff with the necessary information to enable them to meet their child protection responsibilities
- Ensure consistent good practice to protect students from harm
- To demonstrate the school's commitment regarding child protection to students and parents.

The school achieves these aims by

- Ensuring the recruitment of staff who are suitable and appropriate to work with children and have all the necessary and legal documentation in place before starting.
- Providing excellent pastoral care and providing a positive school atmosphere where students feel safe and secure and are encouraged to talk.
- Valuing and promoting effective relationships with parents and professionals from external agencies.
- Teaching students, through PSHE/PD and a varied curriculum, to identify and manage risks. This includes educating students, through regular internal ICT safety talks, about the safe use of devices and access to the internet.
- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach toward online safety, including the acceptable use of devices and the use of appropriate filters and monitoring systems.
- Ensuring that all staff, teaching and non-teaching staff, are properly trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.
- Encourage staff to discuss child protection, safeguarding and welfare concerns confidentially with the DSL and/or the ADSL in order to ensure that they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect.
- Creating a culture of openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults in school can be shared and dealt with in an appropriate and sensitive manner.
- Following the procedures laid down in this Policy.

Part B: Actions where there are concerns about a child



Safeguarding is everyone's responsibility and all staff regardless of their role should exercise vigilance and be watchful for, and aware of, signs that a child may be in need of help as well as the signs of abuse and neglect. If a staff member has any concerns about a child, s/he should report the concern by completing the Safeguarding Concern Form (Appendix 1) or speak directly with a member of the Safeguarding team.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in the Safeguarding Concern Form, so information is accurate and logged. Information should be kept confidential.

Records should include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached and the outcome.

If a staff member has any doubts or questions, including those regarding recording requirements, they should immediately speak with the DSL/ADSL. The DSL/ADSL will discuss the matter with the member of staff and decide on appropriate action. This discussion and actions may be recorded as above if found appropriate by the DSL/ADSL.

DSL, ADSL, and school leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Recognising abuse

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

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. Abuse may be committed by adult men or women and by other children and young people. There are four categories of abuse which are set out in **Part C: Types and signs of abuse and neglect**.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber- bullying, discriminatory bullying

and prejudice-based bullying should be reported using Safeguarding concern form (Appendix 1) and will be managed through our Anti- Bullying Policy. The school's Safeguarding Team consists of the Head of School, School Counsellor, and Designated Safeguarding Lead.

Taking action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

Key points for staff to remember for acting are:

- In an emergency take the action necessary to help the child (including calling 192)
- Report your concern as soon as possible to the DSL/ADSL, definitely by the end of the day
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Complete the Safeguarding concern form immediately.
- Seek support for yourself if you are distressed.

Early help

All staff should be aware of the early help process, understand their role in it and be alert to identifying children, including children who are more vulnerable, who may benefit from early help.

This includes:

- Identifying emerging problems and potential unmet needs
- Liaising with the DSL/ADSLs
- Sharing information with other professionals to support early identification and assessment and in some cases acting as the lead professional in undertaking an assessment of the need for early help.

Early help means providing support as soon as a problem emerges at any point in a child's life. There will be occasions when staff may suspect that a student may be at risk. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk and ask if they are OK or if they can help in any way. If a member of staff has a concern that a child may be in need of early help then s/he should complete the Safeguarding concern form and then discuss early help requirements with the DSL/ADSL.

Effective early help involves the school providing high quality support, in cooperation with or coordinating with other agencies as appropriate, to help address the assessed needs of the child and their family, in order to significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. Nevertheless, each case should be kept under constant review, and consideration should be given to contacting the social worker in case a referral to children's social care is needed if the child's situation does not appear to be improving.

Child in need, suffering, or likely to suffer, significant harm

If at any time it is considered that the child may be a child in need, has suffered or is at risk of significant harm, or is in immediate danger, it should be reported to the DSL/ADSL immediately by completing the Safeguarding concern form and sending it to the following email address: safeguarding@chartwell.edu.rs. In

these cases, the DSL/ADSL will initially contact the social worker before making a referral to the children's social services in the local area where the child lives. If after speaking with the social worker, no referral is made, the school will continue to monitor and record the situation, which may involve the parents or not, depending on the situation. Support and guidance will be given to the student to address any risks and prevent issues escalating, if necessary. In such situations, the Safeguarding Team assesses the level of risk and determines the appropriate next steps, including, where necessary, mandatory reporting to the relevant external authorities.

In cases of significant or immediate danger the police should be notified immediately. Immediate protection measures will be taken if a child shows signs of injury, grave negligence or suspicion of sexual abuse and they will be accompanied to the health centre or hospital.

