



# Child Protection and Safeguarding Policy

International Montessori School of Albania



Approved by:

Mirlinda Boshnjaku

Date:

Last reviewed on:

September 2025

Next review due by:

August 2026

## Important contacts

| ROLE/ORGANISATION                                | NAME               | CONTACT DETAILS              |
|--------------------------------------------------|--------------------|------------------------------|
| Head of School                                   | Mirlinda Boshnjaku | mirlinda.boshnjaku@wat.al    |
| Designated Safeguarding Lead (DSL) and Principal | Fjorda SHIJAKU     | fjorda.shijaku@montessori.al |
| Deputy DSL                                       | Gentiana KOKONAJ   | info@montessori.al           |
| Regional Head of Schools (RHoS)                  | Karl Wilkinson     | karl@orbital.education       |
| Chief Executive Officer (CEO)                    | David Pottinger    |                              |

## 1. Aims

The school aims to ensure that:

- appropriate action is taken promptly to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities concerning safeguarding.
- staff are trained in recognizing and reporting safeguarding issues.

## 2. Legislation and statutory guidance

This policy is based on Albania's Law on Child Rights and Protection [Ligji Nr. 18/2017 Per te Drejtat dhe Mbrojtjen E Femijes](#), [State Agency for Protection of Children's Rights](#), Albanian Ministry of Education Guidance, and by-laws, Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). At all times, it will adhere to national requirements/regulations.

- The Human Rights Act 1998 explains that being subjected to harassment, violence, and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR).
- The Equality Act 2010 makes it unlawful to discriminate against people regarding protected characteristics (including disability, sex, sexual orientation, gender reassignment, and race). This means our board members and Principal should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it is proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they are being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED) explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimization. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some

students may be more at risk of harm from issues such as sexual violence, homophobic, biphobic, or transphobic bullying, or racial discrimination.

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.
- In Albania the legal framework for Child Protection is undergoing major changes, so as to approximate corresponding EU legislation. The existing legal framework offers protection of children's rights, but lacks the bylaws that govern referrals in the case of abuse or the state institutions that will deal with them. A lot of changes are happening and the school pays close attention to the developments in this field.

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

**Child Protection** is part of this definition and refers to activities undertaken to prevent children from suffering, or being likely to suffer, significant harm.

**Abuse** is a form of child maltreatment and may involve inflicting harm or failing to act to prevent damage. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and psychological needs, likely to result in the severe impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Children** include everyone 18 years of age or younger. However, at IMSA, this policy is extended to all students from 1-6 years old.

**The victim** is a widely understood and recognized term, but we know that not everyone subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**The alleged perpetrator(s) and perpetrator(s)** are widely used and recognized. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behavior can harm the perpetrator, too. We will decide what's appropriate and which terms to use on a case-by-case basis.

### 4. Equality Statement

Some children have an increased risk of online and offline abuse, and additional barriers can exist for some children regarding recognizing or disclosing it. We are committed to anti-discriminatory practice and recognize children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- have special educational needs and disabilities (SEND) or health conditions (see Section 10);
- have English as an additional language.
- may experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- are at risk due to either their own or a family member's mental health needs.
- are young carers.
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- are at risk of sexual exploitation.

## 5. Roles and responsibilities

Safeguarding and Child Protection is **everyone's** responsibility. This policy applies to all staff, volunteers, and board members in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for 'model society and global citizenship' and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment. This will be underpinned by our:

- Behaviour Policy;
- pastoral support system;
- Classroom Teacher observations and reporting and intervention.

### 5.1 All staff

Staff who work directly with children are expected to read at least Part 1 and Annex B (about specific safeguarding issues) of [Keeping Children Safe in Education](#) (KCSIE).

All other staff are expected to read Annex A of KCSIE.

All staff will:

- review the KCSIE guidance at least annually;
- sign a declaration at the beginning of each academic year to say that they have reviewed the guidance;
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g., sites they need to visit or who they will be interacting with online).

All staff will be aware of:

- our systems that support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Handbook and Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and Deputy DSL, the Behavior Policy, and other policies as may relate to safeguarding;

- the assessment framework and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- the process for making referrals to local children's social care and for assessments that may follow a referral, including the role they might be expected to play;
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE) etc.;
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- the fact that children can be at risk of harm inside and outside of their homes, at school, and online;
- what to look for to identify children who need help or protection.

