



ST. CATHERINE'S BRITISH SCHOOL

A registered charity in the UK and member of HMC & COBIS

Safeguarding Policy

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Introduction

St. Catherine's British School is committed to providing an environment in which children feel secure, their viewpoints are valued, where they are encouraged to talk and are listened to. As far as possible in a Greek environment, safer recruitment practices are followed in accordance with the requirements of [Keeping children safe in education](#); This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with government publications: [Working together to safeguard children](#), 'What to do if you are Worried a Child is Being Abused' 2015 [Counter-Terrorism and Security Act](#); Sexual Offences Act (2003); Education (Pupil Registration) Regulations 2016; Information sharing advice for safeguarding practitioners (2018); EU General Data Protection Regulation, Greek Law 4624/2019, and the data protection principles of UK GDPR, Data Protection Act 2018 and the Data (Use and Access) Act 2025; the Crime and Policing Act 2026; [Searching, screening and confiscation](#) (DfE, 2018); [Preventing and Tackling Bullying](#) (DfE, 2017); Female Genital Mutilation Act 2003 (S.74 - Serious Crime Act 2015);

St Catherine's recognise that Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child and their wider family context (Contextual Safeguarding).

Employees are expected to make use of this policy as a point of reference. It should be consulted when clarification is required on policies or procedures, when guidance is needed during specific situations.

Staff are reminded that this policy is designed to support compliance with both internal policies and Greek labour legislation. Failure to adhere to the procedures and expectations outlined in this policy may result in disciplinary action.

All key school policies, administrative documents, calendars, and process guides, including this handbook, are available on the [Whole School Admin Hub](#) via SharePoint. The Hub is the central platform for accessing up-to-date information and should be your first point of reference for all operational, academic, and administrative matters. Staff are expected to check the Hub regularly to ensure they are familiar with the most current versions of all relevant documents.

The St. Cats way

What do we do? We deliver a world class independent education through our 4 strategic pillars:

Organisational optimisation

Educational excellence

Infrastructure development

Community engagement

Why do we do this? To deliver the purpose and mission of the school:

Purpose: To empower young people to understand, care and create a better future.

Mission: Foster learning with a rich curriculum that develops intellectual, social, physical and creative skills, preparing students for global citizenship.

How do we do this? By ensuring that everything we do is guided by the values of the school:

Care | Compassion | Empathy | Looking After One Another | Asking Difficult Questions with Respect | Wellbeing | Happiness

Integrity | Honesty | Fairness | Transparency | Doing Our Part | Respect

Dedication | Commitment | Giving Our All | Going the Extra Mile | Consistency | Showing Up When Things Get Tough | Striving for Excellence

Curiosity | Keep Asking Questions | Drive to Evolve | Inquisitive | Explore Ways to Do Things Better | Keep Learning | Creativity

The rising water lifts all boats. To action the what, the why and the how our key objective focus must be

Consistent Excellence in Every Interaction

This is practically seen every day, as well as visibly implemented into Individual Staff Development Objectives (ISDO) process, and Departmental Development Plans (DDPs). This cultural paradigm will ensure that we are able to deliver the top-class education we all aspire to and enjoy the strongest community for students, staff, parents, governors and alumni.

How is the impact measured?

- The Key Performance Indicators (KPIs) that we all contribute to: academic, pastoral, admissions, finance.
- The Individual Staff Development Objectives (ISDO) process
- Student surveys
- Parent surveys
- Staff surveys

Value indicators and behaviours to consider

Care:

- How do you actively show kindness and understanding to all members of the community?
- How have you demonstrated empathy?
- When have you committed to the wellbeing of our community?
- When have you asked difficult questions with respect?
- Have you been able to prioritise your wellbeing and happiness?

Dedication:

- In what ways have I demonstrated my commitment to the school?
- How have I exceeded expectations, going above and beyond?
- When have you been consistent with your interactions with others?
- How have you demonstrated resilience and perseverance?
- Give a time when you have sought improvement and development?

Curiosity:

- Can you give a time when you have asked questions to gain deeper insight and understanding?
- What have you done to demonstrate commitment to personal and collective growth?
- What new ideas have you explored?
- What new learning are you doing?
- How have you been creative with your teaching?

Integrity:

- Give a time when you have upheld truthfulness and sincerity in a conversation or interaction.
- Can you give an example of being impartial and equitable with others in the community?
- Say how you have been open and clear about decisions, processes and actions.
- How have you taken responsibility this year?
- How have you demonstrated respect for others?

1. About Safeguarding at St Catherine's British School

1.1. Safeguarding umbrella

To underpin the values and ethos of our school and our intent to ensure that pupils at our school are appropriately safeguarded, the following policies and procedures are also included under our safeguarding umbrella:

- a. Staff Code of Conduct
- b. Safer Recruitment Policy
- c. Online-Safety Policy
- d. Health and Safety Policy
- e. First Aid Policy
- f. Whole School Anti-Bullying Policy
- g. Behaviour Management Policy
- h. Whole School Educational Visits Policy
- i. Procedures for recording sanctions on students
- j. Procedures for maintaining admissions and attendance registers
- k. Data Protection Guidance to Staff

1.2. Safeguarding and Child Protection Statements

- a. The health, safety and welfare of all our children are of paramount importance to all the adults who work in our school. All children have equal right to protection, regardless of age, gender, race, culture, language, religion, sexual identity or physical or mental abilities. They have the right to grow up unharmed, to have the opportunity to develop fully and to have their basic needs met. We recognise 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 valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support and protection.
- b. In our school, we respect all children. The environment within our school is one that encourages all children to do their best. We provide opportunities that enable all children to take and make decisions for themselves.
- c. We recognise that abuse and neglect can result in underachievement. We strive to ensure that all our children make good educational progress.
- d. We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from school or who go missing from education. We also recognise that safeguarding against subversive ideologies and extremism is no different to safeguarding against any other vulnerability today.
- e. Our teaching such as within Personal, Social, Health and Citizenship Education, as part of the school curriculum, helps to develop appropriate attitudes in our children, and makes them aware of the impact of their decisions on others. We also teach children how to recognise different risks in different situations and how to behave in response to them.

