



FRAM Primary School

No.4 Berăriei Street, Habermann Square
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E-mail:administrative@framschool.com

NAVIGATE YOUR OWN JOURNEYS OF LEARNING AND SELF-DISCOVERY IN AN EXCITING FUTURE

FRAM CHILD PROTECTION POLICY

FRAM School is wholeheartedly dedicated to creating a safe, secure, and nurturing environment where every child learns and develops free from the threat of harm, abuse, or neglect. We recognize that safeguarding is everyone's responsibility—staff, governors, parents, and children alike—and is fundamental to the ethos of the school.

This Child Protection Policy articulates our unwavering commitment to protect children's rights, promote their welfare, and uphold their safety as a top priority. It provides clear guidance on our roles and responsibilities, procedures for identifying and responding to concerns, and our promise to act swiftly, objectively, and with the utmost confidentiality when safeguarding issues arise.

Our overarching goal is to foster an environment where children feel valued, listened to, and protected, encouraging them to grow into confident, resilient individuals. We believe that safeguarding is integral to high-quality education and a positive school culture, and we are committed to implementing best practices in line with legal requirements and international safeguarding principles.

Legal and Statutory Framework

This policy is designed to comply fully with the laws, regulations, and guidance governing child protection and safeguarding within Romania. It reflects our commitment to uphold children's rights and their protection according to national legal standards.

Key Romanian Legislation and Guidance:

- Law no. 307/2004 on the Protection and Promotion of Children's Rights - The primary legislation recognizing children's rights, detailing obligations for institutions and professionals working with children to ensure their safety, well-being, and development.
- Law no. 272/2004 on the Protection and Promotion of the Rights of the Child - Reinforces the child's right to protection from harm, abuse, neglect, exploitation, and all forms of violence.
- Law no. 217/2003 regarding the Prevention and Combat of Domestic Violence - Addresses safeguarding children from violence within the family environment.



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- Emergency Ordinance no. 123/2005 regarding the Prevention and Combating of Child Exploitation and Abuse - Lays out specific measures, reporting procedures, and protocols for protecting children from exploitation and abuse.
- Law no. 51/2006 regarding the pre-university education system - Supports the integration of safeguarding policies into the educational environment.
- National Child Protection and Welfare Policies issued by the Ministry of Education and the National Authority for Child Protection (ANPDC) - Provide further guidelines and best practices for safeguarding in educational settings.

International and EU Principles

In addition to Romanian legislation, FRAM School aligns with international conventions such as the United Nations Convention on the Rights of the Child (UNCRC), ratified by Romania, emphasizing the right of children to protection, participation, and a safe environment.
Implementation and Oversight

The school's governance, led by the School Board, ensures compliance with these legal obligations. The Designated Safeguarding Lead (DSL) and authorized staff are responsible for implementing this policy, conducting regular training, and liaising with local child protection authorities, such as the Child Protection Services (Serviciul de Protecție a Copilului), Police, and Health Authorities.

Staff Training and Awareness

All staff are required to undergo training in child protection laws and procedures, ensuring they understand their roles in safeguarding and know how to report concerns in accordance with Romanian legal standards.

Aims of the Policy

1. To create a safe, nurturing environment where children are protected from harm, abuse, and neglect.

FRAM School is dedicated to fostering an atmosphere in which every child feels secure, respected, and valued. We aim to prevent incidents of harm through proactive safeguarding measures, a positive school ethos, and ongoing education on safety, boundaries, and rights.



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Our environment encourages children to express concerns and seek support without fear of repercussion or stigma.

2. To ensure all staff, volunteers, and governors understand their responsibilities regarding child protection and safeguarding.

All members of our school community must be fully aware of their legal and moral duties to protect children. This includes recognizing the signs of abuse, understanding how to respond to concerns, and knowing the procedures for reporting. We are committed to delivering regular training, clear policies, and ongoing support to ensure everyone knows how to act in the best interests of children.

3. To respond swiftly, professionally, and appropriately to any concerns, disclosures, or allegations of abuse or neglect.

Our priority is the immediate safeguarding of children. When concerns are raised, we will act without delay—listening carefully, documenting accurately, and following established procedures. We recognize the importance of early intervention and aim to minimize trauma, provide support, and ensure the child's safety through prompt and proportionate action.

