Child Protection and Safeguarding

Cambridge School of Bucharest

DISCLAIMER

This policy sets out Cambridge School of Bucharest's safeguarding arrangements and is available to staff, parents/carers and the public. Confidentiality requirements apply to individual safeguarding records and case information. The present document has been issued in English.

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IMPORTANT CONTACTS

Role	Name	Contact details
Designated Safeguarding Lead Nursery - Y13	Julia Suroz	julia.suroz@cambridgeschool.ro 0040 21 210 21 31 Ext. 31 0746234607
Deputy DSL Early Years - KS2	Heather Tereszczenko	heather.tereszczenko@cambridgeschool.ro
Deputy DSL KS3 - KS5	Jonathon Wragg	jonathon.wragg@cambridgeschool.ro
Deputy DSL Early Years - Reception	Jolene Neil	jolene.neil@cambridgeschool.ro
Year Group Deputy DSL Y1 - Y2	Connor Butler	connor.butler@cambridgeschool.ro
Year Group Deputy DSL Y3 - Y4	Natalie Roelofsz	natalie.roelofsz@cambridgeschool.ro
Year Group Deputy DSL Y5 - Y6	Finula Mulhern	finula.mulhern@cambridgeschool.ro
Year Group Deputy DSL Y7	Clint Bowers	clint.bowers@cambridgeschool.ro
Year Group Deputy DSL Y8 - Y9	Ioana Simonia	ioana.simonia@cambridgeschool.ro
Year Group Deputy DSL Y10 - Y11	Craig Cassidy	craig.cassidy@cambridgeschool.ro
Digital Safety Lead Whole school	Naim Barbar	naim.barbar@cambridgeschool.ro
School Counsellor Whole school	Ramona Ceciu	via your Deputy/DSL
School Director	Rita Hayek Maalouf	Rita.Maluf@cambridgeschool.ro Tel: 0040 21 210 21 31
School Partner	Joseph Khoury	Joseph.Khoury@cambridgeschool.ro Tel: 0040 21 210 21 31
Police		112

Role	Name	Contact details
Child's Phoneline (Telefonul Copilului) Asociatia Telefonul Copilului Romania		116 111 www.telefonulcopilului.ro
Emergency phone number to help abused children in Romania Serviciul de Telecomunicatii Speciale		119 www.sts.ro
Child Protection Voluntari		0040 21 270 4790

The contact details above should be checked at each review and whenever staffing changes occur.

AIMS

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- Children receive help and support as soon as problems emerge, with their best interests at the centre of decisions.
- All staff are aware of their safeguarding responsibilities and know how to report and escalate concerns.
- Staff are properly trained in recognising and responding to safeguarding issues, including online safety.

LEGISLATION AND STATUTORY GUIDANCE

This policy is informed by the Department for Education's statutory guidance Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children (2026), together with the Standards for British Schools Overseas, relevant Early Years Foundation Stage safeguarding requirements, and the Romanian legal framework identified in the school's existing safeguarding arrangements, including Law No. 272/2004 on the protection and promotion of children's rights.

KCSIE 2026 came into force on 1 September 2026. CSB uses KCSIE as a safeguarding benchmark alongside applicable Romanian law and British Schools Overseas requirements. Where KCSIE refers to England-specific statutory bodies, thresholds or legal duties, CSB follows the equivalent Romanian safeguarding, child protection and police procedures.

For the purposes of this policy, safeguarding and promoting the welfare of children includes:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether within or outside the home, including online.
- 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.

DEFINITIONS

The following key terms are used throughout this policy. Additional safeguarding terms and definitions are set out in Appendix A.

Child / children/student: everyone under the age of 18.

CSB: Cambridge School of Bucharest.

Designated Safeguarding Lead (DSL): the senior member of staff with overall lead responsibility for safeguarding and child protection across the school. At CSB this is Julia Suroz.

Deputy DSL: a senior member of the safeguarding team trained to the same standard as the DSL and authorised to act in the DSL's absence.

Year Group Deputy DSL: CSB's internal term for trained safeguarding staff assigned to specific year groups. They support the DSL and Deputy DSLs. Overall lead responsibility remains with the Designated Safeguarding Lead.

Digital Safety Lead: the member of staff who supports the DSL, School Director and IT team with online safety, filtering and monitoring, digital safeguarding and emerging technology risks.

HOY: Head of Year. At CSB, the relevant HOY may make or coordinate safeguarding-related parent/carer communication when authorised by the DSL or a Deputy DSL.
Parents / carers: birth parents and other adults with parental responsibility or a parenting role, including adoptive parents, step-parents and foster carers.

Staff: all those working for or on behalf of the school, whether full-time, part-time, paid, unpaid, permanent, temporary, contracted or voluntary.

Student: any young person enrolled at or receiving education from CSB. For safeguarding purposes, any student under 18 is a child.

External safeguarding authority: the competent Romanian child protection authority and/or police, and any additional external safeguarding route required by the school's governance or inspection framework.

EQUALITY STATEMENT

Some children face additional safeguarding risks or barriers to recognising, reporting or disclosing abuse. CSB is committed to anti-discriminatory practice and to ensuring that all children receive appropriate protection and support.

We give particular consideration to children who:

- Have special educational needs, disabilities, certain medical conditions or communication needs.
- May experience discrimination because of race, ethnicity, religion, sex, sexual orientation, gender identity or gender questioning.
- Have English as an additional language or other barriers to communication.
- Are known to be living in difficult circumstances, including temporary accommodation, family substance misuse, domestic abuse or adult mental health difficulties.
- Have a parent or carer in custody or are affected by parental offending.
- Have mental health needs, including self-harm, eating disorders or suicidal ideation.

- Are young carers whose caring responsibilities may affect their attendance, attainment, behaviour or wellbeing.
- Are at risk of exploitation, trafficking, modern slavery, FGM, forced marriage, so-called honour-based abuse or radicalisation.
- Are asylum seekers and/or refugees.
- Are in care, have previously been in care, or are otherwise living away from their family.
- Are absent from education repeatedly or for prolonged periods, or are missing from education.
- Have experienced suspensions, exclusion, part-time timetables or alternative/off-site provision.
- Have themselves shown early signs of abusive, violent or harmful behaviour.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, contractors and the proprietor of the school. It also applies to extended school, trips, off-site activities and any alternative or external provision commissioned by the school.

All staff

All staff will read and understand Part One of Keeping Children Safe in Education 2026 and review it at least annually. School leaders and staff who work directly with children will also be familiar with Annex A of KCSIE, which contains further information on specific safeguarding issues. The DSL and Deputy DSLs will be familiar with Annex B on the role of the designated safeguarding lead.

All staff will receive safeguarding and child protection training, including online safety and an understanding of filtering and monitoring responsibilities, at induction. Training will be regularly updated and staff will receive safeguarding updates at least annually and more frequently where required.

All staff will be aware of:

- The school systems that support safeguarding, including this policy, the Staff/Teacher Handbook, Behaviour Policy, Staff Code of Conduct, Whistleblowing Policy and the role and identity of the DSL and safeguarding team.
- The need to maintain an attitude that safeguarding concerns could happen here and to act in the best interests of the child.
- The signs of abuse, neglect, exploitation, modern slavery and other specific safeguarding issues, including risks that occur online or outside the home.
- The importance of professional curiosity. Children may not feel ready or know how to tell someone, may not recognise their experience as harmful, or may face barriers to disclosure.
- How to respond if a child tells them they are being abused, neglected or exploited, including maintaining an appropriate level of confidentiality and never promising secrecy.
- The importance of reassuring children that they are being taken seriously, will be supported and kept safe, and will not be blamed or shamed for reporting.
- The requirement to report safeguarding concerns without delay using CPOMS, or the paper White Form where the digital system is unavailable.
- The fact that use of the reporting system does not replace urgent action. If a child may be at immediate risk, staff must contact a DSL/Deputy DSL and ensure appropriate external action is taken without delay.
- The requirement to report any safeguarding concern, allegation or low-level concern about an adult working in or on behalf of the school in accordance with Appendix C.

