



1. Policy Statement

Brighton College Abu Dhabi 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 is safe whilst in the care of the College. It also informs parents and guardians how the College will safeguard pupils.

2. 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 (2024)*. The policy also complies with the UAE Child Protection Law 3 which became law on 15th June 2016.

All College staff are responsible for providing a safe environment in which our pupils can learn. As recommended, the policy recognises the need for a designated practitioner to take lead responsibility for safeguarding pupils within the whole College setting, supporting staff to carry out their safeguarding duties and liaising with local agencies as appropriate.

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
- There is an effective whole College policy against bullying
- The College operates safe recruitment procedures (including CRB checks and local security checks). The College will ensure that any full, part-time, supply, peripatetic or volunteer staff are security checked prior to employment/engagement. This is a whole College requirement and should include all ancillary staff as well as academic teaching staff
- Any deficiencies or weaknesses in child protection arrangements will be remedied without delay
- The Board of Governors maintains a very high-level oversight of the safeguarding in school.



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3.2 Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) for the College is Simon Baker, Deputy Head Pastoral. In the event he is unavailable, the following persons should be contacted:

- Stephen Jeffrey –Deputy DSL (Senior)
- Leila Graham –Deputy DSL (Senior)
- Bethany Austen - Deputy DSL (Pre Prep)
- Amy Ellis - Deputy DSL (Prep)
- Dr Anas Al Mulla (Whole College Arabic speaker)
- In addition, the following staff are all DSL Level 3 trained and may be used where deemed appropriate: Ruth Forsythe (Whole College), Joanna Dispirito (Senior School) Lee Francis (Senior School), Adina Aliu (Senior School), Hannah McDermott (Whole College Inclusion), Luke Bromwich (Prep School), Nicholas Crafts (Senior School), Samantha Ribbens (Pre Prep Early Years)

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

- Ensure that the Head Master 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.

We recognise that because of the day-to-day contact with children, the staff are well placed to observe the outward signs of abuse. The College will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to
- Ensure children know that there are adults in the school whom they can approach if they are worried
- Include opportunities in the PSHME/Jigsaw curriculum for children to develop the skills they need to recognise and stay safe from abuse
- Ensure that sharing of relevant information is conducted appropriately, in line with the welfare of the child, which is paramount.

3.2.1 Specifically:



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- Any member of staff concerned about a pupil must inform a member of the safeguarding team and log any incidents onto CPOMS. The DSL will inform the Head Master immediately of any urgent or need for external agency support child protection concerns or weekly in the Pastoral meeting.
- The member of staff must record information regarding their concerns on the same day using CPOMS software. If access to CPOMS is not possible, members of the safeguarding team will log any incidents onto CPOMS
- The Designated Safeguarding Lead in consultation with the Head Master will decide whether the concerns should be referred to an outside agency.
- Designated Safeguarding Lead (DSL) should keep records of all relevant concerns, discussions and decisions and the rationale for the decisions made (including not referring). This is to be held centrally on CPOMS and where a pupil transfers their file should be forwarded.
- As a College, if we have a piece of information which, when combined with information held elsewhere, could help identify a welfare concern or risk, we should proactively share it through the correct safeguarding route. In addition, should the College hold information about a child who may pose a risk to another child should not be withheld simply because that child is not themselves the apparent victim.

3.2.2 Safeguarding Training:

We will follow the procedures set out by the College to:

- Ensure all staff and volunteers will receive annual training on the signs and symptoms of abuse and the procedures within Brighton College Abu Dhabi. They will also be made aware of their responsibilities for referring any concerns to the DSL and Safeguarding Team
- The Designated Safeguarding Lead and Deputy DSL's have received relevant Safeguarding Training and are up to date.
- In addition to internal training, all staff in regular contact with pupils will receive additional online Safeguarding training via external portal 'National College'. Records for all staff who undertake this mandatory training will be held centrally by Human Resources (HR).
- The Board of Governors have received training on the signs and symptoms of abuse and the procedures within Brighton College Abu Dhabi. This will be ongoing in line with staff training.