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 feel ashamed, 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. Sometimes they may not be aware that what is happening is abusive or they may not feel ready or know how to tell someone they are being abused.

Victims who report abuse, sexual violence or sexual harassment should always be taken seriously, kept safe and never be made to feel that they are creating a problem.

If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the student know that in order to help them they must pass the information on to the DSL/ADSL. The point at which they tell the student this is a matter for professional judgement.

Promises of confidentiality should never be given.

All students know that they have a safe space to speak out or to share their concerns with members of staff. During their conversations with the students, staff will:

- Allow them to speak freely and remain calm. Do not interrupt the child or be afraid of silences;
- 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';
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the student's parent think about it;
- Not automatically offer any physical touch as comfort;
- Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong;
- Tell the student what will happen next. The child may want to accompany you to see the DSL/ADSL, otherwise let the child know that someone will come to see them before the end of the day;
- Report verbally to the DSL/ADSL even if the child has promised to do it by themselves;
- Complete the Safeguarding concern form immediately and send it to safeguarding@chartwell.edu.rs;
- Seek support if they feel distressed.

Notifying parents

In accordance with national procedures the school will normally seek to discuss any concerns about a student with their parents or to inform them that a referral to child services will be made, unless they are deemed to be a risk to the child.

Our focus is the safety and wellbeing of the student. 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 the School Director, the social worker and/or the police before parents are contacted.

Reporting directly to the police

Staff should follow the reporting procedures outlined in this policy. However, any member of staff may also share information directly with the social worker or police if:

- The situation is an emergency and the Designated Safeguarding Lead, their assistant, the Head of School and the Executive Principal are all unavailable
- They are convinced that a direct report is the only way to ensure the student's safety
- For any other reason they make a judgement that direct referral is in the best interests of the child.

Confidentiality and sharing information

Staff should never guarantee confidentiality to students or adults wishing to tell them about something serious as this may not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information only to the people who must be told in order to ensure that the appropriate action is taken. If a child or adult decides not to continue with a disclosure, the DSL/ADSL should also be informed as soon as possible.

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, ADSL, members of their SLT and/or the Executive Principal (depending on who 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.

All electronic and paper information is confidential and only made available to relevant individuals.

The DSL/ADSL may share sensitive information within the school or with external agencies when it is necessary to safeguard a student. Information will be shared in line with relevant legal and safeguarding guidelines. Where information is shared without informing those involved, the rationale for this decision will be clearly recorded.

If any member of staff receives a request from a student or parent to see child protection and safeguarding records, they will refer the request to the data protection officer.

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. However, where in doubt, the school will seek legal advice.

Children who may be particularly vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that our students receive equal protection, we will give special consideration to children who are:

- Living away from home or in temporary accommodation, including Boarding students
- Living in chaotic and unsupportive home situations
- Living transient lifestyles
- Affected by parental substance misuse, domestic violence or parental mental health needs
- Vulnerable to being bullied, or engaging in bullying
- Vulnerable to discrimination and maltreatment based on protected characteristics (e.g. race, ethnicity, religion, disability or sexuality)
- Do not have English or Serbian as a first language
- At risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive.

Children with additional educational needs and disabilities

Children with additional educational needs and disabilities (AEND) can face additional safeguarding challenges and are three times more likely to be abused by their peers. Therefore, it is important we ensure measures are taken to keep these students from harm. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- The potential for children with AEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Part C: Types and signs of abuse and neglect

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse

Abuse is a form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments.

All staff, but especially the designated safeguarding lead (and assistants) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

One of the best ways to help children is by being aware of the signs of possible abuse. All staff should be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of help and protection. These signs can take many forms including physical injuries and behavioural indicators. Although in most cases these signs will manifest themselves in children who are themselves the victims of abuse, it is important to remember that adults can also display significant indicators which suggest the existence of their own abuse.

All staff should be aware that the list below is not exhaustive but includes the common signs of abuse, which if present, may indicate a problem requiring follow up. It is important to recognise that some young people who are being sexually exploited or abused do not exhibit any external signs of this abuse. Sometimes children don't even realise that what's happening is abuse. It is also sometimes difficult to tell the difference between injuries suffered as part of normal childhood activities and those caused by abuse. If a staff member is unsure, he/she should discuss the case with the DSL/ADSL. The National Society for the Prevention of Cruelty to Children (NSPCC) includes advice on how to spot signs and patterns of abuse and neglect.

