



Safeguarding and Child Protection Policy

June 2024

1. Policy Statement

Brighton College Al Ain is concerned about the welfare and safety of all its pupils and attempts to create an environment where pupils feel both secure and valued as well listened to and taken seriously.

This policy provides all staff working within the College the necessary guidance for ensuring all pupils are safe whilst in the care of the College. It also informs parents and guardians how the College will safeguard pupils.

Whilst the schools will work openly with parents as far as possible, the school reserves the right to contact the police, or Child Protection Units in ADEK, MOE, ESE, MOI, Family Care Authority or Social Support Centre without notifying parents if this is in the child's best interests.

This policy incorporates updates from KCSIE 2024 within Appendix 6.

2. Aims and purpose

2.1 Aims

We aim to safeguard and promote the welfare of children at the school in compliance with local requirements and the DFES Guidance Keeping Children Safe in Education (2023). The policy also complies with the UAE Child Protection Law 3 which became law on 15th June 2016, the Abu Dhabi National Framework for Child Protection, ADEK Safeguarding and Student Protection Policies 2024.

Duty of Care and In Loco Parentis: All members of staff at BCAA have the duty of care towards their pupils and are responsible for their wellbeing, safety, and protection whilst they are under the College's supervision. The Headmaster shall accept in loco parentis responsibility for all students whilst under the school's supervision.

2.2 Purpose

- Protect students under the supervision of the College from all acts and omissions constituting maltreatment.
- Identify and support students who are at risk of harm, as enforced by the UAE Federal Law No. (3) of 2016 Concerning Child Rights, Federal Law No. (31) of 2021 Promulgating the Crimes and Penalties Law, Federal Law No. (5) of 1983 Concerning Nurseries, Federal Law No. (18) of 2020 Concerning Private Education, Executive Council Chairman Decision No. (26) of 2013 Regarding the Regulation of Private Schools in the Emirate of Abu Dhabi, and other relevant UAE laws.
- Emphasise that all staff and volunteers of Brighton College Al Ain are mandated reporters of cases of alleged and/or suspected maltreatment of students inside and outside the educational institution.

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- Define roles and responsibilities of Headmasters, staff, and parents of students within the College for responding to alleged and/or suspected cases of student maltreatment.
- Define procedures for identifying and reporting cases or suspected cases of student maltreatment.
- Outline the security requirements for schools to ensure effective supervision and duties of security guards, school visiting and departure procedures, and an established system for managing security breaches.
- Set out ADEK's requirements in relation to the use of Closed-Circuit Television (CCTV) cameras within the College.
- Define training requirements to ensure all staff carry out duties responsibly, effectively, and appropriately to facilitate a safe environment for students to grow and learn.

3. Practice and procedure

3.1 Guiding Principles

The welfare of the College's pupils must be the primary concern of all staff members. In the event that there is disagreement regarding the rights of the parent or child, the child's welfare should be paramount.

- All staff should be alert to the signs of abuse and know to whom they should report concern or suspicions
- A Designated Safeguarding Lead with knowledge and skills in recognizing and acting upon child protection concerns is the first point of contact for staff and parents where a concern is identified
- All staff with designated responsibility for child protection should receive appropriate training
- The College operates safe recruitment procedures
- The Board of Governors maintains a very high-level oversight of the safeguarding in College. The Safeguarding Governor is Craig Lamshed.
- The role of the Safeguarding Governor is as follows:
 - Review the policy annually
 - Involvement in an advisory role in any significant safeguarding cases.
 - Involved in safer recruitment processes and the signing off of new hires.
 - Ensures the safeguarding policy is being implemented effectively across the College
- All students have the right to be:
 - Heard and express their voice/opinion and participate in select decision making processes in the educational institution (to be determined by institution staff).
 - Treated with dignity and respect.
 - Treated with fairness and justice.
 - Supported by an advocate and provided with necessary support when required.
 - Safe, protected from harm, and aware of what constitutes risk and harm.

3.2 Roles and responsibilities

Appendix 1 outlines the detailed roles and responsibilities of the various stakeholders who are responsible for the care and safety of pupils within the College.