Section 15 of this policy outlines in more detail how staff are supported to do this.

## 5.2 Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. **Our DSL is Fjorda SHIJAKU (Principal of IMSA).** The DSL takes lead responsibility for child protection and broader safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and networks to keep students safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns and can be contacted during or, if necessary, outside of school hours by e-mail to [fjorda.shijaku@montessori.al](mailto:fjorda.shijaku@montessori.al).

When the DSL is absent, the **Deputy DSL, Gentiana KOKONAJ (Admission Officer)**, will act as cover.

If the DSL and Deputy are unavailable, the **Head of School, Mirlinda Boshnjaku**, will act as cover (for example, during out-of-hours/out-of-term activities).

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

- provide advice and support to other staff on child welfare and child protection matters;
- take part in strategy discussions and inter-agency meetings and support other staff to do so;
- contribute to the assessment of children;
- refer suspected cases, as appropriate, to the Regional Head of Schools (RHoS)/CEO and, if necessary, to the relevant local bodies (local authority children's social care and police) and support staff who make such referrals directly;
- have a good understanding of harmful sexual behavior;

- have a good understanding of the filtering and monitoring systems and processes in place at our school.

The DSL will also:

- keep the Head of School informed of any issues;
- liaise with the RHoS, local authority case managers, and designated officers for child protection concerns as appropriate;
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support;
- Be aware that children must have an 'appropriate adult' to support and help them during a police investigation or search.

The full responsibilities of the DSL and Deputy are set out in their job description.

*Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL or Deputy DSL.”*

### 5.3 School Board

The School Board will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of and underpin all relevant aspects of process and policy development;
- evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head of School to account for its implementation;
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local safeguarding arrangements with other agencies;
- appoint a senior Board-level (or equivalent) lead to, with the RHoS, monitor the effectiveness of this policy in conjunction with the entire School Board. This is always a different person from the DSL.

All Board members will know the key aspects and responsibilities referenced in KCSIE.

Section 15 of this policy has information on how Board members are supported to fulfil their roles.

### 5.4 Regional Head of Schools will:

The RHoS will:

- on behalf of the School Board, ensure all staff undergo Safeguarding and Child Protection training, including online safety, and that such activity is regularly updated and is in line with advice from safeguarding partners;
- Ensure the school has appropriate filtering and monitoring systems and review their effectiveness. This includes:

- making sure that the leadership team and staff are aware of the provisions in place and that they understand their expectations, roles, and responsibilities around filtering and monitoring as part of safeguarding training;
- reviewing the [DfE's filtering and monitoring standards](#) and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards;
- make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources, and support;
  - online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies;
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place;
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level problems) about staff members (including supply staff, volunteers, and contractors). Appendix 2 of this policy covers this procedure.
  - that this policy reflects that children with SEND or certain medical/physical health conditions can face additional barriers to any abuse or neglect being recognized;
- where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed;
  - make sure there are arrangements for the body to consult with the school about safeguarding arrangements, where appropriate;
  - make sure that safeguarding requirements are a condition of using the school premises and that any agreement to use the premises would be terminated if the other body fails to comply.

The RHoS/CEO will function as the 'case manager' if an allegation of abuse is made against the Head of School, where appropriate (see Appendix 2).

### 5.5 The Head of School

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

- ensuring that staff (including temporary staff) and volunteers:
  - are informed of school systems that support safeguarding, including this policy, as part of their induction;
  - understand and follow the procedures included in this policy, mainly those concerning referrals of cases of suspected abuse and neglect;

- communicating this policy to parents/carers when their child joins the school and via the school website;
- ensuring that the DSL has appropriate time, funding, training, and resources and that there is always adequate coverage if the DSL is absent;
- ensuring the relevant staffing ratios are met, where applicable;
- Make sure each child in the Early Years is assigned a key person;
- overseeing the safe use of technology, mobile phones, and cameras in the setting;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 2);
- making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL and RHoS.