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is Julia Suroz. The DSL is a member of the senior school administration and holds overall lead responsibility for safeguarding and child protection across CSB, including online safety and understanding the filtering and monitoring systems and processes in place. This lead responsibility is not delegated, although activities may be undertaken by appropriately trained Deputy DSLs and Year Group Deputy DSLs.

During term time, the DSL or a Deputy DSL will be available during school hours for staff to discuss safeguarding concerns. Safeguarding concerns submitted through CPOMS must be monitored so that absence, illness or leave does not delay action. If the DSL is unavailable, the Deputy DSLs will provide cover. If the DSL and Deputy DSLs are unavailable, a member of the senior leadership team, including the School Director / **Deputy Director** where appropriate, will ensure that urgent safeguarding action is taken. Lack of availability must never delay a necessary referral.

The School Director and DSL will agree and communicate a named cover arrangement, including who monitors CPOMS and responds to concerns during any absence. Appropriate safeguarding cover will also be agreed for school-organised activities outside normal school hours or during holidays.

The DSL will be given the time, funding, training, resources, status and support needed to:

- Provide advice and support to staff on child welfare, child protection and safeguarding matters.
- Manage or oversee referrals to relevant child protection, police, health and other external services.
- Take part in strategy discussions, inter-agency meetings and assessments, or support other staff to do so.
- Maintain and manage child protection records, including appropriate information sharing and secure transfer when children leave the school.
- Ensure the child's wishes and feelings are considered when deciding what action to take and what support to provide.
- Raise awareness of safeguarding policies, reporting routes and local support services.
- Provide support to staff involved in safeguarding cases.
- Work with the Digital Safety Lead and IT Manager on online safety, filtering, monitoring and emerging digital risks.
- Keep the School Director informed of significant safeguarding issues and any concerns about the effectiveness of school systems.
- The DSL and Deputy DSLs will undertake formal safeguarding training at least every two years and update their knowledge and skills at regular intervals between formal training.

Deputy DSLs and Year Group Deputy DSLs

The Deputy DSLs are Heather Tereszczenko, Jonathon Wragg and Jolene Neil. They are trained to the same standard as the DSL and may act for the DSL when required.

CSB also appoints trained Year Group Deputy DSLs to support specific year groups and work within the relevant Key Stage safeguarding arrangements. These staff may receive concerns, provide advice and support, and contribute to safeguarding actions within their designated areas. Concerns requiring school-wide oversight, external referral, serious risk assessment or decisions that KCSIE assigns to the designated safeguarding lead will be escalated to the Designated Safeguarding Lead or a Deputy DSL.

Digital Safety Lead

The Digital Safety Lead is Naim Barbar. The Digital Safety Lead works with the DSL, School Director and IT Manager to support the school's online safety arrangements. The DSL retains overall safeguarding responsibility for online safety.

The Digital Safety Lead will support the school to review digital risks, emerging technologies, generative AI, staff and student online safety education, filtering and monitoring arrangements, cyber security awareness and incident response.

School Counsellor

The School Counsellor is Ramona Ceciu. Referrals to the School Counsellor are made via your Deputy/DSL. Counselling support does not replace safeguarding referral or external intervention where a child may be at risk of harm.

The Proprietor / Governing Board

- Ensure that an appropriate senior member of the school leadership team is appointed as the Designated Safeguarding Lead and that the DSL has sufficient independence, authority, time and resources to discharge the role.
- Ensure a senior board-level lead has oversight of safeguarding arrangements and provides appropriate strategic challenge and assurance.
- Ensure all staff receive safeguarding and child protection training at induction and regular updates, including online safety.
- Ensure proprietors/governors receive appropriate safeguarding and child protection training, including online safeguarding, at induction and that this training is regularly updated.
- Approve this policy at each review, ensure it is reviewed at least annually, and hold the School Director to account for its implementation.
- Facilitate a whole-school approach to safeguarding so that safeguarding and child protection underpin relevant policy, curriculum, systems and decision-making.
- Ensure appropriate safer recruitment, staff conduct, low-level concerns, whistleblowing, online safety and arrangements for children absent from education are in place.
- Act as case manager where an allegation is made against the School Director, or ensure an alternative person with no conflict of interest does so.

The School Director

The School Director is responsible for the implementation of this policy, including:

- Ensuring that staff and volunteers are informed of the school's safeguarding systems and policies as part of induction.
- Making sure staff and volunteers have the relevant background and suitability checks in accordance with the Safer Recruitment Policy and applicable Romanian requirements.
- Communicating this policy to parents/carers and making it publicly available through the school website or other appropriate means.
- Ensuring the DSL has appropriate time, funding, training, resources and cover.
- Ensuring staff undertake appropriate safeguarding and child protection training and regular updates.
- Ensuring that, where reasonably possible, the school holds more than one emergency contact number for each child.
- Acting as case manager for allegations about staff, volunteers and contractors where appropriate, in accordance with Appendix C.

CONFIDENTIALITY

CSB processes safeguarding information in accordance with the GDPR and applicable Romanian data protection law and school data-protection procedures. Safeguarding information is confidential, but confidentiality must never be used as a reason to delay or prevent action needed to protect a child.

Staff should share safeguarding information only with those who need it to protect the child or support an appropriate response. Staff should normally discuss concerns with the DSL or a Deputy DSL, but the absence of a safeguarding lead must not prevent urgent information sharing or referral.

All staff should understand that:

- Timely information sharing is essential to effective safeguarding.
- Information should be relevant to the current safeguarding risk, necessary for the receiving person or agency to know, clearly presented and appropriately contextualised.
- Professional judgement should be used to ensure information sharing is proportionate. Information should not be withheld if doing so would undermine understanding or management of safeguarding risk.
- Data protection law does not prevent lawful sharing of information for the purpose of keeping children safe.
- Consent is not always required before sharing safeguarding information. Information may be shared without consent where there is a lawful basis and where seeking consent is not possible, not reasonable, or would place the child at increased risk.
- Staff must never promise a child that they will keep a report of abuse, neglect or exploitation secret.
- If staff are in doubt about information sharing, they should seek advice from the DSL or a Deputy DSL without delaying any necessary action.
- Written and electronic records must be secure, confidential and available only to those with a right or professional need to access them.

RECOGNISING ABUSE AND TAKING ACTION

If a child is suffering or likely to suffer harm, or is in immediate danger

Act immediately. Contact the DSL or a Deputy DSL using the details in the Important Contacts section. If they are not available, do not delay appropriate action. In an emergency call 112. Concerns about an abused child may also require contact with the Romanian child protection emergency line 119 and/or Child Protection Voluntari, depending on the circumstances and advice available.

Staff should never assume that another colleague or professional will take action. If a child needs urgent protection, the immediate safeguarding response takes priority over completion of school forms or internal processes.

If you have concerns about a child

Staff should maintain an attitude that safeguarding concerns could happen here. Any concern about a child's welfare must be acted on immediately, recorded and shared through the school safeguarding system. The DSL or safeguarding team will consider the level of need, the child's circumstances, the views of the child and whether internal support, early help or external referral is required.

Abuse, neglect and exploitation can occur inside or outside the home, online or face to face, and may involve family members, peers, adults or other people in the community. Extra-familial harm may

include sexual exploitation, criminal exploitation, financial exploitation, serious violence, domestic abuse within teenage relationships, stalking and radicalisation.

If a child discloses a safeguarding issue to you

- Listen carefully and take the child seriously. Give them time to speak and do not express disbelief, shock or judgement.
- Reassure the child that they have done the right thing by telling you and that they will be supported and kept safe.
- Do not promise confidentiality. Explain in an age-appropriate way that you may need to share the information with people who can help.
- Use the child's own language and ask only open-ended questions needed to clarify what has happened. Avoid leading or investigative questions.
- Recognise that an initial disclosure may not contain the full extent of abuse and that trauma can affect memory and the order in which details are recalled.
- Where possible, give the child your full attention and make a detailed written record at the end of the conversation. If notes are required during the conversation, remain engaged with the child.
- Record only what the child says and what you directly observed. Do not add interpretation or personal opinion.
- Report the concern to a DSL or Deputy DSL as soon as practically possible and submit the safeguarding record through CPOMS or the White Form.