- f. Children with Special Educational Needs (SEN) and disabilities can face additional safeguarding challenges. We recognise that additional barriers can exist when recognising abuse and neglect in this group of children. Therefore, the school will provide additional mentoring support as appropriate.
- g. We recognise that we are all role models and as such treat all people with respect.

1.3. Abuse

Abuse is defined as a form of maltreatment of a child. We recognise that child abuse takes a variety of forms:

- a. Physical abuse involves the hitting, shaking or other treatment of a child that can cause actual bodily harm.
- b. Sexual abuse involves forcing or enticing a child into sexual activities, whether or not the child is aware of what is happening. This includes non-contact situations, such as showing children pornography.
- c. Emotional abuse is the persistent emotional ill-treatment of children, such as frightening them, or putting them in positions of danger. It is also an abuse to convey to children the feeling that they are worthless or unloved.
- d. Domestic abuse can be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn
- e. Children are abused also if they are neglected. This could involve failure to provide proper food and warmth, but it might also be failure to see to the emotional well-being of the child.
- f. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
- g. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others
- h. Online Safety safeguarding procedures include enhanced measures to address emerging online risks such as misinformation, disinformation, and conspiracy theories.

2. Aims and objectives

2.1. Our aims are:

- a. To provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children.
- b. To provide a safe environment for children to learn in.
- c. To establish what actions the school can take to ensure that children remain safe, at home as well as at school.
- d. To raise the awareness of all staff to these issues, and to define their roles and responsibilities in reporting possible cases of abuse.
- e. To identify children who are suffering, or likely to suffer, significant harm.
- f. To ensure effective communication between all staff on safeguarding issues.
- g. To set down the correct procedures for those who encounter any issue of safeguarding.

3. Safeguarding is everyone's responsibility

3.1. Staff responsibilities

It is the responsibility of all staff, including the Principal to:

- a. Attend training.
- b. All staff must read, understand and follow the contents of Keeping Children Safe in Education Part One (September 2026) Staff will be required to sign that they have read and understood the most up to date version of KCSIE Part One through Dropbox.
- c. Follow school procedures (*see Appendix 2*).
- d. Implement the safeguarding policy.
- e. Voice their concern if they feel that a child is vulnerable, or that there are any particular practices that are unsafe.

3.2. Designated Safeguarding Leads (DSLs)

At St. Catherine's British School, we have two designated safeguarding leads Lucy Shore – Head of Lower School and James Soumilas - Deputy Head Pastoral (Upper School).

These designated people hold positions of responsibility in the school and are referred to as the designated safeguarding leads, have undertaken an Advanced Safeguarding Training and will keep up to date by attending a course every two years.

We also have several deputies (*see Appendix 1*) in the case that one of the designated safeguarding leads are not available e.g. absent from school. These deputies have also undertaken an advanced safeguarding course and will attend a course every two years. In the absence of the designated safeguarding lead, they will carry out those functions necessary to ensure the ongoing safety and protection of children. Robust cover arrangements are in place at all times, including during trips, before and after school, and during any period when a DSL or deputy is off-site, so that a trained DSL or deputy is always contactable, including via a shared and monitored safeguarding mailbox where necessary.

Deputy Designated Safeguarding Leads (Deputy DSL) play a crucial role in supporting safeguarding and child protection within the school. Their role mirrors much of the responsibility of the **Designated Safeguarding Lead (DSL)**, but they act as a second point of contact and step in when the DSL is unavailable.

3.3. Guidelines for the designated safeguarding leads and deputies.

The welfare of the child is paramount:

- a. Confidentiality should be respected as far as possible.
- b. Know the procedures of Greek Law regarding child protection. (In accordance with Greek Law, child protection cases must be reported by the Principal or one of the DSLs to the Attorney General for Minors or local police, to the extent required by law and always following prompt ad hoc legal advice. (*See Appendix 2* for outline of procedures and contact details.).
- c. Ensure that the school takes action to support any child who may be at risk.
- d. Make sure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to child protection.
- e. Work closely with relevant authorities, when investigating any allegations of abuse.

- f. All parties involved will handle such investigations in a sensitive manner, remembering all the time that the interests of the child are of paramount importance.
- g. Any deficiencies or weaknesses in safeguarding arrangements will be remedied without delay.
- h. Keep a record of staff attendance at safeguarding training.
- i. Keep a record of Senior Leadership awareness of current statutory legislation (local as well as UK).
- j. Liaise as appropriate with the designated Governor responsible for Safeguarding.
- k. Designated safeguarding lead has responsibility for understanding the filtering and monitoring systems and processes in place.
- l. Make this policy available to parents.