3.3 Recognising Child Abuse – When to be concerned

The definition of 'safeguarding and promoting the welfare of children' now aligns with the changes reflected in Keeping Children Safe in Education Working 2026.

(https://assets.publishing.service.gov.uk/media/6a9081309a177a1decf97b00/Keeping_children_safe_in_education_2026.pdf).



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Major Changes from 2025 to 2026 to reflect best practice within UAE context.

1. Safeguarding Information for All Staff (Part One)

- **Early Help:** Now distinguishes between "community-based early help" and "targeted early help" delivered through "Family Help".
- **Expanded safeguarding issues:** Includes modern slavery, financial exploitation, and child-to-parent/caregiver abuse.
- **Child-on-child abuse:** Now explicitly includes harassment and violence, and emphasizes that it is a safeguarding issue for both victim and alleged perpetrator. It is also described as preventable, with a focus on early intervention.
- **Mental Health:** Substantially updated to provide more detail on identifying and responding to mental health concerns as safeguarding issues.
- **Serious Violence:** Expanded content.

2. Management of Safeguarding (Part Two)

- **Online Safety:** Updated risk categories, new guidance on safe and effective use of Generative AI, and a new section on mobile phone policy (schools should be mobile phone-free by default).
- **Children with Medical Conditions:** New section on safeguarding children with medical conditions.

3. Safeguarding Concerns or Allegations about Staff (Part Four)

- **Trainee Teachers:** Now explicitly included throughout as a group for whom safeguarding concerns and allegations procedures apply.
- **Supply Teachers and Contractors:** Clarified shared safeguarding responsibilities with third-party organisations.

4. Child-on-child Sexual Harassment and Sexual Violence (Part Five)

- **Continuum of Harmful Sexual Behaviour (HSB):** Part five rewritten to highlight the progression from HSB to sexual violence.
- **Nudes and Semi-nudes:** All incidents involving sharing of such images require a safeguarding response, regardless of consent.
- **Consent:** Additional information and resources on consent.

The document highlights the emphasis on early intervention, protection from harm (both online and offline) and promoting the best outcomes for all children, including providing help and support to meet the needs of children as soon as problems emerge. Protecting children from maltreatment, inside or outside the home, including online.

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**



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abuse, **physical** abuse, **sexual** abuse and **neglect**. The term 'exploitation' throughout the use of the policy is to reflect the potential for abuse, neglect and exploitation rather than just abuse and neglect. The definition of abuse has been expanded to highlight that witnessing ill-treatment of others is harmful to children in relation to domestic abuse ('including whether they see, hear or experience its effects').

These signs may include one or more of the following:

- An injury that is not typical of the bumps and scrapes associated with everyday activities, or an injury that is not consistent with any explanation given
- Frequent injuries even when apparently reasonable explanations are given
- Sudden changes in behaviour, performance or attitude
- Anxiety or low self-esteem
- Knowledge of sexual matters beyond what would normally be expected, or sexual behaviour that is unusually explicit or inappropriate to the pupil's age. Use of artificial intelligence to create and share nudes and semi-nude images.
- Disclosure of an experience in which the pupil may have been significantly harmed.
- The term 'deliberately missing education' should be understood to mean 'unexplainable and/or persistent absences from education' in relation to outlining the signs that a child may be at risk of harm.

3.3.1 Inclusion and Children with Additional Vulnerabilities

Staff should also be alert to additional safeguarding challenges which exist for pupils who have learning differences 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 learning differences 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 a learning difference 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.
- d) Staff must be hyper-vigilant to the needs and concerns of these children who are among the most vulnerable
- e) Additional barriers can exist in identifying neglect and harm for some groups of pupils.

A more detailed overview of the possible signs of abuse are contained in Appendix 1.