## 6. Confidentiality

The school's Staff Handbook and IMSA Regulation on Protection, Processing and Storing of Personal Data describes IMSA's approach to confidentiality and data protection concerning safeguarding children.

You should note that:

- timely information sharing is essential to effective safeguarding;
- fears about sharing information must not be allowed to stand in the way of safeguarding children - the Data Protection Act (DPA) 2018 and GDPR do not prevent or limit the sharing of information to keep children safe and we will operate consistently to these legislations;
- if staff need to share 'special category personal data, the DPA 2018 contains 'safeguarding of children and individuals at risk as a processing condition that allows practitioners to share information without consent if:
  - it is not possible to gain consent;
  - it cannot be reasonably expected that a practitioner gains consent;
  - or if to gain consent would place a child at risk;
- staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;
- if a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - there is no definitive answer because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the GDPR that applies;
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children;
  - The DSL should consider that:

- parents or carers should generally be informed (unless this would put the victim at greater risk);
  - the basic safeguarding principle is if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the relevant authority;
  - rape, assault by penetration, and sexual assault are crimes. Where a report of rape, assault by penetration, or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 14, if the alleged perpetrator is under 14, the starting principle of referring to the police remains.
- regarding anonymity, all staff will:
    - be aware of anonymity, witness support, and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system;
    - do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the news and any support for children involved;
    - consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities;
  - the UK government's [information-sharing](#) includes 7 'golden rules for sharing information and will support staff who have to make decisions about sharing information;
  - if staff are in doubt about sharing information, they should speak to the DSL (or deputy).

This policy also addresses confidentiality concerning record-keeping in Section 14 and allegations of abuse against staff in Appendix 2. Please refer to the IMSA Regulation on Protection, Processing and storing of Personal Data.

## 7. Recognising abuse and taking action

Staff, volunteers, and board members must follow the procedures below in case of a safeguarding issue.

### 7.1 If a child is suffering or likely to suffer harm or in immediate danger.

While social care is not well-established or funded in Albania, the instruction from the Ministries of the Interior and Education is to refer to the Local Social Services and police immediately, if you believe a child is suffering, likely to suffer from harm, or is in immediate danger. Anyone can make a referral.

The general contact number to make such a referral is 129, and the Chief of the Criminal Department of Police Station No 2 Mr. Sali Mula (+355694100356) has direct responsibility for concerns relating to the school.

Tell the DSL (see Section 5.2) as soon as possible if you make a referral directly.

## 7.2 If a child discloses to you.

If a child discloses a safeguarding issue to you, you should:

- listen to and believe them. Allow them time to talk freely and do not ask leading questions;
- stay calm and do not show that you are shocked or upset;
- tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
- explain what will happen next and that you must pass this information on. Do not promise to keep it a secret;
- write up your conversation in the child's own words as soon as possible. Stick to the facts, and do not put your judgment on it;
- sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless notified to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- not feel ready or know how to tell someone that they are being abused, exploited, or neglected;
- not recognize their experiences as harmful;
- feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation, and language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

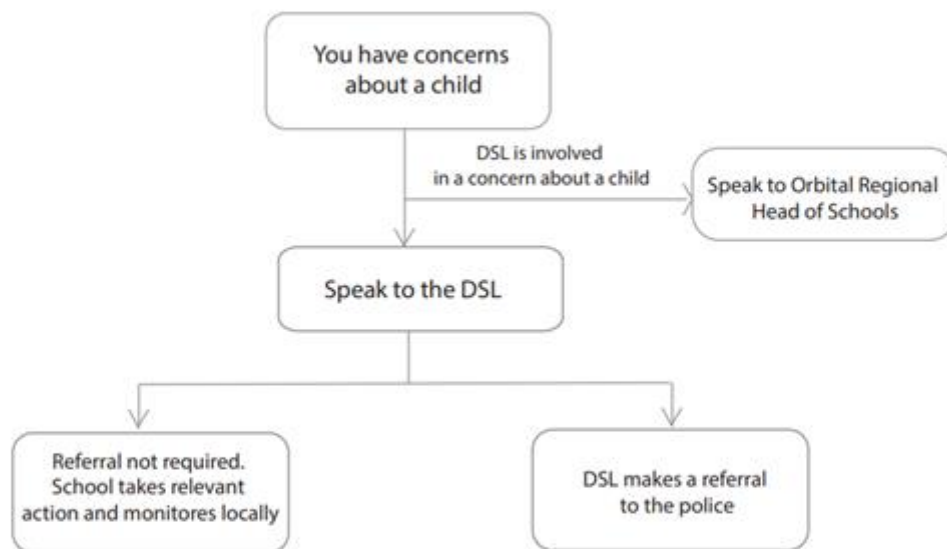
## 7.3 If you have concerns about a child.

