

CHILD PROTECTION & SAFEGUARDING POLICY 26-27

International School of Creative Science
Nad al Sheba



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Table of Contents

Important contacts	3
1. Aims	4
2. Legislation and statutory guidance	4
3. Definitions	4
4. Equality statement	5
5. Roles and responsibilities	5
6. Confidentiality	8
7. Recognising abuse and taking action	8
8. Notifying parents	19
9. E-Safety	19
10. Pupils with special educational needs, disabilities or health issues	21
11. Pupils with a social worker.....	21
12. Complaints and concerns about school safeguarding policies	22
13. Record-keeping.....	22
14. Training	23
15. Monitoring arrangements	24
16. Associated Policies.....	24
Appendix 1: types of abuse.....	24
Appendix 2: safer recruitment and DBS checks – policy and procedures.....	26
Appendix 3: allegations of abuse made against staff.....	30

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Ataullah Parkar	9714-5107005
	Farhaan Abdulla	9714-5107025
Deputy DSL	Sabah Hussein Shide	9714-5107016
	Kabir Ahmed	9714-5107008
	Jorna Khaliq	9714-5107026
	Farah Naaz Hanif	9714-5107039
BEAM Safeguarding Governor & Chair of Governors	Hesham Abdeen	Please contact via school reception

1 AIMS

The school aims to ensure that:

1. Appropriate action is taken in a timely manner to safeguard and promote children's welfare;
2. All staff are aware of their statutory responsibilities with respect to safeguarding;
3. Staff are properly trained in recognizing and reporting safeguarding issues.

2. LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026), which came into force on 1 September 2026, and Working Together to Safeguard Children (2023). We are a British curriculum school operating in Dubai and are regulated by the Knowledge and Human Development Authority (KHDA). Where the statutory guidance refers to bodies, duties or processes that exist only in England, we apply the equivalent UAE arrangements set out in this policy, working with the KHDA, Dubai Police, the Dubai Foundation for Women and Children and the Ministry of Interior Child Protection Centre as appropriate.

This policy is also based on the following legislation:

- [UAE Federal Law No. 3 of 2016 \(the "Child Rights Law"\)](#) – Wadeema's Law
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

3. DEFINITIONS

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment, in school or outside of school, including online.
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcome.
- Ensuring everybody who comes into contact with young people and their families knows and act on their responsibility

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

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

4. EQUALITY STATEMENT

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are at risk due to either their own or a family member's mental health needs
- Are missing from education

We are committed to taking proportionate positive action to address any disadvantage for students with protected characteristics.

5. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with UAE child protection requirements and KHDA guidance. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (2026), and will review this guidance at least annually. Note that the annexes were renumbered in the 2026 edition: the 'further information' annex that staff must read is now Annex A, and the role of the designated safeguarding lead is set out in Annex B.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the school's online safety policy and the attendance policy.
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL are Ataullah Parkar (Principal) and Farhaan Patel (Vice Principal). The DSLs takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. If you need to contact either DSL after school hours please email them on their registered school email address or call Mr Parkar on 050 640 6266 or Mr Farhaan on 050 228 4795

When both DSLs are absent, the deputies identified on page 3 should be contacted.

If the DSL and Deputy DSLs are not available, Miss Maha (Principal's PA) will ensure that contact is made or will escalate to the identified Safeguarding Governors at BEAM. Please note details of safeguarding should not be provided to Miss Maha.

Cover arrangements when the DSL is unavailable

The school maintains robust cover arrangements for any period when a DSL is unavailable, whether because of illness, leave, off-site duties or any other circumstance. A named Deputy DSL will act as the lead for that period and all staff will be told who this is.

Safeguarding concerns can also be sent at any time to the school's confidential safeguarding mailbox, [INSERT SAFEGUARDING MAILBOX ADDRESS], which is monitored by the DSLs and Deputy DSLs. This makes sure that concerns are received, monitored and acted on without delay, including when an individual DSL is absent.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (CDA/Police/Hospital) and support staff who make such referrals directly

The DSL and Deputy DSLs will also keep the Principal informed of any issues, and liaise with authorities' case managers and designated officers for child protection concerns as appropriate.

5.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

5.4 The Principal

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

6. CONFIDENTIALITY

- Timely information sharing is essential to effective safeguarding;
- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm;
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests;
- Confidentiality is also addressed in this policy with respect to record-keeping in section 13, and allegations of abuse against staff in appendix 3;
- For more information and guidance on information sharing, please read [information sharing advice for safeguarding practitioners](#).

