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**Bulgarian School Chuchuliga (Skylark)**  
**Croydon, Surrey, UK**

# **Safeguarding and Child Protection Policy**

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Adopted and Confirmed by the School's Governing Body, the Bulgarian School Chuchuliga Limited,  
Companies House No 10363510

Croydon, Surrey, United Kingdom

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## General Provisions

The Bulgarian School Chuchuliga (Skylark) is a privately-run education establishment that operates in London's borough of Croydon, UK, under the provisions of UK's laws and regulations as well as Bulgarian legislation and regulations concerning children and young people and their protection and safeguarding. In addition to UK's documentation and regulations referred to in this policy, all Bulgarian schools operating abroad must also comply with the [Bulgarian Child Protection Law](#) and [Regulation No 90](#) of the Bulgarian Council of Ministers of 29 May 2018.

The Bulgarian School Chuchuliga (Skylark) also meets all the requirements of the [EU's General Data Protection Regulation](#) (GDPR) of May 2018 and protects students, parents and school staff data in accordance with both the UK and EU legislation. In the event of UK's exit from the EU, the Bulgarian School will continue to comply with EU regulations concerning education and safeguarding of children and young people, as long as Bulgaria remains EU member state.

Since its opening in September 2016, the School uses the teaching facilities of Archbishop Tenison's CoE High School in Croydon, and all the Bulgarian school's staff and students follow the regulations of the English school. Since September 2023, Skylark school has been using teaching facilities of three other schools (in addition to its Croydon base): Hillcroft Primary School (Chaldon Road Caterham, CR3 5PG); Office Tribe Limited (a6 Mount Pleasant Road, Tunbridge Wells, TN1 1QU); Vinters Park Community Centre (Aldon Close, Maidstone, ME14 5QF). Wherever this document mentions the word (school's) "site", this refers to the premises of the four English schools (teaching facilities).

Having classes in these teaching facilities means that the Bulgarian School Chuchuliga fully accepts the Safeguarding Policies of the English schools. Where the School rents teaching facilities, it will always follow their policy on safeguarding and protection of children and young people, in addition to this policy.

According to [Regulation No 90/29.05.2018](#) of the Bulgarian Council of Ministers, the Parents' Councils of all Bulgarian school functioning abroad are regulatory bodies supervising the work of the schools, including their performance and their finances. At the beginning of each academic year (mid-September), the Directors of the School's Governing Body, the Bulgarian School Chuchuliga Limited, nominate a safeguarding governor: as a rule, this is the Parents' Council President.

Since the outbreak of the Covid-19 pandemic in early March 2020, the Bulgarian School Chuchuliga (Skylark) has strictly followed all UK government's regulations and laws in protecting children, parents, school staff and visitors to school from contracting or further spreading the disease.

This safeguarding policy must always be read and understood in close connection with the Risk Assessment Policy as it is regularly updated, in view of the latest government and education authorities recommendations and regulations concerning teaching and learning in the circumstances of Covid-19 or other limitations that the UK government may impose on schools and parents to protect children and young people from any harm.

## Policy Statement and Principles of Safeguarding

Bulgarian School Chuchuliga (Skylark) – hereafter, **The School** – is committed to providing a safe and secure environment for children, staff and visitors and promoting a climate where children and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of children by protecting them from maltreatment, by preventing impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and by taking action to enable all children to have the best possible outcomes. The School's safeguarding policies should be considered alongside [Health and Safety](#) legislative requirements.

The School's safeguarding arrangements may be inspected by UK's local education authorities, and it is supervised and can be inspected by the Bulgarian Ministry of Education directly or through the Bulgarian Embassy in London, UK – the Embassy is also responsible for the education policies of the Bulgarian schools operating in the UK.

### **The School's core safeguarding principles are:**

- our responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- representatives of the School community, including parents through the Parents' Council, are involved in policy development and review
- all School's policies are reviewed annually unless an incident or new legislation or guidance (both in the UK and in Bulgaria) suggests the need for an interim review
- we work with other agencies and share information appropriately to ensure the safety and wellbeing of our students.

### **Child protection statement**

The School recognises our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We will act quickly and follow our procedures to ensure children receive early help and effective support, protection and justice.

### **Policy principles**

- welfare of the child is paramount
- all children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- all staff have an equal responsibility to identify children who may benefit from early help and to act on any suspicion or disclosure that may suggest a child is at risk of harm
- the School maintains a culture of transparency, openness and, if needed, challenge with regards to maintaining high standards in safeguarding
- students, pupils and staff involved in child protection issues will receive appropriate support.

### **Policy aims**

- Identify the names of responsible persons in the school and explain the purpose of their role
- Outline the role of the governing body
- Describe what should be done if anyone in the school has a concern about the safety and welfare of a child who attends the school
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable"
- Set out expectations in respect of training
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, e.g. volunteers, contractors etc.
- Outline how complaints against staff will be handled
- Set out expectations regarding record keeping
- Clarify how children will be kept safe through the everyday life of the school
- Outline how the implementation of this policy will be monitored.