*(as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger)*

If possible, speak to the DSL first to agree on a course of action.

If the DSL is unavailable in exceptional circumstances, this should not delay appropriate action being taken. Speak to a member of the senior leadership team or contact the RHoS.

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



If the DSL is unavailable, this should not delay action. Follow the steps throughout Section 7 for what to do.

#### 7.3.i Assessment framework

If an assessment is appropriate, the DSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an evaluation, sometimes acting as the lead practitioner.

We will discuss and agree with safeguarding partners/other agencies levels for the different types of assessment as part of local arrangements.

The DSL will keep the case under constant review, and the school will consider a referral to Social Services or the police if the situation is not improving. Timelines of interventions will be monitored and reviewed.

#### 7.3.ii Referral

If it is appropriate to refer the case to the police or Local Social Services, the Principal/DSL will make the referral after consultation with the Head of School or RHoS.

Suppose the child's situation does not seem to improve after the referral. In that case, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and the child's situation improves.

### 7.4 Concerns about a staff member, supply teacher, volunteer, or contractor.

If you have concerns about a member of staff (including a supply teacher, volunteer, or contractor), or an allegation is made about a member of the team (including a supply teacher, volunteer, or contractor) posing a risk of harm to children, speak to the Head of School as soon as possible. If the concerns/allegations are about the Head of School, talk to the RHoS.

If appropriate, the Head of School/RHoS will follow the procedures set out in Appendix 2.

Where you believe there is a conflict of interest in reporting a concern or allegation about a staff member (including a supply teacher, volunteer, or contractor) to the Head of School, report them, directly to the RHoS.

If you receive an allegation relating to an incident where an individual or organization was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the DSL (as you would with any safeguarding allegation) and the Head of School.

### **7.5 Allegations of abuse made against other students.**

We recognize that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “just laughing” or “part of growing up,” this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognize the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be handled under our school’s Behaviour Policy.

#### **7.5.i Procedures for dealing with allegations of child-on-child abuse.**

If a student makes an allegation of abuse against another student:

- you must record the allegation using an Incident Report Form and tell the DSL, but do not investigate it;
- the DSL will contact the RHoS and, if the allegation involves a potential criminal offense, the police;
- the DSL will put a risk assessment and support plan into place for all children involved (including the victim[s], the child[ren] against whom the allegation has been made, and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator[s].

Suppose the incident is a criminal offense, and there are delays in the criminal process. In that case, the DSL will work closely with the police (and other agencies as required) while protecting children and taking any disciplinary measures against the alleged perpetrator[s]. We will ask the police if we have any questions about the investigation.

#### **7.5.ii Creating a supportive environment in school and minimizing the risk of child-on-child abuse.**

We recognize the importance of taking proactive action to minimize the risk of child-on-child abuse and creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- challenge any form of derogatory or sexualized language or inappropriate behaviour between peers;
- be vigilant to issues that mainly affect different genders – for example, sexualized or aggressive touching or grabbing towards female students, and initiation or hazing type violence concerning boys;
- ensure our Programme helps to educate students about age-appropriate behaviour and consent;
- ensure students can quickly and confidently report abuse using our reporting systems (as described in Section 7.10 below);
- ensure staff reassure victims that they are being taken seriously;
- be alert to reports of sexual violence and harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum or could reflect broader issues in the local area that should be shared with safeguarding partners;
- consider intra-familial harms and any necessary support for siblings following a report of sexual violence and harassment;
- ensure staff are trained to understand:
  - how to recognize the indicators and signs of child-on-child abuse and know how to identify it and respond to reports;
  - that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”;
  - that if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - children can show signs or act in ways they hope adults will notice and react to;
    - a friend may make a report;
    - a member of staff may overhear a conversation;
    - a child’s behavior might indicate that something is wrong;
  - that confident children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity, and sexual orientation;
  - that a student harming a peer could be a sign that the child is being abused and that this would fall under the scope of this policy;
  - The vital role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it;
  - that they should speak to the DSL if they have any concerns;

- that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s), and friends from either side.