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- Abu Dhabi Department of Education and Knowledge (ADEK)
- Headmaster
- All Staff and Volunteers of Educational Institutions
- Parents

3.3 Designated Safeguarding Leads and Safeguarding Committee

All educational institutions shall appoint a Child Protection Coordinator (CPC) and a Child Protection Team (CPT), and these appointments shall be reported to ADEK annually. At Brighton College, we use the term DSL in place of the CPC. Our Safeguarding Team is in place of the CPT. **The Designated Safeguarding Lead (DSL) for the College is Victoria Shillingford, Deputy Head Mistress Whole College.** In the event she is unavailable, the following persons should be contacted:

- Alex Stagiannis - Deputy DSL (Senior)
- Melanie Rackham - Deputy DSL (Junior)
- Kerry-Ann Lynch - Deputy DSL (FS)
- Oliver Bromley-Hall (Headmaster)

The Designated Safeguarding Lead's (DSL) main tasks are to:

- Ensure that the Headmaster is kept fully informed of any concerns
- Ensure all staff are aware who the DSL is, their role and contact details
- Ensure that all staff are aware of these procedures and what to do in the event they are concerned about a pupil.
- Ensure that the safeguarding procedures are followed in the College
- Ensure that appropriate training and support is provided to all staff
- Decide whether to take further action about specific concerns
- Ensure that accurate records are maintained on individual cases, and these are kept in a secure and locked location
- Provide guidance to parents and staff about obtaining support
- Inform parents of any concerns and work with them to try and facilitate change, unless this would place the pupil at greater risk
- Develop effective links with relevant agencies.

The Safeguarding team consists of the DSLs mentioned above and the following members of staff:

- Oliver Bromley-Hall (Headmaster)
- Andrew Ryan – Head of Junior School
- Rebecca Graves – Head of Senior School
- Karen Roberts – Head of Inclusion
- Hayley Goodenough – College Counsellor

The team meet bi-weekly to discuss all current safeguarding concerns across the College. All meetings are minuted and stored securely. All members are Level 3 Safeguarding Lead trained as a minimum. The member of the governing body that is a lead for Safeguarding is Craig Lamshed.

Where a member of the safeguarding team has a child/children within the College, their access is denied viewing any safeguarding reports pertaining to their child/children on CPOMS. They are also not to be involved or have any influence in any safeguarding

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conversations or decisions within their role, if their child/children are involved. They remain within the role of parent.

3.4 Training and safeguarding awareness.

Staff

Annually

- All staff (teaching, support, admin, 3rd party contractor) receive annual on the signs and symptoms of abuse and the procedures within Brighton College Al Ain.
- They are made aware of their responsibilities for referring any concerns to the DSL and Safeguarding Team and the steps to take to make a referral.
- Required to also complete the Child Protection in International Schools online course that is part of the TES Educare package.
- Required to read section 1 from Keeping Children Safe in Education and any annual updates.

Termly

- Safeguarding refresher training takes place at the start of Term 2 and Term 3 for all staff

Bi-weekly

- Safeguarding snapshots and pertinent information is shared with staff via the SS and JS staff briefings.

Pastoral Staff

- All key pastoral staff (House Masters and Mistresses, Heads of Year) will be level 2 Safeguarding trained as a minimum throughout the year.

Governing Body

- The Board of Governors have received training on the signs and symptoms of abuse and the procedures within Brighton College Al Ain. This will be ongoing in line with staff training.

Parents

Annually

- All relevant Safeguarding policies are shared with parents at the start of the Academic year in English and Arabic and are available on the College website.
- The DSL's hold an annual parent presentation / workshop for parents to attend. The content is an overview of the College's safeguarding and pastoral care and procedures, as well as information on the role of the parent and top tips for keeping children safe at home.

Weekly

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- A weekly safeguarding snapshot and update is included within the College Parent Bulletin. This aims to keep parents informed and up to date with any current safeguarding topics or issues.

Pupils

Annually

- All pupils receive safeguarding training and information as part of the annual welcome back to school sessions.
- All pupils also receive the student friendly version of the safeguarding policy.

Termly

- Termly presentations are given to all pupils as a safeguarding and wellbeing refresher.

Weekly

- All pupils are given opportunities through PSHE / Tutor time / Pupil bulletin to voice any concerns or issues that they may have.

3.5. Safer Recruitment

BCAA is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the College's Safer Recruitment policy; where staff from another organisation are working with pupils on another site, BCAA will have received written confirmation that appropriate child protection checks and procedures have been carried out on those staff. Please refer to the BCAA Safer Recruitment Policy for further details.

3.6 Online safety within the College:

Teaching and learning is increasingly involving online work. It is essential that pupils are safeguarded from harmful material which may be accessed online. The College ensures that there are appropriate filters and monitoring systems to ensure pupils are safeguarded. Pupils are also taught e-safety as part of the curriculum. All staff receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of the annual training.

If a member of staff suspects that a child is accessing/sending inappropriate material online then they must report this via CPOMS and directly to the DSL immediately so that appropriate checks and measures can be put into place.

The designated safeguarding lead takes a lead responsibility for understanding the filtering and monitoring systems and processes in place. (KCSIE 2024).

