Baleares International College, Mallorca

A MEMBER OF ARISTON EDUCATION

Child Protection and Safeguarding Policy 2026

Approved by:	Alison Colwell, Principal	**Last reviewed on:**	September 2026
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This policy applies to Baleares International College at both sites, Sa Porrassa and Sant Agustí.

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1. Purpose

This policy sets out how Baleares International College, at Sa Porrassa (SAP) and Sant Agustí (SAN), safeguards and promotes the welfare of children, responds to concerns, supports children at risk, and makes sure that safeguarding is embedded in leadership, culture, practice and decision-making. It meets the Ariston Education Group's minimum expectations for child protection and safeguarding.

It replaces the school's 2025 Child Protection and Safeguarding Policy and reflects Keeping Children Safe in Education 2026 and Spanish and Balearic law.

This policy is a minimum standard. Where Spanish or Balearic law sets a higher standard, the law is followed.

- Ensure timely action is taken to safeguard and promote children's welfare.
- Ensure staff understand their responsibilities and know how to report concerns.
- Ensure procedures are clear, recordable, defensible and aligned with local safeguarding arrangements.
- Ensure practice is consistent with Ariston Education's Group safeguarding standards.

2. Scope

This policy applies to all children under the age of 18 for whom Baleares International College SAP and SAN has safeguarding responsibility. It applies during the school day, during school-arranged activities, off-site activities, residential and educational visits, online learning, transport and any situation in which the school has a safeguarding role.

This policy applies to all adults working with or on behalf of the school, whether paid or unpaid.

- all employees, including teaching, support, administrative and leadership staff;
- temporary staff, supply staff, agency staff and contractors;
- volunteers, governors, board members and proprietors;
- trainee teachers, student teachers, interns and visiting specialists;
- third-party providers, clubs, transport providers and organisations using school premises;
- parents, carers and visitors where their conduct raises safeguarding concerns.

3. Legislation and Guidance

This policy is informed by the most current versions of relevant statutory guidance, local legal requirements and international safeguarding expectations. As the school is outside England, Keeping Children Safe in Education 2026 is used as a benchmark of good practice and does not replace host-country law, regulator requirements or mandatory local reporting duties.

The Spanish and Balearic law, regulatory requirements, English guidance used as a benchmark, and Group policies that inform this policy are listed below.

- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children 2026;
- the Spanish and Balearic legal framework set out below;
- Standards for British Schools Overseas, and authorisation by the Conselleria d'Educació i Universitats
- the Balearic notification route for suspected maltreatment (RUMI): https://www.caib.es/sites/rumi;https://www.caib.es/sites/rumi

- Regulation (EU) 2016/679 (GDPR) and Ley Orgánica 3/2018 (LOPDGDD);
- Group Safer Recruitment Policy;
- Group Allegations Against Staff Policy;
- Group Staff Code of Conduct;
- Group Online Safety Policy;
- Whistleblowing (internal information system under Ley 2/2023): confidential reporting to the Principal or, where the concern is about the Principal, to the Regional Head of Schools;
- International Task Force on Child Protection standards and recommended practice.

Spanish national legal framework

- Ley Orgánica 8/2021, de 4 de junio, de protección integral a la infancia y la adolescencia frente a la violencia (LOPIVI). This is the principal child protection statute applying to the school. Article 15 places a duty on any person who becomes aware of a situation of violence against a child to communicate it to the authorities. Article 16 places a reinforced duty on those who, by reason of their profession, have habitual contact with children, which includes all school staff. Article 35 requires every school in Spain, whatever its ownership, to appoint a Coordinador/a de bienestar y protección del alumnado. Article 57 requires a negative certificate from the Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos for all adults in habitual contact with children.
- Ley Orgánica 1/1996, de 15 de enero, de Protección Jurídica del Menor, as amended, including the distinction between situación de riesgo (Article 17) and situación de desamparo (Article 18), which governs which authority is responsible for a case.
- Ley Orgánica 8/2015, de 22 de julio, and Ley 26/2015, de 28 de julio, de modificación del sistema de protección a la infancia y a la adolescencia.
- Ley Orgánica 5/2000, reguladora de la responsabilidad penal de los menores. The age of criminal responsibility in Spain is 14, not 10 as under the law of England and Wales.
- Ley de Enjuiciamiento Criminal, Article 262, which obliges those who learn of a public offence in the course of their profession to report it to the Ministerio Fiscal, the police or an investigating court.
- Código Penal, including Article 149.2 (female genital mutilation), Articles 178 to 183 (offences against sexual freedom and indemnity; the age of sexual consent in Spain is 16), and Article 189 (child sexual abuse material). Ley Orgánica 10/2022, de garantía integral de la libertad sexual, governs consent.
- Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales (LOPDGDD), together with Regulation (EU) 2016/679 (GDPR). The UK Data Protection Act 2018 and UK GDPR do not apply to this school and must not be cited as the legal basis for safeguarding information sharing.
- Ley 4/2023, de 28 de febrero, para la igualdad real y efectiva de las personas trans y para la garantía de los derechos de las personas LGTBI.
- Ley Orgánica 1/1982, de protección civil del derecho al honor, a la intimidad personal y familiar y a la propia imagen, which governs consent for the use of images of children.

Balearic Islands framework

- Llei 9/2019, de 19 de febrer, de l'atenció i els drets de la infància i l'adolescència de les Illes Balears.
- Protocol marc interdisciplinari d'actuacions en casos de maltractament infantil a les Illes Balears, provided for by the fifth additional provision of Llei 9/2019.
- RUMI, the Registre Unificat de Maltractament Infantil, which is the notification channel for suspected child maltreatment in the Balearic Islands, together with the associated Guia per a la detecció i notificació del maltractament infantil des de l'àmbit educatiu. Referrals are made at https://www.caib.es/sites/rumi
- Llei 8/2016, de 30 de maig, per garantir els drets de lesbianes, gais, trans, bisexuals i intersexuals i per erradicar l'LGTBI-fobia.

- Protocols issued by the Conselleria d'Educació i Universitats, including those on assetjament escolar (bullying and harassment), on trans and gender-diverse students, and on absentisme escolar.
- The Oficina Balear de la Infància i l'Adolescència (OBIA), the Institut Mallorquí d'Afers Socials (IMAS) as the island child protection authority, and the municipal social services of Calvià and Palma.
- The municipal Policía Tutor programme, where the local police provide a school liaison officer.

Regulatory and inspection framework

- Standards for British Schools Overseas (Department for Education) and the BSO inspection framework operated by the Independent Schools Inspectorate.
- The school's authorisation as a foreign private school by the Conselleria d'Educació i Universitats of the Govern de les Illes Balears.
- Keeping Children Safe in Education 2026, applied as a benchmark of good practice, not as law. KCSIE 2026 takes effect in England on 1 September 2026. Annex A has been removed in the 2026 edition.

Where host-country law and the BSO Standards or KCSIE conflict, the law of Spain and of the Balearic Islands takes precedence. The BSO Standards recognise this, and the school will inform the inspectorate of any resulting departure from the Standards for inclusion in the inspection report. Section 27 of this policy records the departures the school relies on.

4. Definitions

Safeguarding and promoting the welfare of children means providing help and support to meet children's needs as soon as problems emerge; protecting children from maltreatment whether within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring children grow up in circumstances consistent with safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and refers to activity undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Abuse, neglect and exploitation are forms of maltreatment. They may occur face to face, online, within families, in school, in the community, by adults or by other children. Safeguarding issues are rarely standalone events and often overlap.