Some common signs that there may be something concerning happening in a child's life include:

- Unexplained changes in behaviour or personality
- Changes in eating habits
- Sleep problems or experiencing nightmares
- Self-harming
- Suicidal thoughts
- Becoming withdrawn
- Seeming anxious
- Becoming uncharacteristically aggressive
- Lacks social skills and has few friends, if any
- Poor bond or relationship with a parent
- Knowledge of adult issues inappropriate for their age
- Running away or going missing
- Always choosing to wear clothes which cover their body.

These signs don't necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour – but we must not ignore these signs.

KCSIE (DfE 2026) refers to four categories of abuse which are set out below:

1. Physical abuse

Physical abuse is 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 (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

If a child often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated. Some signs of physical abuse can include:

- injuries to parts of the body where accidents are more unlikely, such as thighs, abdomen, back
- respiratory problems from drowning, suffocation or poisoning
- untreated or inadequately treated injuries

- bruising which looks like hand or finger marks
- cigarette burns, human bites, scarring, scalds and burns.

2. Emotional abuse

Emotional abuse is 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, although it may occur alone.

Signs of emotional abuse tend to be behavioural rather than physical and they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children
- become frightened of certain adults
- become angry or disinterested and/or show little creativity
- become sad, withdrawn or depressed
- have trouble sleeping
- become sexually active at a young age
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children
- refuse to change for PE or participate in physical activities
- develop eating disorders
- self-harm
- refuse to attend school or run away from home
- lacks confidence or have low self-esteem
- use drugs or alcohol.

3. Sexual abuse

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 (including online). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection

- pain/itching/bleeding/bruising/discharge to the genital area/anus
- urinary infections/sexually transmitted diseases
- difficulty walking or sitting
- persistent sore throats.

4. Neglect

Neglect is 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:

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

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

- the child seems underweight or is very small for their age
- they are poorly clothed, with inadequate protection from the weather
- they are often absent from school for no apparent reason
- they are regularly left alone, or in charge of younger siblings.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

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/ADSL to decide how to proceed.

Part D: Specific safeguarding issues

All staff should have an awareness of safeguarding issues some of which are listed below. Further details can be read in Annex B of Keeping Children Safe in Education 2026. Safeguarding can link to issues such as drug-taking, alcohol abuse, truanting and the consensual or non-consensual sharing of nude or semi-nude images/videos.

Children missing education

All staff should be aware that children going missing, particularly repeatedly, can be a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The class teachers will monitor unauthorised absence, particularly where children go missing on repeated occasions and/or are missing for periods during the school day and if they have a concern report to DSL/ADSL. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Children absent from education

Children being absent from school for prolonged periods and/or repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation. We must respond to persistently absent children to help prevent the risk of them becoming a child missing in education.

Parents must inform the school of a student's absence which is then recorded in the absence programme. If a child is persistently absent from school, then parents will be contacted to discuss the situation and offer possible support. However, if the child's absence reaches 20%, the Safeguarding teams will receive an email to inform them. Parents will then be invited to school to discuss the situation and inform parents that if it rises above 20% (unauthorised absence) then it is our duty of care to inform the social service.

Child sexual exploitation (CSE) and Child criminal exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt.

They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways of grooming a child in preparation for abuse including via the internet.

A child exploited online may be forced to:

- Distribute sexual images of themselves
- Film or livestream sexual activities
- Engage in sexual conversations.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 14- and 15-years old who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant.

The school includes the risks of sexual exploitation in the PSHE curriculum and during specialist talks about Healthy relationships. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially present what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All concerns should be immediately reported to the DSL/ADSL.

Child on child abuse

We understand that abuse can take place from one child to another child. Child-on-child abuse can take a number of forms including:

- Bullying, including discriminatory bullying and cyberbullying
- Physical abuse
- Sexual violence
- Sexual harassment, including online sexual harassment
- Causing someone to engage in sexual activity without consent
- Upskirting
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Initiation/hazing type violence and rituals.

Sexual violence and sexual harassment can occur between two or more children of any age or sex. 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 be both physical and verbal and can occur online and/or face to face.

We take a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable and should not be tolerated. It should never be passed off as ‘banter’, ‘just having a laugh’, ‘a part of growing up’, or ‘boys being boys’. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and encourage people to falsely believe that it is acceptable. Staff must challenge physical behaviour, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. We should recognise, acknowledge and understand the scale of harassment and abuse, and understand that even if there are no reports, it does not mean it is not happening.

Staff should be aware of the importance of understanding intra-familial harms and any necessary support for siblings following incidents.

At our school, we take the following steps to minimise or prevent the risk of child-on-child abuse:

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them
- Ensure students know that the law is in place to protect rather than criminalise them
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying
- PSHE classes are used to reinforce the message through stories, role play, current affairs and other suitable activities
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.