4. Employment and Safer Recruitment

At St. Catherine's British School, we endeavour to ensure that we employ appropriate staff by following the guidance in Keeping Children Safe in Education September 2026 alongside the school's procedures. The Principal is required to have certification in this area. The Principal is responsible for all appointments and will ensure the compliance of the Single Central Register.

An offer of appointment to the successful candidate will be conditional upon:

- a. the receipt of at least two satisfactory references, at least one from most recent employer.
- b. verification of the candidate's identity.
- c. verification of eligibility to work in Greece.
- d. verification of relevant qualifications.
- e. verification of professional status where required e.g. QTS status.
- f. a satisfactory ICPC (International Child Protection Certificate) obtained through ACRO, local police check or foreign equivalent if the applicant has lived outside the UK or Greece in the last 5 years.
- g. where required a prohibition from teaching check, prohibition from management check and prohibition section 128 check.
- h. where appropriate verification of successful completion of statutory induction period (applies to those who obtained QTS after 7 May 1999).

As part of the shortlisting process, St Catherine's will carry out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened and are publicly available online. We accept that it is our responsibility to where appropriate follow up at least one reference with a telephone call or personal contact, during which we will discuss the applicant's suitability to work with children, before the employment contract is signed.

In addition to assessing and evaluating the applicant's suitability for the post, the members of the panel will also consider:

- a. the candidate's attitude toward children and young people.
- b. their responses to the safeguarding interview question and scenarios.
- c. their ability to support their school's record of their employment history.
- d. concerns or discrepancies arising from the information provided by the candidate and/or a referee.

- e. any gaps in the candidate's employment record.
- f. the safeguarding and promoting the welfare of children agenda.
- g. if the candidate has anything to declare considering the requirement for a ICPC or other police check

Any volunteer or staff employed by another organisation and working with the school's pupils will be subject to the above checks and procedures, as appropriate.

4.1. Regulated Activity, Volunteers and Additional Recruitment Requirements

Following the removal of the "supervision exemption" from the definition of regulated activity, any volunteer who teaches, trains, instructs or supervises children on more than 3 days in any 30-day period, or overnight, is treated by the school as being in regulated activity regardless of whether they are supervised, and will be subject to an enhanced check with barred-list information before being permitted to work unsupervised with children. Where a volunteer falls below this threshold, appropriate supervision arrangements will still be recorded.

For applicants who have lived or worked outside the United Kingdom or Greece, the school will seek an appropriate overseas criminal record check or equivalent from the relevant country or countries of residence, in addition to the checks set out above. St Catherine's does not employ staff from an outside agency.

5. Procedure to be followed if an adult has concerns about a child (see Appendix 2)

5.1 All adults in our school share responsibility for keeping our children safe. We may on occasion report concerns which, on investigation, prove unfounded. Any member of staff can report a concern

5.2 If a member of staff suspects that a child in the school may be a victim of abuse, they should act immediately. They should:

- a. Not investigate.
- b. Immediately inform one of the Designated Safeguarding Leads about their concerns. Staff must not keep to themselves any information about abuse which a child gives them; they are required to pass this information on.
The concern should be documented by either:
 - digital submission via TES MyConcern at <https://login.thesafeguardingcompany.com/> (registered staff only) or
 - submission of hardcopy Report of Concern Form to Lead Safeguarding Officer
- c. Complete a Recording Form for Safeguarding concerns (**see Appendix 4**).
- d. All hardcopy Recording Forms for Safeguarding concerns are kept in a confidential folder, locked away, by the Designated Safeguarding Leads of the phase of the school (Lower School and Upper School). Digital recording through MyConcern is password protected. Designated Safeguarding Leads and Deputy Designated Safeguarding Leads have full access to reports.

6. Procedures to follow if you suspect, or are told, of abuse (see Appendix 3)

If a child makes an allegation or disclosure of abuse against an adult or another child or young person, it is important that you:

- a. Do not try to investigate.
- b. Do not ask leading questions.
- c. Listen to them and/or closely observe their presentation and behaviour.
- d. Let them know that you take what they are saying seriously.
- e. Do not promise to keep what they tell you secret. Let them know that you will need to tell someone else to help him or her.
- f. Inform the appropriate Designated Safeguarding Lead immediately.
- g. Complete the Recording Form for Safeguarding concerns (**see Appendix 4**). Printed versions can be found in the staff room on the Safeguarding display.

6.1. If a child alleges abuse

The competent authorities will be contacted immediately where the child is thought to be in immediate danger. Legal advice may be sought concurrently but will never delay or prevent an immediate referral to the Attorney General for Minors (Eisangeleas Anilikon, contact number 2108827993 and/ or local police - contact number 2108025200) or police if a child is at risk of harm or has made a disclosure.

6.2. Referral

Where possible, referral to the Local Police and/ or the Attorney General for Minors should be confirmed in writing as well as the contact details of the person who took the referral.

If a referral is made, staff are expected to attend and participate in all case conferences and meetings, if requested to do so.

6.3. Early Help

St Catherine's recognises the importance of **early help** assessment when identifying concerns. Staff should be prepared to identify children who may benefit from early help. Early help means 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.

6.4. Mental Health

Staff are alert to the fact that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Only appropriately trained professionals make formal diagnoses, but staff are well placed to observe children day to day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of one. Where staff have a concern about a child's mental health, including where a child self-harms or expresses thoughts of suicide, this should be referred to the Designated Safeguarding Lead. Where a member of staff believes a child is in immediate danger, they must call emergency services on 112, or take the child to Accident and Emergency, without delay.