More detailed processes and procedures are outlined in the BCAA Digital Policy

4. Safeguarding and the College Security

4.1 College Visitors procedures

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Volunteers shall receive proper induction and training on the College Safeguarding and protection policy and safeguarding measures. All invited visitors shall also be required to attest to having read and understood the school's student protection policy. All visitors are given a streamlined version of this policy to keep and scan. **Full visitor procedures are detailed in Appendix 2**

4.2 CCTV

The College has comprehensive CCTV coverage and follows all of the ADEK mandated procedures concerning maintenance, checking and viewing. **See Appendix 3 for more details.**

4.3 Physical and digital security breaches

The College has established systems for managing security breaches to prevent the occurrence of a dangerous/ harmful event, including intruders from gaining unauthorized access to the school grounds or confidential information. These systems and procedures are outlined in detail in the BCAA Critical Incident and Disaster Recovery Policy.

4.4 Safeguarding and the College Security

- Security Guards are present at any given time at all entry points/ gates and do not leave their posts unless there is someone to replace them temporarily.
- All of our guards hold authorized licenses, as per the ADEK Staff Eligibility Policy.
- Our guards maintain a visitor's log by recording the visitor's name, ID, signature, telephone number, purpose of visit, time of arrival, and time of departure.
- They issue visitors access passes only upon collection of a form of photo ID and verifying that it matches the identity of the physical persons.
- The College is authorised to issue permanent access passes to registered visitors involved in the routine pick-up and drop-off of students i.e., parents, nannies, drivers, etc.
- Security guards shall verify that each access pass matches the identity of the physical person and ensure that anyone whose permanent access pass has been cancelled/ revoked cannot enter the school with the invalid access card (they would need to sign in as would a general visitor).
- Our guards are a communication link between the security guard at the entry gate and the school reception/ administration to authorize the entry of unknown persons.

4.5 The start and end of the school day

The College builds strong relationships with families and parents. At the end of the day the following applies:

1. Only parent-authorized persons are picking up students.
2. For persons who are not pre-registered and have permanent access passes, parents shall inform the school in advance in writing and provide the ID of the nominated person.
3. In sudden emergencies or late notice change of plans, parents shall call to inform the school of the name of the person picking up their child and the school shall log the

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conversation including the name of the authorized person and forward the names to the security guards and teachers/ individual(s) supervising the concerned student.

4. The College will check the identity of the nominated person at the gate (via presentation of a form of ID) and when handing over the student from the school's supervision.
5. IDs are not required if the person is already a member of the school community (e.g., another parent), and the school already has their ID on record.

In instances where parents drop off children at the College without the school's knowledge, the College shall not be legally responsible for the safety of the child.

School Arrival and Departure Notification for Unaccompanied Cycle 3 Students: Upon written consent by parents, students in Cycle 3 are authorized to arrive at and depart from school unaccompanied. If this is agreed, the College will record and notify parents of their arrival and departure times.

4.6 Special Events

If the College holds any special events, we ensure that we have increased security measures in place for safeguarding the College during special events. We ensure that:

- 1) Events are only open to the immediate family (parents and siblings of the student). Parents who wish to invite other guests must pre-register them with the school by providing a copy of a valid ID. Guests who are not pre-registered are required to register on arrival at the school gate and subsequently provide a copy of a valid ID.
- 2) Signage indicating accessible areas for visitors within the school premises is clearly displayed.
- 3) Increased security is present when a larger number of visitors are expected.
- 4) All outside service providers and their employees are pre-approved, and contracts stipulate that they have undergone security checks. Service providers shall submit their trade license and a valid work permit for each employee.

5. Identifying concerns and reporting procedures

5.1 Identifying concerns

It is important that all members of staff, including visiting staff both paid and unpaid, should be aware and alert to possible outward signs of abuse or neglect.

There are four categories of abuse: emotional abuse, physical abuse, sexual abuse or child sexual exploitation and neglect: See Appendix 2 for more detail.

All staff are made aware of the signs and symptoms to be aware of in identifying any possible concerns via their training. See Appendix 2 for more detail.

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5.2 Inclusion and Children with Additional Vulnerabilities

Staff should also be alert to additional safeguarding challenges which exist for pupils who have additional learning needs and/or disabilities, for example, pupils may be more vulnerable to being bullied and may be unable to effectively communicate an abusive situation.

- (a) People of Determination and children with additional learning needs can be more vulnerable to exploitation and abuse and should have enhanced access to support systems
- (b) They may be more isolated from their peers and may find it difficult to express concern
- (c) No concern should be overlooked or passed off as a symptom of an additional learning need or disability; including (not an exhaustive list)
 - Communication
 - Toileting
 - Understanding right and wrong
 - Physical Build
 - Unusual or over-physical attachments to staff members or peers.
 -

Staff must be hyper-vigilant to the needs and concerns of these children who are among the most vulnerable.

5.3 Reporting procedures

If a staff member is told about abuse, suspects or knows of any abuse of any pupil, the Designated Safeguarding Lead must be informed immediately in person or by telephone and the information logged on CPOMS.