This policy is consistent with all other policies adopted by the company's Directors, that established the School, and should in particular be read in conjunction with the following UK's policies relevant to the safety and welfare of children:

- Anti-Bullying Policy
- Anti-Racist Policy
- Health and Safety Policy
- Online Safety Policy
- Whistleblowing Policy

- Code of Conduct
- Public Health England guidance for schools in the circumstances of Covid-19 pandemic

The policy is consistent with all Bulgarian legislation and prescriptions concerning children and young people, esp. when they are at schools under the supervision of the schools' staff.

Due to their day-to-day contact with pupils, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that school staff are alert to the signs of abuse, both inside and outside the school and understand the procedures for reporting their concerns. The school will act on identified concerns and provide early help, or support others to do so, to prevent concerns from escalating.

## **Safeguarding Legislation and Guidance**

The School works in accordance with respective regulations in UK concerning children's and young people education and well-being, such as:

### **Education Act 2002**

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

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

### **Counter Terrorism and Security Act 2015**

**Section 26** applies to schools and other providers;

**Working Together to Safeguarding Children (2015)** covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for Local Safeguarding Children Boards (LSCB's) to monitor the effectiveness of local services, including safeguarding arrangements in schools.

**Keeping Children Safe in Education (2016)** is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards ) (England) Regulations 2014 and the Education (Non-Maintained Special Schools) (England) Regulations 2011. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children.

### **Prevent Duty Guidance (England and Wales)**

Covers the duty of schools and other providers in section 29 Counter Terrorism and Security Act 2015, to have due regard to the need to prevent people being drawn into terrorism.

### **Teachers' Standards**

The Teachers' Standards 2011/2013 (Guidance for school leaders, school staff and governing bodies) are used to assess all trainees working towards QTS, and all those completing their statutory induction period. They are also used to assess the performance of all teachers with QTS who are subject to The Education (School Teachers' Appraisal) (England) Regulations 2012, and may additionally be used to assess the performance of teachers who are subject to these regulations and who hold qualified teacher learning and skills (QTLS) status safeguarding children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

### **UK's Department for education Guidance for full opening: schools**

The Guidance is intended to support schools, both mainstream and alternative provision, in providing details about work, teaching, learning and child care in the circumstances of Covid-19 pandemic. It applies to primary, secondary (including sixth forms), infant, junior, middle, upper, school-based nurseries and

boarding schools. The guidance also covers expectations for children with special educational needs and disability (SEND), including those with education, health and care plans, in mainstream schools.

The Bulgarian school also complies with all regulations of the Bulgarian Ministry of Education concerning [Teachers' Standards](#).

### **Bulgarian Child Protection Law**

The School operates by strictly complying with the provisions of the Bulgarian Child Protection Law in its latest revision of 4 July 2025.

## **Roles and Responsibilities**

The School staff have a responsibility for safeguarding no matter what their role is. These are outlined clearly in Part One of Keeping Children Safe in Education 2016 and in the Bulgarian Education Act No 90 of May 2018.

**The Governing Body** ensures that the school:

- operates in strict compliance with the laws and regulations of both UK and Bulgarian education Acts and legislation
- creates a culture where the welfare of students is paramount and staff feel confident to challenge over any concerns
- contributes to interagency working and plans
- has a nominated governor (representative of the Parents' Council) who liaises with the Directors of the School's founding organisation in the event of an allegation being made against the head teacher
- has an effective safeguarding policy (updated annually and on website) as well as staff behaviour policy and both are provided to and followed by all staff in a timely manner
- has an appropriate response to children who go missing from education and inform and report to the Bulgarian Embassy in the UK and/or the Bulgarian Ministry of Education
- appoints a Designated Safeguarding Lead (DSL) who is a member of the senior leadership team, trained every 2 years, and that the responsibilities are explicit in the role holder's job description. There should always be cover for this role
- has considered how children are taught about safeguarding
- has evidence of the child voice and that there are systems in place for feedback and pupils views
- appoints a designated Looked After Children (LAC) teacher and ensures appropriate training; ensure staff is aware of this group and their needs including contact arrangements
- have procedures for dealing with allegations of abuse made against members of staff including allegations made against the headteacher and allegations against other children
- has safer recruitment procedures that include statutory checks on staff suitability to work with children and ensures recording of this; ensures volunteers are appropriately supervised and that at least one person on appointment panel is safer recruitment trained
- develops a training strategy that ensures all staff, including site staff and the headteacher, receive information about the school's safeguarding arrangements on induction and appropriate child protection training
- ensure appropriate online filter and monitoring systems are in place and ensure online safety is included in lessons.

**The Headteacher:**

- ensures that the child protection policy and code of conduct are implemented and followed by all staff
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures

- ensures that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- liaises with the Directors of the School's founding organisation where an allegation is made against a member of staff
- ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

**The Designated Safeguarding Lead (DSL)** responsibilities are as follows:

#### **Manage referrals**

- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care
- refer cases to the [Channel programme](#) where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service (DBS) as required
- refer cases where a crime may have been committed to the Police as required.