Term	Meaning for this policy
Child	Any person under the age of 18.
Staff	Employees, leaders, supply staff, agency staff, volunteers, contractors and any adult acting for the school.
DSL	The Designated Safeguarding Lead, or Deputy DSL when acting in that role.
Family Help	Community-based or targeted support intended to provide help before statutory intervention is required, aligned locally to the Serveis Socials Comunitaris Bàsics (Ajuntament de Calvià for Sa Porrassa; CMSS Ponent, Palma, for Sant Agustí) – see section 10.
Child-on-child abuse	Abuse, harassment, violence, exploitation or harmful behaviour by one child or group of children towards another.
Low-level concern	A concern about adult behaviour towards children that does not meet the harm threshold but may indicate unsafe, inappropriate or unprofessional conduct.

Term	Meaning for this policy
Regulated activity or equivalent local child-facing work	Work with children requiring specific checks or safeguards under the relevant legal framework.
Coordinador/a de bienestar y protección	The child wellbeing and protection coordinator required in every Spanish school by Article 35 LOPIVI. At this school the role is discharged by the DSL, acting under the supervision of the Principal as the person holding the direction of the centre.
Situación de riesgo	A situation in which a child's development or wellbeing is impaired but which does not require separation from the family. Responsibility sits with the municipal social services where the child lives (often Calvià or Palma).
Situación de desamparo	A situation of serious neglect of protective duties in which the public authority assumes guardianship. In Mallorca this is declared by IMAS.
RUMI	Registre Unificat de Maltractament Infantil, the Balearic notification system through which the school formally reports suspected maltreatment.
Fiscalía de Menores	The Sección de Menores of the Fiscalía (public prosecutor) of the Balearic Islands, which deals with the protection of children and with offences committed by minors. Suspected offences against children can be reported to the Fiscalía, the police or the juzgado de guardia.
Policía Tutor	The municipal police officer who acts as school liaison under the Policía Tutor programme, where the local police operate it.

Ages under Spanish law

- A child is any person under 18.
- The age of criminal responsibility in Spain is 14. Children under 14 cannot be prosecuted, but protective measures and referral to social services still apply.
- The age of sexual consent in Spain is 16.
- Compulsory education in Spain runs to the age of 16.

5. Equality, Inclusion and Vulnerability

Baleares International College Sa Porrassa and Sant Agustí are committed to anti-discriminatory safeguarding practice. Some children face additional barriers to recognition, disclosure or access to help. Staff must remain alert to vulnerability without making assumptions or applying stereotypes.

Safeguarding practice must be child-centred, evidence-informed, proportionate and respectful of local law, equality duties, privacy, dignity and the need to protect all children.

- children with SEND, disability or health conditions;
- young carers;
- children experiencing mental health difficulties;
- children affected by domestic abuse, substance misuse, housing insecurity or temporary accommodation;
- children at risk of exploitation, forced marriage, FGM, radicalisation or serious violence;
- children who are looked after, previously looked after, adopted or subject to care arrangements;

- children who experience discrimination, prejudice-based bullying, racism, misogyny or other harmful attitudes;
- trans students and children who are questioning their gender;
- children who are absent from education, missing education or frequently missing from school.

6. Important Safeguarding Contacts

BALEARES INTERNATIONAL COLLEGE SA PORRASSA		
Role / Organisation	**Name**	**Contact details / out-of-hours route**
Principal	Alison Colwell	alison.colwell@balearesint.net
DSL Primary	Fiona Von Waberer	fiona.vonwaberer@balearesint.net
DSL Secondary	Stuart Cadman	stuart.cadman@balearesint.net
Deputy DSL and SENDCo	Lesley Dixon	lesley.dixon@balearesint.net
Leader of Wellbeing	Fiona Von Waberer	fiona.vonwaberer@balearesint.net
Additional DSL cover	Jane Chetty	jane.chetty@balearesint.net
School HR	Myriam Boussoumah	myriam.boussoumah@balearesint.net
Director of Education, Global DSL and Group Safeguarding Lead (Ariston)	Michael Clack	michael@orbital.education
Regional Head of Schools	Jonathan Dey	jonathan@orbital.education
Policía Local de Calvià (schools liaison officer)	Named liaison officer (details held by the DSL)	Policía Local de Calvià: 092 (emergencies)
Ajuntament de Calvià Social Services	Named social workers (details held by the DSL)	Ajuntament de Calvià switchboard Tel: 971139100 Ext 1252
Mental health support / crisis route	024 national	The school does not employ a nurse or counsellor. Urgent: Urgències Pediàtriques, Hospital Universitari Son Espases (Palma), or 112. Non-urgent:

BALEARES INTERNATIONAL COLLEGE SA PORRASSA		
	crisis line (24 hours); 112 in an emergency	referral through the child's paediatrician or GP to the IB-Salut child and adolescent mental health service.
Maltreatment notification (RUMI)	Online referral form	https://www.caib.es/sites/rumi
Andratx municipal social services (Serveis Socials Comunitaris Bàsics)	Named contact (details held by the DSL)	https://www.caib.es/sites/rumiAjuntament d'Andratx
BALEARES INTERNATIONAL COLLEGE SANT AGUSTÍ		
Role / Organisation	**Name**	**Contact details / out-of-hours route**
Principal	Andrew Beavon	andrew.beavon@balearesint.net
DSL	Mel Eccleshall	melanie.eccleshall@balearesint.net
Deputy DSL	Jacqui Robinson	jacquelyn.robinson@balearesint.net
School HR	Myriam Boussoumah	myriam.boussoumah@balearesint.net
Director of Education, Global DSL and Group Safeguarding Lead (Ariston)	Michael Clack	michael@orbital.education
Regional Head of Schools	Jonathan Dey	jonathan@orbital.education
Office for Social Services – SEDE CENTRAL IMAS - PALMA		Calle del General Riera, 67, 07010 Palma Tel: 900 100 444 Email: atencionciutadana@imas.conselldemallorca.net
Police / emergency services	Palma Local Police	Carrer de Son Dameto 1, 07013 Palma Tel: 971 22 55 00 Emergencies: 092 Email: policia@palma.es

BALEARES INTERNATIONAL COLLEGE SA PORRASSA		
Municipal social services (Palma)	CMSS Ponent (West) Municipal Social Work Centre	Carrer de les Soltes 4, 07013 Palma Tel: 971 45 02 94
Mental health support / crisis route	024 national crisis line (24 hours); 112 in an emergency	Urgent: Urgències Pediàtriques, Hospital Universitari Son Espases (Palma), or 112. Non-urgent: referral through the child's paediatrician or GP to the IB-Salut child and adolescent mental health service.
Maltreatment notification (RUMI)	Online referral form	https://www.caib.es/sites/rumi

6.1 Statutory, Emergency and Specialist Contacts (Mallorca)

The following contacts apply to both school sites. Staff do not need permission from a senior colleague before calling an emergency number.

Purpose	Contact	Notes
All emergencies	112	Single European emergency number. Use where a child is in immediate danger.
Policía Nacional	091	Serious crime, including offences against children.
Guardia Civil	062	Serious crime outside urban police jurisdiction.
Policía Local Calvià	971 13 91 00 / 092	Sa Porrassa site. Schools liaison officer recorded in the table above.
Policía Local Palma	971 22 55 00 / 092	Sant Agustí site.
Formal maltreatment notification	https://www.caib.es/sites/rumi	RUMI online notification form. The primary statutory reporting route in the Balearic Islands.