If you have concerns about extremism or radicalisation

Where there is a concern that a child may be susceptible to radicalisation or extremist influence, speak to the DSL or a Deputy DSL and follow the referral procedure in this policy. Where there is immediate danger or possible criminal activity, the school will involve the police and other competent Romanian authorities. The absence of a DSL must not delay action.

If you have a mental health concern

Mental health problems can develop into safeguarding concerns and can also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be alert to concerns including significant changes in behaviour, withdrawal, sleep difficulties, self-harm, eating disorders, suicidal ideation or plans, and other signs that a child is struggling.

Only appropriately trained professionals should diagnose a mental health condition. Staff are, however, well placed to notice changes and to secure early support. If a mental health concern is also a safeguarding concern, follow the safeguarding referral procedure immediately. Where a child appears to be in immediate danger, emergency medical and/or police assistance must be sought.

Where a mental health concern is not a safeguarding concern, staff should consult the appropriate DSL/Deputy DSL and may refer the child to the School Counsellor or other appropriate support through the school's agreed procedures. Any mental health intervention offered by the school must be supported by evidence of safety and effectiveness and be appropriate to the child's needs and phase of education. Support will be reviewed through the school's Mental Health and Wellbeing procedures.

Concerns about a staff member, volunteer, trainee teacher or contractor

Any safeguarding concern or allegation about a person working in or on behalf of the school, no matter how small, must be reported in accordance with Appendix C. Concerns that may meet the harm

threshold should be reported to the School Director and DSL without delay, unless either is the subject of the concern. Concerns about the DSL must go directly to the School Director. Concerns about the School Director must go to the DSL and Proprietor or Governing Board representative. Follow the independent reporting routes in Appendix C; do not report a concern to the person who is its subject.

Concerns about safeguarding practice within the school

All staff and volunteers should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures in the school's safeguarding provision. Concerns will be taken seriously. Staff should use the school's Whistleblowing Policy where appropriate and may use an external safeguarding or regulatory route if they are unable to raise a concern internally or believe a genuine concern is not being addressed.

Organisation or individual using the school premises

Where the school receives a safeguarding allegation relating to an incident that occurred while an external individual or organisation was using school premises to provide activities for children, the school will follow its safeguarding procedures and ensure the allegation is shared with the DSL and relevant external safeguarding authority. The school will also liaise with the provider and take any immediate steps required to keep children safe.

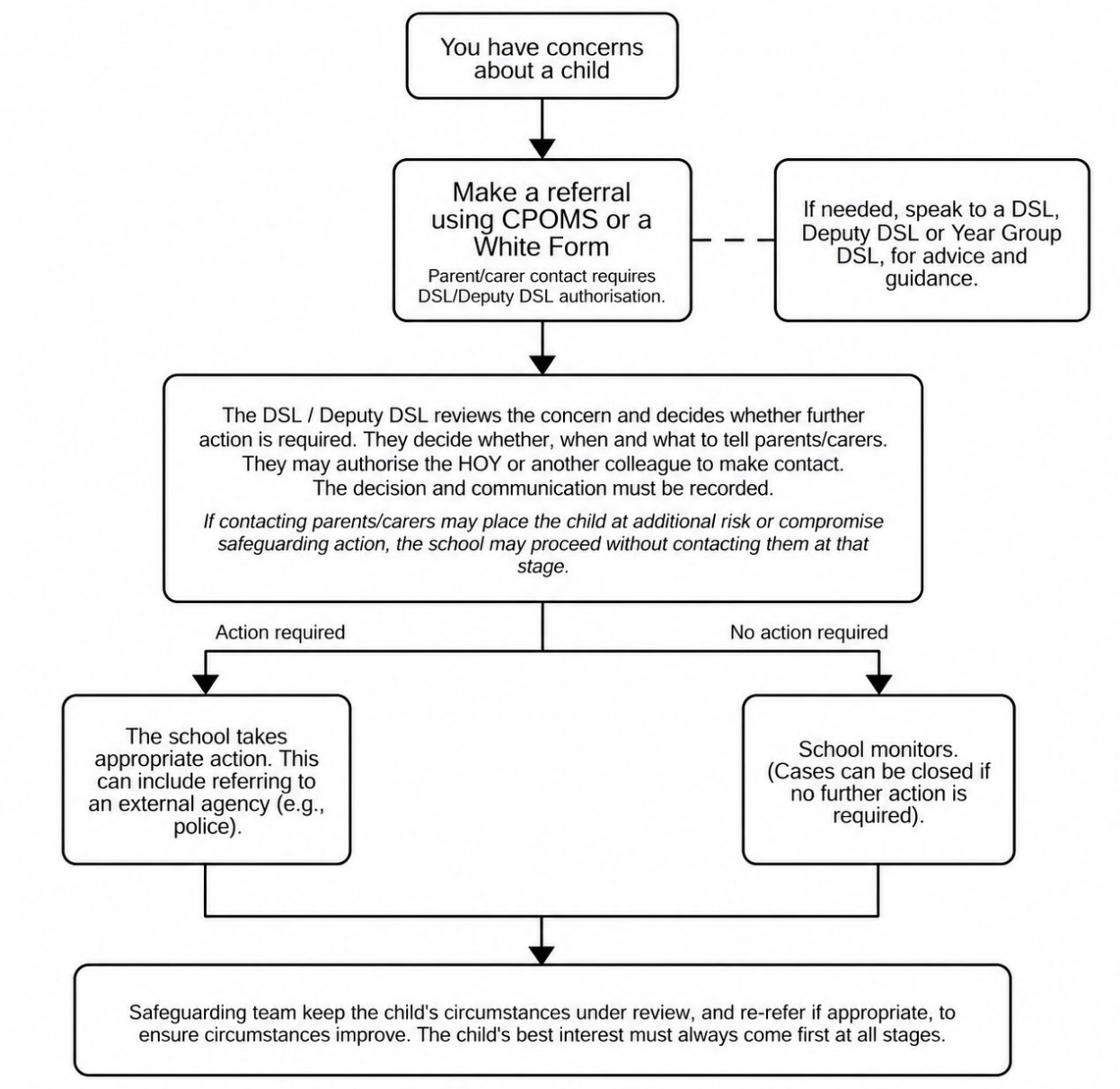
Sanctions and the alleged perpetrator(s)

The school may take disciplinary action under its Behaviour Policy while an external investigation is ongoing, provided that any action does not prejudice a police or child protection investigation. Decisions will be made case by case, with the DSL and School Director taking a leading role and liaising with external agencies where required.

REFERRAL

Safeguarding concerns should be recorded through CPOMS. The paper White Form may be used where the digital system is unavailable or where an immediate written record is required. Recording a concern must never delay urgent safeguarding action.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



The DSL or a Deputy DSL will decide, using professional judgement and the information available, which response is appropriate. Options may include internal pastoral support coordinated with the relevant HOY, early help through school or community services, referral to a competent Romanian child protection authority, referral to police, or a combination of these actions. Where parent/carer contact is appropriate, communication will follow the Notifying Parents section below.

Where a child is suffering or is likely to suffer harm, or there is an immediate safeguarding risk, an external referral must be made without delay. Any staff member may make an external referral if circumstances require it. The staff member should inform the DSL or a Deputy DSL as soon as possible afterwards.

When a referral has been made, the school will support external agencies with relevant information and assessment work. If the school does not receive an appropriate response, or if the child's situation does not improve or becomes worse, the DSL or referrer will follow up, re-refer or escalate the concern through the appropriate local route.

The safeguarding team will keep the child's circumstances under review. The child's wishes and feelings should be considered throughout, together with the school's duty to protect the child and other children.

AI-assisted categorisation in CPOMS

CPOMS may suggest categories based on the written safeguarding concern entered by a member of staff. These are AI-generated suggestions only. Staff remain responsible for checking that the selected categories accurately reflect the concern and should add, remove or change categories where appropriate. Staff should not assume that a suggested category is correct simply because it has been generated by the system.