#### **Work with others**

- liaise with the headteacher to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- as required, liaise with the Directors of the School's founding organisation for child protection concerns (all cases which concern a staff member)
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

#### **Undertake training**

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills will be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as early help assessments
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

#### **Raise Awareness**

- the DSL will ensure the school's child protection policies are known, understood and used appropriately
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this will be specified
- link with the local education training structures to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

#### **Child protection file**

Where children leave the School, the DSL will ensure that their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.



### **Availability**

During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for the School to define what “available” means and whether in exceptional circumstances availability via phone and/or Skype or other similar mediums is acceptable.

## **Good Practice Guidelines and Staff Code of Conduct**

The School meets and maintains responsibilities towards pupils, students and staff, and for this purpose it has agreed standards of good practice which form a code of conduct for everyone. Good practice includes:

- ensuring a sound safeguarding policy
- treating all pupils with respect
- being alert to changes in pupils’ behaviour and to signs of abuse and neglect
- recognising that challenging behaviour may be an indicator of abuse
- setting a good example by the staff and teachers conducting appropriately, including online
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils including challenging inappropriate or discriminatory language or behaviour
- avoiding behaviour or language which could be seen as favouring pupils
- avoiding any behaviour which could lead to suspicions of anything other than a professional relationship with pupils
- reading and understanding the School’s child protection policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, and appropriate IT/social media use
- asking the pupil’s permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between pupils
- avoiding the use of sexualised or derogatory language
- being clear on professional boundaries and conduct with other staff when pupils are present
- being aware that the personal, family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- applying the use of reasonable force only as a last resort and in compliance with school procedures, including those set in the Bulgarian regulative documents concerning “reasonable force”
- dealing with student infatuations in an open and transparent way e.g. informing the correct managers and, whenever necessary the pupils’ parents/guardians, and managing the situation in a way which is sensitive to the feelings of the student
- referring all concerns about a pupil’s safety and welfare to the DSL, or, if necessary directly to police or children’s social care
- following the school’s rules with regard to communication with pupils and use of social media and online networking
- avoiding unnecessary time alone with pupils and risk manage any time alone or one-to-one working
- avoiding sharing excessive personal information with pupils.

## **Abuse of Position of Trust**

The Bulgarian School Chuchuliga (Skylark) and all its staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. The School’s staff are well aware of the prescriptions and statements of the [Sexual Offences Act 2003](#) and they understand that it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.



The same provision is clearly stated in Bulgarian laws and regulations, too, and the School staff are well trained in appropriately applying them.

## Children Who May Be Particularly Vulnerable

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

Some groups such as SEN can be disproportionately impacted by bullying/communication barriers/dismissal of signs and indicators as relating to the disability without further exploration.

For the Bulgarian School to ensure that all of our pupils receive equal protection, we give special consideration to children who are:

- missing education/missing from education
- disabled or have special educational needs
- young carers
- Looked After Children
- privately fostered children
- affected by domestic abuse
- affected by substance misuse/drug use
- affected by mental health issues including self-harm and eating disorders
- affected by poor parenting
- at risk of [Fabricated or Induced Illness](#)
- at risk of gang and youth violence
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying including cyber, homophobic, racist etc.
- live transient lifestyles
- LGBT (lesbian gay bisexual transgender)
- missing from home or care
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- vulnerable to extremism or radicalisation
- vulnerable to faith abuse
- involved directly or indirectly in child sexual exploitation (CSE) or trafficking
- at risk of Honour Based Violence (HBV), including female genital mutilation (FGM) and forced marriage.

## Current Issues

There are many issues of concern affecting children today and not all can be listed here. The issues are often complex and overlap, e.g. drug use/alcohol misuse/truancy. The School has a consistent approach of following appropriate procedures and consulting with other agencies if there are any concerns with any of our pupils.

**Online safety** is exceptionally important and will continue to receive a high priority as an issue, as it is often how issues are facilitating child sexual exploitation, radicalisation, bullying etc. Appropriate filters and monitoring are in place, as well as education of staff and pupils.

**Peer on Peer Abuse.** More specifically, this includes sexting, cyberbullying, sexual assaults, etc. This will always be taken seriously and acted upon, under the appropriate policy e.g. safeguarding, bullying, not dismissed as ‘banter’ or ‘part of growing up’. Victims will be supported through the School’s pastoral system. Any hate crime/incident will be reported through local reporting mechanisms.

### **Sexting**

The dangers sexting bear and the ways it could be combated are well elaborated at the [South West Grid of Learning](#) whose policies on sexting seem efficient and useful. Everyone should remember that the production and distribution of sexting images involving anyone under the age of 18 is illegal and needs very careful management for all those involved. Whenever an incident of sexting occurs, the device should be confiscated and set to flight mode or be switched off; then advice is sought – a report should be made to the DSL via the established child protection procedures.

### **Bullying**

Bullying is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child’s wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying, will be recorded and reported and will be managed through our behaviour and tackling-bullying procedures. All pupils and parents receive a copy of the procedures on joining the school and the subject of bullying is addressed at regular intervals through different school subjects. If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the headteacher and the DSL will consider implementing child protection procedures.