6.5. Serious Violence and Weapons

Any member of staff who becomes aware that a child is carrying, using, or has expressed an intention to use a weapon, or who has concerns about a child's involvement in serious violence more widely, must report this to the Designated Safeguarding Lead immediately. The Designated Safeguarding Lead will assess the level of risk to the child and to others, consider whether the child themselves may be a victim of exploitation, and take appropriate action, which may include seeking to de-escalate conflict between pupils and engaging external agencies where necessary. Staff should be alert to indicators of serious youth violence and criminal exploitation as part of their wider safeguarding vigilance.

6.6. Working with Others

It is recognised that when commissioning alternative provision, the school remains responsible for Safeguarding children when placed with the alternative providers. Where school staff are not supervising such activities, the school will require written confirmation that Safeguarding checks have been done on the staff that work with St Catherine's children.

7. Physical restraint

There may be times when adults, during their school duties, have to intervene physically in order to restrain children and prevent them from coming to harm. Such intervention will always be the minimum necessary to resolve the situation. The Principal will require the adult(s) involved in any such incident to report the matter to him or her immediately, and he will record it. Individual Plans will be drawn up only if deemed appropriate by the Heads of Learning Support, Designated Safeguarding Leads, the Principal and appropriate staff. If this is required, Control and Restraint Training will be undertaken for all staff concerned.

St Catherine's is committed to maintaining a safe and supportive environment for all students. In line with our safeguarding responsibilities and child protection standards, we strictly prohibit the use of corporal punishment in any form. All staff are expected to use positive behaviour management strategies that promote respect, dignity, and emotional well-being.

8. Allegations against staff

If an allegation is made against a member of the school staff, a trainee teacher, or a volunteer helper, it will always be referred to the Principal, or, in the case of the allegation being against the Principal, to the Chair of the Board of Governors. Trainee teachers are subject to the same allegations-management procedures as other staff. The child protection concern procedure will be followed in all cases (**see appendix 2**).

The member of staff may be suspended from work pending a full investigation. This should be seen as a neutral act and in no way implies that the individual is guilty of any wrongdoing. It is acknowledged that this may cause distress and therefore the school will do all it can to balance the interests of any individual with that of the need to keep children safe.

Where possible, any person considered to be unsuitable to work with children will immediately (or at least within one month) be reported to the Attorney General for Minors and to Interpol's National Central Bureau (NCB) - (Local link to Interpol is through the Hellenic Ministry of Citizen

Protection, 4 P. Kanellopoulou Street, Athens, 10173, Tel. 210 6924558, www.yptp.gr). In the case of the United Kingdom referrals must be made to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA); the status of a teacher's registration is checked and recorded via the DfE's "Check a teacher's record" service. For further guidance on referral procedures please visit [here](#) and [here](#).

Staff at St. Catherine's School are expected to treat all children with respect. All staff should follow the Staff Code of Conduct (**see Appendix 5**).

8.1. Recording Low-Level Concerns

The School is committed to maintaining a culture of openness, transparency and safeguarding vigilance. Any low-level concern regarding the conduct or behaviour of a member of staff, trainee teacher, volunteer, contractor or other adult working on behalf of the School, must be reported promptly to the Designated Safeguarding Lead (DSL) or the Principal, as appropriate. Staff are actively encouraged to self-refer where they recognise that they have been involved in a situation that could be misinterpreted or may appear compromising to others. Where there is doubt about whether a concern meets the harm threshold (i.e., whether it is genuinely "low-level" or should be treated as an allegation), the school will consult the appropriate Greek Authority, the Attorney General for Minors.

A low-level concern is about an adult's conduct that does not meet the harm threshold but is still inconsistent with the staff code of conduct or gives rise to a sense of unease. The threshold is therefore:

The behaviour is concerning, inappropriate or inconsistent with expectations, but does not meet the harm threshold allegation criteria.

Examples might include:

- Being overly familiar with a pupil.
- Having a one-off lapse in professional judgement.
- Using inappropriate language that does not constitute abuse.
- Favouring particular pupils.

Harm Threshold:

A concern reaches the harm threshold when an allegation suggests that an adult working in or on behalf of the school may have caused, or may pose a risk of causing, harm to a child. Such concerns must be managed through the school's allegations procedures rather than the low-level concerns process.

Allegations and Concerns About Adults Working With Children (Harm Threshold)

The school recognises that concerns relating to the behaviour of adults working in or on behalf of the school must be managed promptly, fairly and in accordance with statutory guidance.

The procedures set out in this section apply where it is alleged that an adult working in or on behalf of the school has:

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

These concerns (not exhaustive) meet the **harm threshold** and must be reported immediately.

All staff should understand that concerns meeting the harm threshold are distinct from low-level concerns. Where there is any doubt as to whether a concern meets the harm threshold, staff should report the matter to the Designated Safeguarding Lead and/or Principal without delay so that appropriate advice can be sought.

The welfare of the child will remain paramount throughout any investigation or management process, and appropriate support will be provided to both the child and the adult concerned.

All low-level concerns, including self-referrals, are recorded securely on the School's MyConcern safeguarding system. Records include the nature and context of the concern, any actions taken, decisions reached and outcomes. The DSL informs the Principal of all low-level concerns in a timely manner; the Principal is the ultimate decision-maker, consulting the DSL where appropriate, to identify patterns of behaviour, support professional practice, ensure early intervention where necessary, and promote the ongoing safety and welfare of children. All records are managed confidentially and in accordance with the EU General Data Protection Regulation, Greek Law 4624/2019, and the data protection principles of the UK GDPR, which the School additionally has regard to as good practice.