Even if the information is based on rumours of abuse, or there is a suspicion but no firm evidence, the DSL should be contacted regarding the concerns. Therefore, even if the incident does not seem serious it must be reported as it may be a small part of a much larger picture. This needs to be done with care and sensitivity and the pupil needs to be reassured that the matter will only be discussed with people who need to know. The member of staff must not discuss their concern with any other person in order to ensure confidentiality.

Following a referral, the DSL will gather information before deciding whether there is sufficient evidence for suspecting abuse in which case, he/she will speak with the pupil and any other relevant staff to decide the next course of action.

In the event that there is a physical injury, the pupil will be seen by the school nurse who will be asked to record the nature of the injuries on a body map (available on CPOMS)

The DSL will contact the pupil's parents where this is an appropriate course of action and where the pupil will not be placed at greater risk.

5.4 Dealing with a Disclosure

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Dealing with a pupil disclosure can be an emotional interaction and it is important that the interaction is dealt with in a sensitive manner. **For a short summary of the do's and don'ts of dealing with a disclosure please see Appendix 5.**

Staff should not investigate concerns or allegations themselves but should report them immediately.

This recorded disclosure should be made through CPOMS software and should be made as soon as possible after the disclosure and should include:

- The date and time of the report
- The name of the person reporting the incident and, where different, the name of the pupil who has allegedly been abused OR
- Where, when and how disclosure took place and the names of anyone present and/or asked to attend
- The date, time and place where the alleged abuse happened
- The names of those present when the abuse occurred
- The account that was given of the allegations with nature of abuse and outcome, if known in the first instance, communication about such incidents should be directed only to the Designated Safeguarding Lead or Headmaster in order to protect all concerned.
- Keep all original notes taken and pass them to the DSL.

5.5 Allegations Involving College Staff

Allegations against staff or volunteers should immediately be reported to the Headmaster or in his absence to the DSL's (if the concern is not related to either of them).

In the event that an allegation is made against a member of staff at the College, the Headmaster will take advice from the Designated Safeguarding Lead (unless the allegation involves the DSL) on how to investigate the matter.

The Designated Safeguarding Lead or Headmaster will make an initial assessment of the allegation, consulting others as necessary.

Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter will be reported immediately to the Chairperson of the Board of Governors and the Authorities.

The initial assessment should be on the basis of the information received and gives rise to a decision whether or not the allegation warrants further investigation and if so by whom.

In the event of an allegation against the Headmaster, this should be reported to Craig Lamshed the Safeguarding Governor and Nicky Collins without notifying the Headmaster first.

5.6 Allegations by one pupil against another pupil

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Any such allegations will always be taken seriously and will be dealt with using sensitivity and care. The same principles outlined above for dealing with any disclosure apply to such cases.

5.7 What happens after the initial report has been recorded?

- The Designated Safeguarding Lead may liaise with the Headmaster for advice.
- The DSL/HM and school counsellor where necessary will be notified.
- The DSL/HM/School Counsellor should arrange a family conference where possible and if necessary.
- The DSL will liaise with and report to FCA/ ADEK if necessary (see process below).
- If the pupil is at risk (e.g. self-harming, suicidal thoughts) the school will inform parents unless the abuse is alleged to be carried out by the parents
- Where a disclosure has been made about a pupil, the DSL will follow up in an appropriate timeframe with the person who raised the disclosure to inform them of the steps taken. No information will be shared other than on a need-to-know basis.

5.8 External agency reporting procedures

Safety concern referrals in Abu Dhabi educational institutions



Relevant contact details are as follows:

- Abu Dhabi Police: 999
- Ministry of Education Child Protection Unit: 80085; cpu@moe.gov.ae (for guidance)
- Emirates Schools Establishment Child Protection Unit: cpu@ese.gov.ae
- Family Care Authority: 800444; ICM@adfca.gov.ae
- Safety Concern Portal: daasafetyconcern.abudhabi

Note: To report or obtain more information on a child protection concern which occurred outside of or within educational institution's supervision, the Child Protection Coordinator or any other person representing him/her can either call the MoE child protection unit's hotline number (80085) for all schools and nurseries, or reach out to the relevant educational institution child protection unit by email (cpu@ese.gov.ae for public schools, cpu@moe.gov.ae for private schools, charter schools and nurseries).

[SCF \(daasafetyconcern.abudhabi\)](http://daasafetyconcern.abudhabi)

For more detailed information on the agency processes within Abu Dhabi, please refer to the Handling Student Maltreatment Concerns PDF published by Dama Al Aman

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5.9 Monitoring

The Designated Safeguarding Lead will set a timescale for monitoring a pupil about whom a concern has been expressed (nominally 6 – 8 weeks but on a case-by-case basis on CPOMS. If no indicators are found or appear to develop, the monitoring will cease. If indicators and concerns continue, appropriate action will be taken and recorded. As part of good practice, parents should be advised that their child is to be monitored and involved in the process as much as possible.