Bullying incidents including discriminatory and prejudicial behaviour e.g. racist, disability and homophobic bullying and use of derogatory language will be recorded and analysed. There will be occasions when a pupil’s behaviour warrants a response under child protection rather than anti-bullying procedures.

### **Children with sexually harmful behaviour**

The management of children and young people with sexually harmful behaviour is complex and the school will work with other agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil’s sexual behaviour should speak to the DSL as soon as possible.

### **Missing Children**

A child going missing from education, which includes within the school day, is a potential indicator of abuse and neglect, including sexual exploitation. Unauthorised absences will be monitored and followed up in line with procedures, particularly where children go missing on repeated occasions. All staff will be aware of the signs of risk and individual triggers including travelling to conflict zones, FGM and forced marriage.

All pupils will be placed on admission and attendance registers. The School will inform the Bulgarian Embassy in London and/or the Bulgarian Ministry of Education of any child removed from the School’s admission register. We will inform the above authorities of any pupil who fails to attend for a continuous period.

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

Child sexual abuse involves exploitative situations where a child, male or female, receives something from an adult and in return he or she engages in sexual activity. This can be seemingly ‘consensual’ relationships to serious organised crime gangs. There will be an imbalance of power where the perpetrator holds power over the victim. Technology is often used. This is a serious crime. The police team can be contacted for extra support and information.

### **Domestic Abuse**

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship, including relationships between family members. But it isn’t just physical violence – domestic abuse includes emotional, physical, sexual, financial or psychological abuse.

Abusive behaviour can occur in any relationship. It can continue even after the relationship has ended. Both men and women can be abused or abusers.

Witnessing domestic abuse is really distressing and scary for a child, and causes serious harm. Children living in a home where domestic abuse is happening are at risk of other types of abuse too. The School staff are well trained to easily recognise signs of domestic abuse and whenever there is a suspicion, they will immediately inform the DSL and, if needed – the police and social care services.

## **Honour Based Violence**

### **Female Genital Mutilation FGM**

This is illegal and a form of child abuse. It involves a procedure to remove all or some of the female genitalia or any other injury to these organs. The School's staff will be aware of the signs and indicators of this and will report known cases to the police.

### **Forced Marriage**

Forced marriage is illegal and a form of child abuse; it is a marriage entered into without the full and free consent of one or both parties, where violence treats or coercion is used. The School will strictly follow the UK Government's "[Multi-agency practice guidelines in handling cases of forced marriage](#)".

### **Preventing Radicalisation**

Preventing radicalisation is part of the School's wider safeguarding duty. We will intervene where possible to prevent vulnerable children being radicalised. The internet has become a major factor in radicalisation and recruitment. As with all other forms of abuse, staff should be confident in identifying pupils at risk and act proportionately.

The School will work with other partners including the [Channel Panel](#). The DSL is appropriately trained and be able to offer advice, support and information to other staff. The School will also ensure safe internet filters are in place and ensure our pupils are educated in online safety.

### **Private Fostering**

Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'. A connected person is defined as a 'relative, friend or other person connected with a child'. The latter is likely to include person(s) who have a pre-existing relationship with the child, for example, a teacher who knows the child in a professional capacity.

Private foster carers can be from the extended family, e.g. a cousin or a great aunt, but cannot be a relative (a "relative" is father, mother, grandparent, brother, sister, uncle or aunt).

It is imperative that the local authority are notified if a child is living with someone who is not their parent or a 'connected person' for longer than 28 days. The local authority need to be satisfied that the placement is suitable and the child is safe.

### **Teaching and learning in the circumstances of the Covid-19 pandemic**

Since the outbreak of the Covid-19 pandemic in early March 2020, the Bulgarian School Chuchuliga (Skylark) has strictly followed all UK government's regulations and laws in protecting children, parents, school staff and visitors to school from contracting or further spreading the disease. The School aims to ensure healthy and safe environment for all children and school staff while strictly following its Risk Assessment policy's provisions.

## **Helping Children to Keep Themselves Safe**

All children, living and studying in the UK – whether British nationals or immigrants – are taught to understand relationships, promote British values and respond to and calculate risk through different types of school subjects, such as personal, social, health and economic (PSHE) education, Sex and Relationships (SRE) education, etc., including through all aspects of school life.

The approach the School takes is designed to help children to think about risks they may encounter and have help to work out how those risks might be overcome and the support available to them. Discussions about relationships and risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about e-safety, including sexting and tackling bullying procedures including the legalities and consequences.

The School continually promotes an ethos of respect for children and the emotional health and wellbeing of our students is important to us. Pupils are encouraged to speak to a member of staff in confidence about any worries they may have. At the same time all our pupils are aware that if they disclose that they are being harmed or that they have, or intend, to harm another, this cannot be kept secret and that information will need to be shared with other responsible people and/or organisations.