4. To work collaboratively with external agencies, including child protection authorities, social services, law enforcement, and health professionals, to safeguard children effectively.

Safeguarding is a shared responsibility beyond the school environment. We will establish trusted relationships and open communication channels with external agencies, ensuring coordinated efforts to protect children. We will seek advice, share relevant information, and follow multi-agency protocols to provide a comprehensive support system that addresses the child's needs holistically.

5. To promote a school culture rooted in respect, kindness, and resilience, which helps prevent safeguarding issues.

By embedding our core values into the curriculum and school life—such as respect, tolerance, and emotional literacy—we aim to build a positive environment that reduces risks and encourages children to develop healthy relationships and self-awareness.

6. To monitor, review, and improve our safeguarding practices continuously.

We are committed to regularly evaluating the effectiveness of our safeguarding policies, staff training, and procedures. Feedback from staff, students, and parents informs our ongoing efforts to strengthen our safeguarding approach and adapt to new challenges, ensuring the safety and well-being of our community remains at the forefront.



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Core Principles

1. The welfare of the child is paramount.

The safety, health, and well-being of each child are our top priorities. All actions and decisions regarding safeguarding will focus on protecting the child's best interests, ensuring they grow, learn, and develop in a secure environment free from harm.

2. All children have the right to protection from harm and to express their views.

Every child is entitled to a safe environment where their rights are respected. Children should feel confident to share their feelings, concerns, and opinions. Their voices will be heard and taken seriously, respecting their right to participation and agency in safeguarding processes.

3. Safeguarding is everyone's responsibility.

Protecting children is a shared duty across the entire school community—teachers, support staff, governors, volunteers, and even pupils themselves. Everyone has a proactive role in creating a safe environment, recognizing concerns early, and acting appropriately to protect children from harm.

4. Confidentiality should be maintained appropriately but never at the expense of a child's safety.

Sensitive information about safeguarding concerns must be handled with care to respect privacy and foster trust. However, safeguarding takes precedence over confidence when a child's safety is at risk. Information sharing will be conducted in line with legal and school procedures to ensure effective protection.

5. Children should be listened to and their concerns taken seriously.

All staff must listen attentively, demonstrate empathy, and validate children's experiences. Children's disclosures or worries must be treated with respect and urgency, leading to appropriate actions that safeguard their interests and well-being.

Staff Responsibilities

Responsibility	What Staff Should Do	Key Points
Attend training	Participate in safeguarding training and keep updated	Regular training ensures awareness of current policies and procedures.

Recognize signs	Be vigilant for physical, emotional, or behavioral indicators of abuse or neglect	Early recognition helps protect children effectively.
Respond appropriately	Calmly listen and support if a child discloses abuse or shows concerning behavior	Always act with sensitivity, ensuring the child's safety and comfort.
Record concerns	Document all concerns factually and promptly	Include dates, times, locations, and exact words; share with the DSL immediately.
Avoid investigating personally	Do not investigate or question beyond listening	Leave investigations and decisions to trained safeguarding professionals.
Maintain confidentiality	Share information only with the DSL or relevant authorities	Respect privacy but prioritize child safety over confidentiality when necessary.
Promote a safe environment	Encourage respect, inclusivity, and open communication	Foster trust and ensure children feel safe to speak up.

Recognizing Abuse

1. Neglect

Neglect involves failure to meet a child's basic needs and can have serious long-term effects. Staff should be alert to:

- **Poor hygiene:** Consistently unwashed or soiled clothing, foul odor, untreated lice or skin conditions.
- **Malnutrition or underweight:** Noticeable weight loss, persistent hunger, or nutritional deficiencies.
- **Frequent absences or lateness:** Repeated truancy or irregular attendance without valid reasons, which may indicate neglect at home.

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- **Untreated medical issues:** Medical or dental problems that are neglected or untreated, such as persistent ear infections or untreated injuries.
- **Inadequate clothing:** No warm clothing in cold weather or clothing inappropriate for weather conditions.
- **Poor personal care:** Dirty hair, unkempt appearance, or worn-out clothes.
- **Emotional signs:** Low self-esteem, withdrawal from peers, or lack of social skills.
- **Lack of supervision:** Being left alone for extended periods or inadequate adult supervision, especially for younger children.
- **Constant tiredness:** Fatigue during school hours, which may signal poor living conditions or behind-the-scenes neglect.

