



Safeguarding and Child Protection

Please see [Brighton College Dubai Policies and Guidelines](#)

1. Policy Statement

Brighton College Dubai 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 is updated in line with the most recent version of Keeping Children Safe in Education (KCSIE 2025), and all staff are expected to remain familiar with these updates and UAE laws. It also informs parents and guardians how the College will safeguard pupils. We aim to instill a culture where safeguarding is everyone's responsibility.

2. Aims

We aim to safeguard and promote the welfare of children at the school in compliance with local requirements and the DFE Guidance *Keeping Children Safe in Education (2025)*. 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 recognising 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.
- All staff involved in recruitment must have undertaken safer recruitment training as per KCSIE 2025, ensuring that safeguarding considerations are central to the recruitment process.
- All staff play a role in promoting a whole-school safeguarding culture, as per the latest KCSIE guidelines.
- The Board of Governors maintains a very high-level oversight of the safeguarding in school.

3.2 Designated Safeguarding Lead

The details of the Safeguarding Team are available in appendix 6.

The Designated Safeguarding Lead (DSL) and Deputies, 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
- Work closely with the school counsellor to oversee mental health related safeguarding concerns

At least two Deputy DSLs are trained to the same level as the DSL to ensure full cover and safeguarding leadership at all times, including during staff absence, leave, or off-site commitments.

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.
- The DSL must ensure that pupil voice is actively sought and considered in safeguarding decisions. Staff should be trained to listen attentively and respectfully to children, recognising that disclosures may be subtle or indirect.
- Include opportunities in the PHSE 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:

- Any member of staff concerned about a pupil must inform the Designated Safeguarding Lead immediately. The DSL will inform the Head Master and the Deputy DSL's.
- The member of staff must record factual information regarding their concerns on the same day using CPOMS software. If access to CPOMS is not possible, paper records must be dated with a clear and concise account of the observations.
- The Designated Safeguarding Lead in consultation with the Head Master will decide whether the concerns should be referred to an outside agency.

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 Dubai. They will also be made aware of their responsibilities for referring any concerns to the DSL.
- The Designated Safeguarding Lead and Deputy DSL's have received relevant Safeguarding Training.

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- In addition to internal training, all staff in regular contact with pupils will receive online Safeguarding training.
- Key staff throughout the College are trained in Mental Health First Aid to recognise signs of mental health concerns that may be linked to safeguarding issues, and to refer such concerns in line with this policy.
- The Board of Governors have received training on the signs and symptoms of abuse and the procedures within Brighton College Dubai. This will be ongoing in line with staff training.
- All staff are required to read Part 1 and Annex A of KCSIE (2025) and confirm in writing that they have done so. Records of this confirmation are held by the DSL.

3.3 Recognising Child Abuse – When to be concerned

It is important that all members of staff, including visiting staff both paid and unpaid, should be aware and alert to possible outward signs of abuse or neglect. There are four categories of abuse: **emotional** abuse, **physical** abuse, **sexual** abuse and **neglect**. 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.
- Disclosure of an experience in which the pupil may have been significantly harmed.

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 appearance
 - Unusual or over-physical attachments to staff members or peers

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- 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.

3.3.2 Female Genital Mutilation (FGM) see KCSIE Sept 2024

‘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 Vulnerable Children (see KCSIE Sept 2024):

‘Children are vulnerable to extremist ideology and radicalisation, including serious violence or criminal exploitation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’ safeguarding approach.’ Any suspected cases of radicalisation should be 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:

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’. Vigilance is required to monitor potential signs of child on child sexual violence and harassment. It is acknowledged that a pupil may be abused by more than one child. Suspected cases should be referred to the Designated Safeguarding Lead in the same way as any other safeguarding concern.

3.3.5 Online safety:

Teaching and learning increasingly involve online platforms, making it essential to safeguard pupils from harmful material they may encounter. The College maintains robust filtering and monitoring systems to protect pupils from inappropriate content and online threats. Staff receive annual training in online safety to remain vigilant to evolving risks, including exposure



to harmful content, grooming, and inappropriate contact. Pupils are taught digital literacy and e-safety as part of the curriculum to empower them to navigate the online world safely.