When deciding what information to share, staff and the DSL will consider how relevant the information is, what the receiving person or setting actually needs to know, and whether the information is clearly presented and properly contextualised so that it cannot be misunderstood.

Any information shared must be focused and proportionate. Staff should use professional judgement and share what is necessary to keep the child safe, not everything that is known.

7. RECOGNISING ABUSE AND TAKING ACTION

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSLs)”.

7.1 Early Help

Early Help refers to the support and interventions provided to children and their families at the first sign of emerging difficulties. It is a proactive approach designed to address issues before they escalate into more serious concerns, involving a wide range of services and support mechanisms tailored to the specific needs of the child and family.

All staff play a critical role in this process by recognizing early signs of distress or challenges, whether related to the child's home environment, mental health, or social circumstances. By collaborating with the Designated Safeguarding Lead and external agencies, staff can ensure that appropriate Early Help is provided, safeguarding the welfare of children and promoting their well-being and academic success. This approach not only helps in protecting children but also strengthens families, fostering resilience and long-term positive outcomes.

The Team Around the Child (TAC) committee regularly meets to escalate Early Help caseloads. They have been successful in deescalating multiple safeguarding issues. Please refer to your department's social worker or Deputy DSL for more information about referrals to the Early Help/TAC service.

A child may benefit from early help at any point. In addition to the groups listed in section 4, staff should be

alert to children who:

Are experiencing or witnessing domestic abuse, or abuse or neglect at home

Are misusing, or at risk of misusing, drugs, alcohol, vapes or other substances

Are showing early signs of abusive, violent or harmful behaviour towards others

Are frequently absent, persistently late, or missing from lessons

Are carrying, or at risk of carrying, a weapon

Are at risk of criminal or sexual exploitation

Have a family member in prison or in detention, or whose family circumstances have changed suddenly

7.2 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger when the DSL is not available to report to. **Anyone can make a referral.**

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

7.3 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain to children that the law is in place to protect them from harm and not criminalise them
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to the police directly (see section 7.2), and tell the DSL as soon as possible that you have done so.

All referrals should be made via the Reporting Button on Microsoft Form. Once submitted, the form will automatically be forwarded to the Designated Safeguarding Leads in school. Please inform your departments' Head Teacher when you have submitted a report in case immediate action is required. If they are not available, please escalate to the Vice Principal or Principal.

To report a safeguarding concern please visit the ISCS NAS Central staff intranet or [click here](#).

Report a Safeguarding Concern- الإبلاغ عن مخاوف تتعلق بالحماية

The survey will take approximately 4 minutes to complete.
Use this form to report student safeguarding disclosures or concerns about staff behaviour towards a student.
You should let your department Designated Safeguarding Lead know that you are submitting a disclosure.

سيستغرق الاستطلاع حوالي 4 دقائق لإكماله.
استخدم هذا النموذج للإبلاغ عن إصابات حماية الطلاب أو مخاوف بشأن سلوك الموظفين تجاه الطالب/تحت عنوان إخبار
مسؤول الحماية المعين في إدارتك أنك تقدم إصفاة

Hi, Abulh. When you submit this form, the owner will see your name and email address.

*** Required**

1. Is there an allegation against a member of staff in this incident? هل هناك ادعاء ضد أحد الموظفين في هذا الحادث؟

☐ Yes- نعم

☐ No- لا

☐ Send me an email receipt of my responses

Submit

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team or the BEAM leadership team. Share any action taken with the DSL as soon as possible.

Referral

If it is appropriate to refer the case to the police or another government agency, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.2), you must tell the DSL as soon as possible. The DSL or person who made the referral must follow up with the contacted authority.

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

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from the police.