To ensure low-level concerns are handled consistently, the school follows a formal process for reporting, recording and reviewing them:

Step 1 – Report: The concern is reported, as soon as reasonably practicable and in any event within 24 hours of arising or being noticed, using the MyConcern logging system. Any urgent concerns should be reported directly to the DSL or the Principal.

Step 2 – Log: The DSL notes the log on MyConcern within one working day of receiving it, recording the date, the individuals involved, the nature and context of the concern, and any immediate action taken. The DSL informs the Principal if the concern approaches the harm threshold.

Step 3 – Assess: The Principal, consulting the DSL where appropriate, considers whether the concern meets the harm threshold; where there is doubt, the Attorney General for Minors is consulted, as set out above.

Step 4 – Record the outcome: The outcome is recorded on MyConcern, for example: no further action, informal words of advice, referral to the Staff Code of Conduct, a management or HR route, or escalation to the school's allegations-management procedure.

Step 5 – Review for patterns: The DSL and Principal review the log of low-level concerns at least once a term to identify any patterns of behaviour, whether concerning a single individual or across the school, and take further action as needed.

Step 6 – Retain: Records are retained securely in accordance with the school's data retention arrangements and the data protection provisions set out above.

Self-referral is explicitly encouraged and is treated no differently, and no less seriously, than a concern raised about another adult. A member of staff, trainee teacher, volunteer or contractor who recognises that their own conduct may have fallen below the standards in the Staff Code of Conduct should:

- a.** report the matter themselves, without delay, using the MyConcern logging system. Any urgent concerns should be reported directly to the DSL or the Principal
- b.** where the concern relates to the Principal, report instead to the Chair of the Board of Governors; or where the concern relates to a DSL, report to the Principal or another DSL;
- c.** expect the self-referral to be logged on MyConcern in the same way as any other low-level concern, and to be treated fairly, proportionately and without automatic assumption of wrongdoing;
- d.** be signposted, where appropriate, to staff wellbeing support, recognising that self-referral is a positive step consistent with the school's culture of openness and transparency.

8.2. Abuse of Trust

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach. In addition, staff should understand that under the Sexual Offences Act 2003 and in line with Greek Law No. 4267/2014 aligns with EU Directive 2011/93/EU 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 entrusted with the supervision and safeguarding of the minor even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a child under 18 may be a criminal offence, even if that child is over the age of consent and will be treated as potential child abuse. All staff are expected to uphold the highest standards of conduct and report any concerns immediately.

8.3. Safeguarding Whistle Blowing guidance

The rationale of our whistle blowing system is to provide staff with an avenue to raise awareness and concern if they feel that a colleague or manager is engaged in conduct that is causing a negative effect upon the welfare and safety of any children in one of our schools. This guidance is written for all adults working with children in our school. Each staff member must acknowledge their individual responsibility to bring matters of concern to the attention of the senior leadership in the school. Although this can be a difficult situation it is particularly important where the welfare of children is concerned. A staff member may recognise that something is wrong but may not feel able to express concerns because of loyalty to colleagues or a fear of harassment or victimisation. We encourage all adults to ensure that children are their priority and should not be unnecessarily at risk.

Whistleblowing is not a type of concern. It is a reporting route.

In the context of Safeguarding, Whistleblowing applies when a member of staff believes:

- The school is failing to safeguard children appropriately.
- A safeguarding concern is being covered up.
- Leaders are failing to act on concerns.
- There is malpractice, wrongdoing or unlawful conduct.
- They cannot raise a concern through normal management channels.

Examples:

- A staff member reports a low-level concern repeatedly, but no action is taken.
- A DSL fails to refer a serious safeguarding concern.
- A senior leader suppresses allegations against a member of staff.
- A member of staff feels unable to raise concerns internally.

The threshold is therefore:

The concern is about organisational failings, wrongdoing, or a lack of confidence in internal reporting processes, rather than the behaviour itself. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistle blowing channels may be open to them. Further guidance can be found [here](#).

8.3.1. Reasons for using the whistle blowing system:

Every individual has a responsibility to raise concerns about unacceptable practice or behaviour in relation to the safety and welfare of our children.

- a. To prevent a problem from becoming more serious.
- b. To protect or reduce risks to other children in the school.

8.3.2. How to raise a concern:

- a. Concerns should be expressed as soon as possible. The earlier a concern is expressed the sooner action can be taken.
- b. The concern should express exactly what practice is causing concern and why.
- c. The person raising a concern should approach the Principal immediately and in his absence, the Head of School.

A member of staff expressing a concern is expected to be acting in good faith and explain the reasons for the concern. However, it is not expected that the staff member will always have hard evidence or be certain that his or her concerns are well grounded.

The next steps:

- a. The staff member specified in any whistle blowing procedure should, as soon as practicably possible and unless this would jeopardise the effectiveness of the investigation, be given information about the nature and progress of any enquiries.
- b. The employer has a responsibility to protect the staff member from any harassment or victimisation, including keeping the whistle blower staff member's identity confidential, unless otherwise required by law.

- c. No action will be taken against the whistle blower if the concern proves to be unfounded and was raised in good faith.

The school informs the staff about the whistle-blowing system and provides guidance on its use.