Purpose	Contact	Notes
IMAS Servei de Protecció al Menor	900 100 444	Island child protection authority for Mallorca. Cases of possible desemparament.
Servicios Sociales Calvià	971 13 91 00 ext. 1252	Municipal social services for families resident in Calvià.
CMSS Ponent, Palma	971 45 02 94	Municipal social services for families resident in Palma.
Fiscalía de Menores de les Illes Balears	971 21 92 00 (Fiscalía de la Comunidad Autónoma de las Illes Balears, Plaza del Bisbe Berenguer de Palou 10, Palma – switchboard; ask for the Sección de Menores)	Suspected criminal offences against or by children.
Oficina Balear de la Infància i l'Adolescència (OBIA)	012; C/ de la Llotja 3, Palma; online complaints form at caib.es/sites/obia	Balearic children's rights body; advice and escalation.
ANAR child and adolescent helpline	116 111	Free, confidential, 24 hours. Also available to adults concerned about a child on 600 50 51 52.
Missing child hotline	116 000	European missing children number.
Gender-based violence helpline	016	Free and does not appear on phone bills. Covers violence in the home affecting children.
Mental health and suicidal crisis line	024	National 24-hour line. See section 16 for the school's own escalation route.
Stop Radicalismos	900 822 066	Ministerio del Interior reporting line for concerns about violent radicalisation.
AEPD Canal Prioritario	https://www.aepd.es/canalprioritario	Urgent removal of sexual or violent content involving a child published online.

7. Roles and Responsibilities

Safeguarding and child protection are everyone's responsibility. All adults must act immediately when they have a concern and must never assume that someone else will act.

Role	Core responsibilities
All staff, volunteers and adults	Read and understand this policy and assigned KCSIE Part 1; remain alert to signs of abuse, neglect and exploitation; report concerns immediately; record accurately; maintain professional boundaries; follow the Staff Code of Conduct; and contribute to a culture where children feel safe to speak.

Role	Core responsibilities
DSL	Leads safeguarding and child protection; advises staff; manages referrals; oversees safeguarding records; liaises with local agencies; leads information sharing; ensures appropriate support plans and risk assessments; understands online safety, filtering and monitoring; coordinates training; and keeps the Principal informed.
Deputy DSL	Acts in the DSL role when required, supports casework and ensures continuity of safeguarding response.
Principal	Ensures implementation of this policy; provides resources and authority for the DSL; ensures effective DSL cover; communicates the policy to staff and families; acts as case manager where appropriate; ensures safeguarding is embedded in school culture.
Ariston Education (proprietor)	Approves this policy; seeks assurance; ensures the school has an effective whole-school safeguarding approach; ensures appropriate training; challenges leaders and monitors compliance.
Regional Head of Schools	Provides Group oversight, challenge and support, especially for complex cases, allegations, cross-border issues, serious incidents, audits and assurance.
School HR	Supports safe recruitment, staff suitability, allegations processes, training records and secure personnel-related safeguarding records.
IT Manager (Adrian Carden)	Supports online safety, filtering and monitoring systems, annual review, records of checks, cyber security and safe use of technology.
SENDCo (Lesley Dixon, Sa Porrassa; Mel Eccleshall, Vice Principal and SENDCo, Sant Agustí)	Works with the DSL to support children with SEND, communication barriers or health conditions and ensures safeguarding needs are not misattributed to disability or additional needs.
Coordinador/a de bienestar y protección (LOPIVI Article 35)	A statutory role in every Spanish school. At this school it is carried out by the DSL at each site, under the supervision of the Principal. Duties include promoting training on prevention and early detection, coordinating cases requiring social services intervention in line with approved protocols, being identifiable to students and staff as the reference point for reporting violence, promoting a culture of buen trato, and communicating with the authorities where required. Formal communication with the police and Guardia Civil on behalf of the school is coordinated with the Principal, but any member of staff may contact 112 or the police directly where a child is in danger.
Policía Tutor liaison	Where a Policía Tutor or schools liaison officer is assigned, the DSL maintains the relationship and records the substance of any consultation on the safeguarding system.

7.1 DSL Availability and Cover Arrangements

The DSL must be available during school hours for staff to discuss safeguarding concerns. During off-site activities, residential visits, extended provision and out-of-hours activities, DSL support is available by telephone as set out below.

KCSIE 2026 places greater emphasis on robust cover arrangements where the DSL is unavailable. Baleares International College must document cover arrangements, including Deputy DSLs Lesley Dixon (SAP) and

Jacqui Robinson (SAN), named escalation routes, and where appropriate a confidential shared safeguarding mailbox or equivalent system that is monitored by authorised safeguarding staff.

- The DSL cover rota must be clear to staff.
- Safeguarding concerns must be received, monitored and acted on without delay.
- Staff must know what to do if the DSL and Deputy DSL are unavailable.
- Safeguarding information must remain confidential while being accessible to those with a professional need to know.

Out of school hours, the DSL team and the Heads of School can be contacted by staff. If the DSL and Deputy DSL are both unavailable, including during out-of-hours and out-of-term activities, the Principal and the Regional Head of Schools act as cover. No member of staff should delay contacting 112, the police or municipal social services because a DSL cannot be reached.

8. Confidentiality and Information Sharing

Timely information sharing is essential to effective safeguarding. Fears about sharing information must not prevent action to promote welfare and protect children from harm.

Information must be shared lawfully, proportionately, securely and with those who need it to safeguard the child or others. Staff must not promise confidentiality to a child because safeguarding information may need to be shared.

KCSIE 2026 strengthens expectations that information shared with a receiving setting is relevant, clear, proportionate and properly contextualised. Where a pupil moves settings and information indicates a risk to the child or others, the DSLs from both settings should communicate directly so that an appropriate risk assessment, safety plan or support plan can be put in place.

- Ask: is sharing necessary to safeguard or promote welfare?
- Share only the information that is relevant, necessary and proportionate.
- Make clear whether information is fact, allegation, opinion or professional judgement.
- Record what was shared, with whom, when, why and by whom.
- If in doubt, seek advice from the DSL, Group Safeguarding Lead (Michael Clack) or municipal social services.

Legal basis for sharing in Spain

Information sharing at this school is governed by Regulation (EU) 2016/679 (GDPR) and Ley Orgánica 3/2018 (LOPDGDD), not by the UK Data Protection Act 2018 or the UK GDPR.

- Sharing safeguarding information is lawful under Article 6(1)(c) GDPR where the school is under a legal obligation to report, under Article 6(1)(d) where sharing protects the vital interests of the child or another person, and under Article 6(1)(e) in the public interest.
- Health, sexual life and similar data are special category data. Article 9(2)(c) (vital interests) and 9(2)(g) (substantial public interest on the basis of Union or Member State law, including LOPIVI) GDPR, read with the LOPDGDD, permit processing where necessary for child protection.
- The duty to communicate under Articles 15 and 16 LOPIVI, and the duty to report offences under Article 262 of the Ley de Enjuiciamiento Criminal, override professional confidentiality. Consent is not required in order to notify RUMI, social services, the Fiscalía de Menores or the police.

