



International School
San Patricio
Toledo



STUDENT PROTECTION AND SAFEGUARDING POLICY.

International School San Patricio Toledo
Juan de Vergara, 1 – Urbanización La Legua – 45005 Toledo
email: infoledo@colegiosanpatricio.es

Find us on Social



ÍNDICE

1. INTRODUCTION.
2. OUR POLICY ON SAFEGUARDING – PRINCIPLES.
3. CONTACTS AND COMMITTEE.
4. PROTOCOL FOR DETECTING CHILD MALTREATMENT FROM THE EDUCATIONAL CENTRE.
 - 4.1 Safeguarding is everyone-s responsibility
 - 4.2 Reporting and handling a concern.
 - 4.3 Confidentiality.
5. SUPPORTING CHILDREN AND HOW.
6. INVOLVEMENT OF PUPILS.
7. PROTOCOL OF ACTION IN SITUATIONS OF RISK FOR STUDENTS
 - 7.1 Risk situations for students.
 - 7.2 Physical Abuse
 - 7.3 Sexual Abuse
 - 7.4 Emotional Abuse
 - 7.5 Cyberbullying
8. ACTION PLAN.
 - 8.1 The following aspects should be considered in this process.
9. BULLYING HAS THE FOLLOWING CHARACTERISTICS.
 - 9.1 Children with Special Educational Needs and/or Disabilities
 - 9.2 Types of bullying
 - 9.3 Consequences of bullying
 - 9.4 Preventive measures against bullying
 - 9.5 Action protocol against bullying
10. COLLECTION OF INFORMATION FROM DIFFERENT SOURCES
11. LOW LEVEL CONCERNS
 - 11.1 How will Low Level Concern be Handled?
 - 11.2 How will records be kept?
12. HIGHER LEVEL CONCERNS AND ALLEGATIONS.
 - 12.1 What Should be done?
 - 12.2 How will Higher Level Concerns or Allegations be Handled?
13. INFORMATION TO FAMILIES
14. REFERENCES.

1.- INTRODUCTION.

In our community, it is essential that we know our students and our students feel known and cared for. We identify and meet the varying needs of each individual. We are well aware of our moral and the importance of our responsibility to safeguard and promote the welfare of our students. We aim to create a caring, secure environment in which young people feel safe, respected and valued, and in which their welfare is paramount.

This policy applies to all teaching and non-teaching staff at International School San Patricio and Boarding House. It is an expression of our commitment to safeguarding in all aspects of the life of the school, and to working together with in order to ensure that we have effective systems and procedures within the school to identify, assess and support any children who may be suffering from harm, at risk of suffering from harm, or in need of additional support.

Children have a right to feel safe and secure, they cannot learn effectively unless they do so. All children have a right to be protected from harm and abuse.

Whilst the school will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are growing up in circumstances that are consistent with the provision of safe and effective care;
- Taking action to enable all children to flourish and to achieve their full potential as people and as members of the school and of the wider community.

The aim of safeguarding is to enable children to have optimum life chances and to enter adulthood successfully.

Application

This policy applies to all teaching, non-teaching, residential, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers, non-school-based San Patricio staff 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.

Throughout the document, the term DSL is used. Designated Safeguarding Leads

This Safeguarding Policy and the Code of Conduct applies to all pupils and adults in the school, including when being educated off-site and undertaking an educational visit. It also applies to pupils who are on an exchange and being hosted by the School.

Publication staff handbook - PTSC dates, progress report dates and pathway and internal dates

This Policy is updated annually and is published to all staff and volunteers and placed on the school website.

It should be understood that the School will always refer to this document as the benchmark for all safeguarding practice and decision making.

Education and Training

The school community will:

Train all staff in English and Spanish, including: teaching staff, support staff (e.g. administration staff, lunchtime support staff and site support staff) and tutors to identify all forms of bullying and take appropriate action, following the school's policy and procedures (including recording and reporting incidents)



2.- OUR POLICY ON SAFEGUARDING – PRINCIPLES.

The central principle is that our approach must always be child-centred and that the welfare of the child is the paramount consideration. In all situations, and in particular where there may be a potential conflict of interest, the child's best interests must always be the primary aim of every action or decision.

All staff should be aware that safeguarding incidents can happen anywhere and at any time, and that they are required to be alert to any possible concerns.

All staff in a school have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. In such circumstances all staff have a responsibility to take appropriate action, working with other services as needed.