Physical Abuse

Physical abuse leaves visible injuries or signs that are often inconsistent with explanations. Look for:

- **Unexplained bruises, burns, or scars:** Bruises that have multiple shapes or patterns, burns with clear edges, or scald marks.
- **Repeated injuries: Multiple injuries or injuries in various stages of healing.**
- **Injuries at unusual sites:** Injuries on the torso, buttocks, or back that are inconsistent with the child's explanation.
- **Fractures or dislocations:** Broken bones, particularly if found at different stages of healing, which may suggest repeated abuse.
- **Injuries inconsistent with the child's explanation:** Discrepancies between what is said and the injury observed.
- **Signs of restraint:** Marks around wrists, ankles, or other areas suggestive of being restrained.
- **Unexplained or suspicious patterns:** Injuries shaped like objects, or injuries that match known abusive techniques.
- **Fearfulness or anxiety:** Child appears fearful of physical contact or reacts anxiously to touch.

Sexual Abuse

Indicators may be physical, behavioral, or emotional. Staff should be alert to:

- **Physical signs:** Genital or anal pain, itching, bleeding, or discharge; urinary infections or sexually transmitted infections.

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- **Behavioral changes:** Withdrawal from social interactions, difficulty trusting others, regression to earlier behaviors (e.g., bedwetting, thumb-sucking).
- **Inappropriate sexual knowledge:** Child discusses sexual acts or knowledge beyond their age.
- **Sudden emotional changes:** Anxiety, depression, aggression, or fears related to specific individuals or environments.
- **Avoidance behaviors:** Refusal to be with certain individuals, flinching or recoiling from physical contact.
- **Unexplained injuries or presence of objects:** Unusual bruises or injuries in private areas, or signs of self-harm.
- **Inappropriate sexualized behavior:** Acting thematically sexual in their speech, play, or drawings, especially if inconsistent with age.

Emotional Abuse

Emotional abuse may be more difficult to detect but can cause lasting damage. Signs include:

- **Low self-esteem and self-worth:** Child frequently speaks negatively about themselves.
- **Withdrawal and isolation:** Avoidance of social interactions and reluctance to participate.
- **Anxiety, fearfulness, or excessive worry:** Especially in response to particular individuals or situations.
- **Sudden behavioral shifts:** Acting out, aggressive behavior, or regression to earlier stages of development.
- **Developmental delays:** Physical or emotional setbacks inconsistent with age.
- **Unexplained fears:** Fear of being abandoned or fears related to specific people or places.
- **Eating or sleeping problems:** Changes in appetite, sleep disturbances, or eating disorders.
- **Self-harm or suicidal thoughts:** Signs of emotional distress indicating profound psychological harm.
- **Lack of trust in adults:** Difficulty forming relationships or expressing emotions openly.

Reporting and Responding to Incidents

1. Recognizing and Reporting Concerns

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- Any staff member who observes or receives disclosures of harm, abuse, or concerning behaviors must respond calmly, listen actively, and record the facts.
- Concerns must be reported immediately to the Designated Safeguarding Lead (DSL) through secure channels through the incident report form or a written report through Kinderpedia.

2. Gathering Facts Objectively

- The DSL and designated safeguarding staff will gather information from multiple sources: the child, teachers, support staff, peers, and relevant documentation.
- All collected data and observations must be factual, objective, and free from assumptions or opinions.
- The environment, context, and patterns of behavior are considered holistically—that is, in relation to the child's overall situation and environment.
- The process involves respect for the child's rights, privacy, and emotional states, maintaining a child-centered focus.

3. Assessing Impacts

- The impact of incidents on the child's learning, emotional well-being, and environment is carefully evaluated.
- The school assesses how the incident or concern could affect the child's ability to participate in and benefit from the educational environment.
- Any necessary support or external intervention is initiated based on this holistic assessment.

Mechanisms for Action

4. Confidentiality and Data Management

- All safeguarding records, reports, and evidence are stored securely in accordance with data protection legislation and school policies.
- Access to sensitive information is restricted to authorized personnel of the Welfare and Pastoral Care Department.
- School documentation (*e.g., Child Protection files*) is maintained separately from general academic records.