The Principal will take the lead role in any disciplining of the alleged perpetrator[s]. We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations (e.g., by the police) occur. The fact that another body is investigating or has investigated an incident does not prevent our school from coming to its conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- taking action would prejudice an investigation and subsequent prosecution – we will liaise with the RHoS and police to determine this;
- some circumstances make it unreasonable or irrational for us to reach our view about what happened while an independent investigation is ongoing.

### 7.6.i Initial review meeting

Following an incident report, the DSL will hold an initial review meeting with the appropriate school staff – this may include the staff member who reported the incident and the leadership team. This meeting will consider the initial evidence and aim to determine the following:

- if it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed);
- whether there is an immediate risk to students;
- whether to refer to the RHoS;
- if a referral needs to be made to the police;
- what further information is required to decide on the best response;
- whether the image(s) has been shared widely and via what services and platforms (this may be unknown);
- whether immediate action should be taken to delete or remove images or videos from devices or online services;
- any relevant facts about the students involved that would influence risk assessment;
- if there is a need to contact another school, setting, or individual;
- whether to contact the parents or carers of the students involved (in most cases, parents/carers should be involved).

The DSL will make an immediate referral to the police if:

- the incident involves an adult;
- what the DSL knows about the images or videos suggests the content depicts sexual acts that are unusual for the Child's developmental stage or are violent;

- the imagery involves sexual acts, and any student in the images or videos is under 14;
- The DSL has reason to believe a student is at immediate risk of harm owing to sharing nudes and semi-nudes (for example, the young person presents as suicidal or self-harming).

If none of the above apply, the DSL (in consultation with the Head of School, RHoS, and other staff members as appropriate) may decide to respond to the incident without involving the police. The decision will be made and recorded in line with the procedures set out in this policy.

#### 7.6.ii Further review by the DSL

If, at the initial review stage, a decision has been made not to refer to the police, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the students involved (if appropriate).

If, at any point in the process, there is a concern that a student has been harmed or is at risk of harm, a referral will be made to the police immediately.

#### 7.6.iii Informing parents/carers

The DSL will inform parents/carers early and keep them involved unless there is a good reason to believe that involving them would put the student at risk of harm.

#### 7.6.iv Referring to the police

If it is necessary to refer an incident to the local Social Services or the police, this will be done through the Head of School in consultation with the RHoS.

#### 7.6.vi Recording incidents

All incidents of nude and semi-nude sharing, and the decisions made in responding to them, will be recorded. The record-keeping arrangements in section 14 of this policy also apply to recording these incidents.

### 7.7 If you discover that FGM has occurred or a student is at risk of FGM.

While relatively unusual in Albania, Female Genital Mutilation (FGM) comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.”

FGM is illegal in many countries and is a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting,’ ‘circumcision,’ or ‘initiation.’

Any member of staff who:

- is informed by a girl under 18 that an act of FGM has been conducted on her;
- observes physical signs that appear to show that an act of FGM has been conducted on a girl under 18 and they have no reason to believe that the action was necessary for the girl’s physical or mental health or purposes connected with labor or birth;
- suspects a student is *at risk* of FGM or discovers that a student aged 18 or over appears to have been a victim of FGM,

Immediately report this to the DSL, who will discuss the case with the police and involve Social Services as appropriate.

Staff should not examine students.

### **7.8 If you have concerns about extremism.**

If a child is suffering or likely to suffer from harm or immediate danger, speak to the DSL first to agree on a course of action.

If the DSL is unavailable in exceptional circumstances, this should not delay appropriate action being taken. Speak to a member of the senior leadership team.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to.

### **7.9 If you have a concern about mental health.**

Mental health problems can sometimes indicate that a child has suffered (or is at risk of suffering) abuse, neglect, or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 7.3.