All staff in a school have a responsibility to identify children who may benefit from 'early help'. 'Early help' means providing support as soon as a problem emerges. In the first instance, staff should discuss early help requirements with the DSL who will, where appropriate, refer the issue to children's social care who, in turn, may initiate an 'early help assessment'.

All students know that there are adults to whom they can turn if they are worried. These include teaching tutors, Coordinators, the School Counsellor Department and, in the case of boarders, Head of Boarding House and Boarding Educators.

Members of staff should be aware that they may be asked to support social workers to take decisions about individual children. Schools and their staff are a part of a wider safeguarding system for children, and school should work with all other agencies involved including social care, health services and the police, to promote the welfare of children and to protect them from harm.

Raising concerns: all staff and volunteers should feel able to raise concerns about poor or unsafe practice and about potential failures in the school's safeguarding systems or processes, and that such concerns will be taken seriously by the school's senior leadership.

3.- CONTACTS AND COMMITTEE.

Dirigentes Designados a la Protección del Menor (DDPM): Simon David Hatton-Burke, Patricia García Rodríguez, Declan Ennis
Vice Dirigente Designado a la Protección del Alumno (Vice DDPA) Vicedirectora; Patricia García
Cualquier otro miembro del personal del colegio que ha recibido preparación sobre DDPA Responsable de la Residencia / Monitores
Contacto Autoridades Locales
Nuestro colegio sigue los procedimientos y protocolo de protección de los servicios sociales locales de Toledo
Números de teléfono para información y consejos sobre asuntos de menores:
Fundación Anar - consejos para adultos preocupados por los jóvenes https://www.anar.org/ 917260101-600505152
Equipo de Apoyo de la Guardia Civil - Comandancia Toledo 925225900
Policía - Local Nacional, o de Emergencia Toledo 091-112 - 925 28 85 00



4.- PROTOCOL FOR DETECTING CHILD MALTREATMENT FROM THE EDUCATIONAL CENTER.

4.1.- SAFEGUARDING IS EVERYONE'S RESPONSIBILITY .

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 (see below for a list of some common signs). If a staff member has any concerns about a child s/he should report to the Members of the Committee. If staff members have nagging doubts or questions they should speak immediately to a Designated Safeguarding Lead ("DSL") or Headteacher. The DSL will discuss the matter with the member of staff and will decide on an appropriate course of action. This discussion and actions may be recorded in if found appropriate by the DSL.



4.2.- REPORTING AND HANDLING A CONCERN.

When reporting and/or handling a concern about a child all staff should act with the utmost discretion and any pupils who are involved will receive appropriate care and support. Staff should always listen to a pupil who wants to talk about a concern. If a child tells a member of staff that they know about or have been a victim of child abuse or neglect the member of staff should:

- Allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
- Reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Limit questioning to the minimum necessary for clarification and avoid leading questions such as, "Has this happened to your siblings?"
- At an appropriate time tell the child that the matter will be referred in confidence to the appropriate people. Promises of confidentiality should not be given (see Confidentiality section below).
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.
- Write up their conversation as soon as possible on MyConcern.
- Seek support if they feel distressed.

4.3.- CONFIDENTIALITY.

Staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious as this may ultimately 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 in confidence only to the people who must be told in order to ensure that the appropriate action is taken. All staff involved will also take whatever steps they can to protect the informant from any retaliation or unnecessary stress that may occur after a disclosure has been made.

4.4.- REPORTING AND HANDLING A CONCERN.

Reporting and Handling a Concern:

Any member of the staff suspicions of the existence of abuse:

- unfair behavior
- physical signs or injuries
- the student tells it directly or tells it to another child

Communication from the tutor

Systematic observation of the student

Obtain information from other teachers or professionals who know the minor

Interview with the family

Interview with the child

Inform the **Members of the Committee** and the Counselor Dept..

Agree, some joint actions that improve the student's situation

The family will be informed of the situation detected and the necessary notification to the Protective Services

Whenever it is necessary to intervene in the family environment, Municipal Social Services will be notified.

- 1. Suspicions by the school of the existence of abuse:
 - unfair behavior
 - physical signs or injuries
 - the student tells it directly or tells it to another child

- 2. Communication from the tutor and make a systematic observation of the student in different spaces and in the relationship with their parents in order to detect possible signs of bullying.