- Data shared must still be adequate, relevant and limited to what is necessary. Record what was shared, with whom, when and on what legal basis, using Appendix J.

9. Recognising Abuse, Neglect and Exploitation

All staff must understand that abuse, neglect and exploitation can happen anywhere and by anyone. Children may be harmed inside or outside the home, online or offline, by adults or by other children.

Staff must maintain professional curiosity. Children may not feel ready or able to disclose, may not recognise their experiences as harmful, or may communicate distress through behaviour, presentation, attendance, friendship patterns, online activity or changes in wellbeing.

- physical abuse;
- emotional abuse, including verbal abuse;
- sexual abuse and sexual exploitation;
- neglect;
- domestic abuse and child-to-caregiver abuse;
- child criminal exploitation and child sexual exploitation;
- serious violence, weapons concerns and coercion;
- harmful sexual behaviour, sexual harassment and sexual violence;
- online abuse, grooming, image-based abuse and technology-assisted harm;
- radicalisation and extremism;
- FGM, forced marriage and so-called honour-based abuse;
- bullying, prejudice-based abuse, misogyny and discriminatory behaviour;
- self-neglect or neglect linked to medical needs, where relevant to the child's welfare.

10. Family Help, Early Support and Referrals

KCSIE 2026 introduces and expands information on community-based Family Help assessments and referrals to Family Help support, targeted early help and children's social care. Baleares International College applies this through the tiered map of equivalent services in Mallorca set out below.

Family Help is intended to provide support as soon as problems emerge and before statutory intervention is required, where appropriate. It does not replace the need to make an immediate referral where a child is suffering, likely to suffer harm, or is in immediate danger.

Situation	Expected action
Emerging concerns that do not indicate immediate harm	Speak to the DSL. Consider Family Help, targeted early support, school pastoral support, external signposting or the municipal Serveis Socials Comunitaris Bàsics.
Concerns escalate or do not improve	DSL reviews the case, records actions and considers referral to social services (municipal social services or IMAS).
Child is suffering, likely to suffer harm or in immediate danger	Make an immediate referral to social services (municipal social services or IMAS) and/or police. Anyone can make a referral. Inform the DSL as soon as possible.

Situation	Expected action
DSL unavailable	Do not delay. Contact another DSL or a Deputy DSL (Sa Porrassa: Stuart Cadman, Fiona Von Waberer, Lesley Dixon; Sant Agustí: Jacqui Robinson), the Principal (Alison Colwell, SAP; Andrew Beavon, SAN), local social services or police/emergency services as appropriate.
Disagreement with agency response	Escalate through the DSL to the Principal and RHoS, and to IMAS or the Fiscalía de Menores where needed, and record the rationale, advice received and next steps.

How Family Help maps onto services in Mallorca

There is no direct equivalent of the English Family Help model in Spain. The functionally equivalent structure is tiered as follows, and the DSL should use this map when deciding where to take a concern.

Level	Service in Mallorca	When used
In-school support	Pastoral team, tutor, Head of House, SENCo, Leader of Wellbeing	Emerging concerns not indicating harm.
Community-based support	Serveis Socials Comunitaris Bàsics: Ajuntament de Calvià for Sa Porrassa, CMSS Ponent for Sant Agustí	Family difficulty, housing or financial instability, parenting support, early indicators of neglect. Broadly equivalent to targeted early help.
Statutory child protection	IMAS Servei de Protecció al Menor, notified through RUMI	Suspected serious maltreatment or possible situación de desamparo. Situaciones de riesgo are for municipal social services.
Criminal and judicial	Fiscalía de Menores, Policía Nacional, Guardia Civil, Policía Local	Suspected offences, immediate danger, sexual offences.
Specialist assessment	Specialist child abuse assessment services accessed through IMAS or health services	Suspected sexual abuse requiring forensic or specialist assessment. The school does not assess.

A notification to RUMI does not replace a call to 112 or to the police where a child is in immediate danger. Where a case is already open with municipal social services, the DSL should continue to liaise with the assigned social worker as well as recording on the school system.

11. Responding to Disclosures and Concerns

When a child discloses abuse, neglect, exploitation or another safeguarding concern, the adult receiving the information must respond calmly, listen carefully and pass the information on without delay.

- Listen and allow the child to speak freely.
- Do not ask leading questions.
- Reassure the child they have done the right thing by speaking.
- Do not promise secrecy. Explain that information must be shared with safeguarding staff.
- Record the child's words as accurately as possible, distinguishing fact from opinion.
- Record the concern on CPOMS the same day (if CPOMS is not available, write it down, sign and date it, and hand it to a DSL immediately).
- Report immediately to the DSL or follow emergency procedures where required.
- Do not investigate, confront alleged perpetrators or discuss the concern with unnecessary colleagues.

Local reporting route

- All safeguarding concerns are recorded on CPOMS. Records are made the same day, in the child's own words where there has been a disclosure.
- Where a child is suffering or is likely to suffer harm, or is in immediate danger, contact 112, the police or municipal social services immediately. Anyone can make a referral. Tell the DSL as soon as possible afterwards. In most cases the DSL will make the referral.
- Formal notification of suspected maltreatment is made through the RUMI online form at https://www.caib.es/sites/rumi. The DSL normally completes this (the DSLs and, at Sa Porrassa, the Directora Técnica, Macarena Llull, hold RUMI access), in consultation with the Principal and the Regional Head of Schools where time allows, but time must never be lost where a child is in danger.
- Suspected criminal offences are additionally reported to the Fiscalía de Menores or the police, consistent with Article 262 of the Ley de Enjuiciamiento Criminal.
- Where a child is interviewed by the police as a suspect, Spanish procedure requires the involvement of those holding parental responsibility and, where appropriate, the Fiscalía de Menores. The English "appropriate adult" scheme does not apply here. The DSL will ensure a familiar adult supports the child so far as the investigating authority permits.

12. Specific Safeguarding Issues

The following issues must be understood by all staff at a level appropriate to their role. The DSL must ensure staff training and updates include current indicators, reporting routes and local risk factors.

Issue	Policy expectation
Domestic abuse and child-to-caregiver abuse	Domestic abuse can affect children directly and indirectly. Staff must be alert to the impact of coercion, control, violence, verbal abuse, fear and instability on children. KCSIE 2026 references child-to-caregiver abuse as a form of abuse staff should understand.
Child criminal exploitation and child sexual exploitation	Children may be exploited by individuals, groups, organised networks or gangs. They may not be recognised as victims and may be criminalised for actions taken under coercion. Staff must consider coercion, fear, debt, grooming, missing episodes and unexplained possessions.
Serious violence and weapons concerns	Serious violence remains an ongoing safeguarding concern. Any concern that a child is carrying, using or intending to use a weapon must be reported to the DSL, who should undertake a risk assessment and consider external referral.
Mental health and safeguarding	Mental health problems can develop into safeguarding concerns. Staff should not diagnose mental health conditions but should identify warning signs, refer concerns and ensure support is safe, effective and appropriate.
FGM, forced marriage and honour-based abuse	Female genital mutilation is a criminal offence in Spain under Article 149.2 of the Código Penal, and Spanish courts have extraterritorial jurisdiction where the victim is resident in Spain. Staff must never examine a child. Concerns, including concerns about planned travel, must be reported to the DSL the same day, and are notified through RUMI and to the police or Fiscalía de Menores. The English mandatory reporting duty on teachers does not apply in Spain, but the duties under Articles 15 and 16 LOPIVI and Article 262 LECrim do. The same approach applies to forced marriage and to so-called honour-based abuse.