NOTIFYING PARENTS

Where it is safe and appropriate to involve parents/carers, the DSL or a Deputy DSL will decide whether contact should be made, when it should take place and what information can be shared. Staff who receive or record a safeguarding concern must not contact parents/carers directly about that concern unless specifically authorised by the DSL or Deputy DSL. The DSL or Deputy DSL may authorise the relevant HOY or another appropriate colleague to make or coordinate contact. The decision and communication must be recorded.

Parents/carers will not be informed before referral or other action where doing so could place the child or another person at additional risk, compromise evidence or an investigation, lead to intimidation or retaliation, or conflict with advice from police or the competent child protection authority. The reason for any decision not to inform parents/carers will be recorded. Where the relevant HOY is involved in the concern or there is another conflict of interest, the DSL or Deputy DSL will arrange for an appropriate senior member of staff to coordinate communication.

For child-on-child abuse, harmful sexual behaviour, sexual harassment or sexual violence, decisions about informing the parents/carers of the victim and alleged perpetrator(s) will be made separately for each child, taking account of risk, the child's wishes, external agency advice and the need to safeguard all children involved. Communication will follow the authorisation and recording arrangements above.

E-SAFETY AND THE USE OF MOBILE TECHNOLOGY

CSB recognises that technology is a significant component in many safeguarding and wellbeing issues. Online risks can occur alongside face-to-face risks and can involve school systems, personal devices, social media, gaming, messaging platforms, generative AI and other emerging technologies.

The DSL holds overall safeguarding responsibility for online safety. The Digital Safety Lead, School Director, IT Manager and other relevant staff support the implementation of online safety arrangements and the response to incidents.

The school aims to:

- Have effective processes to safeguard students, staff and volunteers online.
- Protect and educate the whole school community in the safe and responsible use of technology, including mobile and smart technology and generative AI.
- Set clear expectations for the use of school devices, personal devices, mobile phones, social media, communication platforms and AI tools.
- Identify, intervene in and escalate online safety concerns appropriately.
- Ensure online safety is integrated into safeguarding training, curriculum planning, parental engagement and relevant school policies.

The four key categories of online risk

The school considers online safety through four interrelated categories of risk:

- **Content -** exposure to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, fake news and conspiracy theories.
- **Contact -** harmful interaction with other users or generative AI applications that simulate interaction, including peer pressure, commercial advertising, grooming, exploitation, impersonation and adults posing as children or young adults.
- **Conduct -** online behaviour that causes or increases the likelihood of harm, including bullying, harassment, sending or receiving explicit images, making or sharing nudes or semi-nudes, and AI-generated or digitally altered sexual images.
- **Commerce -** risks including online gambling, inappropriate advertising, phishing, scams, financial exploitation and other commercial harms.

Generative AI

Where generative AI is used by staff or students, the school will consider safeguarding, ethics, data protection, intellectual property, age-appropriateness, accuracy, contact risks and the possibility that AI tools may create, alter or simulate harmful content. Staff and students should use only school-approved tools and should report harmful or sexualised AI-generated content through normal safeguarding procedures.

AI-generated or digitally altered nude or semi-nude images of children, including deepfakes or so-called deep nudes, will be treated as a safeguarding concern and handled under the procedures in Appendix B.

Staff communication and social media

Staff should contact students only through school-sanctioned platforms such as MS Teams and school email. Staff must not communicate with current students through private social media accounts or other private channels. Breaches may lead to disciplinary action and referral to external authorities where appropriate.

Filtering and monitoring

The school will maintain appropriate filtering and monitoring systems to reduce exposure to harmful and inappropriate content while avoiding unreasonable restrictions on teaching and learning. Roles and responsibilities for filtering and monitoring will be clearly assigned.

The effectiveness of filtering and monitoring will be reviewed at least once every academic year by the responsible Digital Safety Lead, Naim Barbar, supported by the DSL, School Director and IT support. The review will include checks that filtering operates appropriately on internet-connected devices and in relevant locations, and a record of the checks and resulting actions will be kept.

Relevant leaders and staff will understand the filtering and monitoring arrangements and know how to escalate concerns. The school will also consider an annual online safety risk assessment reflecting the technology and risks faced by its students. The filtering and monitoring review is separate from the DSL's semester review of CPOMS records, which checks the handling, follow-up and recording of safeguarding concerns. Neither review replaces prompt action on individual concerns.

Mobile phones - students

The school's pupil mobile phone arrangements are set out in the relevant Behaviour/Student Handbook procedures. The safeguarding principle is that access to personal mobile phones during the school day is restricted so that devices do not undermine safety, learning or supervision. Any exceptions will be authorised and managed in line with the child's needs and school procedures.

Cyber security and information security

The school will maintain appropriate cyber-security and access-management measures to protect personal information, reduce the risk of data breaches and disruption, and mitigate safeguarding risks. Safeguarding and cyber-security responsibilities will be reviewed together where incidents involve student data, compromised accounts or harmful access to systems.

Teaching online safety

Students will be taught how to use technology safely, respectfully and responsibly; protect personal information; recognise unacceptable or harmful online behaviour; identify reliable sources; understand online manipulation and misinformation; recognise harmful content and contact; seek help; and report concerns. Age-appropriate preventative education will include topics such as consent, sharing images, deepfakes, pornography, online misogyny and other emerging online harms.

Parents/carers will receive information and guidance on online safety through school communications and platforms. Where appropriate, communications will explain the school's filtering and monitoring arrangements and the online systems children are expected to use.

STUDENTS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

Students with special educational needs and disabilities (SEND), and some students with medical or physical health conditions, can face additional safeguarding challenges online and offline. Additional barriers can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the child's condition without further exploration.
- Greater risk of peer-group isolation, prejudice-based bullying or other harmful behaviour.
- Being disproportionately affected by bullying or abuse without outwardly showing signs.
- Communication barriers and difficulties reporting what has happened.
- Not understanding that what is happening to them is abuse or exploitation.
- Vulnerability arising from intimate care needs, isolation from others or greater dependence on adults for care.
- Cognitive difficulties in distinguishing fact from fiction in online content or understanding the consequences of repeating online content or behaviour.

Reports involving children with SEND should involve close liaison between the DSL or a Deputy DSL and the school's SEND lead, together with any communication support needed by the child. Extra pastoral support will be considered where appropriate. Further information is available in the school's SEND Policy.

Children with medical conditions

A medical incident does not automatically constitute a safeguarding concern. A safeguarding referral may be required where a medical condition or the way it is managed indicates that the child may be at increased risk of neglect, abuse or exploitation, including where essential information or medication is repeatedly withheld or not provided. Detailed arrangements for healthcare plans, medication, emergency responses and relevant staff training are set out in the school's medical and allergy policies and procedures.

MOBILE PHONES AND CAMERAS - STAFF

Staff are permitted to bring personal phones to school, subject to the Staff Code of Conduct and school mobile-device rules.

- Staff must not take photographs or recordings of students on personal phones or personal cameras.
- Staff must not use mobile phones for personal purposes in front of students or while supervising them. Necessary, school-authorised work use is permitted where it does not compromise supervision. Where practicable, non-urgent work use should take place away from students, without leaving them unsupervised.
- Each Key Stage may maintain an authorised WhatsApp group for urgent internal messaging and emergencies. Full student names should not be used in these messages; initials or year group information should be used where possible.
- Safeguarding concerns must never be managed or stored through WhatsApp. Any safeguarding information communicated urgently by messaging must be recorded promptly in the designated safeguarding system.
- The school will follow applicable GDPR and data-protection requirements when taking, using and storing photographs and recordings for school purposes.
- Under no circumstances staff are to use the students' names in messages sent to each other. Initials are permitted.

RECRUITMENT, SELECTION AND PRE-EMPLOYMENT VETTING

Details of safer recruitment, selection, background checking, suitability assessment, references, volunteers, contractors, trainee teachers and other pre-employment checks are set out in the Safer Recruitment Policy. That policy must reflect KCSIE 2026 safeguarding principles and applicable Romanian

and British Schools Overseas requirements. HR must retain evidence of the required checks and any restrictions pending clearance.