Bullying/Safeguarding threshold

All cases of alleged bullying cases will be reported to the Head of School and school counsellor, and class teacher. This team will decide whether the case merits involvement of the safeguarding team. Should an allegation of abuse be made against another student, all children involved (whether perpetrator or victim) will be treated as being ‘at risk’. Where there is reasonable cause to suspect that a child is suffering/likely to suffer significant harm, the allegation will be discussed with the Safeguarding Team who are likely to have a complete safeguarding picture and be the most appropriate team to advise on the initial response by the school. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school’s duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour (HSB) has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?

- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- if the alleged incident is within the intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school staff, and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The Safeguarding Team will decide on next steps, which may include contacting the police. Where appropriate, the matter will be dealt with under the school's Behaviour Policy with the use of relevant disciplinary sanctions.

As with other concerns of abuse, the school will normally seek to discuss concerns about a student with parents. Our focus is the safety and wellbeing of the student and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the Executive Principal, the social worker and/or the police before parents are contacted.

Where the DSL considers or suspects that the behaviour might constitute abuse students' social services should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will consult social services and agree on a course of action, which may include:

- (a) taking any steps to ensure the safety and wellbeing of any students affected;
- (b) further investigation;
- (c) referral to other agencies such as the police (where a crime may have been committed), a specialist harmful sexual behaviour team and/or youth offending service; and
- (d) a strategy meeting.

Any response should be decided in conjunction with student's social services and any relevant agencies:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other students;
- consider that the abuse may indicate wider safeguarding concerns for any of the students involved;
- treat all students (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other students, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of child-on-child abuse and of students' experiences and consider the interplay between power, choice and consent. While students may appear to be making choices, if those choices are limited, they are not consenting;
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other students, their own unmet needs, the severity of the abuse and the causes of it.

Disciplinary action may be appropriate, including

- (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour;
- (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and
- (c) to ensure the safety and wellbeing of the victim and other students in the school.

Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other students in the school and provide on-going support to victim(s) including by:

- (a) ensuring their immediate safety;
- (b) responding promptly and appropriately to the abuse;
- (c) assessing and addressing any unmet needs;
- (d) following the procedures set out in the Safeguarding Policy (including where the student is in need of early help or statutory intervention);
- (e) monitoring the student's well-being closely and ensuring that s/he receives on-going support from all relevant staff members within the school;
- (f) engaging with the student's parents and any external agencies to ensure that the student's needs are met in the long-term;
- (g) consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

Domestic abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and witnessing domestic abuse is child abuse. It's important to remember domestic abuse:

- can happen inside and outside the home
- can happen over the phone, on the internet and on social networking sites
- can happen in any relationship and can continue even after the relationship has ended and
- both men and women can be abused or abusers.

The abuse can encompass but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional.

The indicators of potential domestic abuse can include:

- Becoming anxious or withdrawn
- Sleep difficulties
- Bed-wetting
- Complaining of physical symptoms eg. tummy ache
- Behavioural issues such as aggression or behaving in a much younger manner than their actual age
- Low sense of self-worth or self-esteem
- Self-harm
- Alcohol or drug abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame

themselves for the abuse or may have had to leave the family home as a result. More advice can be found at <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>

Honour-based abuse (Female Genital Mutilation and Forced Marriage)

Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse and must be reported to the police.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Children may be married at a very young age, and well below the age of consent in Serbia. School should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not being allowed to return to Serbia.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

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. Teaching 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact their mental health, behaviour, and education.

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 an assistant designated safeguarding lead.

Individual risk assessments are carried for all students deemed to be at risk. In Primary and Secondary risk register lists are available, which identify three categories. Students identified as green are low risk and are monitored by staff. Students identified as amber are at moderate risk. These students must not be permitted to leave class during lessons, unless accompanied by another staff member. Students identified as red are at high risk. These students must not be permitted to leave class during lessons. If they appear to be having any kind of crisis and are requesting to leave the room, call for assistance. In Primary, each situation is reviewed and appropriate action is taken based on the level of risk. This may include observations of the student during break times, informing staff who regularly interact with the student, and requesting regular feedback to monitor the situation.

Nude or semi-nude images/videos

The sharing of nude or semi-nude images or videos refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobile or over the internet. Sharing can be classified as consensual or non-consensual.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.

All incidents involving the consensual or non-consensual sharing of nude or semi-nude imagery or video will be responded to as follows:

- The incident will be referred to the DSL/ADSL immediately who will then hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a child has been harmed or is at risk of harm a referral will be made to the social worker and/or the police immediately in accordance with this policy. In all such cases, the School's Child Safeguarding Team will assess the situation and take all appropriate measures in accordance with the school's internal policies and procedures.