## **Support For Those Involved In A Child Protection Issue**

It is well understood that child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. The School will support pupils, their families, and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person (DSL, usually) who will keep all parties informed and be the central point of contact
- where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- maintaining and storing records securely
- offering details of helplines, counselling or other avenues of external support
- cooperating fully with relevant statutory agencies, including the Bulgarian Embassy in London and the Bulgarian Ministry of Education.

## **Complaints Procedure**

The School's complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil, belittling a pupil or discriminating against them in some way.

Complaints are managed by senior staff, the Headteacher and the governing body that founded the School – the Bulgarian School Chuchuliga (Skylark) Limited; complaints from staff are dealt with by the School's DSL and the Parents' Council.

## **Having Concerns About A Colleague Or Safeguarding Practice**

School's staff who are concerned about the conduct of a colleague or safeguarding practice within the school are undoubtedly placed in a very difficult situation. All staff must remember that the welfare of the child is paramount and staff should feel able to report all concerns about a colleague or the safeguarding practice within the school. The school's whistleblowing code enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the headteacher. Complaints about the headteacher will be reported to the governing body of the School's founding organisation.

Staff may also report their concerns directly to the Directors of the School's founding organisation or the police if they believe direct reporting is necessary to secure action.

## **Allegations Against Staff**

When an allegation is made against a member of staff, set procedures must be followed. It is important to have a culture of openness and transparency and a consultation with the Directors of the School's founding organisation will happen if staff have;

- behaved in a way which has harmed (physically or emotionally), 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 would pose a risk of harm to children.

Allegations against staff should be reported to the headteacher. Allegations against the headteacher will be reported to the governing body of the School's founding organisation. Staff may also report their concerns directly to the Police or the Directors of the School's founding organisation; reports may also be sent to the Bulgarian Embassy in London and/or the Bulgarian Ministry of Education.

School staff need to remember that it is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. We recognise that a child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. However if a child is found to continually make false allegations this may be a sign of mental health issues and a referral to services such as CAMHs ([Child and Adolescent Mental Health](#)) may be required.

An uncomfortable fact is that some professionals do pose a serious risk to pupils and we must act on every allegation. However staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. Staff will be advised to contact their trade union (including Bulgarian trade unions) and will also be given access to a named representative.

The full procedures for dealing with allegations against staff can be found in [Keeping Children Safe in Education](#).

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. We will communicate this to all parties.

## **Staff Training and Induction**

It is important that all staff have regular training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. All staff, including site staff and the headteacher, will be regularly trained in Safeguarding and given at least annual updates in the form of email/newsletter/staff meetings.

The DSL will receive training updated at least every two years, including training in inter-agency procedures. They will be supported and encouraged to attend additional training to keep up to date, including forums and multi-agency training.

Governors (Parents' Council representatives) will receive strategic safeguarding training.

All training will be recorded and monitored to flag in advance when updates are required.

New staff and governors will receive an induction in safeguarding which includes the School's child protection policy, details for the DSL, reporting and recording arrangements specific to the school, dates of their last training, the staff code of conduct and the whistleblowing policy. Staff will sign to say they have received this and understood.

Supply staff and other visiting staff will be given the School's (Visiting Staff) Leaflet with a brief summary of the above regulations.

## **Safer Recruitment**

The School endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education (2016) together.

Recruitment, selection and pre-employment vetting is carried out in accordance with Keeping Children Safe in Education 2016. This includes:

- Verifying identity
- Enhanced DBS (disclosure and barring service) check for those in regulated activity
- Prohibition from teaching check – teacher services system – for all teaching posts/EEA restrictions.
- Verification on mental and physical fitness
- Right to work in UK
- Professional qualifications.

Since the outbreak of the Covid-19 pandemic, the School ensures that all recruitment follows the UK government's regulations while requiring from potential new staff to provide at least two consequent negative Covid-19 test results.

At least one member of each recruitment panel will have attended safer recruitment training.

The Single Central Record ("Employment Register" for the Bulgarian School Skylark) is maintained in accordance with Keeping Children Safe in Education 2016 and with the Bulgarian legislation concerning teaching and learning and work with children.

All appointments of teaching staff in the School must be approved by the Bulgarian Ministry of education and then they are confirmed by the directors of the School's founding organisation.

### **Volunteers**

Volunteers, including governors, will undergo checks commensurate with their work in the school and contact with pupils, irrespective of whether they are in regulated activity or not.

### **Contractors**

We will check the identity of all contractors working on site and requests evidence of checks where they work in regulated activity or unsupervised.

### **Visitors**

The School do not have the power to ask for DBS checks or see their DBS certificate. The headteacher will use their professional judgement regarding escorting visitors in the school. All visitors will be asked to wear a badge identifying them as a visitor.

## **Site Security**

Visitors to the school (currently, Archbishop Tenison's CoE High School in Croydon) are asked to sign in, if necessary show ID, and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in.

The same provisions apply to the Hillcroft Primary school in Caterham where Skylark rents classrooms, too.

All visitors are expected to enter through one entrance and observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe. The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

Site security also applies to all school facilities, playgrounds, equipment, devices, etc. – they all must be safe and their use must be safe, too.