CHECKING THE IDENTITY AND SUITABILITY OF VISITORS AND CONTRACTORS

Visitors

All visitors must verify their identity and the purpose of their visit before being admitted to the school.

- Visitors must sign in and wear the designated visitor lanyard while on site.
- Visitors who do not have the required safeguarding clearance or status will be accompanied by a member of staff while moving around the premises.
- Any adult found on the premises without the correct identification or lanyard should be challenged appropriately and directed to reception for verification.
- Unaccompanied or unidentified visitors must be reported immediately to reception or a member of the senior leadership team.

Contractors and organisations using school premises

Contractors must pass through school security arrangements and have their identity verified. The school will seek written assurance from the employing organisation that appropriate background and safeguarding checks have been completed for individuals working with children or on the school site.

Contractors will receive appropriate information about the school's safeguarding procedures and reporting routes. Where possible, work that could create unnecessary contact with children will be scheduled outside the regular school day.

Where an external organisation provides activities for children on school premises, the school will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures. Safeguarding expectations and a requirement to liaise with the school should be included in relevant service, hire or transfer-of-control arrangements. Serious non-compliance may result in the arrangement being terminated.

Where supply staff, trainee teachers or contracted staff are provided by another organisation, CSB shares safeguarding responsibilities with that organisation. The school remains responsible for gathering safeguarding facts and managing the school-side safeguarding response, while working closely with the employer or provider.

RECORD-KEEPING

All safeguarding concerns, discussions, decisions and the reasons for those decisions must be recorded in writing. Records should be clear enough for another safeguarding professional to understand what was known, what was decided, what action was taken and why.

Safeguarding records will include, as appropriate:

- A clear and comprehensive summary of the concern.
- The child's account, wishes and feelings where relevant.
- Details of how the concern was followed up and resolved.
- Any immediate safety action taken.
- External referrals and advice received.

- A note of actions taken, decisions reached, the rationale for those decisions and the outcome.
- Review dates, follow-up action and closure information where appropriate.

Safeguarding concerns and referrals will be kept in a separate child protection record from the main student file, whether held electronically through CPOMS or in secure paper form. Confidential records will be accessible only to those with a professional need to see them.

If a child for whom the school has or has had safeguarding concerns moves to another school, the DSL or a Deputy DSL will ensure that the child protection file is transferred securely and separately from the main student file as soon as possible. CSB will transfer the file within five days of an in-year transfer or within the first five days of a new term, in line with lawful information-sharing arrangements. Receipt must be confirmed.

The transferred file must include a concise handover summary of current safeguarding concerns, relevant context and ongoing support needs. Historical information must be clearly distinguished from current concerns and presented with appropriate context.

Where information is significant or complex, or would allow the receiving school to put support or a safety plan in place before the child arrives, the DSL will consider speaking to the receiving DSL and sharing relevant safeguarding information in advance.

When a child joins CSB, the DSL or a Deputy DSL must review incoming safeguarding information promptly, clarify any gaps with the previous school and arrange any necessary risk assessment or support before, or as soon as possible after, arrival. Information will be shared with relevant staff on a need-to-know basis.

The school will hold safeguarding records in line with its Records Retention Schedule and applicable law. The current school approach of retaining child safeguarding information for 20 years will be subject to that schedule and any legal requirement to retain particular records for a different period.

TRAINING

All staff

All staff will undertake safeguarding and child protection training at induction, including online safety, filtering and monitoring responsibilities, staff conduct, allegations and low-level concerns, whistleblowing, and the school's reporting systems. Training will enable staff to identify signs of possible abuse, neglect and exploitation and to respond appropriately.

Staff will receive safeguarding and child protection updates, including online safety, as required and at least annually. Training should be integrated with the school's wider safeguarding approach and curriculum planning.

Staff should be given opportunities to contribute their safeguarding experience to the development of safeguarding arrangements and the child protection policy.

DSL and Deputy DSLs

The DSL and Deputy DSLs will undertake safeguarding and child protection training at least every two years and update their knowledge and skills at regular intervals. Deputy DSLs will be trained to the same standard as the DSL.

Year Group Deputy DSLs and Digital Safety Lead

Year Group Deputy DSLs will receive training appropriate to the responsibilities assigned to them. The Digital Safety Lead will maintain relevant knowledge of online safety, filtering and monitoring, cyber security and emerging digital risks, including generative AI.

Proprietors / governors

Proprietors and governors will receive safeguarding and child protection training, including online safeguarding, at induction and regular updates thereafter. Training should enable them to provide strategic challenge and assurance that safeguarding policies and procedures are effective.

Contractors and volunteers

Contractors and volunteers will receive safeguarding information and training proportionate to their role and level of contact with children. Individuals working regularly on site will receive clear information about school safeguarding procedures and how to report concerns.

LINKS TO OTHER POLICIES

Teacher / Staff Handbook and Staff Code of Conduct
Safer Recruitment Policy
Behaviour Policy
Whistleblowing Policy
Online Safety / Acceptable Use procedures
Pupil Mobile Phone procedures
Uncollected Child Policy
Missing Child Policy
Child Missing Education / Attendance Policy
Health and Safety Policy
Medical and allergy policies and procedures
SEND Policy
Anti-Bullying Policy
Data Protection and Records Retention procedures
PSCHEE / RSHE curriculum and Relationships Education procedures
Mental Health and Wellbeing procedures

APPENDIX A - TYPES OF ABUSE AND KEY DEFINITIONS

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events. Multiple issues may overlap and harm may occur online or offline, inside or outside the home, and through adults or other children.

Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical and the impact of seeing, hearing or experiencing the ill treatment of others. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

Physical abuse

Physical abuse 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.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may include persistent criticism, belittling, name-calling or other verbal abuse, conveying that a child is worthless or unloved, silencing or ridiculing a child, developmentally inappropriate expectations, overprotection, preventing normal social interaction, seeing or hearing ill treatment of another, serious bullying, exploitation or corruption.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. It may involve physical contact, including penetrative and non-penetrative acts, or non-contact activities such as involving children in sexual images, watching sexual activities, encouraging sexually inappropriate behaviour or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can facilitate offline abuse. Sexual abuse may be perpetrated by adults or other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may involve failure to provide adequate food, clothing or shelter; protect a child from physical or emotional harm; provide adequate supervision; ensure access to medical care or treatment; or respond to a child's basic emotional needs.

Exploitation and extra-familial harm

Exploitation occurs where a person or group uses an imbalance of power to coerce, control, manipulate or deceive a child for criminal, sexual, financial or other advantage. Extra-familial harm refers to harm occurring outside the family environment and can include sexual exploitation, criminal exploitation, serious violence, financial exploitation, abuse in intimate relationships, stalking and radicalisation.

Modern slavery and trafficking

Modern slavery can include trafficking, forced labour, criminal exploitation and sexual exploitation. A child cannot consent to being exploited, abused or trafficked. Children who are exploited may not recognise what is happening and may themselves be treated as offenders for actions taken under coercion.

Harmful sexual behaviour (HSB)

Harmful sexual behaviour is an umbrella term for sexual behaviour by children that is developmentally inappropriate, problematic, abusive or violent. HSB may occur online, face to face or both, and should always be considered within a child-protection context. Sexual behaviour exists on a continuum from developmentally expected to harmful; age, developmental stage, power imbalance, coercion and vulnerability must be considered.

Making or sharing nudes and semi-nudes

Making or sharing nudes and semi-nudes means the creation, sending or posting of nude or semi-nude images by people under 18. Images include photographs, videos and livestreams. They may be self-generated, taken or created by another person, digitally altered, or wholly generated using artificial intelligence, including deepfakes or deep nudes. Every incident requires a safeguarding response, whether the image sharing appears consensual or non-consensual.