9. Staff training

All adults, including all support staff, in the school receive regular training to raise their awareness of abuse and safeguarding, and to improve their knowledge of the safeguarding procedures that have been agreed locally. The maximum period before refresher training must take place is yearly. This also applies to volunteers and other temporary staff employed by the school. The school recognises the importance of safeguarding and child protection updates. Where required, staff will receive regular updates via email, e-bulletins and/or staff meetings.

Designated safeguarding leads will go through policy and procedures at the start of every new school year with all staff and whenever a new member of staff is appointed.

All staff must follow the Code of Conduct, **see Appendix 5**, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil).

Every new member of staff or volunteer will have an induction period that will include essential safeguarding information. This programme will include basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record any issues of confidentiality. The induction will also remind staff and volunteers of their responsibility to safeguard all children at our school and the remit of the role of the Designated Safeguarding Leads (DSL). At induction, all staff and volunteers will also be provided with a copy of Part One of 'Keeping Children Safe in Education' (2026) and will be expected to read this.

New staff will be given appropriate training so that they understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

All regular visitors and volunteers to our school will be given a set of our safeguarding procedures; they will be informed of whom our designated safeguarding leads (and deputies) are and what the recording and reporting system is (**See Appendix 6**).

The designated Governor responsible for Safeguarding will also undertake appropriate training to ensure the governors are able to carry out their duty to safeguard all of the children at our school

We actively encourage all of our staff to keep up to date with the most recent Greek and UK safeguarding advice and guidance. Part One of 'Keeping Children Safe in Education' (2026) provides links to guidance on specific safeguarding issues. In addition, guidance can be accessed via the UK government website. The designated safeguarding leads will also provide regular safeguarding updates for staff.

10. Child-on-Child Abuse (including Harassment and Violence)

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. Such child-on-child abuse will be recognised by the school as abuse and will not be tolerated or passed off as “banter” or as “part of growing up”.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physical and verbal) and are never acceptable. We believe it is important that all victims are taken seriously and offered appropriate support.

Staff are made aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff are made aware of the importance of:

- a. making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- b. not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- c. challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

At St Catherine’s we work hard to promote the prevention of any type of abuse or behaviour that might cause upset and/or harm to others. We use our curriculum, lessons and assemblies to raise children’s awareness, and this is supplemented by a programme of partnership with parent events to help understand issues.

St Catherine’s has a strict zero tolerance approach to any form of derogatory or sexualised language, sexual harassment or sexual violence between peers. Any such behaviour must be challenged and reported.

We will follow both national and local guidance and policies to support any children subject to child-on-child abuse, including sexting (also known as youth produced sexual imagery) and gang violence. We respond to issues that arise sensitively and taking into account the specific context of the situation, needs of the child and family and also the age of the child. We are proud of the pastoral work and provision available to support children and work proactively with external agencies if we feel more intensive or expert support would benefit the pupil.

The school recognises that child-on-child abuse can also take the form of a child using, carrying or threatening another child with a weapon, and that this will be treated with the same seriousness as other forms of child-on-child abuse and referred to the Designated

Safeguarding Lead. The school is also alert to the risk of children creating, sharing or being the subject of sexually explicit images generated or altered using artificial intelligence (including deepfakes), which will be treated in the same way as other youth-produced sexual imagery.

11. Children Who Are Questioning Their Gender

Where a child discloses that they are questioning their gender, or a request is made for the school to address a change of name, pronoun, or approach to uniform or facilities, the member of staff receiving the disclosure will inform the Designated Safeguarding Lead in the first instance, rather than agreeing to any change unilaterally. The school will listen carefully to the child, take a cautious approach, and, other than in the most exceptional circumstances, involve parents, recognising that safeguarding a child necessarily means involving their parents. Decisions will be considered individually, taking full account of the child's wellbeing and any risk of harm, and a record of the disclosure, actions and decisions taken will be kept in the same way as other safeguarding records.

12. School Premises: Single-Sex Facilities and Accommodation

The school provides single-sex toilet facilities for pupils aged 6 and over and ensures that pupils aged 11 and over are not required to undress or shower in the presence of pupils of the opposite biological sex. On residential trips, overnight accommodation is arranged on a single-sex basis. Where a pupil or parent requests an alternative arrangement, this will be considered by the Principal in consultation with the Designated Safeguarding Lead, and any decision, together with the reasoning behind it, will be recorded.

13. Sport

Where contact sports or changing arrangements are organised on a single-sex basis, staff will apply this consistently and sensitively, having regard to both the safeguarding and welfare needs of all pupils and any individual circumstances raised with the Designated Safeguarding Lead.

14. Online Safety

Online Safety safeguarding procedures include enhanced measures to address emerging online risks such as misinformation, disinformation, and conspiracy theories. Online safety is an integral part of the curriculum. The use of ICT equipment and systems are well monitored, and appropriate actions are taken where issues are identified. We are committed to ensuring that our school is a safe digital learning community through the curriculum, professional development, auditing of systems, working with parents and developing detailed e-policies.

The school has an online safety policy and a designated online safety officer (Mr van Straten). Children are taught how to use the internet in a safe way. Parents are asked to give permission for their children to use the internet on entry to the school. Parents, pupils and staff must sign an Acceptable Use form to ensure that they understand the risks and sanctions relating to misuse of systems in and beyond the school. Staff who know of misuse by a teacher, staff member, volunteer or child must report it to the Principal without delay.

The DSLs supported by Online safety Officer have overall responsibility for internet safety.