- 3. Obtain information from other teachers or professionals who know the minor, interview with the family and, where appropriate, interview with the child. Inform the management team of the center and the Counselor Dept..

- 4. Agree, if possible, some joint actions that can lead to improving the student's situation.

- 5. The family will be informed of the situation detected and the necessary notification to the Protective Services (provided that with this information the child is not put at risk) explaining in any case that the objective is to seek the necessary help to improve the situation.

- 6. Whenever it is necessary to intervene in the family environment, Municipal Social Services will be notified. It must be taken into account in all cases that teachers are not responsible for contrasting and confirming the existence of abuse. Therefore, after suspicion, it is necessary to notify the Protection Services. Notification can be done in writing or verbally.
 Use of the Children's Observatory Notification Sheet (Plataforma)
 Summary report using if deemed necessary the Social Risk Detection Questionnaires (CRS) or open report.

- 7. If the situation is considered high risk for the minor, serious and urgent, it will be immediately referred to Health Services (if there has been physical damage) or the Police.

- 8. Action if a Pupil is Missing

The School needs to be aware of those pupils who are persistently absent or missing from school as this may be an indicator of welfare concerns, including abuse or neglect. All staff must also be aware of their role to prevent children from going missing from education. For details of the School's procedures and responses please see our separate policy entitled 'Lost or Missing Children' and 'Attendance Policy'. The latter contains the school's procedures for unauthorised absence, including on repeat occasions, as well as referral to the local authority.

5.- SUPPORTING CHILDREN AND HOW.

We recognise that school may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm.

We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our school will support all children:

We will promote a caring, safe and positive environment within the school.

We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.

6.- INVOLVEMENT OF PUPILS.

- Involve pupils in policy writing and decision making, to ensure that they understand the school's approach and are clear about the part they have to play to prevent bullying.
 - Regularly canvas children and young people's views on the extent and nature of bullying.
 - o Ensure that all pupils know how to express worries and anxieties about bullying.
 - Ensure that all pupils are aware of the range of sanctions which may be applied against those engaging in bullying.
 - Involve pupils in anti-bullying campaigns in schools and embedded messages in the wider school curriculum.
-

7.- PROTOCOL OF ACTION IN SITUATIONS OF RISK FOR STUDENTS.

Every 15 days there is a meeting held for Vulnerable Students attended by Counseling Dept, School Nurse, Principal and Deputy Principal and Head of Boarding. The safeguarding and welfare of our students are discussed and analysed.

7.1.- THE FOLLOWING ARE CONSIDERED RISK SITUATIONS FOR STUDENTS:

- Autolytic behaviors (self-harm)-
- Inappropriate use of social networks, Sexting
- Addictions
- Substance use
- Bullying / Bullying
- Eating disorders
- Mistreatment
- Sexual abuse
- Cyberbullying

7.2.- 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.

7.3.- 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 via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

7.4. 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 involve conveying to a child that they are worthless or unloved or 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 the 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 cyberbullying), 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.

7.5. CYBERBULLYING.

When responding to cyberbullying concerns, the school will:

Act as soon as an incident has been reported or identified.

Provide appropriate support for the person who has been cyberbullied and work with the person who has carried out the bullying to ensure that it does not happen again.

Encourage the person being bullied to keep any evidence (screenshots) of the bullying activity to assist any investigation.

Take all available steps where possible to identify the person responsible.

This may include:

- looking at use of the school systems;
- identifying and interviewing possible witnesses;
- contacting the IT department and online service provider and the police, if necessary.

work with the individuals and online service providers to prevent the incident from spreading and assist in removing offensive or upsetting material from circulation.

Support reports to a service provider to remove content if those involved are unable to be identified or if those involved refuse to or are unable to delete content.

Confiscating and searching pupils' electronic devices, such as mobile phones, in accordance with the law of the country and also the school searching and confiscation policy.

Requesting the deletion of locally-held content and content posted online if they contravene school behavioural policies.

Ensure that sanctions are applied to the person responsible for the cyberbullying; the school will take steps to change the attitude and behaviour of the bully, as well as ensuring access to any additional help that they may need.

Inform the police if a criminal offence has been committed.

Information to staff and pupils regarding steps they can take to protect themselves online.

This may include:

Advising those targeted not to retaliate or reply;

Providing advice on blocking or removing people from contact lists;

Helping those involved to think carefully about what private information they may have in the public domain.