In view of the new rules established after the outbreak of the Covid-19 pandemic in March 2020, the regulations concerning site security may change, depending on every school's circumstances, and the Bulgarian school always follows the regulations of the English schools where it rents classrooms.

## **Extended School And Off-Site Arrangements**

Where extended school activities are provided by and managed by the School, our own child protection policy and procedures apply and the DSL will be available. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures and clarify whose procedure is to be followed if there are concerns. There will be clear communication channels to ensure the DSL is kept appropriately informed.

When our pupils attend off-site activities, including day and residential visits and work related activities, we will risk assess and check that effective child protection arrangements are in place. We will clarify which procedures are to be followed while the DSL will be kept appropriately informed.

## **Photography And Images**

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

To protect pupils we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- not use pupils' full name with an image
- ensure pupils are appropriately dressed
- ensure that personal data is not shared
- store images appropriately, securely and for no longer than necessary
- use school equipment and try to avoid using personal devices; the latter could be only used when there is no option of using school devices, and used only incidentally
- encourage pupils to tell us if they are worried about any photographs that are taken of them.

## **Physical Intervention And Use Of Reasonable Force**

All staff are encouraged to use de-escalation techniques and creative alternative strategies that are specific to the child. Restraint will only be used as a last resort and incidents are usually reported. Reasonable force will be used in accordance with [government guidance](#). The school does not need to inform parents on every incident of using reasonable force but it is a good practice for the teacher or the School to talk to parents of disruptive pupils and seek common solution for the pupil's behaviour.

Whenever the notion of “using reasonable force”, as applied in Bulgarian schools and in English schools, differs, precedence will be given to British law and regulations. Any disciplinary occasion in class or at school in general must be reported to the headteacher first, and it is his or her decision whether to refer these incidents to the School's DSL (or to Archbishop Tenison's DSL, if he or she, or any of the deputies, are available at that time).



## Intimate Care

If a child requires regular intimate care on site this is likely to be written into a care plan which staff will adhere to. If an accident occurs and a child needs assistance with intimate care, this will be risk managed to afford dignity to the child as well as security to the staff member. Staff will behave in an open and transparent way by informing another member of staff and having the child's consent to help.

In any case, parents will be informed and incidents recorded.

## Online Safety

Nowadays pupils increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive communications, to enticing children to engage in sexually harmful conversations, webcam photography, encouraging radicalisation or face-to-face meetings. The School's e-safety policy aims to keep pupils safe in school which includes reasonable filters and monitoring. Cyberbullying and sexting by pupils, via texts and emails, will be treated as seriously as any other type of bullying, and concerns will be managed through our anti-bullying and confiscation procedures.

Chatrooms and some social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access these sites in school. Some pupils will undoubtedly be 'chatting' outside school and are informed of the risks of this through PSHE/SRE. Parents are encouraged to consider measures to keep their children safe when using social media.

Acceptable IT use for staff and pupils will be enforced and parents are also informed of expectations.

## First Aid And Managing Medical Conditions

The School's staff will be trained appropriately in first aid. Section 100 of the [Children and Families Act 2014](#) places a duty on schools to make arrangements for supporting pupils at their school with medical conditions.

If appropriate, the School may draw up an Individual Health care Plan while also considering multi-agency communication when necessary.

## Child Protection Procedures

### Categories and Definitions

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

**Abuse** and **neglect** are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or kitchen matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

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

The school staff are trained to notice the signs of all types of emotional abuse and to follow the School's procedures in cases of such abuse or neglect.

### **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.

### **Position of Trust**

For England and Wales, the age of consent for sexual activity is 18 years old if you are in a position of trust over that child ([Sexual Offences Act 2003](#) for England and Wales).

Where the age of consent differs between Bulgarian and UK's laws and regulations, the latter will always be observed by the School.

### **Neglect**

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
  - protect a child from physical and emotional harm or danger;
  - ensure adequate supervision (including the use of inadequate care-givers); or
  - ensure access to appropriate medical care or treatment
- it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Indicators of abuse**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'.

It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. However, children may have no physical signs or they may be harder to see (e.g. bruising on black skin) therefore staff need to also be alert to behavioural indicators of abuse.

A child who is being abused or neglected may:

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

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

## **Impact of abuse**

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some, full recovery is beyond their reach, and research shows that abuse can have an impact on the brain and its development. The rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## **Taking Action**

It is the responsibility of staff to report and record their concerns as soon as possible. The School actively encourage a ‘never do nothing’ attitude if staff have a concern about a child and promote discussion with DSL if in any doubt. It is not their responsibility to investigate or decide whether a child has been abused.

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

Key points for staff to remember for taking action are:

- If an emergency take the action necessary to help the child, for example, call 999, for UK, or 112 for Bulgaria and the other EU countries
- Report your concern to the DSL as soon as possible and certainly by the end of the day
- Complete a record of concern and immediately pass onto to the DSL (see the Appendices, point A)
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue unnecessarily with colleagues, friends or family

- seek support for yourself if you are distressed.