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

In an emergency, call 999 if you:

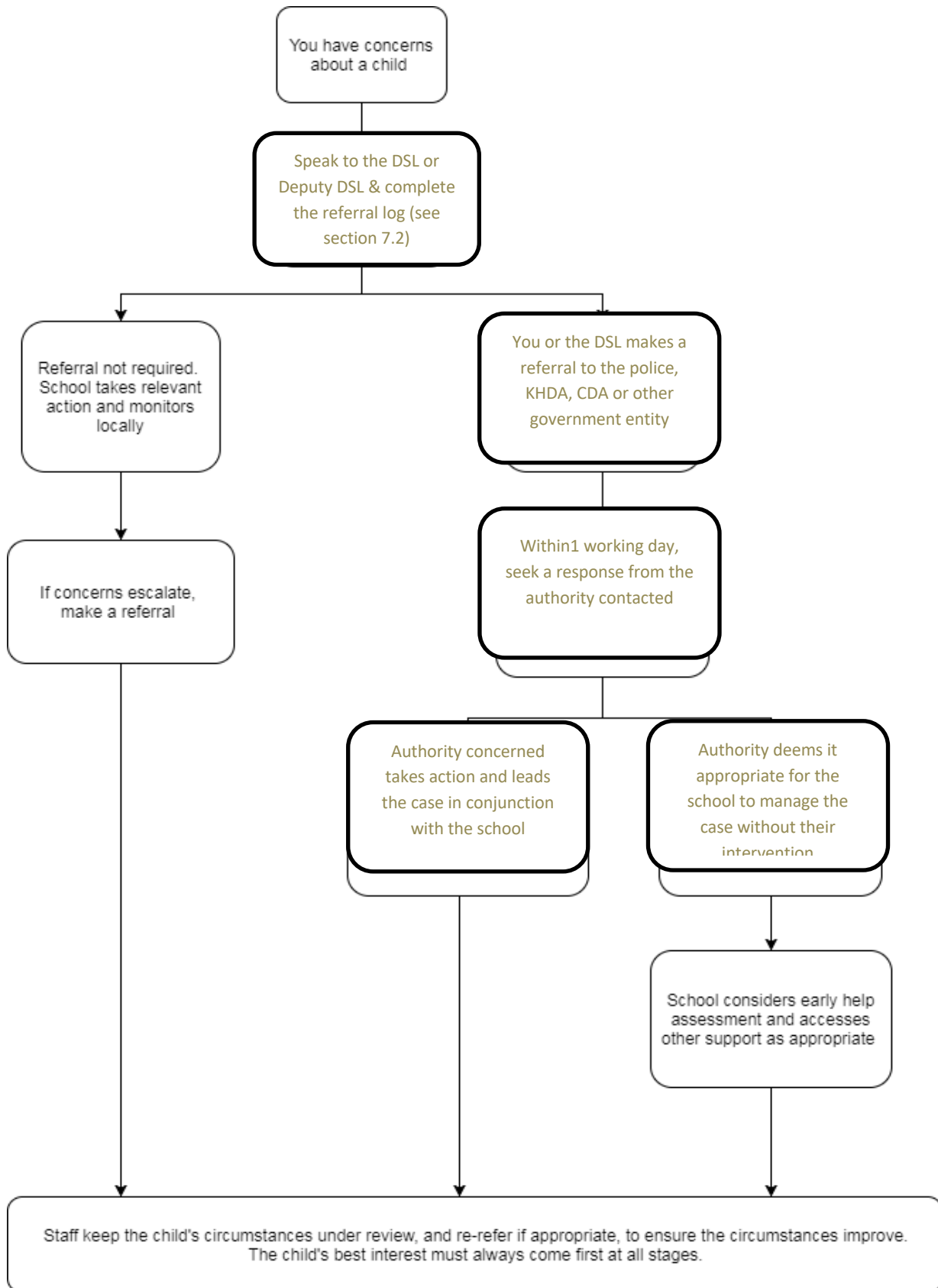
Think someone is in immediate danger

Think someone may be planning to travel to join an extremist group

See or hear something that may be terrorist-related

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

(Note –if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.) Refer to 7.2 for reporting procedures.



7.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Principal. If the concerns/allegations are about the Principal, speak to the chair of governors.

The Principal/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Principal, report it directly to the Chair of Governors Hesham Abdeen.

7.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of **child-on-child** abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all **child-on-child** abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

Is serious, and potentially a criminal offence

- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

- You must record the allegation (see section 7.3) and tell the DSL, but do not investigate it
- The DSL will contact the the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

Creating a supportive environment in school and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of **child-on-child** abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Staff should also understand that:

Child-on-child abuse is preventable. The behaviours and attitudes that precede it are usually visible before an incident occurs, and staff should challenge them early rather than waiting for a report to be made

Children can be at greatest risk at particular points in the school day - for example immediately before and immediately after school, during transitions between lessons, at break and lunchtime, and in areas of the campus that are less well supervised. Our duty and supervision arrangements take account of this

Misogyny, and misogynistic language and attitudes, can underpin child-on-child abuse. We will challenge these attitudes wherever they appear, including where they are presented as humour, and will address them through our curriculum and our Islamic values and character education

Child-on-child abuse is a safeguarding issue for every child involved, including the child or children alleged

to have caused the harm. The DSL will consider the support needs of all children involved, not only the victim

- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

7.8 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether the sharing was consensual or non-consensual.