If you have a mental health concern that is **not** a safeguarding concern, notify the SENCO of a potential issue.

- SENCO will arrange for a classroom observation to observe the student.
- If necessary, SENCO will facilitate a parent meeting to propose strategies for supporting the student. SENCO may recommend that the family consult with an external specialist.
- If behaviour indicates a mental health situation that could pose an immediate threat to the student or community members, the DSL should be notified, who may liaise with the appropriate local agency.

For more information, refer to the guidance on mental health and behavior in schools.

### **7.10 Reporting systems.**

Where there is a safeguarding concern, we will consider the child's wishes and feelings when determining what action to take and what services to provide.

We recognize the importance of ensuring students feel safe and comfortable to come forward and report any concerns and allegations.

To achieve this, we will apply clear Reporting Procedures:

1. Develop age-appropriate reporting procedures that are simple and easy for young children to understand. Use visuals and simple language.
2. Confidential Reporting: Explain to children in a child-friendly way that their reports will be kept private and not shared with others unless it's necessary to ensure their safety.

3. **Safe and Trusted Adults:** Identify specific teachers or caregivers as trusted individuals whom children can approach if they have concerns. Use familiar names or titles, like "Miss Sarah" or "Ms. Smith."
4. **Education and Training:** Provide age-appropriate training or discussions on personal safety and recognizing uncomfortable or unsafe situations. Use stories or role-play to engage children.
5. **Anonymous Reporting:** For older kindergarten students, you can introduce simple ways for them to report anonymously, like drawing pictures or using a suggestion box.
6. **Regular Communication:** Maintain open and regular communication with parents, so they understand the importance of reporting and can reinforce these concepts at home.
7. **Supportive Environment:** Create a warm and caring atmosphere where children feel comfortable expressing their feelings and concerns. Encourage empathy and kindness among peers.
8. **Prompt Investigation:** If a concern arises, address it promptly and gently. Use age-appropriate language to explain the process of investigation and resolution to the child.
9. **Reporting to Authorities:** In cases of serious concern, follow legal requirements for reporting to the appropriate authorities, but ensure that the child's well-being is the primary focus.
10. **Continuous Improvement:** Regularly review and adapt your safety procedures and policies to suit the age group and needs of the children in your kindergarten.

Communication with parents and guardians is crucial in a kindergarten setting, as they play a significant role in reinforcing safety awareness and reporting practices at home. Adapting these strategies to the specific needs of young children will help create a safe and nurturing environment in your kindergarten.

## **8. Online safety and the use of mobile technology.**

Even though Children of IMSA due to their age have no access to any type of technology or internet, we recognize the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and well-being issues.

Our approach to online safety and mobile technology use is to ensure the maximum amount of protection is provided without having an undue effect on educational activities:

- any staff member taking photos/videos of educational activities for documentation purposes on personal devices must transfer the files to a school computer and delete them from the personal device within 24 hours;
- filters are used to prevent access to inappropriate content for staff;
- monitoring of internet use is carried out twice a year to identify sites that need to be blocked to support the safety and well-being of our community;
- all members of the IMSA community must read and sign a statement that they fully understand the Staff Handbook and Parent Code of Conduct.

For full details about our school's policies in these areas, please refer to the Staff Handbook on the use of mobile phones by staff.

To address this, our school aims to:

- have robust processes (including filtering and monitoring systems on school devices and the school network) in place to ensure the online safety staff, volunteers, and board members;
- protect and educate the whole school community in its safe and responsible use of technology, including mobile and innovative technology (which we refer to as ‘mobile phones’);
- set clear guidelines for the use of mobile phones for the whole school community;
- establish precise mechanisms to identify, intervene, and escalate incidents or concerns, where appropriate.
- not suitable for their age group or may engage in unauthorized online purchases.

### 8.1 To meet our aims and address the risks above, we will:

(IMSA Student do not have access to internet or technology within the school premisses.)