- f) Early Help has been updated in KCSiE 2024 to reflect the changes outlined in Working Together to Safeguard Children 2023. (Part one – Paragraph 18 and other sections). It broadens the scope of Early Help, including a wider range of concerns. Staff should be alerted to the need for early help for children who: Frequently go missing/goes missing from education, home or care. Have
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experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit. Has a parent or carer in custody or is affected by parental offending.

3.3.2 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.

3.3.3 Radicalisation (see KCSIE Sept 2023):

'Children may be susceptible to extremist ideology and radicalisation. Like 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 referred in the same way as any other suspected cases of abuse. The PHSE programme in the Prep and Senior school facilitates pupil awareness of radicalisation within society.

3.3.4 The abuse of a pupil by another pupil (Child on Child KCSIE Sept 2023):

All staff should be aware of the potential for a pupil's relationship with another pupil to be or become abusive. Staff should be alert to this possibility and the requirement for concerns of this nature to be referred under the procedures detailed in this policy. Staff should also refer to the Anti-Bullying policy. Bullying is a subset of abuse that can take different forms including physical, sexual (including sexting), emotional and verbal. Child on child abuse should never be excused as 'teasing/banter/pupils growing up'. It is acknowledged that a pupil may be abused by more than one child and by children of different age groups. Suspected cases should be referred to the Designated Safeguarding Lead in the same way as any other safeguarding concern. This might also take the form of an overtly audible disclosure from a pupil(s) meant to potentially cause emotional harm to a pupil.

3.3.5 Online safety:

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 should receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The designated safeguarding lead should take lead responsibility for understanding the filtering and monitoring systems and processes in place. (KCSIE 2023). Daily Checks are conducted by the IT department using FortiGate firewall, which has FortiGuard web-filter service as per



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the ADEK Digital Policy. In addition, all teaching staff have undertaken mandatory ADEK AI training and AI as a standalone subject is being rolled out September 2026 across the College.

Updates from KCSIE (2025): Expanded Online Safety Risks: Under the “content” segment of the “four Cs” (content, contact, conduct, commerce), KCSIE now explicitly names misinformation, disinformation (including fake news), and conspiracy theories as safeguarding harms that schools should address. Filtering, Monitoring & AI Guidance: There's now a link to the DfE's Generative AI: Product Safety Expectations, providing that AI tools must meet to be considered safe for use in schools (e.g., content control, activity logging, accountability, data protection). Cybersecurity expectations are clarified with added description of the Cybersecurity Standards for Schools and Colleges to bolster resilience against cyber threats.

The September 2026 update to Keeping Children Safe in Education places stronger emphasis on online safety: guidance has expanded, with schools now expected to address misinformation, disinformation, and conspiracy theories as safeguarding risks. New expectations highlight the use of DfE tools for filtering, monitoring, cybersecurity, and safe use of AI in schools. Alternative provision requirements are tighter, with written safeguarding assurances, location checks, and half-termly reviews now mandatory.

3.4 Dealing with a Disclosure

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

Do:

- Arrange a place and time where you can talk as soon as possible, this must be 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.
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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.

For a short summary of the above please see Appendix 2. 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 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.

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 Head Master** in order to protect all concerned.

3.4.1 Dealing with a Disclosure in Nursery

In accordance with ADEK and UAE law, all Brighton College Abu Dhabi nursery staff have a legal duty to safeguard and protect children from harm. The following procedures must be strictly followed if maltreatment is suspected or disclosed:

Mandatory Reporting

- All nursery staff, regardless of their role, are *mandated reporters* under Federal Law No. (3) of 2016 (Wadeema Law).
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- Any suspicion, disclosure, or allegation of abuse (whether occurring inside or outside the nursery) must be reported within 24 hours to the Brighton College Designated Safeguarding Lead (DSL) and ADEK's Child Protection Unit (CPU).
- Reports must be submitted using the Safety Concern Form on the [ADEK digital portal](#) and should also be logged on CPOMS.