8.- ACTION PLAN.

STEP 1. Identification, communication and reporting of the situation

Any member of the educational community (students, teachers, families, non-teaching staff) who has knowledge or suspicions of a risk situation about a student has the obligation to inform the Tutor, the Guidance Department, the technical management and Designated Safeguarding Lead ("DSL")

STEP 2. Immediate actions.

After communication, a meeting will be called to analyze and assess the necessary intervention.

STEP 3. Emergency measures

If deemed necessary, the emergency measures required to protect the student will have to be adopted, as well as support and help measures.

STEP 4. Information to the family and the necessary Services

Previous knowledge of the Management Team, with due caution and through an interview, will make the case known to the family of the student involved, providing information on the situation and on the measures being adopted.

The pertinent Services will be informed and requested advice according to the case (Police, Social Services, Social Welfare, Health Services ...)

STEP 5. Transfer the situation to the rest of the professionals who attend the student.

If deemed appropriate, it will also be communicated to the rest of the Center's staff and to other instances outside the Center.

STEP 6. Creation of an Individualized Action Plan

An individualized Action Plan will be developed and applied. This plan will have the following structure:

Collection and analysis of information.

Action measures

Conclusions

8.1. THE FOLLOWING ASPECTS SHOULD BE CONSIDERED IN THIS PROCESS

- Guarantee the protection of students
- Preserve their privacy and that of their families
- Act immediately
- Generate a climate of basic confidence in students
- Collect all kinds of tests and indicators
- Do not duplicate interventions and avoid unnecessary delays

9.- BULLYING HAS THE FOLLOWING CHARACTERISTICS.

Power imbalance: There is an inequality of physical, psychological and social power that generates an imbalance of forces in interpersonal relationships.

-Intentionality and repetition: Intentionality is expressed in an aggressive action that is repeated over time and that generates in the victim the expectation of being the target of future attacks.

Helplessness / Personalization: The objective of the abuse is usually a single student, who is thus placed in a situation of helplessness.

Peer abuse can take various forms, among which the most characteristic are: social exclusion and marginalization, verbal aggression, indirect physical aggression, intimidation, threat or blackmail, cyberbullying and sexual harassment.

Harassment usually has, in addition, a collective or group component, since normally there is not a single aggressor, but several, and because the situation is usually known by other colleagues, passive observers, who do not contribute enough for the aggression to stop.

Our school recognises the need to educate the community especially regarding PEER on PEER abuse.

9.1. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND/OR DISABILITIES.

Harassing behavior can be defined as: “Intentional and repeatedly negative behavior (unpleasant or hurtful) by one or several people, directed at another person who can hardly defend themselves.

A student becomes a victim when he is exposed, repeatedly and for a time, to negative actions that are manifested through different forms of bullying or harassment committed in his school environment, carried out by another student or several of them, being in a situation of inferiority with respect to the aggressor or aggressors. It is important not to confuse this phenomenon with sporadic aggressions among the students or other violent manifestations that do not suppose the inferiority of one of the participants in the event.

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of children.

These include:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

That children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and

Communication barriers and difficulties in overcoming these challenges.

9.2. TYPES OF BULLYING.

Aggression can take different forms:

- Exclusion and social marginalization:
 - Direct: Exclude from group activities.
 - Indirect: Ignore, ignore, indirectly block the possibility of interacting with other colleagues (making the harassed invisible) ...
- Physical aggression:
 - Direct: Hitting, pushing, kicking, punching, attacking with objects ...
 - Hint: Hiding, stealing, breaking objects that belong to the victim ...
- Verbal assault:
 - Direct: Insulting, putting humiliating nicknames, denigrating highlighting a disability, questioning sexuality, belittling ...
 - Indirect: Speaking badly, spreading false rumors, making disqualifying jokes ...

- Intimidation / threat / blackmail
- Sexual harassment: conduct of a sexual nature not consented to by the harassed student.
- Cyberbullying or improper use of the internet: Insulting, threatening through social networks. Intimidate using any variant of technologies.

9.3. CONSEQUENCES OF BULLYING.

The maintained bullying carries a high individual cost in the school and social group, both in aspects related to physical and emotional health, and in the development of personality. The damages caused by bullying are wide, ranging from school performance to health (somatizations, emotional and psychological impairment).