Victim and alleged perpetrator terminology

The term victim may be used in this policy because it is widely understood, but not every child who has experienced abuse will want to be described in that way. Staff should use terminology that is appropriate and comfortable for the child. The terms alleged perpetrator and perpetrator should also be used carefully, particularly when speaking in front of children, because harmful behaviour may be connected to the alleged perpetrator's own experiences of abuse or trauma.

APPENDIX B - SPECIFIC SAFEGUARDING ISSUES

Children absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of safeguarding concerns including neglect, sexual exploitation, criminal exploitation, mental health difficulties, substance misuse, radicalisation, FGM and forced marriage. Persistent absence can also increase existing risks within the family or community.

The school will follow its attendance and Child Missing Education procedures, respond to repeated or prolonged absence as a safeguarding issue where appropriate, and work with parents/carers and external agencies to identify the reason for absence and reduce risk.

Elective home education

Home education can provide a positive learning experience, but it can also make some vulnerable children less visible to services. Where a parent/carer indicates an intention to remove a child from CSB to educate at home, the school will consider whether there are safeguarding concerns and, where possible, meet with the family before withdrawal. Particular attention will be given where the child has SEND, is known to child protection services or is otherwise vulnerable.

Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual, group, organised network or gang takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the child needs or wants, financial or other advantage to the perpetrator, or violence or threats of violence. CCE may constitute modern slavery or trafficking.

A child cannot consent to exploitation. Children may identify with the group exploiting them, may be threatened or trapped by debt, may carry weapons for protection, and may be criminalised for actions they undertake under coercion.

Indicators can include:

- Unexplained gifts, money or new possessions.
- Association with people involved in exploitation or organised crime.
- Changes in emotional wellbeing, friendships or behaviour.
- Misuse of drugs or alcohol.
- Going missing for periods of time or regularly returning late.
- Repeated or prolonged absence from education or disengagement from learning.
- Involvement in theft, transport of drugs or money, vehicle crime, threats or serious violence.

Any suspicion of CCE must be reported to the DSL or a Deputy DSL. The school will consider child-protection and, where relevant, police or modern-slavery/trafficking referral routes under Romanian law.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. An individual, group or organised network may use an imbalance of power to coerce, manipulate or deceive a child into sexual activity. The abuse

may involve physical contact or non-contact activity and can happen online. A child may believe the relationship is consensual or loving and may not recognise that they are being exploited.

CSE can occur as a one-off incident or over time and can happen without the child's immediate knowledge, for example through others sharing sexual images or videos. Children may be criminalised for actions taken under coercion. Concerns must be reported to the DSL or a Deputy DSL.

Domestic Abuse

Domestic abuse can include psychological, physical, sexual, financial and emotional abuse and may be a single incident or a pattern of behaviour. Children can be victims of domestic abuse when they see, hear or experience its effects at home, and they may experience domestic abuse in their own intimate relationships. Exposure can have a long-term impact on health, wellbeing, attendance and learning. Any concern will be reported to the DSL or a Deputy DSL and supported in accordance with the child's needs.

Homelessness and temporary accommodation

Being homeless, at risk of homelessness or living in temporary accommodation can create significant welfare and safeguarding risks. Staff should report concerns to the DSL or a Deputy DSL, particularly where accommodation creates additional vulnerability, isolation, instability, exploitation risk or difficulty accessing education and health care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse includes incidents or crimes committed to protect or defend the perceived honour of a family or community. It can include FGM, forced marriage and other harmful practices. Such abuse may involve wider family or community pressure and multiple perpetrators. All forms are abuse and will be treated and escalated as safeguarding concerns.

FGM

Staff should be alert to children who may be at risk of FGM or who may have undergone FGM. Concerns must be reported immediately to the DSL or a Deputy DSL. Where an act may have been carried out or a child is at immediate risk, the school will follow the relevant Romanian child-protection and police reporting requirements.

Possible indicators can include a child talking about a special procedure or ceremony, an extended trip to a country or community where FGM is practised, repeated absence, difficulty walking or sitting, frequent urinary or menstrual problems, prolonged time in the toilet, avoiding physical activity, behavioural change, emotional distress or asking for help without explaining the reason. Indicators are not exhaustive.

Forced marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or other coercion is used. Staff should recognise the one-chance principle: there may be only one opportunity to speak safely with a potential victim. Concerns should be reported immediately to the DSL or a Deputy DSL and handled without contacting family members where this could increase risk.

Preventing radicalisation

Radicalisation is the process by which a person comes to support terrorism or extremist ideology. There is no single profile of a child who may be susceptible. Staff should be alert to significant changes in behaviour, increasing isolation, fixation on extremist content, dehumanising or violent rhetoric, secretive online activity, contact with extremist recruiters or other indicators that a child may be at risk.

The school will consider local and international context, online activity, the child's vulnerabilities and the possibility that indicators may have another explanation. Concerns must be reported to the DSL or a Deputy DSL and, where necessary, shared with police or other competent authorities.

Child-on-child abuse (including harassment and violence)

Children can abuse other children inside or outside school and online. Even if there are no reports, abuse may still be occurring and may not be reported. CSB takes a zero-tolerance approach to abusive behaviour and it must never be dismissed as banter, just having a laugh, part of growing up or boys being boys.

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. It is also preventable. Early recognition, challenge and evidence-informed support can help prevent escalation. Prevention will include age-appropriate teaching on relationships, consent and online safety, active supervision and review of recurring concerns, locations and times of risk. Staff will challenge abusive or discriminatory behaviour.

Forms of child-on-child abuse may include:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Abuse in intimate personal relationships between children.
- Physical abuse, including hitting, kicking, shaking, biting, hair pulling, serious physical assault or threats involving weapons.
- Harmful sexual behaviour, sexual violence and sexual harassment, including misogyny or misandry.
- Causing someone to engage in sexual activity without consent.
- Consensual or non-consensual making or sharing of nudes and semi-nudes, including AI-generated images.
- Upskirting or other non-consensual sexual imagery.
- Initiation or hazing-type violence, harassment, abuse or humiliation.
- Online abusive, harassing, misogynistic or misandrist messages, sexualised bullying, coercion, threats and unwanted explicit content.

The school will maintain well-promoted and accessible routes for children to report abuse. Allegations will be recorded, investigated and dealt with under safeguarding and behaviour procedures. The school will consider how the victim, alleged perpetrator and any other affected children will be supported and kept safe.

Children can report to any trusted member of staff, including a teacher, HOY or safeguarding colleague, and may ask another adult to help them report. Staff must pass concerns to the DSL or a Deputy DSL without delay; children do not need to complete a form. The school will explain these routes in an age-appropriate way and provide communication support where needed.

Children who are lesbian, gay or bisexual and children questioning their gender

Being lesbian, gay or bisexual is not in itself a safeguarding risk. Children who are, or are perceived to be, lesbian, gay or bisexual can, however, be vulnerable to discriminatory bullying or harassment. The school will act to prevent and respond to such behaviour and ensure children have access to trusted adults.

Children who are questioning their gender may also experience bullying, family or peer difficulties, mental health needs or other vulnerabilities. Staff should take time to understand the child's thoughts and feelings, remain professionally curious about the full range of their experiences and follow normal safeguarding procedures where concerns arise.

Any request concerning social transition will be considered case by case in accordance with applicable Romanian law, the school's equality and safeguarding responsibilities, the child's welfare and best interests, the views of parents/carers where it is safe to involve them, and any relevant professional advice. Where involving parents/carers could increase risk to the child, the DSL must be involved before parent/carer contact is authorised.

Staff must refer requests for changes to school arrangements to the School Director and DSL rather than agree them independently. Decisions, their reasons and review arrangements will be recorded. Any implications for premises, changing facilities, residential activities or sport must be checked against applicable Romanian law and BSO requirements before arrangements are authorised.

A child sharing feelings without requesting changes is different from a request for social transition. Staff should respect the child's privacy and follow normal safeguarding procedures where a concern about safety or wellbeing arises.

Harmful sexual behaviour, sexual harassment and sexual violence

Harmful sexual behaviour, sexual harassment and sexual violence can occur between children of any age or sex, online or face to face, inside or outside school, and through a group of children towards an individual or another group. HSB exists on a continuum and may escalate into sexual harassment or sexual violence.