Initial Reporting Procedure

1. Immediately inform the DSL or a DDSL if the DSL is not available.
2. If they are unavailable or if it is not in the child's best interest to report to them, contact the ADEK CPU or Family Care Authority (FCA) directly.
3. For emergencies where a child is in immediate danger, contact Abu Dhabi Police (999) and notify the College's Designated Safeguarding Lead (DSL).

Emergency Cases

- Emergency situations must be escalated without delay to:
 - **Police (999)**
 - **MOI CPU 116111**
 - **ADEK Child Protection Unit (CPU):** 800 85 / cpu@moe.gov.ae
 - **FCA:** 800 444 / icm@adfca.gov.ae

Documentation

- Concerns must be documented factually using the Safety Concern Form and logged on CPOMS.
- The CPC is responsible for maintaining confidential records and initiating contact with external agencies.
- Staff must not investigate or interview the child or any suspected parties themselves.

What to Report

Indicators of possible maltreatment include:

- Unexplained injuries
- Withdrawal or changes in behaviour
- Reluctance to go home
- Disclosure of harm by the child

Confidentiality

- All information must be treated as confidential and only shared with relevant safeguarding personnel or authorities.
- Staff must not discuss suspected cases with colleagues or parents without DSL guidance.

3.5 Allegations Involving College Staff

The procedures apply to all staff including former members of staff. Those dealing with an allegation must maintain an open mind and ensure that further action is not subject to delay. Allegations against staff or volunteers should immediately be reported to the Head Master or in his absence to either the Head of School or the DSL's (if the concern is not related to either of them).



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If an allegation is made against a member of staff at the College, the Head Master 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 Head Master will make an initial assessment of the allegation, consulting others as necessary. Where the allegation is 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. The initial assessment should be based on the information received and gives rise to a decision whether the allegation warrants further investigation and if so by whom.

In the event of an allegation against the Head Master, this should be reported to the Chairperson of the Board of Governors without notifying the Head Master first.

3.5.1 Sharing Information/Independent Safeguarding Authority (ISA) and Relevant Local Authorities

The College undertakes to report to the ISA and any relevant local authorities within one month of leaving the school any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children. The College will share relevant information, where the welfare of the pupil is concerned, across the Foundation, Prep and Secondary DSLs. Line management meetings with teachers will contain agenda items on safeguarding concerns, where relevant. BCAD staff understand the shared responsibility of the welfare of all pupils. Meetings will occur throughout the academic year to ensure information is shared appropriately with staff to support those who have come to the attention of DSLs. 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.

Furthermore, BCAD will ensure that best practice is considered when sharing information with other schools. In the instance of a pupil who is moving to another school and who has been identified as a cause for concern/in need of safeguarding, the DSL will give verbal information to the designated DSL at the new school on a need-to-know basis. The DSL will keep a record of what was discussed and any previously intended course of action. BCAD will keep a record of previous pupils' safeguarding concerns and related auditing documents.

External Agency Access to Pupils

This relates to any external agency attending the school and wanting to speak to any of the pupils on School premises e.g. ADEK, the Police, Child Protection unit or any other external agency. The School will seek prior consent from the child's parents or legal guardians, as well as from the child themselves, before any meeting takes place. The pupil will be given the opportunity to speak with their parents beforehand, and either their parent, or a member of the school staff; should the allegation be against a parent, the pupil will be afforded the opportunity to consult with a trusted adult typically from the Safeguarding or Pastoral team, will attend the meeting to support and represent the child's best interests.



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It is important for our children's well-being and mental health that they are supported and have an advocate with them when meeting with adults from any external agency. This will always be the case, regardless of the nature of the meeting or its intended outcome. For the purposes of this policy and for clarity, this policy applies to all pupils within the College, no matter their age or year group.

Should parental permission be declined, the School will not allow the pupil to attend that meeting but will provide the contact details of the parents to that external authority, so that they may be in direct contact with the family, should they so wish.