For the victim: It can translate into school failure, emotional problems (anxiety, depression), physical risk, low self-esteem, abandonment of studies. Feelings of loneliness, manifestations of tension, hypervigilance, anxiety, multiple fears, decreased motivation, feelings and verbalizations of self-esteem, thoughts and experiences of guilt, self-contempt.

For the aggressor: Learning of the violent act as socially acceptable and rewarded. Difficulties in aspects related to empathy, self-esteem, social skills.

For fellow observers: It can lead to a passive and complacent attitude to injustice. To think that what is happening is normal.

9.4. PREVENTIVE MEASURES AGAINST BULLYING

Peer abuse requires immediate and determined action. The College is very aware of this problem. Therefore, one of our objectives is the prevention of conflicts between equals.

Prevention is developed through:

- Tutorial Action Plan. Within our Tutorial Plan, Tutorials related to this topic are planned annually, but if a specific conflict arises within a classroom, the Guidance Department organizes material for direct and immediate intervention in that group.

- Emotional Intelligence Project (i3e). Through this project we work with students to understand their own emotions and those of others, emotional regulation, empathy, active listening ... many of the aspects related to personal relationships.

- Implementation of direct communication channels: Help boxes in classes and hallways as a way to seek direct help with the tutor and the Guidance Department.
- With the San Patricio Foundation, developing activities, programs, talks, monographs ...
- Methodology in the classroom: conflict prevention is worked through cooperative learning. The school's methodology places special emphasis on the teacher working explicitly on the following aspects: conflict resolution, assertiveness, interpersonal relationships: the value of friendship, work in empathy and managing one's own and other people's emotions (i.e: Emotional Intelligence), stress management (relaxation, meditation, self-control).
- Coexistence rules, internal regulations and school coexistence.
- International Baccalaureate, with the CAS subject, where work and social assistance are encouraged.

9.5. ACTION PROTOCOL AGAINST BULLYING.

The College will guarantee, always and everywhere, the following principles:

Protection: ensure the physical integrity and personal safety of the possible victim.

Effective but not hasty intervention: the educational response will include both remedial and disciplinary measures, if applicable.

Discretion and confidentiality: the management of the center will guarantee that only the people and professionals strictly necessary for the correct application of this protocol have knowledge of the relevant information.

Global intervention: the educational intervention will be extended to all the students and agents involved.

Prudence, empathy and sensitivity: the interventions will take into account that this problem generates a lot of suffering, both in families and in harassed students.

Shared responsibility: understood as the commitment, involvement and active participation of all members of the educational community in creating an adequate school climate of coexistence.

STEP 1. Identification, communication and reporting of the situation

Any member of the educational community (students, teachers, families, non-teaching staff) who has knowledge or suspicions of a situation of harassment about a student has the obligation to inform the Tutor, the Guidance Department and the Management Team.

STEP 2: Creation of the School Bullying Commission:

After communication, the Management Team (Pedagogical Coordinator of the corresponding Program and Technical Director), Tutor (or tutors of the students involved) and the Guidance Department will meet to analyze and assess the necessary intervention. The Technical Director will immediately constitute a working group: the "School Bullying Commission", which must necessarily be made up of at least one member of the Management Team, a counselor and a teacher or tutor.

STEP 3. Immediate actions

This School Bullying Commission will adopt the immediate measures necessary to protect the students involved:

Measures that guarantee the immediate safety of harassed students:

Increased observation measures in risk areas

Accompaniment and attention to students

Precautionary measures aimed at bullying students:

Restriction of the use of certain spaces and resources of the center.

Increased surveillance measures

Measures aimed at working with the rest of the students to clarify the facts, which will be carried out from a non-prosecution approach.

STEP 4. Information to the Educational Inspectorate

Immediately, the Technical Director of the School, will inform the school's inspector or inspector of reference by telephone and in writing, hereinafter Educational Inspection, of the events that have occurred, of the constitution of the School Bullying Commission and of the measures immediately taken by the center.

STEP 5. Information to families

The Technical Director of the School (accompanied by the tutor or counselor) will inform the families or legal guardians of the students involved, guaranteeing confidentiality and showing the provisional nature of the conclusions, as well as the immediate measures adopted by the center, drawn up minutes of the interviews held.

STEP 6. Transfer to the other professionals who attend the harassed student
The School Bullying Commission will inform the team of teachers of the situation.
If deemed appropriate, it will also be communicated to the rest of the Center's staff and to other entities external to the Center (social, health, judicial ...) based on the initial assessment.