### **If you are concerned about a pupil's welfare**

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

Staff should record these early concerns. If the pupil does begin to reveal that they are being harmed, staff should follow the disclosure advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

### **Early intervention**

If the concern is low level and does not require other agency involvement, the DSL will initiate early intervention to;

- Engage with the parents/carers as soon as possible (unless the situation is so serious that would put the student at increased risk). We then can evidence quick action was taken and the length of time of involvement
- The School will invite the parents/carers into school for a meeting to demonstrate professional concerns and discuss a supportive working partnership for the best interests of the student (e.g. breakfast club, additional in school support)
- At this meeting we will discuss the plan of next action should the situation not improve
- We will record all contacts with the family, dates and times, including phone calls/letters
- We will then monitor the student closely - behaviour/concerns/interaction with peers and parents/academic progress etc. This will demonstrate the frequency of concerns and help to build patterns.

### **If a pupil discloses to you**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the pupil know that they must pass the information on – staff are not allowed to keep secrets of this kind. The point at which they tell the pupil is a matter for professional judgement. If they jump in immediately, the pupil may think that they do not want to listen, if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the pupils it is best practice for staff to:

- allow pupils to speak freely
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener
- give reassuring nods or words of comfort – 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not be afraid of silences, and allow space and time for pupil to continue, staff will recognise the barriers the pupil may have had to overcome the decision they took to disclose
- clarifying or repeating back to check what they have heard if needed but will not lead the discussion in any way and will not ask direct or leading questions – such as whether it happens to siblings too, or what does the pupil's mother think about it
- use questions such as Tell me.....? Is there anything else?
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on

- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- remember professional boundaries and not share personal experiences such as ‘that happened to me’
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next. The pupil may agree to go with you to see the Designated Safeguarding Lead. Otherwise let them know that you will be consulting them
- write up their conversation as soon as possible on the record of concern form and hand it to the designated lead
- seek support if they feel distressed.

## **Notifying parents**

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

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from Social Care Direct.

## **Records and Monitoring**

### **Recording is important**

The School’s staff is well aware of why it is important that recording is timely, comprehensive and accurate and what the messages are from serious case reviews in terms of recording and sharing information.

Any concerns about a child will be recorded and given to the DSL as soon as possible. All records will provide a factual and evidence based account and there will be accurate recording of any actions. Records will be signed, dated and, where appropriate, witnessed.

At no time will a staff take photographic evidence of any injuries or marks to a child’s person. The body map will be used instead in accordance with recording guidance.

It may be appropriate for the DSL to open a secure safeguarding file and start a chronology page. This will help in building patterns and decision making.

We will feedback to the staff member any actions, however this will be on a need to know basis. It may not be appropriate for staff members to know every detail of the child’s life.

### **The safeguarding file**

Creating a safeguarding file is an important principle in terms of storing and collating information about children which relates to either a safeguarding concern or an accumulation of welfare concerns which are outside of the usual range of concerns in ordinary life events.

We should note that what constitutes a ‘concern’ for one child may not be a ‘concern’ for another, and the particular child’s circumstances and needs will differ, i.e. a child subject to a child protection plan, looked after child, child in need may be looked at differently to a child recently bereaved, parental health issues etc. We will therefore use professional judgement when making this decision as will have clear links and discussions between pastoral staff and DSL’s.

This file will be kept separately from the main pupil file and will be held securely only to be accessed by appropriately trained people. The main file, open to staff, will have a marker to signify that a separate safeguarding file exists for that child so that all staff coming into contact with that child are aware that an additional vulnerability exists.

The School will keep written records of concerns about children even where there is no need to refer the matter to external agencies immediately. Each child will have an individual file, i.e. no family files. All incidents/episodes will be recorded, e.g. phone calls to other agencies, in the chronology with more detail and analysis in the body of the file. This will help build a picture and help the DSL in analysis and action, which may include no further action, monitoring, whether an action should be undertaken, or whether a referral should be made to other agencies - Social Care Direct/Early Help Hubs.

In cases where there is multi agency involvement, meetings and plans, actions and responsibilities shall be clarified and outcomes recorded.

Files will be made available for external scrutiny, for example, by a regulatory agency or because of a serious case review or audit. Records will be kept up to date and reviewed regularly by the DSL to evidence and support actions taken by staff in discharging their safeguarding arrangements.

The file can be non-active in terms of monitoring, i.e. a child is no longer a looked-after-child, subject to a child protection plan. If future concerns then arise, it can be re-activated and indicated as such on the front sheet and on the chronology as new information arises.

If the child moves to another school, the file will be securely sent or taken to the DSL at the new establishment/school and a written receipt will be obtained. There will be a timely liaison between each school's DSL to ensure a smooth and safe transition for the child. We will retain a copy of the chronology to evidence actions, in accordance with record retention guidance.

### **Referral to Social Care Direct**

The School's DSL will make a referral to Social Care Direct if it is believed that a pupil is suffering or is at risk of suffering significant harm. If there is already a social worker assigned to this case, for safeguarding reasons, the social worker should be contacted.