Harmful sexual behaviour, sexual harassment and sexual violence sit on a continuum, and behaviour that appears low-level can escalate. Staff must report every such incident to the DSL and must not judge for themselves how serious it is.

Our response will be proportionate. It will take account of the age and stage of development of the children involved, the circumstances of the incident, and any element of coercion, exploitation or vulnerability.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)

- If a referral needs to be made to the police, the KHDA or any other authority
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or KHDA if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 18
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or KHDA, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Child and Women Protection

Unit or through the nearest Police Station.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording these incidents.

7.9 Reporting Systems for our pupils

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

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

7.10 Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Exploitation occurs where a child is coerced, manipulated or deceived into criminal or sexual activity, often in exchange for something the child needs or wants, or as a result of a real or perceived imbalance of power.

Staff should be aware that:

Exploitation can be carried out or facilitated by an organised network or group, and children may see themselves as belonging to that group rather than as victims of it

Most sexual abuse is committed by someone the child knows and trusts, rather than by a stranger

Children are not always recognised as victims, and can be blamed, disciplined or treated as offenders for things they did while being coerced or exploited

Exploitation affects boys as well as girls, and can be online as well as in person

Where staff suspect exploitation they must report it to the DSL immediately. The DSL will complete a risk assessment and consider a referral to Dubai Police and/or the relevant child protection authority.

7.11 Serious violence and weapons

Serious violence is an ongoing safeguarding concern. It may involve physical assault, the carrying or use of weapons, and can be linked to criminal exploitation.

Staff should be aware of the signs and risk factors that a child may be at risk of, or involved in, serious violence. These can include unexplained absence, a sudden change in friendship group, unexplained money, gifts or possessions, a marked decline in engagement or attainment, self-harm, or significant changes in

behaviour or wellbeing.

Any concern that a child is carrying, using, or intending to use a weapon must be reported to the DSL immediately. The DSL will carry out a risk assessment, decide what protective action is required and consider a referral to the police.

We recognise that targeted interventions, including mentoring, pastoral support and therapeutic support, play a key role in protecting children from violence.

7.12 Mental health as a safeguarding issue

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. A mental health concern can develop into a safeguarding concern.

Only appropriately trained professionals should attempt to diagnose a mental health problem. School staff are, however, very well placed to observe children day to day and to identify those who may be struggling. Staff fulfil four key roles:

Promoting good mental wellbeing and helping to prevent the onset of mental ill health

Observing pupils and identifying at an early stage those who may be experiencing, or at risk of developing, mental health problems

Making sure early targeted support is provided

Liaising with, and referring to, the school's counselling and inclusion teams and specialist services where needed

Any mental health support or intervention offered by the school will be evidenced as safe, effective and appropriate to the need and to the phase of education. Staff with a concern should speak to the DSL and to the school counsellor.

7.13 Young carers

Some children have caring responsibilities at home, for example for a parent, sibling or other family member who has a disability, illness, mental health condition or addiction.

Caring responsibilities can affect a child's attendance, punctuality, attainment, behaviour, friendships and wellbeing. Young carers may be reluctant to speak about their situation, and their needs are often identified late.

Early identification is essential so that young carers receive the right support at the right time. Staff who believe a child may be a young carer should inform the DSL and the relevant Head of Phase so that appropriate support, and where necessary a referral, can be put in place.

7.14 Safeguarding children with medical conditions

Most incidents relating to a child's medical condition are managed under the school's medical, first aid and inclusion arrangements rather than as safeguarding matters.

A safeguarding referral is needed only where an incident indicates that a child may be at increased risk of

neglect, abuse or exploitation because of their medical condition. This might include, for example, where relevant medical information is repeatedly not provided to the school, where a child is repeatedly sent to school without essential medication, or where a child's medical needs are consistently not being met at home.

Staff with such a concern should report it to the DSL in the usual way.