5. Child-Centered and Supportive Approach

- Throughout investigations, the child's safety, well-being, and wishes are prioritized.
- Interventions aim to minimize distress; evidence collection uses respectful, non-intrusive methods.



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- The school works collaboratively with external agencies when required, ensuring the child's best interests remain central.

Use of Communication Platforms and Technology

6. Child Protection and Communication

- The school primarily uses KidPeria (or similar secure platforms) for documenting and communicating safeguarding concerns.
- Alternative communication methods such as emails or official report forms are used to prevent information leakage.
- The use of apps or platforms that may compromise or leak personal or visual information of children (*e.g., unofficial messaging apps*) is strictly avoided unless approved and secure.

7. Protecting Confidentiality and Privacy

- Personal or photographic data of children are not stored or shared via insecure apps or social media.
- Any photos or videos for safeguarding purposes are stored securely and only circulated internally within approved protocols.
- Staff are trained in digital safeguarding to minimize risk of leakage or misuse of personal data.

Handling Incidents

8. Investigation Protocol

- Once a concern is reported, the DSL initiates an impartial, comprehensive investigation.
- The process includes interviewing relevant individuals, reviewing documentation, and observing the child's environment.
- The focus remains on collecting facts objectively, considering the wider context and environment.

9. Impact on Academic and Social Environment

- The investigation and subsequent actions are planned to minimize disruption to the child's education and social development.
- Support services (counselors, external agencies) are engaged as needed to support recovery and well-being.

10. Decision-Making and Follow-up



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- Based on factual findings, the DSL determines appropriate actions: support, safeguarding referral, disciplinary measures, or other interventions.
- Transparency with the child and family is maintained, respecting confidentiality.
- All actions are documented with clear records of decisions, follow-up plans, and outcomes.

Training, Monitoring, and Policy Review

- Staff will be trained regularly on safeguarding procedures, incident management, and confidentiality protocols.
- Incidents, concerns, and actions are reviewed periodically to improve safety practices.
- The policy itself is reviewed annually or following significant safeguarding incidents, ensuring continuous improvement.

Supporting Children at Risk

1. Acting in the Child's Best Interests

When a concern about a child's safety or wellbeing is raised, the school will prioritize the child's welfare above all other considerations. This involves:

- Conducting a thorough and objective assessment of the situation.
- Ensuring that any necessary support actions are timely, appropriate, and sensitive to the child's needs.
- Carefully considering the potential impact of any intervention or referral on the child's emotional and physical well-being.

2. Arranging Support or External Referral

The school will:

- Provide immediate in-school support, such as pastoral care or counseling, where appropriate.
- Collaborate with external agencies, such as child protection services, mental health professionals, or medical providers, to ensure the child receives specialized assistance.
- Facilitate referrals in accordance with local legal procedures and in partnership with parents or guardians, unless doing so might place the child at further risk.

3. Ensuring Confidentiality and Respect

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- Personal information related to safeguarding concerns will be handled with the utmost confidentiality.
- Details will only be shared with individuals who have a legitimate need-to-know (e.g., the Designated Safeguarding Lead, external agencies involved in safeguarding or support).
- Information sharing will adhere strictly to legal frameworks and school policies, including the General Data Protection Regulation (GDPR) in Romania or relevant national privacy laws.

4. Maintaining Child's Safety and Dignity

- Throughout the support process, the child's safety, privacy, and dignity are always at the forefront.
- Support and interventions are carried out discretely, ensuring the child feels respected and protected from any form of discrimination, humiliation, or stigma.
- The child's views, wishes, and feelings are actively sought and incorporated into decision-making, where appropriate, in a manner that is age-appropriate and sensitive.

5. Monitoring and Follow-up

- Ongoing monitoring of the child's situation is critical to ensure the effectiveness of support measures.
- The school will review the child's wellbeing regularly, adjusting the level of support as needed.
- Staff involved in supporting the child will document actions taken and outcomes, always respecting confidentiality.