Issue	Policy expectation
Radicalisation and extremism	Staff must report concerns that a child may be vulnerable to radicalisation, extremist influence or harmful ideology. There is no Prevent duty in Spain. The DSL assesses risk and, where referral is needed, contacts the Policía Nacional, the Guardia Civil or the Ministerio del Interior Stop Radicalismos line on 900 822 066, and notifies the Regional Head of Schools.
Homelessness, temporary accommodation and housing instability	Housing instability may create safeguarding vulnerabilities and may require information sharing, attendance monitoring and support.
Cybercrime and online harm	Online harm, cyber-enabled abuse, technology-facilitated coercion, image-sharing and cybercrime risks must be addressed through online safety education, filtering, monitoring and safeguarding response.
Bullying and assetjament escolar	Bullying is dealt with under the school's anti-bullying procedures in the Behaviour Policy and, where the threshold is met, under this policy. The school follows the principles of the Govern de les Illes Balears protocol on assetjament escolar. Cases that amount to suspected maltreatment are notified through RUMI and, where an offence may have been committed, to the Fiscalía de Menores.
School absence and absentisme escolar	Compulsory education in Spain runs to 16. Persistent unexplained absence is a safeguarding indicator and is escalated to the DSL. Where absence is not resolved, the school follows the Balearic absentisme protocol and considers notification to municipal social services.
Children missing from home or education	Where a child is missing from home or their whereabouts are unknown and there is risk, contact 112 or the police immediately and notify the DSL. Unexplained absence from education is handled under section 20. Families can be signposted to 116 000. Notify the DSL and record the actions taken.
Online publication of images of a child	Where sexual or violent content involving a student is published online, the AEPD Canal Prioritario can be used to seek urgent removal, alongside referral to the police.

13. Child-on-Child Abuse, Harmful Behaviour and Sexual Violence/Harassment

Children can abuse other children. Child-on-child abuse will never be passed off as "banter", "part of growing up" or "just having a laugh". It is a safeguarding issue for all children involved, including victims, alleged perpetrators, witnesses and wider peer groups.

KCSIE 2026 expands the child-on-child abuse section to emphasise overlapping safeguarding issues, times of increased risk around the school day, misogyny, the preventable nature of abuse and the importance of recognising behaviours and indicators early.

- bullying, prejudice-based abuse and online abuse;
- physical harm or threats;
- abuse linked to gangs, coercion or exploitation;
- harmful sexual behaviour, harassment or violence;
- sharing of nudes or semi-nudes;
- initiation or hazing behaviours;
- misogyny, discriminatory language or peer cultures that normalise harm;
- abuse during travel, immediately after school, online or during unsupervised periods.

13.1 Response to Child-on-Child Abuse

Where an allegation or concern arises, staff must record and report it to the DSL immediately. Staff must not investigate. The DSL must consider immediate safety, risk assessment, support, external referral and whether the matter may be criminal or require specialist advice.

- Complete a written record.
- Assess immediate safety of all children involved.
- Consider separation, supervision, timetable adjustments or transport arrangements.
- Consult municipal social services, IMAS or the police where required.
- Provide support plans for victim, alleged perpetrator and affected children.
- Review wider school culture, locations, timings or behaviours that may require preventative action.
- Record decisions, rationale and review dates.

13.2 Preventative Culture

The school will take proactive steps to prevent child-on-child abuse through curriculum, supervision, adult modelling, reporting systems, pastoral support and a zero-tolerance approach to harmful behaviour.

- Teach healthy relationships, consent, boundaries, respect, online safety and reporting.
- Challenge sexualised, derogatory, misogynistic, discriminatory or harmful language.
- Ensure students know how to report concerns safely and confidentially.
- Monitor hotspots, transition times, toilets/changing areas, transport and online spaces.
- Review patterns of concerns to identify cultural, environmental or systemic issues.

14. Sharing Nudes and Semi-Nudes

All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether the sharing appears consensual or non-consensual. The response must be proportionate and must consider age, development, circumstances, vulnerability, coercion, exploitation and risk of further harm.

Staff must report any incident immediately to the DSL and must not view, copy, print, forward, save, upload or ask a child to share imagery.

Do	Do not
Report immediately to the DSL.	Do not view, copy, print, save, upload or forward imagery.
Reassure the child that support is available.	Do not ask children to disclose unnecessary details.
Record the concern factually.	Do not blame, shame or minimise.
Preserve devices only where directed by the DSL or the police.	Do not delete imagery or ask the child to delete it unless advised through appropriate safeguarding route.
Consider immediate safety, coercion, exploitation and mental health risk.	Do not discuss widely or share information without a safeguarding need to know.

14.1 DSL Initial Review

The DSL will undertake an initial review and decide whether immediate referral is required. The DSL should consider whether the incident involves an adult, coercion, blackmail, grooming, exploitation, violence, age-related concerns, significant vulnerability, wide distribution, immediate risk or criminality.

- whether there is immediate risk to any child;
- whether parents/carers should be informed and how;
- whether police, social services (municipal social services or IMAS) should be contacted;
- whether the image has been shared widely or via platforms requiring removal;
- whether another school or organisation must be contacted;
- what support and risk management is required for all children involved;
- how the incident and rationale will be recorded.

15. Online Safety, Filtering, Monitoring, Generative AI and Mobile Technology

Online safety is an integral part of safeguarding. Technology is a component in many safeguarding and wellbeing issues, including grooming, exploitation, bullying, harassment, harmful content, coercion, image-sharing, radicalisation, misinformation, financial exploitation and cybercrime.

KCSIE 2026 includes new guidance and resources to support schools in understanding safety and legal requirements around the use of generative AI in teacher-facing and pupil-facing materials. The school ensures AI use is governed by safeguarding, data protection, academic integrity and professional conduct expectations.

Baleares International College is a phone-free school: students do not use mobile phones during the school day, and use laptops or tablets for learning.

Risk category	Examples and controls
Content	Exposure to illegal, inappropriate or harmful content. The school will use age-appropriate curriculum, filtering, monitoring and reporting routes.
Contact	Harmful interaction with others online, including grooming, exploitation, peer pressure or adults posing as children. Staff must teach safe communication and report concerns.
Conduct	Online behaviour that causes or increases harm, including bullying, harassment, sharing images or unsafe self-disclosure. Expectations must be clear in codes of conduct and acceptable use agreements.
Commerce	Online gambling, scams, phishing, financial exploitation and inappropriate advertising. Staff must teach digital literacy and report schemes targeting children.
Generative AI	AI tools may create safeguarding, privacy, misinformation, bias or inappropriate content risks. The school's approved tools and safeguards are set out in section 15.2.
Mobile technology	Mobile phones, cameras, smart watches and personal devices are managed under the school's phone-free rule, with clear rules for use, storage, holding devices securely and unexamined, and reporting.

15.1 Filtering and Monitoring

The school will identify and assign roles and responsibilities for filtering and monitoring, block harmful and inappropriate content without unreasonably affecting teaching and learning, and maintain effective monitoring strategies that meet safeguarding needs.

KCSIE 2026 highlights that schools should review filtering and monitoring systems at least annually, including checks that filtering is working appropriately on all devices connected to the internet, and should keep a record of these checks.