An electronic copy (CPOMS) will include the details of how the allegation was followed up and resolved together with a note of any action taken and decisions reached, should be kept by the DSL and Headmaster on CPOMS.

5.10 Online/Distance Learning

If school is needed to be suspended or moved to Online/Distance Learning, normal school safeguarding policies and protocols apply. The principles of Keeping Children Safe in Education, ADEK Child Protection guidelines and this guidance continue to apply. Safeguarding principles remain the same:

- The best interests of pupils must always continue to come first
- If anyone has a safeguarding concern about a pupil they should continue to act and act immediately
- The DSL & Deputy DSL's are fully contactable.
- Children should continue to be protected when they are online.

Further Guidance for staff:

- All live teaching lessons should be recorded by the teacher
- When a live lesson is finished, pupils should exit the session, and the teacher should end the session
- Live lessons should take place during school hours, (07:50am – 3:00pm)
- Live lessons should take place from an environment that is quiet, safe and free from distractions.
- Ideally position yourself where there is a wall/curtain behind you
- Live/recorded lessons must be delivered in professional dress
- If a pupil were to behave inappropriately, the school's normal Behaviour policy will apply
- A record of attendance should always be kept, iSAMs should be updated daily
- Forms of less formal communication, e.g. memes, emojis, GIF/giphys, stickers, text talk should not be used.

5.11 Low Level Concerns

The College follows the UK and KCSIE guidelines regarding Low Level Concerns. More details of this can be found in the BCAA Low Level Concerns Policy

6. Assessment and Record Keeping

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The College ensures all safeguarding and child protection conversations and reports are recorded accurately and safely via CPOMS.

6.1 Safeguarding Risk Register

The College maintains and updates a Safeguarding Risk Register. This register outlines potential safeguarding risks that could occur on and off the College site and what we have in place to mitigate the risk. This is revisited termly by the Safeguarding Team to update on any changes.

6.2 Confidentiality and Information Sharing

Case reports and student data are strictly confidential.

The identities of the student subject to alleged and/or suspected maltreatment, the alleged/suspected perpetrator, and the person reporting the alleged/suspected case must be kept confidential by all parties involved in the case.

The data should be shared only with authorized individuals from the ADEK CPU and the FCA, within investigative teams, and the Abu Dhabi Judicial Department

Authorised individuals are strictly prohibited from discussing active or closed cases with the media, any third parties or other staff, and/or unauthorized ADEK staff, with the exception of investigative and judicial authorities and within the legal responsibilities

Only relevant members of staff need to know the details or concerns relating to a pupil in need i.e. the Designated Safeguarding Lead, Headmaster, Counsellor, Housemistress/Housemaster, Nurses and anyone involved in monitoring particular aspects of a pupil's behaviour.

The affected pupil should also know which members of staff are in possession of what information, when it will be shared, why and with whom.

Remember that instead of disclosing information unnecessarily, it is fine to say that "a concern has been raised and it is being dealt with following the College's procedures".

- An electronic file will be kept on CPOMS.
- Nothing is to be kept on iSAMs.
- Any note-taking needs to be cognisant of our context and passed to the DSL.
- The Designated Safeguarding Lead will make contact and maintain open communication with parents, unless parents are alleged abusers.

Approved by

Policy to be reviewed and checked annually by the Head Master.

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Oliver Bromley-Hall

On behalf of the College Oliver Bromley-Hall -Headmaster

On behalf of the Board of Governors Craig Lamshed – General Manager, Bloom Education

Change History Record

Version No.	Description of Change	Owner	Date of Issue
1.0	Policy update	Victoria Shillingford	August 2022
2.0	Updated DSL leads names Added reference to Wadeemas’ law as a point of reference.	Victoria Shillingford	August 2023
3.0	Policy redrafted to make information more concise and to include new policy information from the ADEK Safeguarding Policy and Child Protection Policy	Victoria Shillingford	June 2024

Related Policies

E-Safety Policy, Missing Child Policy, Anti-bullying Policy, Safer Recruitment Policy,

Brighton College Al Ain’s Policies and Guidelines

Brighton College Al Ain policies have been developed by the College Leadership Team (CLT) with input and guidance from the Brighton College network, including Brighton College UK.

Policies reflect current best practice. At the time of writing, policies aligned with the following:

- The principles established by ADEK’s ‘Child Protection Policy’, published in September 2016 and Federal Law No.3 of 2016 pertaining to the Rights of the Child (often referred to as Wadeema'sLaw,
- The National Child Protection Policy in Educational Institutions in the UAE (2022)
- The ADEK Safeguarding policy 2024
- The ADEK Student Protection Policy 2024

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This policy also takes into account further statutory guidance applicable to the School comprising:

- DFES Guidance Keeping Children Safe in Education 2024
- MOE United Arab Emirates School Inspection Framework
- DSIB School Inspection Supplement
- Standards for British Schools Overseas (DfE)
- COBIS Accreditation and Compliance
- Bloom Education and Bloom Holding policies where applicable.