Allegations Against Staff (Romanian Context)

1. Immediate Reporting

Any concerns, suspicions, or allegations involving staff, volunteers, or other adults must be reported immediately to the Designated Safeguarding Lead (DSL) or an official in charge, in accordance with Law no. 272/2004 on the Protection and Promotion of Children's Rights and Law no. 303/2004 (regarding the legal regime of acts of misconduct, which also regulates misconduct in the workplace). Romanian legislation mandates that any suspicion of child abuse or misconduct by staff must be treated as a serious matter, handled with urgency and confidentiality.

2. Legal Protections and Procedures



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- The school will follow Directive no. 1476/2019 issued by the Romanian Ministry of Education, which details protocols for handling allegations against staff in educational settings.
- As per Law no. 272/2004, the school is required to collaborate with Child Protection Authorities and Law Enforcement (Poliția Română) in criminal cases.
- The Labor Code of Romania (Law no. 53/2003) regulates employment rights, including disciplinary procedures, suspension, and termination, which must be adhered to during investigations.
- All investigations will be prompt, fair, and impartial, ensuring the rights and dignity of the accused staff member, and respecting legal confidentiality standards.

3. School Responsibilities

- The school will initiate suspension or interim measures if the allegation involves serious misconduct, following legal advice and safeguarding protocols, to protect children while investigations proceed.
- The process will align with an internal disciplinary protocol in adherence to Romanian labor law and regulations on child protection.
- The school will document all actions taken, from reporting to investigation, maintaining records in line with GDPR and Romanian laws on personal data.

4. External Involvement

When necessary, the school will notify Child Protection Services (Direcția Generală de Asistență Socială și Protecția Copilului - DGASPC) and law enforcement authorities, particularly in cases of criminal conduct like abuse or exploitation.

5. Rights of the Staff Member

- The staff member will be informed of the allegations against them and will have the right to respond and be assisted during the process.
- The process will be transparent and in line with Labor Law provisions, ensuring protection against wrongful accusations.

6. Post-Investigation Actions

- Depending on findings, actions may include disciplinary sanctions, retraining, or legal proceedings.
- The school will support the child throughout, providing access to counseling and monitoring their ongoing development and safety.



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NAVIGATE YOUR OWN JOURNEYS OF LEARNING AND SELF-DISCOVERY IN AN EXCITING FUTURE

Highly problematic behaviors/reactions that are inconsistent with FRAM Safeguarding, Behavioral and Child Protection Policies and that are to be avoided at all costs.

Age Group	What NOT to Do (Unacceptable Behaviors)	Examples	Severity & Consequences
Nursery (0-3 years)	Rough handling, neglect, ignoring needs	Handling infants roughly, leaving babies unattended, ignoring basic needs	Severe: Immediate disciplinary action, termination, or legal consequences
	Yelling, shouting, or shouting loudly	Yelling at infants or toddlers during routine care	Severe: Disciplinary action, possible suspension or legal issues
	Physical contact without consent	Handling babies roughly or touching inappropriately	Severe: Immediate termination, legal action
	Calling infants negative labels ("bad," "naughty")	Using negative words about infants	Moderate/Severe: Damages attachment, emotional security
	Ignoring emotional or physical signals	Overlooking crying, fears, or pain	Severe: Emotional damage, neglect charges
Preschool (4-6 years)	Physical punishment, threats, shouting	Pushing, hitting, aggressive language	Severe: Suspension, dismissal, legal action
	Favoring some children unfairly	Giving extra attention to certain children	Moderate: Could lead to disciplinary review

NAVIGATE YOUR OWN JOURNEYS OF LEARNING AND SELF-DISCOVERY IN AN EXCITING FUTURE

	Public humiliation or name-calling	Calling children “lazy,” “bad” in front of peers	Severe: Emotional trauma, damage trust
	Using negative labels (“stupid,” “troublemaker”)	Name-calling persisted	Moderate/Severe: Low self-esteem, social harm
	Ignoring student feelings or emotional cues	Dismissing fears or worries	Severe: Emotional neglect, long-term harm
Early Primary (6-8 years)	Harsh discipline, unpredictable punishment	Detention, yelling for minor faults	Severe: Disciplinary action, possible termination
	Bullying or social exclusion	Ignoring bullying reports	Severe: Emotional trauma, social withdrawal
	Disrespect, dismissiveness	Talking down, ignoring opinions	Moderate: Low confidence, feelings of worthlessness
	Calling children “stupid” or “bad”	Persistently criticizing	Severe: Damaged self-esteem
	Not addressing emotional distress	Ignoring tears, fears, or anxieties	Severe: Emotional neglect, mental health risks
Later Primary (9-11 years)	Favoritism, bias	Unequal treatment	Moderate: Resentment, trust issues
	Verbal abuse, insults, threats	Yelling, labeling as “worthless”	Severe: Emotional trauma, legal review
	Public humiliation	Calling children “troublemaker” publicly	Severe: Emotional distress, loss of trust