Staff must also be alert to emerging online risks such as misinformation, disinformation, conspiracy theories, and AI-generated content. These threats can distort pupils' understanding and expose them to manipulation. The College will review its filtering and monitoring systems annually to ensure they address these evolving challenges. Pupils will be equipped with critical thinking skills to help them evaluate digital content responsibly and safely.

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 by the recording of the incident on CPOMS, in person or by telephone.

Even if the information is based on rumours of abuse, or there is a suspicion but no firm evidence, the incident should be recorded on CPOMS. Therefore, even if the incident does not seem serious or appears to be a low-level concern, 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, preferably with another adult present e.g. nurse or counsellor
- Stay calm and reassure the pupil that she/he is right to tell someone.
- Let the pupil know that she/he is not to blame
- Allow the pupil to speak and keep questions to a minimum
- Let him/her know that you recognise how difficult it is to talk about such experiences
- Explain that you will need to involve other people and why
- Report bruises or physical harm to the nurse so that this can be logged
- Be supportive and give realistic encouragement
- Talk to someone about your feelings and seek support for yourself
- Refer the concern immediately to the Designated Safeguarding Lead. Whilst the initial referral may be verbal, all referrals must be followed up by recording them on CPOMS software or the completion of the referral form by the member of staff making the referral. (Disclosure/Record of Concern form is in Appendix 2)

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 4. 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 (Appendix 3). 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.

Timescales

All allegations and disclosures will be dealt with as a priority to avoid any delay with each case being pupil centred. It is important that a pupil at risk or in need receives the right help at the right time, including the provision of early help where appropriate, to address risks and prevent issues escalating. Once a serious concern is raised, it is the duty of the person raising the concern to get confirmation that a member of the DSL team has received it and is acting on it. DSL's will follow escalation procedures to ensure concerns have been dealt with in a timely manner.

Staff should not investigate concerns or allegations themselves but should report them immediately. This recorded disclosure should be made through CPOMS software (or written, see Appendix 2) 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
- 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

3.5 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 Prep School or the DSL's (if the concern is not related to



either of them). Any low-level concerns about staff that do not meet the harm threshold should still be recorded and handled in accordance with the College's policy on low-level concerns, ensuring transparency and maintaining professional boundaries. The Headmaster is responsible for managing low-level concerns that do not meet the harm threshold but still require addressing.

In the event that 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 considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter will be reported immediately to the Chairperson of the board of Governors. The Board of Governors have the right of access of information involving any safeguarding allegations against a member of staff. The initial assessment should be on the basis of the information received and gives rise to a decision whether or not the allegation warrants further investigation and if so by whom.

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

3.5.1 Low-Level Concerns

In line with Keeping Children Safe in Education (KCSIE) 2025, the College is committed to fostering a culture of openness, trust, and transparency in which all concerns about adults working in or on behalf of the College are shared responsibly and appropriately. It is important to note that low-level concerns relate to the conduct of adults, not children. A low-level concern is any concern, no matter how small, indicates that an adult may have acted in a way that is inconsistent with the staff code of conduct, but does not meet the threshold for a formal safeguarding allegation.

Staff are encouraged to report such concerns, including self-referrals, so that they can be addressed early and sensitively. The Head Master is responsible for managing all low-level concerns and for maintaining accurate records of such concerns in a secure and confidential manner. These records will be regularly reviewed to identify any potential patterns of behaviour that may require further action. Where a low-level concern relates to the Head Master, it must be reported directly to the Chairperson of the Board of Governors. All staff are reminded of the importance of maintaining professional boundaries and are encouraged to speak up if they observe conduct that may put those boundaries at risk.

The DSL will review low-level concern logs termly to identify patterns and ensure appropriate follow-up.