- The Principals Alison Colwell (SAP) and Andrew Beavon (SAN) retain overall accountability.
- The DSLs Stuart Cadman (SAP), Fiona Von Waberer (SAP) and Mel Eccleshall (SAN) must understand filtering and monitoring arrangements and use safeguarding information to inform review.
- The IT Manager will maintain technical records and report concerns.
- All staff must know how to report online safety concerns and filtering failures.
- The annual review must consider school-owned and connected devices, networks, remote learning, BYOD arrangements and emerging risks.

15.2 Use of Generative AI

Generative AI must not be used in ways that compromise safeguarding, confidentiality, children's privacy, data protection, assessment integrity or professional judgement. At Baleares International College, staff use only AI tools approved by the school and the Group after a data protection impact assessment, in line with Group guidance on AI use, and never enter personal data about students into unapproved tools. Students use AI tools only as directed by their teachers and in line with the school's Acceptable Use of IT agreement.

- Do not input identifiable child safeguarding information into public AI tools.
- Do not rely on AI to make safeguarding decisions.
- Check AI-generated resources for accuracy, bias, age-appropriateness and safeguarding risk.
- Ensure AI-generated pupil-facing materials meet school curriculum, safeguarding and equality expectations.
- Report AI-related safeguarding concerns to the DSL and IT Manager.

Searching devices: local legal position

The English guidance on searching, screening and confiscation does not apply in Spain, and staff must not rely on it. The right to privacy and to secrecy of communications is protected by Article 18 of the Spanish Constitution and by the LOPDGDD, and the Agencia Española de Protección de Datos has taken a restrictive view of school staff examining students' personal devices.

- Staff must not search, unlock or examine the contents of a student's phone or personal device.
- A device may be held securely and unexamined where this is necessary to prevent immediate harm or to preserve evidence, and the reason must be recorded.
- Where examination of a device may be necessary, this is a matter for the police or the Fiscalía de Menores, not for school staff.
- Parents or carers are informed unless doing so would place the child at greater risk.

16. Children Requiring Mental Health Support

The school recognises that mental health problems can develop into safeguarding concerns. Staff must not attempt to diagnose mental health conditions, but they play an important role in identifying warning signs, referring concerns and ensuring children receive appropriate support.

Any mental health support or intervention offered or signposted by the school should be safe, evidence-informed, appropriate to need and suitable for the phase of education.

- promote positive mental wellbeing and prevention;
- observe and identify early signs of mental health difficulty;
- provide early targeted support where appropriate;
- refer to specialist services or the IB-Salut child and adolescent mental health service (through the child's paediatrician or GP), Urgències Pediàtriques at Hospital Universitari Son Espases, or the 024 crisis line where needed;
- act immediately where there is risk of harm, self-harm or exploitation.
- At Sa Porrassa, in-school wellbeing support is coordinated by the Leader of Wellbeing, Fiona Von Waberer, with the DSLs.

17. Children with SEND, Health Conditions and Young Carers

Children with SEND, disabilities or health conditions may face additional safeguarding barriers. Staff must avoid assuming that signs of abuse, neglect or exploitation are explained by a child's condition without further professional curiosity.

KCSIE 2026 introduces specific emphasis on young carers and safeguarding children with medical conditions. Staff must be alert to how caring responsibilities or unmet medical needs may affect attendance, attainment, behaviour and wellbeing.

Group	Safeguarding expectations
Children with SEND or disability	Ensure accessible reporting routes, reasonable adjustments, close liaison between DSL and SENCo, and careful consideration of communication barriers.
Children with medical conditions	Consider whether repeated absence of medication, failure to provide medical information or unmanaged health needs indicate neglect, abuse or exploitation.
Young carers	Identify caring responsibilities early and consider how they affect attendance, learning, behaviour, fatigue, anxiety and emotional wellbeing.
Children with language barriers or EAL	Provide accessible communication and avoid assuming silence means absence of concern.
Children with mental health needs	Ensure concerns are not dismissed as "just mental health" where safeguarding indicators are present.

18. Children with a Social Worker, Looked-After and Previously Looked-After Children

Some children need a social worker due to safeguarding or welfare needs. The school recognises that adversity and trauma can create barriers to attendance, learning, behaviour and mental health, as well as increasing vulnerability to further harm.

Where the school is aware that a child has a social worker, the DSL will consider this information when making decisions about safeguarding, attendance, exclusions/suspensions, pastoral support, curriculum access and transitions.

- Maintain details of social workers and care arrangements securely.
- Where parents are separated, the school holds and reviews a copy of the custody arrangements, keeps them up to date on the school's information system, and communicates with each parent separately where this is consistent with the court order and the law.
- Ensure relevant staff know what they need to know to support the child.
- Work with the child's social worker at municipal social services or IMAS where relevant.
- Recognise attendance as a key safeguarding factor.
- Ensure safeguarding records transfer securely when children move school.

19. Trans and Gender-Questioning Students

Baleares International College supports trans and gender-questioning students in line with Spanish and Balearic law: Ley 4/2023; Llei 8/2016, in particular Article 12.7, which requires schools to be a welcoming and respectful environment in which students can live their sexual orientation, gender identity and gender expression freely; and the Conselleria d'Educació i Universitats' Protocol d'acompanyament a l'alumnat trans* als centres educatius de les Illes Balears. Where guidance written for schools in England differs, Spanish and Balearic law applies.

Recognition of a student's gender identity is never conditional on a medical diagnosis, medical treatment or a psychological report.

A request for support may come from the student, from their parents or carers, or from a member of staff or the school community. Where it does not come from the parents or carers, the school arranges a meeting with the family, unless this would place the student at risk of harm, in which case the DSL decides what safeguarding action to take.

The Principal informs the staff who need to know. The student's tutor and a member of the pastoral or SEND team meet the student and family, explain the Conselleria protocol and the LGTBI support services available, and record in writing the measures agreed. The agreement is reviewed at least once a year.

For students under 18, the family's written consent to the agreed measures is sought, as the protocol requires, unless the student can exercise the right independently under Article 9 of Ley Orgánica 1/1996 and Article 154 of the Código Civil. If the family does not agree, the school works with the family, with support from the Inspecció Educativa, to reach agreement, with the student's best interests as the primary consideration.

The measures agreed may include:

- use of the student's chosen name in class lists, registers, displays and all internal and non-official documents, shown in the same way as other students' names; official documents keep the legal name until it is changed on the student's identity documents;
- access to toilets and changing facilities in line with the student's gender identity;
- uniform, including PE kit, in line with the student's gender identity;
- arrangements for sport, trips and residentials that take account of the student's gender identity where activities or rooms are separated by sex, agreed in advance with the student and family;

- where a student uses a chest binder, making sure PE staff know the associated health risks so that they can support the student safely.

A student's trans status is confidential. It is shared only with the staff who need to know in order to support the student, and is not disclosed to other students or families.

The school acts to prevent and respond to LGTBI-phobic bullying and harassment under the Behaviour Policy and this policy, and trains staff accordingly. Safeguarding duties are unaffected: any concern about a trans or gender-questioning student's safety or wellbeing is reported to the DSL in the usual way.

20. Attendance, Missing Education and Temporary Accommodation

Attendance is a safeguarding matter. Absence, persistent lateness, unexplained absence, sudden changes in attendance or missing education may indicate abuse, neglect, exploitation, mental health concerns, caring responsibilities, accommodation instability or other safeguarding risks.