All incidents involving the making or sharing of nude or semi-nude images require a safeguarding response, whether they appear consensual or non-consensual. The response should be proportionate and consider age, development, context, coercion, exploitation and vulnerability.

Staff should challenge inappropriate sexual behaviour and make clear that sexual harassment and sexual violence are never acceptable. Behaviours such as grabbing intimate body parts, pulling down clothing, lifting skirts or other non-consensual sexualised contact must not be normalised.

Responding to a report

- Act immediately and take the report seriously, including where it concerns behaviour online or outside school.
- Reassure the child that they will be supported and kept safe and are not to blame for reporting.
- Do not promise confidentiality. Explain who information may need to be shared with.
- Listen carefully, use the child's language, avoid judgement and ask only open-ended questions.
- Make a clear written record and inform the DSL or a Deputy DSL as soon as practically possible.

- Protect the anonymity and privacy of children involved as far as reasonably possible and consider the impact of social media and rumours.

Risk and needs assessment

Following a report of sexual violence, the DSL or a Deputy DSL will carry out an immediate risk and needs assessment. For sexual harassment, the need for a formal risk assessment will be considered case by case. The assessment should consider the safety and support needs of the victim, potential other victims, the alleged perpetrator(s), the wider school community, and the location and timing of the incident. It will be recorded and reviewed as circumstances change.

Where a report concerns rape, assault by penetration, sexual assault or other conduct that may constitute a serious sexual offence, the school will report the concern without delay to police and the competent child protection authority in accordance with Romanian law and local procedures. The school will not wait for an external investigation to begin before taking reasonable steps to protect children.

Where the victim and alleged perpetrator attend the same school, the school will consider classroom, timetable, transport and site arrangements immediately. For the most serious allegations, physical separation may be required while facts are established and external agencies are consulted. Any such action is a safeguarding measure and does not imply a finding of guilt.

Serious violence

Serious violence can include physical assault, carrying, threatening with or using weapons, often in the context of peer conflict, bullying or criminal exploitation. Staff should report any concern about a child carrying or using a weapon, or expressing an intention to do so, to the DSL or a Deputy DSL.

Staff should be alert to indicators including unexplained injuries, significant changes in friendships or behaviour, increased or repeated absence from education, declining engagement or performance, self-harm, unexplained gifts or possessions, association with criminal groups, and threats or violent conflict. Risk may be higher for children with disrupted education or a history of offending.

The DSL will assess the risk to the individual child and others and will consider a safety and support plan, de-escalation of peer conflict, external referral and early evidence-informed support where appropriate.

Reasonable force and restrictive intervention

There are limited circumstances in which physical contact or restrictive intervention may be necessary to safeguard a child or others. Any intervention must be lawful under applicable local requirements, necessary, proportionate and used for the minimum time required. Staff should consider the additional vulnerability of children with SEND, mental health needs or medical conditions and follow the school's behaviour, health and safety and physical-intervention procedures.

Non-collection of children

If a child is not collected at the end of the session or school day, the school will follow the Uncollected Child Policy. Any pattern of non-collection or circumstances that raise safeguarding concerns will be reported to the DSL or a Deputy DSL.

Missing students

The school's procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing from school or an activity, staff will follow the Missing Child Policy and will treat repeated or unexplained incidents as a safeguarding concern.

Abuse of Trust

All staff must understand that inappropriate behaviour towards students is unacceptable and that professional boundaries apply inside and outside school, including online. Any sexual or romantic relationship between a member of staff and a student under 18 is prohibited by school policy and may constitute a criminal offence or abuse of a position of trust under applicable law. Concerns must be reported immediately under Appendix C.

Making or sharing nudes and semi-nudes, including AI-generated images

If a member of staff becomes aware of an incident involving the making or sharing of nudes or semi-nudes, including digitally altered or AI-generated images, they must report it immediately to the DSL or a Deputy DSL.

Staff must not:

- View, download, forward or share the imagery, or ask a child to send or download it. If imagery has been viewed accidentally, report this immediately.
- Delete the imagery or ask a child to delete it before the DSL has considered the safeguarding response and any need to preserve evidence.
- Conduct an investigation by asking children to disclose unnecessary detail about the imagery.
- Share information about the incident with people who do not need to know.
- Blame or shame any child involved.

The DSL or Deputy DSL will conduct an initial review and consider immediate risk, whether police or child protection referral is required, whether any device needs to be preserved as evidence, whether the imagery has been shared widely, the ages and vulnerability of the children involved, coercion or exploitation, and whether parents/carers should be informed. Any parent/carer contact must follow the Notifying Parents section of this policy.

In most cases staff should not view the imagery. If viewing is considered unavoidable to protect a child, the decision and rationale must be recorded and the school should follow appropriate specialist guidance. All incidents require a safeguarding response, with more serious, coercive, exploitative or developmentally concerning incidents escalated externally.

Cybercrime

Children with particular skills or interests in computing and technology may become involved in cyber-dependent crime, including unauthorised access to computer systems, denial-of-service activity, malware or other harmful technical activity. Staff should consider whether such behaviour indicates exploitation, coercion or safeguarding vulnerability and should report concerns through the school safeguarding system. The Digital Safety Lead and DSL will consider appropriate educational, pastoral, technical and external responses.

APPENDIX C - SAFEGUARDING CONCERNS OR ALLEGATIONS ABOUT STAFF

This appendix applies to safeguarding concerns and allegations about anyone working in or on behalf of the school in a paid or unpaid capacity, including staff, supply staff, trainee teachers, volunteers and contractors. It covers concerns that may meet the harm threshold and concerns that do not meet that threshold, referred to as low-level concerns.

Concerns or allegations that may meet the harm threshold

The harm-threshold procedure applies where it is alleged that a person working in or on behalf of the school has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last category includes behaviour outside school that may create a transferable risk to children. Where appropriate, the School Director, Rita Maalouf, together with the DSL, Julia Suroz, will assess that risk and seek external safeguarding advice if there is uncertainty.

Historical or non-recent allegations will be taken seriously. Where an adult reports abuse that occurred when they were a child, they will be advised and supported to report the matter to police. Where a child makes a non-recent allegation, the school will follow the same safeguarding and external referral procedures as for any other allegation.

Reporting route

A safeguarding concern or allegation about a member of staff, supply staff, trainee teacher, volunteer or contractor should be reported to the School Director and the DSL without delay, unless either is the subject of the concern. If the concern is about the DSL, report it directly to the School Director. If it is about the School Director, report it directly to the Proprietor/Governing Board; involve the DSL only where they are not implicated or conflicted. Where both are implicated, report directly to the Proprietor/Governing Board and the competent external safeguarding authority. If an independent internal route is unavailable or there is another conflict of interest, report to the competent external safeguarding authority without delay. Do not report the concern to the person who is its subject.

If a child has been harmed, there may be an immediate risk of harm, or the situation is an emergency, the school will contact the competent child protection authority and/or police immediately. The DSL or a Deputy DSL is responsible for safeguarding the welfare of the child, while the case manager oversees the response concerning the adult.

Initial response and external consultation

The case manager will establish basic facts without conducting an investigation that could compromise external enquiries. Initial checks may include whether the adult and child were present, whether contact could have occurred, whether there were witnesses and whether relevant CCTV or records exist.

Where the allegation may meet the harm threshold, the case manager will seek advice from the competent Romanian child-protection or external safeguarding authority and police where appropriate, and agree the next steps. The school will document the advice received and the actions agreed.

The timing and content of information given to the adult who is the subject of the allegation will be considered carefully, taking account of external agency advice and the need to protect children and preserve evidence.

Supply staff, trainee teachers and contracted staff

Where an allegation concerns a person employed or placed by another organisation, CSB shares safeguarding responsibilities with the employer or provider. CSB remains responsible for gathering facts available within school and for managing the immediate safeguarding response. The employer/provider should be fully involved in the process and will normally lead any employment or disciplinary action.