In some instances, it may be necessary to refer the matter directly to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of devices and interviews with the young people involved.

Serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for

schools is provided in the Home Office's *Preventing youth violence and gang involvement* and its *Criminal exploitation of children and vulnerable adults: county lines guidance*.

UK DfE advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provide more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school staff. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

Supporting those involved

The support required for the student who has been harmed will depend on their circumstances and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the student who is the perpetrator of the harm. We will seek to understand why the student acted in this way and consider what support may be required to help the student and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

Online safety

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation. The SLT liaise with the IT department regularly to review the effectiveness of school filters and monitoring systems in order to manage the content available to students, who can contact our students and the personal conduct of our students online.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm
- commerce: risks such as online gambling, solicitation for substances, inappropriate advertising, phishing and/or financial scams.

The school takes a proactive approach to teaching children about being a safe online citizen. As well as explicit teaching opportunities, staff use incidental opportunities to promote safe messages and teach about online risks. Please refer to the E-safety and Acceptable use policy for further information.

All staff are required to undergo regular updated safeguarding training, including online safety training.

Filtering

The school internet access is provided by MTS that has a filtering system against inappropriate web content. Our filtering system is appropriate to the age of students. In addition, all ICT labs are equipped with the Veyon Master programme which enables teachers to monitor students' activities while using the school's devices.

We are aware that:

- filtering and monitoring are important parts of safeguarding students and staff from potentially harmful and inappropriate material
- we have overall strategic responsibility for filtering and monitoring
- we must ensure a safe learning and working environment for both students and school personnel, including when online
- The Heads of School liaise with the IT department regularly to review the effectiveness of school filters and monitoring systems in order to manage the content available to students, who can contact our students and the personal conduct of our students online.

CCTV

In order to ensure the safety and security of students, staff and school property, and to prevent violence and other prohibited behaviour, the School operates video surveillance in strategic locations in communal areas (corridors, entrances and the school grounds) and in classrooms. The purpose of processing personal data through video surveillance is strictly limited to protecting individuals and property and to providing evidence in the event of an incident. Access to recordings is strictly limited to authorised personnel (the Head of School, the Designated Safeguarding Lead (DSL/ADSL), and, where applicable, another person authorised by the Head of School) and is permitted only where there is a suspected incident or a need to review a safety or security concern, in accordance with the School's internal procedures and the Law on Personal Data Protection. Recordings are retained in accordance with the principles of data minimisation and storage limitation.

Mobile phone use

See Mobile Phone Policy

Monitoring

During snack and lunch breaks, staff on duty monitors the behaviour of students in the common areas of the school, but also in the classrooms on the ground floor by randomly opening the doors and greeting any students who are there. Students are not permitted to spend snack and lunch breaks in any other part of the building except on the ground floor, canteen and outdoor area where there is a member of staff on duty.

Part E: Roles and responsibilities

The school Director has an overarching role in ensuring that policies, procedures and training in their school are effective and comply with the law at all times.

The school has a DSL and ADSL in Primary and Secondary who have equal responsibility for safeguarding and child protection. The DSL and ADSL are Serbian native. Staff and students can speak with either the DSL or the ADSL depending on the language needs.

The DSL and the ADSL liaise with the Heads of School and the Director on Safeguarding issues before referring any cases of suspected abuse to the social services and/or the police, if there is an immediate threat to the child.

The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is a member of the SLT and takes responsibility for safeguarding and child protection (including online safety) in the school. The DSL completes bi-yearly training, have a

specific job description and therefore the status and authority within the school to carry out the duties of the post.

The school also has four named Assistant Designated Safeguarding Leads, who also complete bi-annually training, ensuring there is always an appropriately trained and designated person in the school at all times.

The responsibilities of the DSL/ADSL include:

- All child protection and safeguarding incidents, policies, procedures and staff training
- Understand the filtering and monitoring systems and processes in place
- Ensuring the child protection and safeguarding policies are known, understood and used appropriately by staff, reviewed annually and publicly available
- Advising and supporting staff on child protection and safeguarding matters
- Encouraging a culture of listening to children
- Taking part in strategy discussions and inter-agency meetings
- Manage safeguarding referrals to children's social services, the police or other agencies
- Ensuring all staff receive regular safeguarding training whether it be internal or online
- Transferring the child protection file to a child's new school
- Undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.

The DSL/ADSL liaise with the Senior Leadership Team on safeguarding issues. DSL/ADSL training is completed every two years to ensure they are up to date with best practice advice and equip them to be a source of advice for colleagues.

Opportunities to teach safeguarding

As a school, we will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.

This may include covering relevant issues for schools through Relationships Education.