Should any regulations change or develop further, the policies will be reviewed to ensure continued alignment.

Policy Structure

Policies will show the date of writing and reviews on them. Version control will also be in place. Should there be an error or inaccurate fact in any policy, a CLT member should be notified.

Appendix 1 – Roles and responsibilities

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Roles and Responsibilities

Abu Dhabi Department of Education and Knowledge (ADEK):

1. Develop, monitor and enforce student protection policies and safeguarding measures.
2. Support educational institutions in developing their student protection policies where needed.
3. Introduce a broad range of student protection standards to the inspection framework, and monitor and work with educational institutions falling below expectations by providing the necessary support.
4. Collaborate with relevant entities on the design and implementation of safeguarding programs.
5. Receive and filter reports of concern of student maltreatment (neglect, physical, and emotional abuse) and notifications (sexual abuse and exploitation) happening within educational institutions and take necessary actions.
6. Refer concerns involving a maltreatment suspicion of a staff of an educational institution towards a student to the relevant entities.
7. Activate procedures related to bullying in alignment with relevant entities.
8. Cooperate with and facilitate sharing of education-related information for student maltreatment comprehensive assessments and/or investigations being conducted by the relevant entities.
9. Follow up, if needed, with the relevant entities on the referrals made to them for cases in educational institutions.
10. Document all notifications and/or reports received in confidential records that can be accessed only by the CPS or any other concerned agency(ies), where needed, based on established information sharing protocol.

Principals:

1. Comply with the provisions of this policy.
2. Every educational institution shall publish and post this policy to protect students from maltreatment.
3. Ensure that procedures to prevent situations that could lead to the maltreatment of students are in place and understood by all institutional staff and principal.
4. Ensure the oversight of students at all times while under the supervision of the educational institution.
5. Ensure that there is priority emphasis within the educational institution on the protection of the students and for taking immediate actions when there is suspicion of cases of student maltreatment.

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6. Ensure that students know how, where, and to whom to safely report their concerns about alleged and/or suspected maltreatment without fear of retribution or punishment.
7. Ensure that staff, volunteers, and students are aware of how, where, and to whom they can safely report their concerns about the potential exposure of any student to alleged and/or suspected maltreatment without fear of retribution or punishment.
8. Include the views and recommendations from students and parents regarding safety and protection reporting within the educational institution.
9. Immediately report any case of alleged and/or suspected maltreatment of students as stated by this policy.
10. Ensure that all staff and volunteers targeted for student protection training fully attend and participate in all training sessions and sign off on safeguarding training and student protection training.
11. Conduct orientation sessions for parents upon student registration or enrollment and at the start of every school year to promote this policy and to inform them of their roles and responsibilities, and their rights and duties.
12. Maintain students' records in compliance with Policy 35 (Records) and ensure confidentiality of open and closed cases in accordance with the guidelines.
13. Immediately suspend any staff who is suspected of an offense involving student maltreatment on a temporary basis until the suspicion is adjudicated.
14. Ensure that students have a safe and confidential opportunity to report any concerns they may have in regarding their rights to safety and wellbeing.
15. Ensure the vetting, hiring, and monitoring of all staff, volunteers, and invited visitors according to this policy and relevant safeguarding measures.

All Staff and Volunteers of Educational Institutions:

1. Report immediately an alleged and/or suspected case of maltreatment upon discovery.
2. Care for students at all times while under the institution's supervision.
3. Understand this policy to address alleged and/or suspected student maltreatment cases.
4. Attend and participate in mandated student protection and safeguarding training.

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Parents:

1. Cooperate with the educational institution's principal and staff, answer all inquiries related to the student's behavior, academic performance, and respond to their feedback and guidance.
2. Attend all scheduled parent meetings with the educational institution.
3. Communicate any concerns, observations, or changes in the student's behavior to the educational institution's principal, board members, and/or to the concerned institutional staff.
4. Support the educational institution in ensuring safe online practices during distance learning and homework.

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Appendix 2 – Visitors

The Headmaster shall have the right to deny or allow visitors in their school with good cause.