The school will not simply cease to use a supply teacher, trainee teacher or contracted worker as a substitute for completing the safeguarding process. Relevant facts will be established, external safeguarding advice sought where required, and an appropriate outcome recorded. Teacher-training providers will be involved where a concern relates to a trainee teacher.

Suspension and alternatives

Suspension is not the default response. It will be considered where there is cause to suspect that a child or other children may be at risk of harm, or where the matter is so serious that dismissal may be a possible outcome. The case manager will consider alternatives before suspension, taking account of risk and external advice.

Alternatives may include:

- Redeployment so the adult has no direct contact with the child or children concerned.
- Providing an additional adult to be present when contact with children occurs.
- Temporary alternative duties that do not involve unsupervised access to children.
- Adjusting classes or arrangements for the child where this is in the child's best interests and is not presented as a punishment.
- Temporary work in another location or role where appropriate.

If suspension is considered necessary, the rationale and alternatives considered will be recorded. Written confirmation and a named school contact will be provided to the individual as soon as practicable.

Supporting those involved

The welfare of the child is the primary safeguarding concern. The school will provide appropriate support to the child and consider the needs of other affected children. The school also recognises its duty of care to an adult who is the subject of an allegation and will provide appropriate information, a named contact and access to support while maintaining confidentiality.

Parents/carers of the child will normally be informed as soon as possible unless doing so would increase risk or conflict with external agency advice. The case manager will agree the timing and content with the DSL or an unconflicted Deputy DSL. The relevant HOY or another appropriate colleague may

communicate this information only when authorised. Information shared will be limited to what is appropriate and lawful.

Definitions for allegation outcomes

Substantiated: there is sufficient evidence to prove the allegation.

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person who is the subject of the allegation.

False: there is sufficient evidence to disprove the allegation.

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. This does not imply guilt or innocence.

Unfounded: there is no evidence or proper basis that supports the allegation being made.

Conclusion, referrals and learning lessons

If an allegation is substantiated and the individual is dismissed, resigns, ceases to provide services or would have been removed from duties had they remained, the school will make any referral required by applicable Romanian law and its safer-recruitment / inspection framework. Where a UK-specific mechanism such as the DBS or Teaching Regulation Agency does not apply to CSB, the school will use the relevant Romanian or international safeguarding route.

The school will continue an appropriate safeguarding investigation even if the individual resigns or ceases to provide services. Every reasonable effort will be made to reach and record an outcome.

At the conclusion of a case, the case manager, DSL and any external safeguarding authority involved will consider whether lessons should be learned, including whether policies, training, supervision, working practices or safeguarding culture need to change.

Record keeping for harm-threshold allegations

For allegations other than those found to be malicious or false, the school will retain a clear and comprehensive summary of the allegation, details of how it was followed up and resolved, action taken, decisions reached, the outcome and whether the information should be referred to in future employment references. Records will be held securely and retained in line with the school's retention schedule and applicable law.

Concerns that do not meet the harm threshold - low-level concerns

A low-level concern does not mean that the concern is insignificant. It is any concern, no matter how small and even if it amounts only to a sense of unease or a nagging doubt, that an adult working in or on behalf of the school may have acted in a way that:

Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and

Does not meet the harm threshold or is otherwise not serious enough to require the harm-threshold allegation procedure.

Examples can include being overfriendly with children, having favourites, taking photographs on a personal phone contrary to policy, one-to-one contact in a secluded area or behind a closed door, humiliating children, or using inappropriate, sexualised, intimidating or offensive language.

Sharing and responding to low-level concerns

CSB will promote a culture of openness, trust and transparency in which staff are clear about professional boundaries and feel confident to share concerns and self-refer where an interaction could be misinterpreted or may have fallen below expected professional standards.

Low-level concerns should be shared promptly with the School Director or through the school's agreed low-level concern route. Where concerns are initially received by the DSL, the School Director should be informed in a timely manner according to the nature of the concern. The School Director remains the ultimate decision-maker for low-level concerns, while consulting the DSL where appropriate. The independent reporting routes above also apply to low-level concerns about the School Director or DSL.

If there is any doubt about whether a concern meets the harm threshold, the school will seek external safeguarding advice. Low-level concerns involving supply staff or contractors will also be notified to their employer/provider so that patterns can be identified.

Where a concern is raised by a third party, the School Director or nominated deputy will gather proportionate evidence by speaking to the person raising the concern, the individual involved and witnesses where appropriate. The information will be used to categorise the behaviour, decide any further action and record the rationale.

Recording low-level concerns

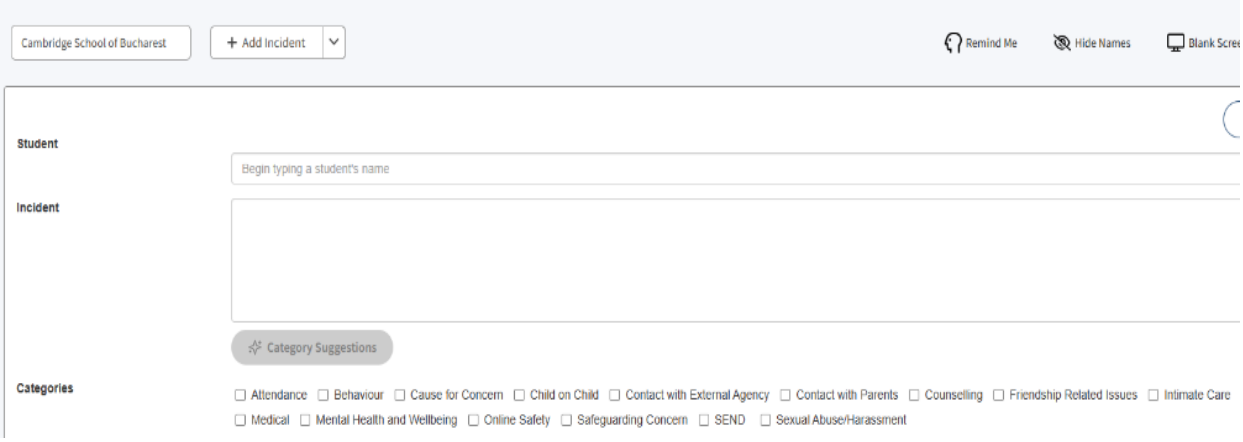
All low-level concerns will be recorded in writing on Engage (see Staff Daybook on Engage). Records will include the details of the concern, the context in which it arose, the name of the person sharing the concern where appropriate, action taken, decisions made and the rationale for those decisions. Records will be confidential, secure and compliant with applicable data-protection law. Direct system access must be restricted to authorised case-management staff and must exclude anyone who is the subject of the concern. Ordinary staff or line-management access to a Staff Daybook does not authorise access to these records.

Low-level concern records will be reviewed so that patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern emerges, the school will consider disciplinary action, escalation to the harm-threshold procedure, wider cultural or system issues, changes to policy and additional training or supervision.

Low-level concerns will normally be retained at least until the individual leaves employment or service with the school, subject to the school's retention schedule and applicable law. They will not normally be included in references unless they relate to matters that would ordinarily be included, such as misconduct or poor performance, or a group of substantiated concerns collectively meets the harm threshold.

APPENDIX D - DIGITAL REFERRAL FORM

Safeguarding concerns should normally be entered in the Child Protection Referral in CPOMS. The digital record should capture the following information.



APPENDIX E - PAPER BASED REFERRAL FORM (WHITE FORM)

Cambridge School *of* Bucharest

CHILD PROTECTION RECORD - Report of a Concern

Name of referrer:		**Role of referrer:**	
Child name:			
Date of birth:		**Year group / class:**	
Details of concern:			
Child's words / wishes where relevant:			
Immediate action taken:			
Parent / carer contact or reason not contacted:			
Reported to:		**Role:**	
Date / time reported:		**Signature:**	
DSL / Deputy DSL decision and rationale:			

External referral / advice:	
Follow-up / review / outcome:	

Use a body map where appropriate. Record the child's words accurately. Do not ask the child to demonstrate an injury or remove clothing solely for the purpose of completing a body map.

Body Map

Body Map