The school will use attendance information alongside pastoral, safeguarding and academic information to identify children who may need help or protection.

- follow the school's attendance procedures and the Balearic absentisme escolar protocol;
- notify the DSL where attendance patterns indicate safeguarding risk;
- consider children with social workers, young carers, SEND and mental health concerns;
- maintain safe admission, withdrawal and transfer procedures;
- consider temporary accommodation or unstable housing as a potential vulnerability.

Compulsory education in Spain runs to the age of 16. Where absence is persistent or unexplained, the school follows the Balearic absentisme escolar protocol and considers notification to municipal social services, alongside its own attendance procedures. Attendance data is reviewed alongside safeguarding records at least termly.

21. Allegations, Low-Level Concerns and Whistleblowing

Concerns or allegations about staff, supply staff, agency staff, contractors, volunteers, governors or other adults must be reported immediately in accordance with the Group Allegations Against Staff Policy and local procedures.

Where the concern relates to the Principals Alison Colwell (SAP) or Andrew Beavon (SAN), staff must report to Jonathan Dey, Regional Head of Schools. Where there is a conflict of interest, or the concern relates to the Regional Head of Schools, staff must report to Michael Clack, Director of Education and Group Safeguarding Lead.

KCSIE 2026 clarifies that where allegations involve supply teachers, trainee teachers or contracted staff, schools and third-party organisations share safeguarding responsibilities. The school remains responsible for gathering the facts and managing the safeguarding process while liaising with the employing agency or business.

Concern type	Action
Allegation that may meet harm threshold	Report to the Principal (Alison Colwell, SAP; Andrew Beavon, SAN) or, if the allegation concerns the Principal, to the Regional Head of Schools (Jonathan Dey). Follow allegations policy and local statutory referral route.
Low-level concern	Record and report to the Principal in accordance with the Staff Code of Conduct and the Allegations Against Staff Policy. Review patterns and ensure appropriate response.
Whistleblowing concern	Report to the Principal or Regional Head of Schools, in confidence, where safeguarding practice is unsafe, poor or potentially failing.
Concern involving third-party staff	School gathers facts and manages safeguarding response while liaising with the agency/provider.
Immediate risk	Contact 112 or the police immediately and inform DSL/Principal as soon as possible.

There is no equivalent of the English local authority designated officer (LADO) in Spain. Allegations are managed through the Group route set out above, together with notification to the police or the Fiscalía de Menores where an offence may have been committed, and to municipal social services or IMAS where the child needs protection. Where the allegation concerns a person in habitual contact with children, the school also reviews that person's continued access to children pending the outcome.

22. Safer Recruitment and Suitability

Safer recruitment is a core safeguarding control. This policy should be read alongside the Group Safer Recruitment Policy, Safer Recruitment Commitment and School HR procedures.

No adult should work unsupervised with children unless required safeguarding, identity, suitability and local legal checks have been completed or a written risk assessment has been approved in exceptional circumstances. A risk assessment can never replace the certificado negativo, which must be held before any habitual contact with children begins.

- advertisements must state safeguarding commitment;
- application forms must include full employment history;
- shortlisting must assess gaps and concerns;
- interviews must include safeguarding questions;
- references must be obtained directly;
- identity, qualification, right-to-work and criminal-record checks must be completed;
- overseas checks must be completed where required;
- volunteers, contractors, agency staff and third-party adults must be risk assessed and checked appropriately;
- the Single Central Record (SCR) must be accurate and regularly reviewed.

Checks required in Spain

The following checks are required in addition to, not instead of, the Group Safer Recruitment Policy. They apply to teaching and support staff, leaders, volunteers, contractors, agency staff, coaches and any other adult in habitual contact with children, whether paid or unpaid.

Check	Requirement
Certificado negativo del Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos	Required by Article 57 LOPIVI before any adult has habitual contact with children. A positive certificate, or failure to produce a negative certificate, prevents the person working with children.
Home-country criminal record certificate	Non-Spanish nationals must additionally provide a criminal record certificate from their country of nationality and, where different, of previous residence, translated and legalised or apostilled. This is essential at this school given the proportion of staff recruited from the United Kingdom and elsewhere.
UK criminal record check (ACRO ICPC, or DBS where lawfully available)	For candidates who have lived or worked in the United Kingdom, an ACRO International Child Protection Certificate (or a DBS check where one can lawfully be obtained), in line with the BSO Standards and KCSIE expectations for overseas recruitment.
Teaching Regulation Agency prohibition check	Carried out for teaching staff. A section 128 check is carried out for those in leadership or management roles.
Online search of shortlisted candidates	Carried out on shortlisted candidates as part of due diligence, and recorded proportionately.
Identity, right to work and qualifications	Passport or national identity document, NIE and social security registration where applicable, and verification of qualifications with the awarding body.
References	Obtained directly from the employer, never from the candidate, and scrutinised for gaps in employment history.
Single Central Record	All checks recorded on the SCR, which is maintained accurately and reviewed regularly. The SCR is examined at BSO inspection.

- No adult works unsupervised with children until the required checks are complete, unless a written risk assessment has been approved by the Principal in exceptional circumstances. No risk assessment can replace the certificado negativo required by Article 57 LOPIVI, which must be held before any habitual contact with children.
- Staff and volunteers in habitual contact with children renew their certificado negativo every two years, and the renewal date is recorded on the single central record.
- The school does not rely on supervision as a reason to omit any required check.

23. Record-Keeping and Safeguarding File Transfer

All safeguarding concerns, discussions, decisions and reasons must be recorded in writing. Records must be clear, factual, timely, dated, signed or attributable, secure and stored separately from the main pupil file where required.

Safeguarding records must distinguish between fact, allegation, professional judgement and action taken. Records must be accessible only to those with a professional need to know.

When a child moves school, the DSL will ensure safeguarding records are transferred securely, separately from the main file, and in time to enable the receiving school to put support in place. Where concerns are significant or complex, the DSL should speak directly with the receiving DSL.

- clear summary of concern;

- child's words where relevant;
- date, time and location;
- people involved;
- action taken and by whom;
- advice received;
- decisions and rationale;
- referrals made;
- support/risk plan and review dates;
- information shared and with whom.

Local recording arrangements

- All safeguarding concerns, discussions, decisions and the reasons for them are recorded on CPOMS.
- Historical paper records are held in locked filing cabinets in the DSL office, with access restricted to the DSLs. Safeguarding records are retained for at least ten years after the student leaves the school, and in any case until the student reaches 25, and are then reviewed and securely destroyed unless there is a reason to keep them longer.
- Where a child with safeguarding concerns moves school, the DSL, after informing the Principal, forwards the child protection file securely and separately from the main student file, within five days for an in-year transfer or within the first five days of a new term. Where concerns are significant or complex, the DSL speaks directly to the receiving DSL. Where the receiving school is a Spanish state or concertado school, the file is transferred through CPOMS where that school uses it; otherwise the DSL contacts the school directly to agree a secure transfer.

24. Training

All staff must receive safeguarding and child protection training at induction and regular updates thereafter. Training must be integrated with the whole school safeguarding approach, online safety, behaviour, attendance, curriculum, pastoral support and staff conduct.

DSLs and Deputy DSLs must receive appropriate specialist training and regular updates to maintain their knowledge and skills. Board members must receive safeguarding training sufficient to provide strategic challenge and assurance.