The College's procedure for visitors includes the following:

1. All visitors to the school shall sign in at the security gate and obtain a visitor's access pass in exchange for a valid form of ID.
2. Visitors shall display their access passes, which are to be visibly worn at all times whilst on the school premises. Visitors are not authorized to enter classrooms unless invited.
3. Invited visitors shall remain under the supervision of a designated member of staff unless they are authorized personnel whilst on the school premises.
4. Upon completion of the school visit, visitors must sign out at the security gate and return their visitor access passes upon leaving the school premises.
5. Granting Access to Authorized Personnel: Schools shall provide authorized personnel (e.g., government inspectors) with access to their full premises and relevant resources (e.g., school reports, records, access to keys for locked areas, etc.), as per Federal Decree Law No. (18) of 2020 Concerning Private Education.

Where required, the College shall enable such personnel to monitor and interact with staff, students, and parents.

- a. The College shall verify the identity of the personnel and ensure they have a valid purpose for their requests, prior to providing access to the school's premises or resources.
- b. We will ensure that any access granted is in line with the requirements and purpose of the personnel's visit.
- c. Where access is provided to any school reports and records, the Headmaster shall keep a record of the personnel to whom the access was provided, the reports and records accessed by them, and the purpose for providing access. The College will preserve these records in line with the requirements for administrative records, as per the ADEK Records Policy.
- d. Authorized personnel are authorized to be present on the College premises without being accompanied by a member of staff.

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Appendix 3 – CCTV

The College is equipped with integrated and fully functioning access and security systems, including security video surveillance cameras (CCTV systems). Our CCTV Systems are installed and maintained via an MCC licensed vendor, in compliance with the Manual of Surveillance Devices (MCC, 2022).

Our CCTV cameras provide coverage / restrictions in the following areas:

- All entrances and exits of the school buildings and grounds.
- All walkways and public areas (corridors, stairs, courtyard, sports hall, sports fields, canteen, libraries).
- Student pickup and drop-off areas for private vehicles and buses.
- Security areas (e.g., control room) and hazardous areas.
- Exterior areas surrounding the school grounds.
- Learning spaces (e.g., classrooms, labs, studios, maker spaces). Entrances to lavatories and changing rooms.
- All blind spots within the school premises.
- CCTV cameras shall not be installed inside lavatories, changing rooms, or any other areas where there is a reasonable expectation of privacy.
- The College had signs within the school premises indicating to the public that the area is under CCTV surveillance.

Access to Footage and Recordings: The College restricts access to CCTV footage and recordings as follows:

- 1) Monitoring of CCTV Footage: We have a monitoring and control room for the purpose of monitoring CCTV footage and only the vendor-appointed CCTV specialist(s) monitor the footage.
- 2) The Headmaster is authorized to access live CCTV footage of the school premises from their office.
- 3) Access Permission for Staff: The Headmaster and vendor-appointed CCTV specialist(s) are authorized to retrieve and view CCTV recordings. The Headmaster is authorized to permit other staff members to view CCTV footage on a need-basis at the Headmaster's

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discretion. The College maintains a record of all individuals granted permission to view the footage, where applicable.

- 4) Access Permission for ADEK Personnel: The College will provide access to CCTV footage and recordings to authorized ADEK personnel upon request.
- 5) Copying and Distribution: The copying or distribution of CCTV recordings is strictly prohibited and punishable by law.
- 6) Escalation: Where an incident captured in a CCTV recording requires clarification beyond the school level, the College shall immediately notify ADEK in order to deal with the incident.
- 7) Deletion: The College shall retain CCTV recordings for a minimum of 180 days

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Appendix 4 – Child Protection Dimensions

Physical Abuse

Physical abuse is the deliberate physical injury to a child, or the wilful neglectful failure to prevent physical injury or suffering. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, confinement to a room or cot, or inappropriately giving drugs to control behaviour.

Signs and symptoms

- physical injuries, such as cuts, bruises, fractures
- unexplained or unusual injuries
- improbable excuses, reluctance or refusal to explain injuries
- reluctance to change clothing for games or PE
- fear of physical contact
- fear of suspected abuser being contacted.

Emotional Abuse (Psychological)

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some levels of emotional abuse are involved in all types of ill-treatment of a child, though it may occur alone. Domestic violence, adult mental health problems, and parental substance misuse may expose children to emotional abuse.

Signs and symptoms

- feeling depressed
- withdrawal from social interaction and low self-esteem
- isolation from friends and family
- fearfulness, increased anxiety
- feeling of shame / guilt
- mood changes and not trusting others
- extreme dependence on others
- telling lies
- aggressive behaviour or substance misuse

Sexual Abuse & Exploitation

Sexual abuse involves forcing or enticing a child to take part in sexual activities. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children looking at, or the production of, pornographic

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material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Signs and symptoms

- frequent need to urinate / urinary tract infections
- age-inappropriate sexual knowledge, language, behaviours
- regressive behaviours such as thumb sucking, needing previously discarded cuddly toys
- loss of appetite or compulsive eating
- becoming withdrawn, isolated
- inability to focus
- reluctance to go home
- bed-wetting
- drawing sexually explicit pictures
- trying to be 'ultra good'
- over-reacting to criticism
- struggling to sit cross legged on the carpet

Neglect

Neglect is the persistent failure to meet a child's physical, emotional, and/or psychological needs, likely to result in significant harm. It may involve a parent or carer failing to provide adequate food, shelter, and clothing, failing to protect a child from physical harm or danger, failing to ensure access to appropriate medical care or treatment, lack of stimulation, or lack of supervision. It may also include non-organic failure to thrive.