- Educational Programs:
- make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example, that:
  - Staff are allowed to bring their phones to school for their use but will limit such usage to non-contact time when students are not present;
  - Staff will not take pictures or recordings of students on their phones or cameras;
- **Technology Guidelines:** Establish clear guidelines and policies for the use of technology within the school, including rules for online behavior, content filtering, and privacy protection. Ensure that these guidelines align with Montessori principles and are communicated effectively to students, parents, and staff. Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the Internet and mobile phones;
- carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community;
- provide regular safeguarding and children protection updates, including online safety, to all staff, at least annually, to continue to provide them with the relevant skills and knowledge to safeguard effectively;
- review the Child Protection and Safeguarding Policy, annually, and ensure the procedures and implementation are updated and reviewed regularly.

## 9. Notifying parents or carers.

Where appropriate, we will discuss concerns about a child with the child’s parents or carers. The DSL will typically do this in case of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the Local Social Services or the police before doing so.

In the case of allegations of abuse against other children, we will generally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved and when. We will work with the police to ensure our information-sharing approach is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed;
- Meet with the alleged perpetrator's parents or carers to discuss support for them, what is being put in place that will impact them (e.g., moving them out of classes with the victim), and the reasons behind any decisions.

#### **10. Students with special educational needs, disabilities, or health issues.**

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. Other barriers can exist when recognizing abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behavior, mood, and injury relate to the child's condition without further exploration;
- students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students;
- the potential for students with SEN, disabilities, or certain health conditions to be disproportionately impacted by behaviors such as bullying without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.

We offer additional pastoral support for these students. This includes:

- individual consultation sessions with members of the SEND team. Sessions are during regular school hours with parental consent. *Note: IMSA SEND staff do not provide therapy or any diagnosis;*
- creation of Individual Education Plans to overcome barriers to academic achievement;
- general classroom observations in support of teachers who teach classes where students with SEND may be at risk;
- group sessions with classes that contain SEND students who may be at risk. These sessions, as needed, will focus on bullying, gender/sexuality issues, etc.

Any abuse involving students with SEND will require close liaison between the DSL and SENCO.

#### **11. Students with a shadow teacher**

Students may need a shadow teacher due to safeguarding or welfare needs. We recognize that a child's experiences of adversity and trauma can leave them vulnerable to further harm and potentially create barriers to attendance, learning, behavior and mental health.

The DSL and all staff members will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare, and educational outcomes. For example, it will inform decisions about:

- responding to unauthorized absence or missing education where there are known safeguarding risks;
- the provision of pastoral and academic support.

## **12. Children looked after by guardians other than their parents.**

We will ensure that staff have the skills, knowledge, and understanding to keep looked-after children safe, including those who have previously been looked-after. In particular, we will provide that:

- appropriate staff have relevant information about children's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements;
- the DSL has details of children's social workers.

We have appointed an appropriately trained staff member, Ms Lumanie Shabani, as a school psychologist, to promote the educational achievement of looked-after and previously looked-after children. She will work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

## **13. Complaints and concerns about school safeguarding policies**

### **13.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled by our procedures for dealing with allegations of abuse made against staff (see Appendix 2).

### **13.2 Whistleblowing**

Concerns regarding the way the school safeguards students – including poor or unsafe practices, or potential failures – should be raised under our [Whistleblowing Policy](#).

In the event a staff member witnesses actions, including low-level concerns, that might endanger the health, safety, and welfare of community members:

- the staff member should report the incident to the DSL, who will notify the Head of School. If the staff member believes that local laws have been broken or there is the potential for imminent physical or psychological harm, the police should also be notified;
- if the report concerns the DSL or the Head of School, the information should be made directly to the RHoS;

- the school's leadership team will investigate and take prudent measures to prevent reoccurrence while this is ongoing. This may include the suspension of staff or students during the investigation or the re-assignment of teachers or students to other classes if it is believed to be in the best interest of the individuals involved or the community as a whole. If warranted, the police will be contacted and provided with all relevant information;
- upon completion of the investigation, the school will take appropriate action, including (but not limited to) re-training, formal warnings, dismissal of staff, or expulsion of students.

At IMSA, we want to encourage the reporting of legitimate concerns that affect the health, safety, and well-being of our community members. Wherever possible, the identity and privacy of those raising concerns will be protected. Individuals who raise legitimate claims will not be targeted for harassment, disciplinary action, or have their job performance negatively affected.