The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless doing so would increase the risk to the child. If the situation does not appear to be improving, the school will press for reconsideration.

Any member of staff can refer to other agencies in exceptional circumstances, i.e. in an emergency or when there is a genuine concern that action has not been taken.

### **Confidentiality and sharing information**

Depending on who is the subject of the concern, the School's staff will only discuss concerns with the Designated Safeguarding Lead, headteacher or chair of governors. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

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

However, if we believe that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from Social Care Direct; advice may also be obtained from the Bulgarian Embassy in London and/or the Bulgarian Ministry of Education.

The School fully accepts the so called 'seven golden rules for [safeguarding information sharing](#) (May 2024 regulation):

- data protection/human rights laws (including [EU's GDPR](#) regulation of May 2018) are not a barrier.
- be open and honest (unless unsafe or inappropriate)
- seek advice (anonymise if necessary)

- share with consent if appropriate; under the GDPR and [Data Protection Act 2018](#), you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk
- consider safety and wellbeing
- in sharing information, keep to the principles: necessary, proportionate, relevant, adequate, accurate, timely and secure
- keep a record of decision and reason for it.

The Data Protection Act, as well as the EU's GDPR regulation, does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. Ideally, information sharing will be done in writing so that there is an evidence trail, however there may be occasions where this method is too slow. In cases where agencies such as MASH (Multi Agency Safeguarding Hub) ring the school requesting information, reception staff will take a message and inform the DSL immediately, the DSL will ensure they can identify who is requesting the information before sharing and then record what has been shared, when, why and with whom.

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

Any personal safeguarding information shared with external agencies will be done securely, e.g. by secure email, password protected or recorded delivery; this includes sharing information with Bulgarian education bodies or the Bulgarian Embassy.

### **Bringing children to school and taking them back after school**

Parents should be aware of the fact that Churchuliga School only allows parents to bring their child to school and take them after school. In rare cases the child may be brought and taken back by a third-party responsible adult. If a third-party is to bring or take back the child, this must be agreed between the concerned adults and the class teacher of the child well in advance; this agreement must be done both in written (email including) and oral form (a call on a mobile phone is preferred).

In the case of divorced parents, both of them must give their consent when the child is taken from school at the end of the school day; in rare cases, the class teacher may pass on the child only to the parent who takes care of the child and will try to inform the other parent about this.



## Appendices

### A. A Record of Concern Form

Pupil / Student Name: \_\_\_\_\_

Year Group: \_\_\_\_\_

A child spoke to you: time, date and location: \_\_\_\_\_

What did the child say \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Did you do or say something, if yes – what \_\_\_\_\_

\_\_\_\_\_

Do you know something else about the child \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Did you tell the child that what was shared during the conversation will be passed on to the DSL and the headteacher \_\_\_\_\_

\_\_\_\_\_

After the conversation with the child, what action have you taken \_\_\_\_\_

\_\_\_\_\_

Have you informed anyone at the Bulgarian Embassy in London or the Bulgarian Ministry of Education \_\_\_\_\_

\_\_\_\_\_

Date of completing this Form \_\_\_\_\_

Signature and name of the staff \_\_\_\_\_

### B. Terminology

**Age of Majority** and **Age of Consent**: age of 18 is the age of majority in the UK and in Bulgaria; age 16 is the age of consent in the UK, and age 14 is the age of consent in Bulgaria (cf. [The Law on Sex](#) for UK and [Criminal Code](#) for Bulgaria).

**Child/Children** include everyone under the age of 18.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**DSL** – The School's Designated Safeguarding Lead

**Early Help** refers to providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. It is about providing support quickly whenever difficulties emerge to reduce the impact of problems.

**Fabricated or induced illness** is a form of child abuse; it occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

**Parent** refers to birth parents and other adults who are in a parenting/carers role, for example step-parents, foster carers and adoptive parents.

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. It can also include issues such as health and safety, use of reasonable force, meeting the needs of pupils with medical conditions, providing first aid, educational visits, intimate care and emotional well-being, online safety and associated issues and security – taking into account local context.

**Social Care** for children and young people is ensured under the [general provisions of NHS](#), including the services NHS offers: Needs assessments, Family support, Children with special educational needs and disabilities, Looked-after children, and Child protection, including the Bulgarian Child Protection Law.

**Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

## Signatures and Date

Designated Safeguarding Lead: .....  
Mr Valentin Kozhuharov (Tel.: Please contact the School)

Deputy Designated Safeguarding Lead: .....  
Ms Zory Burner (Tel.: Please contact the School)

Headteacher: .....  
Mrs Daniela Todorova Kozhuharova (Tel.: Please contact the School)

Nominated Safeguarding Governor  
(the President of the Parents' Council): .....  
Mrs Diana Gemkova-Yunchova (Tel.: Please contact the School)

The School's official email: chuchuliga.uk@gmail.com  
Telephone number: 07787082200

Date: 25 September 2025

Croydon, Surrey, UK