8. NOTIFYING PARENTS

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

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

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the KHDA.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

9. E-SAFETY

Staff are allowed to bring their personal phones to school for their own use, and if appropriate, to capture evidence for storage on the school's systems. In classes that do not use school iPads, staff are allowed to use their devices on the school's Wi-Fi network only. In case personal phones are used to take pictures for Class Dojo or any other school based platform, it must be stored on teachers' OneDrive account, and not their phone memory.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams
- **Disinformation** – the deliberate creation and spread of false or misleading content such as fake news
- **Misinformation** – the unintentional spread of false or misleading content
- **Conspiracy Theories** – the spreading of unverified and far-fetched explanations causing confusion.

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Establish a campus-wide (school partnership) e-safety committee which reviews e-Safety in line with [AQDAR](#) standards for regular self-evaluation and action planning.

Generative artificial intelligence (AI)

Staff and pupils may only use generative AI tools in line with the school's Artificial Intelligence Policy. Before using an AI tool to produce teacher-facing or pupil-facing material, staff must satisfy themselves that it is age-appropriate, that it will not expose pupils to harmful content, and that no personal data relating to a child is entered into it. All AI-generated material must be checked by a member of staff before it is used with pupils.

A mobile-phone-free environment

The school is a mobile-phone-free environment for pupils. The arrangements for this, the permitted use of school-managed devices, and the sanctions that apply are set out in the Student Mobile Phone Policy and the iPad/BYOD Parent Guidance, which are published to parents and reviewed annually.

Filtering and monitoring

The school will review its filtering and monitoring systems at least once every academic year. The review will check that filtering is working correctly on all devices connected to the school network, including personal devices used under the BYOD arrangements, and a written record of these checks will be kept and reported to the governing board.

10. PUPILS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

ISCS currently partners with The Bridge to ensure that students with the most profound needs have the appropriate provision for their long term education, or transition into mainstream classrooms. Staff at The Bridge are externally employed, and are subject to the same safeguarding arrangements as ISCS staff.

11. PUPILS WITH A SOCIAL WORKER

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

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

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES

12.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

12.2 Whistle-blowing

The school abides by the Whistle-Blowing procedures available on Link HR and is adopted by Bukhatir Group

13. RECORD-KEEPING

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Our safeguarding records are kept on EduSafe. Section 7.2 provides you with full details about this.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Where the information held indicates a risk to the pupil or to others, the receiving school is responsible for assessing that risk and putting a safety and support plan in place. Our DSL will hold a direct conversation with the DSL of the receiving school in every case where there are ongoing concerns, in addition to transferring the child protection file securely.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

14. TRAINING

14.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated in line with changing national and international policy.

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

14.2 The DSL and Deputies

The DSL and Deputies will undertake child protection and safeguarding training at least every two years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

14.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

14.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education.

14.5 Staff who have contact with pupils and families

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

15. MONITORING ARRANGEMENTS

This policy will be reviewed annually by Ataulah Parkar. At every review, it will be approved by the Chair of Governors.

Safer recruitment, and the maintenance and audit of the Single Central Record, are monitored separately under the Safer Recruitment Policy. That policy sets out three lines of assurance for the Single Central Record: a monthly operational check by Human Resources, a termly management check by the Principal or Vice Principal, and an independent check by a governor who is not the Designated Safeguarding Lead. The outcome of each audit, and any action still outstanding, is reported to the governing board.

16. ASSOCIATED POLICIES

- **Anti-bullying Policy**
- **Behaviour Policy**
- **First Aid Policy**
- **Inclusion Policy**
- **Physical Handling Policy**
- **PSHE Policy and Curriculum Documentation**
- **Health & Safety Policies**

These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education**.

Appendix 1: types of abuse

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

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. **Verbal abuse - including persistent shouting, threatening, humiliating, belittling or degrading language - is a form of emotional abuse.**

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Domestic Abuse is now included as a separate category of abuse, indicating the need for staff to be aware of its distinct nature. Domestic abuse can be psychological, physical, sexual, financial or emotional. Children can be impacted through seeing, hearing or experiencing the effects of domestic abuse, and or experiencing it through their own intimate relationships

Child-to-caregiver abuse is abuse carried out by a child towards a parent, carer or other family member. It can be physical, verbal, emotional or financial, and may include damage to property, threats, intimidation or controlling behaviour. Staff should be aware that this is a recognised form of abuse, that the child causing the harm may themselves be experiencing abuse or unmet need, and that both the child and the adult may require support. Concerns should be reported to the DSL.