Staff training

As part of the induction programme, all newly appointed staff will receive safeguarding training that outlines CIS Safeguarding and Child Protection Policy (documents are available in English and Serbian for all staff to access), and includes:

- The role of the DSL/ADSL
- Identifies the signs of abuse
- Knowing what to do to raise concerns
- Knowing how to make a referral
- Recognising the need for early help
- Staff code of conduct
- Whistleblowing policy related to child protection
- Behaviour policy
- E-safety and Acceptable use policy.

All staff receive the compulsory safeguarding refresher training annually which is recorded upon completion.

Safeguarding team

The following training is completed bi-annually:

- Advanced Certificate in Child Protection and Safeguarding for Leaders for International Schools (Safeguarding Alliance)

Other training

Any member of staff who is involved in recruitment will complete the following course:

- Certificate in Safer Recruitment for International Schools

Support for and supervision of staff

All staff should feel comfortable and confident approaching the DSL, ADSL, Executive Principal or any other member of the senior leadership teams about safeguarding and/or pastoral concerns, including in relation to unsafe practice (see Whistleblowing related to child protection section below). If a staff member would like additional support and/or training in order to fulfil their safeguarding responsibilities, including in identifying and/or handling a concern they should speak to the DSL/ADSL who will work with the member of staff to ensure that they are adequately supported.

One-on-one situation with a student

All staff should:

- Avoid meetings with students in remote, secluded areas of school. All lessons must be taught in designated teaching spaces.
- In case the teacher has to have a one-on-one situation with a student, ensure there is visual access by keeping the door of the classroom open and sitting at desk near the door.
- Inform other staff of a meeting beforehand, assessing the need to have them present or close by.
- Always report any situation where a student becomes distressed or angry to a member of a Senior Leadership Team.

Abuse of position of trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence under Serbian law for a person aged 18 or over and in a position of trust, authority or influence, to have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

Proprietorial oversight

The proprietor (Director) carries a legal responsibility in relation to all matters of CIS, including safeguarding legal matters. Designated Governor for Safeguarding (DGS), Ognjen Stosic, completes the level 3 Safeguarding training and is part of the whole school safeguarding team and has an advisory role on all safeguarding matters at CIS.

Bi-weekly safeguarding meetings take place in Primary and Secondary and the safeguarding team meets to review procedures, discuss serious incidents/cases (especially those involving siblings across both schools) and monitor trends.

The DSL prepares the Annual Safeguarding report at the end of each academic year and meets with the Designated Governor for Safeguarding every July to review it and to audit safeguarding procedures and practice. Appraisal of the work done by the safeguarding team is delivered by the proprietor.

This policy is updated annually in line with the KCSIE document.

Part F: Other safeguarding policies and procedures

Safer recruitment

Our school prioritises embedding a culture of safe recruitment as part of our strategy for preventing harm to children and complies with the requirements of COBIS criteria and Keeping Children Safe in Education (DfE 2026) and the local authority arrangements by carrying out the required checks (ICPC) and verifying the applicant's identity, qualifications, work history, detailed references and interview information. As part of our due diligence and online search will be carried out for shortlisted candidates. The CIS Safer Recruitment Policy sets out the process in full and can be found on the school webpage. Candidates must complete the application form. A curriculum vitae (CV) is not accepted on its own.

Volunteers and visitors will always be accompanied around the school and never be left unsupervised unless they have undergone the appropriate checks, which allows them to do so.

The school checks the identity of all contractors working on site and requests the Serbian Police Check where required. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

Good practice guidelines and staff code of conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in the Staff Code of Conduct.

Good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students
- being a good listener
- being alert to changes in students' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection and safeguarding policy, staff code of conduct and other policies related to safeguarding
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
- referring all concerns about a student's safety and welfare to the DSL/ADSL
- ensuring any transparent panels/windows are not covered

- leaving doors open if in a 1:1 situation with a child.

Staff should always avoid behaviour which might be misinterpreted by others, and report in accordance with the whistleblowing policy related to child protection.

Whistleblowing related to child protection

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 they will 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 Whistleblowing Policy Related to Child Protection enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place by completing a Whistleblowing form related to child protection (see Appendix 2) and sending it to the Head of School or Executive Principal.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Head of School or Executive Principal, unless their concern relates to the member of SLT in which case they should report their concern to the DGS.

Additionally, where an individual has behaved or may have behaved in a way that indicates they may not be suitable to work with children, this must also be reported. The reason is because of transferable risk, where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic violence at home. No children were involved, but school needs to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk.

Staff may also report their concerns directly to the social services or the police if they believe direct reporting is necessary to secure action.