Signs and symptoms

- constant hunger
- emaciation
- compulsive scavenging
- poor personal hygiene
- constant tiredness
- clothing poor, dirty, inappropriate for weather
- untreated medical problems
- poor social relationships
- destructive tendencies

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences'. The government of the UAE also views this procedure as illegal and has actively participated with the UK authorities to prevent girls being flown to parts of the world where this is still enforced. Any suspected cases of FGM should be referred to the Designated Safeguarding Lead following the same process outlined in this policy.

Radicalisation

Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach'. Any suspected cases of radicalisation should be

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referred in the same way as any other suspected cases of abuse. The PHSE programme in the Junior and Senior school facilitates pupil awareness of radicalisation within society.

Appendix 5 – Dealing with a disclosure

Do:

- Arrange a place and time where you can talk as soon as possible, preferably with another adult present e.g. nurse or counsellor
- Stay calm and reassure the pupil that she/he is right to tell someone
- Let the pupil know that she/he is not to blame
- Allow the pupil to speak and keep questions to a minimum
- Let him/her know that you recognise how difficult it is to talk about such experiences
- Explain that you will need to involve other people and why
- Report bruises or physical harm to the nurse so that this can be logged
- Be supportive and give realistic encouragement
- Talk to someone about your feelings and seek support for yourself
- Refer the concern immediately to the Designated Safeguarding Lead. Whilst the initial referral may be verbal, all referrals must be followed up by recording them on CPOMS software or the completion of the referral form by the member of staff making the referral.

Do not:

- Promise confidentiality. Even if the pupil is not at risk there may be other younger children who are and therefore staff cannot promise confidentiality
- Make promises or reassurances you cannot keep
- Press for details or ask leading questions as this can affect subsequent investigation
- Ask the pupil to repeat the details unnecessarily
- React emotionally
- Interrupt or stop a pupil during a disclosure
- Underestimate your role as a trusted adult
- Forget to make time and seek support for yourself.

Appendix 6

Changes to Keeping Children Safe in Education 2024

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Defining Abuse, Neglect, and Exploitation in KCSIE 2024

Perhaps the most significant change in the guidance, which will come into force in September 2024, is the addition of the word ‘exploitation’. Throughout the document where previously the phrase ‘abuse and neglect’ were used, this has now been replaced by *‘abuse, neglect, and exploitation’*.

Exploitation is included to remind us that abuse might not just occur in the home, but it may also occur outside of the home environment, even online. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity. This is a significant distinction where previously they may have been viewed as an offender instead of a victim.

Child Protection Inside and Outside the Home

The updated version of KCSIE also adds to the definition of safeguarding so it now includes the phrase “protecting children from maltreatment, whether that is within or outside the home, including online.” Practitioners have been referring to this idea as ‘Contextual Safeguarding’. This is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families.

Contextual Safeguarding recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships.

It expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

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Alignment with Working Together to Safeguard Children Guidance

Many of the linguistic changes to KCSIE 2024 are to bring it into line and be consistent with the guidance document Working Together to Safeguard Children 2023 that was updated in December 2023. Crucially, the updates make reference to 'Early help' and includes: "Providing help and support to meet the needs of children as soon as problems emerge."

This same wording is found in the Working Together to Safeguard Children 2023 document and represents an important focus on providing support at the earliest opportunity.

Additional Linguistic Updates to Note

The harm done to children by living in an environment where domestic abuse occurs has been underlined with a reminder to practitioners that the harm may be caused "where they see, hear or experience its effects." This is an important factor to note when recognising the impact of domestic abuse in children and young people which may extend beyond signs of physical harm.

The wording "Deliberately missing education" has also been changed to the more accurate and less pejorative "unexplained and or persistent absences". When considered in the context of as many as 117,000 children missing from education in 2022/23, this reflects a significant shift towards understanding the causes of children missing education, over a punitive approach which lays blame on victims.

The Importance of Information Sharing

Keeping Children Safe in Education 2024 now also requires that those working with children and young people should record "all concerns, discussions and decisions made including the rationale for those decisions. These recordings should include instances where referrals were or were not made to another agency.

Recording why you decided not to refer a matter to children's services may be as important as why you decided to do so. Recording the rationale for decisions even if that decision was to wait and monitor the situation, or not refer can be very useful to counter allegations and criticism that the school did nothing.

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