3.6 Guidelines for Staff

This guidance is issued within this policy for the protection of both staff and pupils. In education, all relationships are founded on trust. It is vital for those in positions of trust to understand the power this gives them over those in their care, and the responsibility they must exercise consequently.

- Do not let suspicion, disclosure or allegations of abuse go unreported or unrecorded
- Do provide access for pupils to talk to you about any concerns they may have
- Plan activities that involve more than one other person being present or are at least within sight or hearing of others
- If it is necessary to speak to a pupil alone, always inform another member of staff where you are. It is advisable not to close the door of the room
- Recognise that caution is required in sensitive moments of counselling on matters such as bullying, bereavement or abuse
- On residential trips, pupils and staff must have separate sleeping accommodation
- Avoid situations that compromise your relationship with pupils and are unacceptable within a relationship of trust
- During coaching of sport or instrumental teaching, where a degree of physical contact may be inevitable, staff must be particularly aware that this should only be used to develop skills/techniques or to treat or prevent injury
- Staff are advised to avoid transporting a single pupil in a vehicle except in case of an emergency
- Remember that someone else may misinterpret your actions, no matter how well intentioned
- Do not have inappropriate physical or verbal contact with pupils. Avoid suggestive remarks or gestures, even in fun
- Do not jump to conclusions about others without checking the facts
- Do not rely on your good name to protect you
- **Do not believe "it could never happen to me".**

3.7 Allegations by one pupil against another pupil

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

- If a member of staff/volunteer suspects or is informed about an allegation involving a pupil, the College should listen and treat in good faith
 - The College should establish the initial salient details of the allegation and then contact both families for discrete appointments to discuss the area of concern
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- The College will ask the family/families to support the college's disciplinary approach with a view to developing a cooperative process
- The College will liaise with ADEK sharing the nature of the area of concern and work towards a mutually acceptable solution
- In association with the ADEK, the requirement to report the area of concern to the Police should be discussed
- The College will seek legal advice about the safety of the pupil returning to the College
- The College will request that the family undertakes counselling as required regarding the pupil's return to college.

3.8 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 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 with details available in Appendix 3
- 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.

4. Assessment and Record Keeping

- In the event of a disclosure, best practice is followed as soon as is practically possible
 - Pass the concern to the Designated Safeguarding Lead or member of the safeguarding team and log the concern onto CPOMS immediately
 - Listen but do not ask leading questions. Your role is not to investigate the disclosure
 - Make notes as soon as possible after the conversation. These notes should be passed to the DSL as soon as they have been taken and logged onto CPOMS
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- Do not destroy the original notes in case they are needed by a court
- Record the date, time, place and any noticeable non-verbal behaviour **and the words used by the pupil**
- Record on a body map the site of any injury (available on CPOMS)
- Record statements and observations, not interpretations or assumptions
- All information relating to safeguarding is maintained on CPOMS with dual authentication access.

5. Staffing - Safeguarding Leads

Please see appendix 3 for staff with designated safeguarding lead responsibilities.

6. Procedure following a Disclosure

6.1 What happens after the initial report has been recorded?

- The Designated Safeguarding Lead will liaise with the Head Master 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 ADEK
- A school mobile number will be given for an age-appropriate child at risk - to be ascertained on a case-by-case basis including the organisation of who will be responsible for it – normally the Head Master or DSL
- The school will deal with a family in cases of parental bullying or violence on a case-by-case basis
- If the pupil is at risk (e.g. self-harming, suicidal thoughts) the school must 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.

6.2 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.



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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 Head Master on CPOMS.

6.3 Confidentiality and Information Sharing

All confidential issues relating to children and young people should be dealt with on a need-to-know basis. Therefore, only information relevant for a particular purpose should be passed on to the recipient, who in turn may not pass this information onto another individual, without consulting the informant.