Allegations against staff (including supply staff)

When an allegation is made against a member of staff, our set procedures must be followed. Guidance for dealing with allegations against staff can be found in Keeping Children Safe in Education (DfE, 2026).

There are two levels of allegations/concerns:

1 Allegations/concerns that do not meet the harms threshold (low level concerns)

- A low-level concern is any concern, no matter how small and even if no more than a "nagging doubt", that an adult may have acted in a manner inconsistent with the school's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children. It is a concern that does not meet the harm threshold.
- All low-level concerns should be reported to the Head of School who will investigate it. It may be brought to the attention of the Executive Principal should there be any doubt.
- If confirmed that it is a low-level concern, it will be dealt with by means of discussion, guidance, training etc.
- Low level concerns are recorded confidentially. The Head of School only access staff in their department. The Executive Principal has access to all staff.

2 Allegations that may meet the harms threshold (high level concerns)

An adult who:

- 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 he or she 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.

Whilst we acknowledge such allegations may be false, malicious or misplaced, we also acknowledge they may be founded. It is therefore essential that all allegations are investigated properly and in line with agreed procedures.

Initial Action

- The person who has received an allegation or witnessed an event will immediately inform the Head of School. Where appropriate the DSL will be informed and the final decision on how to respond may be done in consultation with the DSL.
- The Executive Principal will be informed immediately.
- In the event that an allegation is made against one of the SLT members, the matter will be reported to the DGS.
- The school will take steps, where necessary, to secure the immediate safety of the children, which may involve the suspension or supervision of the staff member.
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of the children.

The Head of School may need to clarify any information regarding the allegation

- Consideration will be given throughout to support the needs of the students, parents and staff.
- All staff are expected to recognise the need for absolute confidentiality in these situations.
- The Head of school will consult with the Executive Principal in order to determine if it is appropriate for the allegation to be dealt with internally by the school or if there needs to be a referral to the police for investigation.
- If externally investigated, the school will collaborate with the external agencies involved.

If after the internal or external investigation has been completed, the allegation is founded, then

- Employment with the school will be ceased.
- School will report the member of staff to the UK's Disclosure and Barring Service (DBS) and to the Serbian equivalent and/or make a referral to the Teaching Regulation Agency in the UK (TRA).
- The school will make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

Detailed records will be made to include decisions, actions taken and reasons for these. All records will be retained securely. All cases should be reviewed, to update procedures and learn from each situation.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

Site security

All visitors are escorted or supervised while on site.

Extended school and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection and safeguarding policy and procedures apply.

When our students attend off-site activities, including day and residential visits and work-related activities, trip leaders will check that effective child protection arrangements are in place. The trip leader is the first person of contact in case of any child related concerns. The trip leader will then decide whether the situation merits involving the safeguarding team. During all trips, the safeguarding team will be available over phone or zoom.

Staff/Student and parent online relationships

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students and parents. Details are found in the E-safety policy. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Children staying with host families during a foreign exchange

The school may arrange for students to stay with a host family during a foreign exchange trip or sports tour. Some overseas students may reside with host families during school terms and we will work with the host school to check that such arrangements are safe and suitable.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. When students stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the students, which will include ensuring students understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable.

We will also make parents aware of these arrangements.

Related safeguarding policies

- E-safety policy
- Acceptable use policy
- Staff code of conduct
- Primary school behaviour policy
- Secondary school behaviour policy
- Anti-bullying policy
- Health and safety policy
- Trips policy
- Whistleblowing policy related to child protection.

Appendix 1 - Safeguarding concern form

Safeguarding concern form

Please complete this form if you have a concern about a pupil and send it to the following email address
safeguarding@chartwell.edu.rs