The school will ensure that:

- a. Software is in place to safely manage access and identify any person accessing inappropriate sites or information. Appropriate filtering and monitoring technology on school devices and school networks forms part of the school's holistic approach to Safeguarding. The school's filtering and monitoring systems are reviewed throughout the year by the IT Manager and the Head of Digital Innovation. The latter works with the Designated Safeguarding Leads to ensure that data captured enables timely responses to alerts raised by the systems deployed across both school sites.
- b. Students are taught to discuss openly their use of technology and anything that makes them feel uncomfortable. They can discuss their concerns with a tutor, Head of Year, tutor/teacher, Head of Year/Key Stage, Online Safety Officer, or any other member of staff they trust. If the concern results in child protection concerns, a Designated Safeguarding Lead should be informed immediately.
- c. Students are taught not to give out their personal details, phone numbers, school or home addresses, or passwords.
- d. Students adhere to the school policy on mobile phones.
- e. Training is provided to pupils, staff and volunteers on e-safety matters where necessary.
- f. All IT equipment in the school has suitable software to maximise the online protection of children.

Staff and children are expected to engage in the safe and responsible use of social media, including respecting age restrictions on use. However, any member of staff who is alerted to any child protection concerns related to the use of the internet or social media should follow the lines of communication set out in this policy.

The school acknowledges that parents like to take photos and videos of their children in performances, sports events and other presentations. Parents are advised at the start of these events that any images should not be shared and are for personal use only. However, if this raises Health and Safety issues (e.g., the use of a flash could distract a child and cause an accident) we will take appropriate steps (e.g., we will inform parents that flash photography is not permitted).

The school follows a policy of seeking parents' written permission before using a pupil's photograph or video in the school's materials, brochures, websites, advertisements or press releases. The school cannot, however, be held accountable for any photos or videos taken by parents or members of the public at school functions and/ or within school premises. Please also refer to **Appendix 5**.

15. Generative Artificial Intelligence (Gen AI): Risks and Safe Use

Staff and students are bound by the regulations laid down in the school's Mobile Device Policy and Acceptable Usage Policies (AUPs). They are also bound by the legal obligations contained in the EU AI Act as well as guidance presented by the Department for Education in England and Wales *Keeping Children Safe in Education* documentation, plus DfE guidance on the use of AI in school settings.

Staff receive ongoing online and in person training in the use of AI tools for education. Students

receive regular lessons about online safety, including AI, at an age-appropriate level, across both Lower and Upper School. Additionally, students receive focused specialist lessons from the Head of Digital Innovation.

AUPs make it clear to students and staff that only school-approved programs and apps may be used. This includes those that contain elements that use AI to create content, including, but not limited to, text, audio and video-based outputs.

Students are taught about the risks of emotional attachment to AI generated personae, as well as the risks of generating deepfakes. This includes the legal implications of creating nude or semi-nude content. AUPs and the Mobile Device policy explain to students how breaches of these rules are governed by the school's behaviour policy, together with the possibility of law enforcement involvement. Students are taught about the risks posed to individuals and societies by the rise of AI generated content designed to spread misinformation and conspiracy theories.

Staff are kept informed about obligations arising from the EU AI Act, with updates as new legislation comes into effect.

The Staff AUP is explicit in listing what student data can and cannot be entered into AI systems.

Where staff or students encounter content they believe has been generated using AI that causes concern, this should be reported to a DSL and the Online Safety Officer. As directed by the AUPs and Mobile Device Policy, content must be isolated and not distributed to others in the first instance.

Children Missing from Education

Schools also have safeguarding duties under section 175 of the Education Act 2002 in respect of their pupils, and as part of this should investigate any unexplained absences. With consideration to guidelines set out by the Greek Ministry of Education, robust monitoring and reporting systems are in place in relation to school attendance.

We contact families on the first day of absence if a child does not arrive in school without reason. When a pupil leaves the school, the Admissions Office will endeavour to ensure that we are in contact with the receiving school whether in Greece or overseas. This will enable any appropriate safeguarding information to be passed on.

16. Pupil Transfer

Considering Greek Legislation and where possible following UK guidelines, the designated safeguarding lead will ensure, where deemed necessary, that any safeguarding concerns are transferred to the new school. Where there is a Safeguarding risk to a student, the transfer of such data is done in line with Greek Legislation and GDPR (EU). Where possible, this is done within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. Each case is looked at on an individual basis with child safety at the heart of any decision.

17. Child Trafficking

It is everyone's responsibility to be vigilant regarding children leaving and joining our school. Contact will be made with previous schools to ensure appropriate information sharing. When pupils leave our school, we make every effort to make contact with the receiving schools in order to make sure this chain of information remains unbroken.

18. Female Genital Mutilation (FGM)

Female Genital Mutilation is a practice carried out in some cultures. It is **ILLEGAL** in this country. Our school has duty of care to all the children to ensure that this practice does NOT occur. If we are concerned that an extended holiday may be used for this practice, we will ask for a meeting with parents. If it is still a concern, we will make a referral as per our procedures (*see Appendix 2*).

19. Subversive ideologies and Extremism

As part of our safeguarding ethos we encourage pupils to respect the fundamental values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different backgrounds, faiths and beliefs.

While respecting the law, the Greek constitution and the human rights in general, including among others the freedom of expression, we also ensure that extreme partisan views are not promoted in the teaching of any subject in the school and where controversial issues are brought to the attention of the pupils, in the context of courses or otherwise, reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils.