Only relevant members of staff need to know the details or concerns relating to a pupil in need i.e. the Designated Safeguarding Lead, Head Master, 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. The Designated Safeguarding Lead will make contact and maintain open communication with parents, unless parents are alleged abusers. When a pupil or staff member leaves BCAD any Child Protection issues should be passed on to the new school in the form of a phone call to the new Head from either the Head Master or the CEO whenever possible.

APPENDIX 1

Signs of possible Child Abuse

It is important to remember that lists such as the one below are neither completely definitive nor exhaustive. The information in such lists has to be used in the context of the child's whole situation and in combination with a range of other information related to the child and his/her circumstances. There can be an overlap between all the different forms of child abuse and all or several can co-exist.

1. Emotional Abuse

Some level of emotional abuse is present in all forms of abuse. Persistent emotional ill treatment or rejection can cause serious effects on behaviour and emotional development and usually leads to a sense of low self-worth. It may involve inappropriate expectations (e.g. by age or ability), repeated criticisms that convey to a child that he or she is worthless or unloved. It may involve causing children frequently to feel unhappy, frightened or in danger.



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Signs of possible emotional abuse

- Low self-esteem
 - Continual self-deprecation
 - Sudden speech disorder
 - Significant decline in concentration
 - Socio-emotional immaturity
 - 'Neurotic' behaviour (e.g. rocking, head banging)
 - Self-mutilation
 - Compulsive stealing
 - Extremes of passivity or aggression
 - Running away
 - Indiscriminate friendliness.
2. **Neglect** – This refers to persistent or deliberate failure to meet a child's physical or psychological needs e.g. a failure to provide adequate food, clothing or shelter, failure to protect a child or failure to provide adequate medical care. It may also involve neglect or failure to give adequate response to a child's emotional needs.

Signs of possible physical neglect

- Constant hunger
 - Poor personal hygiene
 - Constant tiredness
 - Poor state of clothing
 - Frequent lateness and/or unexplained non-attendance
 - Untreated medical problems
 - Low self-esteem
 - Poor peer relationships
 - Stealing.
3. **Physical Injury** – This involves physical harm to a child e.g. hitting, shaking, scalding and may be deliberate or a result of failure to take adequate precautions. It can also include the deliberate withholding of physical needs e.g. food. It can involve the abuse of dangerous substances and alcohol.

Signs of possible physical abuse

- Unexplained injuries or burns, particularly if they are recurrent.
 - Improbable excuses given to explain injuries.
 - Refusal to discuss injuries.
 - Untreated injuries, or delay in reporting them.
 - Excessive physical punishment.
 - Arms and legs kept covered in hot weather
 - Fear of returning home.
 - Aggression towards others.
-



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- Running away.

When considering the possibility of non-accidental injury, it is important to remember that the injuries may have occurred for other reasons, e.g. genuine accidents or medical disorders.

4. Sexual Abuse – This involves the child being forced or coerced into participating in or watching sexual activity. The apparent consent of the child is irrelevant. The acts may involve physical contact, penetrative or non-penetrative. They may involve non-contact activities such as involving children in looking at or in the production of pornographic material, watching sexual activities or encouraging children to behave in sexually inappropriate ways. This includes under-age sex.

Not all children are able to tell parents/adults that they have been assaulted and changes in behaviour may be a signal that something has happened. It is important to remember that in sexual assault there may well be no physical or behavioural signs.

Signs of possible sexual abuse

- Lack of trust in adults or over-familiarity with adults
 - Fear of a particular individual
 - Social isolation – withdrawal or introversion
 - Sleep disturbance (nightmares, irrational fears)
 - Running away from home
 - Girls taking over the mothering role
 - Reluctance or refusal to participate in physical activity or to change clothes for physical activities
 - Low self-esteem
 - Display of sexual knowledge beyond the child's years e.g. 'French kissing'
 - Unusual interest in the genitals of adults or children or animals
 - Fear of bathrooms, showers, closed doors
 - Abnormal sexualised drawing
 - Fear of medical examinations
 - Developmental regression
 - Poor peer relations
 - Over-sexualised behaviour
 - Compulsive masturbation
 - Stealing
 - Psychosomatic factors, e.g. recurrent abdominal pain or headache
 - Sexual promiscuity
 - Bruises, scratches, bite marks on top of the thighs or genital areas
 - Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
 - Pain on passing urine or recurrent urinary infection
 - Stained underwear
 - Unusual genital odour
 - Anxiety/depression
 - Eating disorder, e.g. anorexia nervosa or bulimia
 - Discomfort/difficulty in walking or sitting
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- Pregnancy – particularly when reluctant to name father
- Venereal disease, sexually transmitted diseases
- Soiling or wetting in children who have been trained
- Self-mutilation/suicide attempts.