STEP 7. Creation of an Individualized Action Plan

The School Bullying Commission will prepare and apply an Action Plan, which it will inform the Educational Inspectorate.

This plan will have the following structure:

- Collection and analysis of information.
- Action measures
- Conclusions

10.- COLLECTION OF INFORMATION FROM DIFFERENT SOURCES.

Once the appropriate emergency measures have been adopted, the School Bullying Commission (Direction and Guidance Dept) will collect the necessary information regarding the event:

Collection of information related to the event from various sources: involved students, families, teachers, observant students, non-teaching professionals, other professionals who are related to the students involved.

Compilation of the existing documentation on the affected students. Taking into account the student's history.

Systematic observation in common spaces of the Center, in class, in complementary and extracurricular activities.

Likewise, the Center Management will request the Guidance Department, with the collaboration of the Tutor, to complete the information. This will be done, depending on the case, observing the affected students, contrasting opinions with other classmates, speaking with the affected students or interviewing the families.

In the interviews to be carried out, the members of the School Bullying Commission will participate, depending on the severity and circumstances of the facts to be analyzed, guaranteeing the anonymity of the minors involved.

The following aspects should be considered in this process:

- Guarantee the protection of students
- Preserve their privacy and that of their families
- Act immediately
- Generate a climate of basic confidence in students
- Collect all kinds of tests and indicators
- Do not duplicate interventions and avoid unnecessary delays

The Commission will analyze and contrast the information received taking into account the correct application of the privacy and data protection regulations, guaranteeing at all times the custody and protection of the documentary information obtained.

II.- LOW LEVEL CONCERNS.

The overarching aim of the School's low-level concern policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. This is consistent with 'Working Together to Safeguard Children' A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult who works in the school 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.

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such the School sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

11.1. HOW WILL LOW LEVEL CONCERN BE HANDLED?

The Headteacher will discuss all low level concerns s/he receives with the DSL as soon as possible and in any event within 24 hours of becoming aware of it. The Headteacher will in the first instance satisfy him/herself that it is a low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where (a) the threshold is met for a higher level concern/allegation (b) there is a pattern of low-level concerns which collectively amount to a higher level concern/allegation or (c) there is other information which when taken into account leads to a higher level concern/allegation. Where the Headteacher is in any doubt whatsoever, advice will be sought from the CEO, if necessary on a no-names basis.

Having established that the concern is low-level the Headteacher or the Headteacher's delegate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

11.2. HOW WILL RECORDS BE KEPT?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either (a) the concern (or group of concerns) has been reclassified as a higher level concern as above or (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the School's grievance, capability or disciplinary procedure.

12.- HIGHER LEVEL CONCERNS AND ALLEGATIONS.

A higher level concern or allegation is any behaviour where an adult is alleged to have:

- 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; or
- behaved towards a child or children in a way that indicates he or she could pose a risk of harm to children

A higher level concern or allegation may be triggered by one specific incident or by a pattern of behaviour or low-level concerns which when considered collectively amount to a higher level concern/allegation.

12.1. WHAT SHOULD BE DONE?

Higher level concerns or allegations should be reported to the Headteacher immediately. The adult to whom the concern or allegation (referred to hereafter as allegation) relates should not be informed.

12.2. HOW WILL HIGHER LEVEL CONCERNS OR ALLEGATIONS BE HANDLED?

The Headteacher will contact the Safeguarding Committee and conduct a strategy team. The decision of the strategy team could be:

- official investigation by local social services
- police investigation if there is a criminal element

13.- INFORMATION TO FAMILIES.

The tutors, with the advice of the School Bullying Commission, will again inform the families of the agreed actions and measures. The families of the aggressors will be expressly informed of the consequences that may result in the case of repeated abuse. These meetings must be recorded in writing.

Evaluation and monitoring

The Head of the School will evaluate the effectiveness of the measures carried out and will inform the families in a timely manner.

The Head of the School will also periodically inform the Inspector of the evolution and / or resolution of the abuse situation.

14. REFERENCES..

Castilla de la Mancha

<https://drive.google.com/drive/folders/1t6nnjly-WGaePfxixJV4DGHuZRWipXAT>

Comunidad de Madrid

<https://drive.google.com/drive/folders/1t6nnjly-WGaePfxixJV4DGHuZRWipXAT>