Audience	Minimum training expectations
All staff	Induction, annual updates, reporting procedures, online safety, filtering and monitoring, child-on-child abuse, confidentiality, information sharing and local referral routes.
Staff working directly with children	Assigned KCSIE Part 1 reading, specific safeguarding issues, professional curiosity and disclosure response.
DSL / Deputy DSL	Specialist training at required intervals, annual updates, local agency arrangements, information sharing, online safety, mental health, exploitation and allegations.
Ariston Education (proprietor)	Strategic safeguarding responsibilities, policy oversight, safer recruitment, allegations, online safety and challenge role.
Contractors / volunteers	Role-appropriate safeguarding induction, code of conduct, reporting route and supervision expectations.

Audience	Minimum training expectations
Recruitment panels	Safer recruitment training aligned with Group policy and local arrangements.

Local training requirements

- LOPIVI requires specific training in child protection for staff in habitual contact with children, and specialist training for the Coordinador/a de bienestar y protección. This is in addition to Group training requirements.
- Staff working directly with children read Part 1 of Keeping Children Safe in Education and sign an annual declaration.
- Training covers the RUMI notification route, the local referral map in section 10 and the contacts in section 6.1, so that staff can act without needing to look up a process in a crisis.
- DSLs and Deputy DSLs undertake child protection training at least every two years and update their knowledge at least annually.
- At least one member of every interview panel has completed safer recruitment training.
- The school will ensure that the safeguarding team has access to Spanish or Catalan language support (for example through the Directora Técnica or School HR) to deal directly with social services, the police and the Fiscalía without relying on families or students to interpret.

25. Monitoring and Review

This policy will be reviewed annually by Principals Alison Colwell (SAP), Andrew Beavon (SAN), DSLs Stuart Cadman, Fiona Von Waberer (SAP), Mel Eccleshall (SAN) and sooner if statutory guidance, Group requirements, inspection findings, audit outcomes, serious incidents or local legal requirements change.

Compliance will be monitored through safeguarding audits, training records, record-keeping checks, recruitment checks, online safety review, filtering and monitoring review, case sampling and governance assurance.

Each month the Principal sends the Regional Head of Schools a safeguarding report summarising concerns by level of seriousness, in line with the Group Safeguarding Tier Matrix.

This is established practice. The DSL enters the data on the Group safeguarding reporting platform, but the report remains the Principal's responsibility.

At every review the policy will be approved through the school's governance arrangements and published on the school website. A copy is provided to parents on request.

26. Related Policies

This policy should be read alongside the following policies.

- Safer Recruitment Policy;
- Safer Recruitment Commitment;
- Allegations Against Staff Policy;
- Staff Code of Conduct;
- Whistleblowing (internal information system under Ley 2/2023): confidential reporting to the Principal or, where the concern is about the Principal, to the Regional Head of Schools;

- Online Safety Policy;
- Privacy Policy;
- Behaviour Policy (including the school's phone-free rules);
- Attendance Policy;
- Risk Assessment Policy (including educational visits);
- SEND Policy (Sa Porrassa and Sant Agustí);
- Health and Safety Policy;
- Incident & Accident Reporting Policy (which replaces the Accident Report and First Aid Policy);
- RSE Policy and RSE Statement;
- Balearic assetjament escolar (anti-bullying) protocol;
- Complaints Policy;
- Early Years policies and procedures;

27. Balearic and Spanish Requirements

This section records requirements that apply to this school because of its location and status, and which are not covered, or not covered correctly, by the Ariston Group policy.

27.1 Precedence of host-country law

The BSO Standards provide that where the Standards and host-country law conflict, host-country law takes precedence, and that departures are notified to the inspectorate for inclusion in the inspection report. The school will maintain a register of such departures and inform the inspectorate of them. The areas identified so far are set out below.

Area	Position at this school
Criminal record checks	Spanish law requires the certificado negativo del Registro Central de Delincuentes Sexuales. UK checks (ACRO International Child Protection Certificate) are obtained in addition for anyone who has lived or worked in the United Kingdom.
Searching students and devices	The English powers of search, screening and confiscation do not apply. See section 15.
Age of criminal responsibility	Fourteen in Spain, not ten. Suspected offences by children under 14 are still reported; the Fiscalía de Menores refers them to child protection services.
Mandatory FGM reporting	No teacher-specific mandatory reporting duty exists in Spain, but the LOPIVI and LECrim duties apply. See section 12.
Gender-questioning children	The Group process based on guidance for schools in England is replaced by the Balearic Protocol d'acompanyament a l'alumnat trans*, in line with Ley 4/2023 and Llei 8/2016. See section 19.
Data protection	EU GDPR and the LOPDGDD apply. The UK Data Protection Act 2018 does not.
Statutory referral route	RUMI, municipal social services, IMAS and the Fiscalía de Menores replace the English children's social care and LADO arrangements. There is no LADO equivalent in Spain; allegations against staff follow the Group route together with referral to the police or Fiscalía where an offence may have been committed.

27.2 Notifying parents and carers

Parental responsibility in Spain, patria potestad, gives both parents extensive rights to information about their child unless a court has ordered otherwise. Where appropriate, the DSL discusses concerns with parents or carers. Other staff only do so after consulting the DSL. Where notifying parents or carers would increase the risk to the child, the DSL discusses this with municipal social services or IMAS before deciding. In cases of alleged abuse between students, the parents or carers of all children involved are normally notified, with care taken over what information is shared about another family's child.

27.3 Complaints about safeguarding

Complaints against staff likely to require a child protection investigation are handled under section 21 and the Group Allegations Against Staff Policy, not the general complaints procedure. Concerns about the way the school safeguards students, including poor or unsafe practice, are raised with the Principal or the Regional Head of Schools, in confidence. Families may also raise concerns directly with the Conselleria d'Educació i Universitats, with the Oficina Balear de la Infància i l'Adolescència, or with the Fiscalía de Menores, and the school does not discourage them from doing so.

27.4 Student reporting routes

Students can raise a concern with any member of staff, with their tutor, with the Leader of Wellbeing or directly with a DSL. Students are regularly reminded that they can disclose in person or by email, in confidence, to their tutor, the DSL team or the wider pastoral team, while being told honestly that information will be shared where this is needed to keep them or others safe. Concerns raised by students are logged on CPOMS and categorised by the DSL. Reporting routes are promoted to students so that they are well understood and easy to use, and students are told how their concern will be handled.

27.5 Early Years

In the Early Years, each child is assigned a key person. Staffing ratios are maintained in line with the requirements applying to the setting. Early Years provision (Nursery and Reception) is at Sant Agustí only. There, the safe use of technology, mobile phones and cameras in Early Years areas is overseen by the Principal, Andrew Beavon, with the DSL.

27.6 Images of children

Consent for the use of a child's image is governed by Ley Orgánica 1/1982 and by data protection law, and is more restrictive than in England. Photo permissions will be recorded for every child and reviewed regularly, and staff check them before any image is taken or used. Staff must not photograph or record students on personal devices.

Document Approval

Role	Name and signature	Date
Global DSL / Group Safeguarding Lead	M W Clack	08/08/2026
Director of Education	M W Clack	08/08/2026
Chief Executive Officer	_____	_____

Role	Name and signature	Date
Chair, Group Board / Board Safeguarding Committee	_____	_____
Principal, Baleares International College (Alison Colwell, SAP; Andrew Beavon, SAN)	_____	_____