APPENDIX 2

WHAT TO DO ON SUSPICION OR DISCLOSURE

Stay Calm

(Don't overreact. It is extremely unlikely that the child is in immediate danger).

Listen, Hear and Believe

(Don't probe for more information. Questioning the disclosure may affect how it is received at a later date).

Give time for the person to say what they want

(Don't make assumptions, don't paraphrase and don't offer alternative explanations).

Reassure and explain that they have done the right thing in telling.

Explain that only those professionals who need to know will be informed

(Don't promise confidentiality to keep secrets or that everything will be OK).

Act immediately in accordance with the procedures in this document

(Don't try to deal with it yourself).

Record in writing as near as verbatim as possible and as soon as possible on CPOMS software

(Don't make negative comments about the alleged abuser).

Report to the Designated Safeguarding Lead who will inform the Head Master according to the procedure

(Don't gossip with colleagues about what has been said to you).



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Record Your Report (CPOMS)

(Don't make a child repeat an allegation unnecessary).

APPENDIX 3

Safeguarding Lead Responsibilities

Name	Role	Email
Simon Baker	Deputy Head Pastoral, DSL	sbaker@brightoncollege.ae
Stephen Jeffrey	Deputy DSL Senior	sjeffrey@brightoncollege.ae
Leila Graham	Deputy DSL Senior	lgraham@brightoncollege.ae
Kelly Mansbridge	Head of Pre-Prep	kmansbridge@brightoncollege.ae
Luke Bromwich	Deputy DSL Prep	lbromwich@brightoncollege.ae
Barney Durrant	Head Master	bdurrant@brightoncollege.ae

7. Digital and Physical Breaches

In the event of a physical breach of the school premises, the school will initiate a school lockdown drill. The UAE and Bloom each have a very strong fire walls, however, should we experience a Digital breach, this will be reported immediately by the DSL/Head Master to the relevant authorities in Abu Dhabi, namely the Cyber Crimes Unit and we would act accordingly from their directive(s).

8. Monitoring and Review



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This policy is monitored on a termly basis by the DSL and the Head Master and is reviewed annually by the Board of Governors.

8. Approved by

The Head Master on behalf of the College:

On behalf of the Governors:

Change History Record

Version No.	Description of Change	Owner	Date of Issue
1.0	Minor edits throughout editing BCD initial document and updated contact details	LWU	September 2022
2.0	Reviewed following KCSIE 2023 updates. Changed Head Mistress to Head Master	LWU	August 2023
3.0	Format Alignment	KC	October 2023
4.0	ADEK Updates	LWU	June 2024
5.0	Updated DSL personnel and KCSIE 2024	RAF	October 2024
6.0	Updated DSL personnel, Head Master and KCSIE 2025. Update to external agency access and parental contact	RAF	August 2025
7.0	Change in DSL for Prep School	RAF	December 2025
8.0	3.3.4 Line inserted to consider malicious whistleblowing	SBA	June 2026
9.0	Increase of AI and information sharing, change of DSL in PS	SBA	September 2026



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Brighton College Abu Dhabi Policies and Guidelines

Policy Statement

Brighton College Abu Dhabi 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:

- DFES Guidance Keeping Children Safe in Education
- 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.

Policy Development

Policies will continue to be developed as strategic priorities are set.