At our school we are committed to contributing to community cohesion and reducing the likelihood that our children may fall prey to anti-democratic, subversive or extreme ideologies. To support this process the staff in our school report any concerns they have about our children in this respect to the Designated Safeguarding Lead. For further details please refer to guidance, [Prevent duty guidance: England and Wales](#) DfE (2023).

20. Prevent Strategy

We use the PREVENT strategy if necessary. From 1 July 2015 all UK schools are subject to a duty under section 26 of the Counterterrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to the statutory guidance. Paragraphs 57-76 of the guidance are concerned specifically with schools and childcare providers. For further details please refer to [The Prevent duty: Departmental advice for schools and childcare providers](#), DfE (2021).

Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life as a global citizen and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. These values will be underpinned by the school behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

21. Confidentiality

We regard all information relating to individual child protection issues as confidential, and we treat it accordingly. We pass information on to appropriate persons only.

The files we keep on children are open to those children's parents.

Information from third parties will not be disclosed without their prior consent, unless otherwise required by law.

Access to these files may be withheld in certain prescribed cases where there are instances of actual or alleged abuse.

Working notes are not subject to disclosure but will be summarised and then kept on file.

These guidelines are in line with the safeguards on disclosure of information according to Greek Law.

22. Role of the Governors

The Board of Governors will have a designated Governor for Safeguarding in order to liaise with the Designated Safeguarding Leads regarding policy and procedure on safeguarding (**see Appendix 2**). The **Safeguarding Governor** holds the school leadership to account for keeping children safe. They don't deal with individual safeguarding cases but ensure policies, training, and procedures are strong, compliant, and effective.

The Designated Governor and Designated Safeguarding Leads will liaise throughout the year to undertake a review of the safeguarding procedures and the effectiveness of which this policy is being discharged.

Designated Governor and Designated Safeguarding Leads will update the governing body at every Full Board meeting on safeguarding policy and training. These meetings are minuted. The Governors will undertake to review annually the school's safeguarding policy and procedures and the efficiency with which the related duties have been discharged. DSLs meet with the link Safeguarding Governor prior to full board meetings to ensure updates are shared and there are opportunities for questions.

All governors and trustees will receive appropriate safeguarding and child protection (including online) training at induction.

St Catherine's Governing body is aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010²², (including the Public Sector Equality Duty²³), and their local multi-agency safeguarding arrangements.

23. Extended school and off-site arrangements

Extended school activities provided and managed by organisations other than the school will be checked to ensure that appropriate procedures are in place including safer recruitment procedures. We will check that effective safeguarding arrangements are in place when our children attend off-site activities.

24. Legislation and Guidance

- a. This policy complies with UK and Greek law requirements and guidance, including: ‘Working Together to Safeguard Children’ 2023 DfE
- b. [‘Keeping Children Safe in Education’](#), DfE (2026)
- c. [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings](#), DCSF, March 2009.
- d. [‘What to do if you're worried a child is being abused’](#), DfE (March 2015)
- e. [‘Information Sharing: Advice for practitioners’](#), DfE (March 2015)
- f. ‘The Prevent duty: Departmental advice for schools and childcare providers’, DfE (2021)
- g. Revised Safeguarding Statutory Guidance 2 "Framework for Assessment of Children in Need and their Families 2000"
- h. Children Act 1989 and 2004
- i. United Nations Convention on the Rights of the Child
- j. Education Act 2002
- k. Greek Law 1566/1985
- l. Greek Penal Code
- m. Greek Code of Penal Procedure
- n. Greek Law 3500/2006
- o. Greek Law 4624/2019 (implementing the EU General Data Protection Regulation in Greece, superseding Greek Law 2472/1997)
- p. Data (Use and Access) Act 2025, and the data protection principles of the UK GDPR and Data Protection Act 2018, which the School additionally has regard to as good practice
- q. Crime and Policing Act 2026 (removal of the supervision exemption from the definition of regulated activity)

25. Policy Consultation & Review

This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance ‘Keeping Children Safe in Education’, DfE (2026).

This policy will be reviewed in full by the Governing Body on an annual basis. This policy was last reviewed September 2026. It will be due **for review in September 2027**

NB This Safeguarding Policy has been updated to incorporate key updates to statutory guidance for schools in England – Keeping Children Safe in Education (2026), including the removal of the supervision exemption from the definition of regulated activity, updated arrangements for recording low-level concerns, and new provisions on mental health, serious violence, gendered patterns of abuse, gender-questioning children, school premises, and online safety. The safeguarding of pupils and staff is of the utmost importance. Failure to follow the above would be considered a serious matter and, in some circumstances, the result would be disciplinary action.

26. Useful Links

A video on supporting children who are victims of sexual abuse.

<https://www.csacentre.org.uk/knowledge-in-practice/practice-improvement/supporting-practice-in-tackling-child-sexual-abuse/>

LGFL Undressed- a website that features a video and song that schools can use to teach young children about the risk of being tricked into getting undressed online

<https://undressed.lgfl.net/>

Using AI in education settings: support materials – training materials from the DfE, created by the Chiltern Learning Trust and Chartered College of Teaching.

Generative Artificial Intelligence (AI) in Education – overview provided by the DfE

Sharing nudes and semi-nudes: advice for education settings working with children and young people – guidance from the DfE.

Staff Wellbeing

St Catherine's aims to build and maintain a workplace environment and culture that supports mental health and wellbeing and prevents discrimination (including bullying and harassment).

Review: This Policy will be reviewed annually by the DSLs and the Executive Leadership Team (ELT) or sooner if required. The next review date is August 2027