Appendix 2: safer recruitment and DBS checks – policy and procedures

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. Please see the Safer Recruitment Policy for full details and alignment with KHDA Teacher Registration Requirements.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files at the BEAM Central Office. We follow requirements and best practice in retaining copies of these checks, as set out below.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy.
- CVs will not be accepted without the completion of a school application form.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and examine the reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list

- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information

Sign a declaration confirming the information they have provided

Seeking references and checking employment history

We will obtain references before making an offer for employment. Any concerns raised will be explored further with referees and taken up with the candidate prior to contracts being signed.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed
- The school's recruitment team will conduct online searches as part of their due diligence checks for shortlisted candidates.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate or equivalent (For example through ACRO). When a DBS is not available, the UAE's visa and labour process will be relied on to capture any criminal history.
- Comply with the KHDA requirements to conduct a criminal check locally or from an employee's home country as part of the current KHDA Teacher Permit requirements.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UAE. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, through legalization and attestation from their home country.
- We will ask for written information about previous employment history and check that information is not contradictory or incomplete.
- We will seek references on all candidates selected for appointment, including internal candidates, before any offer of employment is confirmed. We will scrutinise these and resolve any concerns before confirming the appointment. The references requested will ask specific questions about the suitability of the applicant to work with children. Because of the volume of candidates interviewed, references are not routinely sought before interview; the compensating controls that apply at shortlisting and interview are set out in full in the Safer Recruitment Policy.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid or unpaid work regularly in a school or college where that work provides an opportunity for contact with children. Following the removal of the supervision exemption, work carried out under supervision is no longer excluded from regulated activity; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school is included on the school's SCR and received appropriate guidance on safeguarding. Their Emirates ID and copy of visa will be kept on file.

Contractors are not permitted to work on-site unsupervised, whether documents are provided or not. The exception to this are external providers providing after-school activities. The school will permit students to

attend their sessions, once documentation is provided and a contract of services is put in place with BEAM Head Office.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. The school only has such a relationship with the University of Birmingham at present.

Volunteers

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Treat any person volunteering in a role that involves teaching, training, instructing, caring for or supervising children on more than three days in any 30-day period, or overnight, as engaged in regulated activity, and apply the same pre-appointment vetting checks that we apply to new staff

Apply those checks to existing volunteers who now fall within regulated activity following the removal of the supervision exemption

Where a volunteer does not fall within regulated activity, complete and retain a written risk assessment recording the nature of the role, the level and nature of contact with children, what is known about the volunteer, whether they will be supervised at all times and by whom, and what checks (if any) are required

Volunteers are required to provide their Emirates ID and Visa – and require written permission from the Principal if they are to be involved in unsupervised or regulatory activity.

Governors

All schools include:

All governors will provide copies of their passports, Visas and Emirates IDs, and will be included on the schools Single Central Record. The school HR will confirm their:

- Identity
- Right to work in the UAE
- Other checks deemed necessary if they have lived or worked outside the UAE

Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

Behaved in a way that has harmed a child, or may have harmed a child, or

Possibly committed a criminal offence against or related to a child, or

Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the principal, or the chair of governors where the principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

Allegations against individuals supplied by a third party

Where an allegation is made against an individual supplied by an employment agency, a contractor or another third-party organisation, the school and that organisation share responsibility for the safeguarding response. The school remains responsible for gathering the facts and for managing the safeguarding process. The employing agency or business will usually lead on any disciplinary action. We will work closely with them, share relevant information throughout, and will not simply cease to use the individual's services without completing the safeguarding process.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

Redeployment within the school so that the individual does not have direct contact with the child or children concerned

Providing an assistant to be present when the individual has contact with children

Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Temporarily redeploying the individual to another role in a different location, for example to an alternative school

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or chair of governors if the Principal is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at BEAM and/or KHDA. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer. Where the police and/or KHDA services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know. The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or KHDA.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the KHDA with respect to future employment in other schools.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Principal, or other appropriate person in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the BEAM Governors to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.6 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses
- The school's DSL (School Principal) should be made aware of every low-level concern. He/she will discuss with the relevant Deputy DSL to take appropriate action in line with the concern.
- Low level concerns about supply staff or contractors should be escalated to their employer by the School Principal.

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the Bukathir Group and relevant school policies.

The school will review low-level concerns to extrapolate lessons learned to amend staff policies, inform professional development and take swifter action in future cases.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely on the school's safeguarding portal.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance



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