#### 14. Record-keeping

We strive to maintain the maximum possible privacy protection while still providing staff with the information they need to fulfill their duties. Non-confidential records will be readily accessible and available. Confidential information and documents will be held securely and only available to those with a right or professional need to see them.

All safeguarding concerns, discussions, decisions made, and the reasons for those decisions must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

All safeguarding records are kept securely by the DSL. Concerns and referrals will be held in a separate child protection file for each child. These will include:

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

Safeguarding records, including incident reports and other documentation, will be stored electronically on drives only accessible by the DSL. Written documents will be scanned and uploaded, and the original will be destroyed.

All computers with access to safeguarding information will be password protected.

Safeguarding records relating to individual children will be retained for at least five years after a child has left the school, in line with our records retention schedule.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will consult with the Head of School and RHoS before forwarding a copy of their child protection file securely and separately from the main student file. Suppose the concerns are significant or complex, and other agencies are involved. In that case, the DSL should endeavour to speak to the DSL of the receiving school to provide information to enable them to make any necessary preparations to ensure the child's safety.

Safeguarding records will be shared with the police upon the presentation of a valid warrant. When a valid contract has not been provided, the Head of School and RHoS will assess the request and decide whether to release the information.

## **15. Training**

### **15.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and responsibilities and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- be integrated, aligned, and considered as part of the whole-school and Orbital group safeguarding approach, broader staff training, and curriculum planning.
- include online safety (including an understanding of the expectations, roles, and responsibilities for staff around filtering and monitoring);
- have regard to the Orbital Teacher Standards to support the expectation that all teachers:
  - manage behavior effectively to ensure a good and safe environment.
  - have a clear understanding of the needs of all students.

Staff will also receive regular safeguarding and child protection updates, including online safety, as required but at least annually (for example, through emails, e-bulletins, and staff meetings).

Contractors will also receive safeguarding training.

Volunteers will receive appropriate safeguarding training if applicable.

### **15.2 The DSL and Deputy DSL**

The DSL and DDSL will undertake high-level child protection and safeguarding training at least every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (e.g., through e-bulletins, webinars, meeting other DSLs, or taking time to read and digest safeguarding developments).

### **15.3 Board members**

All Board members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenges.
- can be assured that safeguarding policies and procedures are effective and support the school in delivering a robust whole-school approach to protecting.

The RHoS and CEO undertake high-level child protection and safeguarding training every two years. As they may be required to act as the 'case manager' if an allegation of abuse is made against the Head of School, they receive training in managing claims for this purpose.

#### **15.4 Recruitment – interview panels**

All staff conducting interviews for any post at the school and all HR staff will have undertaken safer recruitment training. This will cover, as a minimum, the contents of KCSIE and the school's safeguarding procedures.

#### **15.5 Staff who have contact with students and families.**

All staff who have contact with children and families will have supervision, which will provide them with support, coaching, and training, promote the interests of children, and allow for confidential discussions of sensitive issues.

#### **16. Monitoring arrangements**

This policy will be reviewed **annually** by the Head of School and RHoS. At every review, it will be approved by the full Board.

#### **17. Links with other policies**

This policy links to the following policies and procedures:

- [Accident Report Policy 2025-27](#)
- Employee Handbook 2025-26
- [Concerns and Complaints Policy 2025-26](#)
- [Admissions Policy 2025-27](#)
- [Equality, Diversity and Inclusion Policy 2025-26](#)
- [First aid and managing medical conditions Policy 2025-26](#)
- [Home-school Communication Policy 2025-26](#)
- [Whistleblowing Policy 2025-26](#)
- [Mission, Vision, and Values Guiding Statement 2025-26](#)

#### **Appendices**

## Appendix 1: Types of Abuse

**Abuse** (including neglect) and safeguarding issues are rarely standalone events that can be covered by just one definition or label. In most cases, multiple issues will overlap.

**Physical Abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical damage may also be caused when a parent or carer fabricates a child's symptoms or deliberately induces illness.

**Emotional Abuse** is the persistent emotional maltreatment of a child, causing severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of child maltreatment, although it may occur alone.

Emotional abuse 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.