NAVIGATE YOUR OWN JOURNEYS OF LEARNING AND SELF-DISCOVERY IN AN EXCITING FUTURE

	Ignoring peer conflict or bullying	Not intervening	Severe: Depression, social withdrawal
Early Secondary (12-14 years)	Disrespectful language, threats	Threatening or insulting	Severe: Disciplinary and legal action
	Favoritism, discrimination	Unequal treatment	Moderate/Severe: Trust issues, emotional harm
	Ignoring mental health signs	Overlooking depression, anxiety	Severe: Serious mental health risks
	Rough handling or physical aggression	Pushing, grabbing	Severe: Trauma, possible injuries
Late Secondary (15-16 years)	Unprofessional conduct, inappropriate comments	Flirting, gossiping, inappropriate language	Severe: Suspension, dismissal, legal consequences
	Threatening, bullying, intimidation	Threats or harassment	Severe: Disciplinary hearing, legal action
	Disrespecting personal boundaries	Ignoring privacy	Severe: Emotional harm, trust loss
	Neglecting emotional/mental health	Ignoring signs of depression	Severe: Risk to well-being, self-harm

Older Secondary (17-18 years)	Unprofessional relationships, harassment	Flirting, inappropriate comments	Severe: Termination, legal action
	Threats, intimidation	Emotional or physical threats	Severe: Disciplinary hearing, legal action
	Ignoring mental health needs	Overlooking depression or self-harm	Severe: Long-term damage, possible hospitalization

External Agencies the School Cooperates With

- Social Services (Direcția Generală de Asistență Socială și Protecția Copilului - DGASPC):
Responsible for child protection, providing support, and intervention in cases of abuse or neglect.
- Law Enforcement Authorities (Poliția Română):
Handle criminal investigations, including cases of abuse, exploitation, or domestic violence.
- Health and Medical Professionals:
Pediatricians, psychologists, or mental health specialists involved in safeguarding and providing support to children.
- School Medical Office:
For health-related concerns, injuries, or medical support within the school setting.
- External Support and Counseling Services:
Child therapists, mental health clinics, or NGOs specializing in child welfare.
- Judicial Authorities:
Courts and legal bodies involved in cases of child protection or legal proceedings.
- Educational Inspections and Authorities:
Romanian Ministry of Education officials overseeing school safeguarding policies.



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Monitoring, Recording, and Review of Child Protection and Safeguarding Incidents

1. Case Registry and Case Officers

All safeguarding cases are meticulously documented in the Cases and Action Plans (CAP) registry. Each case is assigned to a specific case officer responsible for overseeing the case, ensuring consistent follow-up, and maintaining accountability throughout the process.

2. Detailed Reporting & Documentation

Every concern, observation, and action taken is recorded in detail. These reports are stored securely on the school's drive within the Welfare and Pastoral Care Directory. All entries include relevant information, dates, and updates to ensure transparency and traceability.

3. Access Control and Confidentiality

- The Welfare and Pastoral Care Directory is accessible only to authorized staff members with a legitimate safeguarding role.
- The DSL maintains a dedicated confidential directory with strict no-access policies for third parties, ensuring sensitive information is protected from unauthorized access or breaches.

4. Regular Review and Follow-up

The DSL and school leadership will review all safeguarding cases annually, or as needed, to evaluate the effectiveness of interventions, identify trends, and improve safeguarding practices.

5. Continuous Monitoring & Record Keeping

Cases are monitored throughout their lifecycle with regular updates logged. All records are kept securely and are subject to legal and data protection standards to ensure confidentiality.

6. Policy Improvement

Lessons learned from case reviews inform ongoing safeguarding training and policy enhancement, fostering a responsive and vigilant safeguarding environment.



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