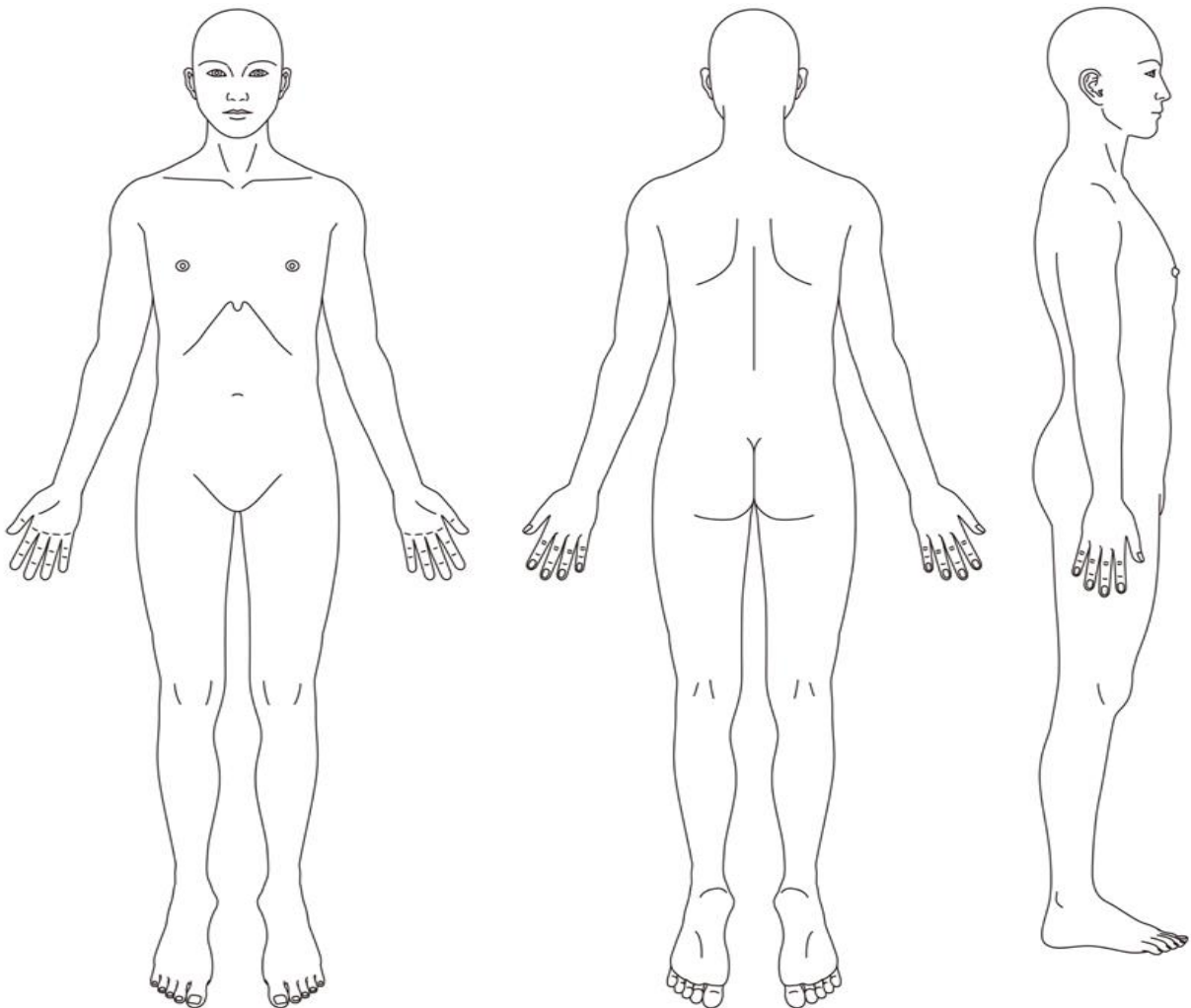
Pupil's name			Class teacher			Class	
Date of referral			Time of referral				
Body chart attached	Yes	No	Name of DSL/ADSL				
Have you already contacted parents about your concerns?				Yes	No		
Staff name							

Reason for referral (check all that apply)			
☐ Anger management	☐ Honesty	☐ Mental health concern	☐ Self-esteem
☐ Bullying	☐ Health (family or self)	☐ Grief (Loss/Death)	☐ Personal hygiene
☐ Social skills/Friends	☐ Adjustment	☐ Uncooperative/ Defiant	☐ Theft/Vandalism
☐ Negative attitude	☐ Family Conflict	☐ Child protection concern (abuse, neglect, exploitation)	
☐ Withdrawn/Shy	☐ Attendance	☐ Issues with achievement	☐ Other: _____

Concern (provide as much detail as possible)

This chart must be attached to the concern form. Clearly mark the location of your concern and label each concern with a number for referencing purposes.

Pupil's name	
Observations made by	
Signed	
Date	



Appendix 2 - Whistleblowing form related to child protection

Whistleblowing form related to child protection (strictly private and confidential)

Please use this form to report any serious concerns that you may have over malpractice or wrongdoing occurring at Chartwell International School, especially matters relating to safeguarding of children, young people or vulnerable adults.

The above may either involve CIS employees, sub-contractors or other related individuals/organisations.

Who is the allegation against? Please provide name and position (if known)	
What is the allegation?	
Where is this happening and is it still happening?	
What evidence can you give to support this? Please provide further details	
Have you reported this previously? Yes or No.	
If you have reported this previously, who and when did you report it?	
Any further information to add?	
Please provide your contact details Print name: Contact telephone: Email address:	
Date	

Please return this form in confidence to:
Head of School or Executive Principal