3.5.1 Sharing Information and Relevant Local Authorities

In the case of employees from the UK, the College undertakes to report to the Disclosure and Barring Service (DBS) and where applicable the Teaching Regulation Authority (TRA), 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.

In the case of employees from other countries, the College will inform their relevant safeguarding authorities and teaching professional bodies.

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. BCD 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 in order 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, BCD 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 through CPOMS(or a paper record if the system is not accessible) and any previously intended course of action. BCD will keep a record of previous pupils' safeguarding concerns and related auditing documents.

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 as a consequence.

- 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.
- 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 the KHDA, sharing the nature of the area of concern and work towards a mutually acceptable solution.
- In association with the KHDA, the requirement to report the area of concern to the Police should be discussed.
- The College will seek legal advice with regard to 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 Distance Learning

When school is suspended and Distance Learning is implemented, normal school safeguarding policies and protocols apply. The principles of Keeping Children Safe in Education and this guidance continue to apply. Distance Learning is fundamentally different to in-person learning, however a number of important safeguarding principles remain the same:

- The best interests of pupils must always continue to come first

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- 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 6
- Children should continue to be protected when they are online

3.9 Children Missing Education (CME)

The College recognises that children missing education, either through unexplained absence or repeated patterns of absence, can be at significant risk of harm. Attendance is a safeguarding priority.

- Daily attendance is monitored through the College's MIS (iSAMS / Go4Schools), and all absences are followed up with parents immediately by the College reception team.
- Parents are contacted on the first day of any unexplained or unexcused absence.
- Pupils may not exceed 5 unexcused absences in a term or 15 unexcused absences in an academic year. Breaching these thresholds may result in the pupil being required to repeat the academic year, in line with UAE regulations.
- Absences occurring on Fridays, or directly before or after public holidays, will count as two days for the purpose of monitoring and recording.
- Where absences become frequent, irregular, or approach threshold levels, the DSL and pastoral team will meet with parents to identify barriers to attendance and provide support, including early help strategies, counselling, or SEND adjustments where appropriate.
- Where a child is missing from education for 10 consecutive school days, or shows a sustained pattern of irregular attendance, the case will be reported to KHDA and relevant UAE authorities in line with statutory requirements.
- Parents/guardians have the right to appeal absence classifications or related actions, by submitting a written appeal to the Head Master within five working days of notification.
- Records of absences, interventions, and referrals are monitored by key pastoral staff supported by the DSL

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, (07:30am – 3:20pm).



- 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
- Forms of less formal communication, e.g. memes, emojis, GIF/giphys, stickers, text talk should not be used.

We are aware of the increased level of risk around one-to-one video meetings with pupils, however there are many reasons why these are helpful and appropriate, such as single pupil classes in the senior school, counselling, inclusion and pastoral support. All Distance Learning sessions should be recorded. Pupils should be informed prior to each session that it is being recorded by the staff member and that no pupils should record or take pictures of the screen without staff approval.

Inclusion, Counselling and Pastoral Support:

Throughout distant learning these provisions will continue where possible. Due to the age and stage of pupils these may take an alternative form in order to adapt to the online environment. The relevant staff will keep Form Tutors/Class teachers in the loop where provision is not possible.

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.
- 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
- 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 (appendix 3) the site of any injury.
- Record statements and observations, not interpretations or assumptions.
- All information relating to safeguarding is maintained within a confidential file and is stored securely either in a locked cabinet or through a password protected data file.

Records must be reviewed regularly to identify emerging patterns or repeated concerns. The DSL will conduct termly audits of safeguarding records to ensure consistency, completeness, and early identification of risk factors.

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5. Staffing - Safeguarding Leads

Please see appendix 6 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 Head Master (HM)/School Counsellor for advice.
- The DSL/HM/School Counsellor should affect appropriate triage.
- The DSL/HM/School Counsellor should arrange a family conference where possible.
- The DSL will liaise with the KHDA.
- A school mobile contact number, will be provided to 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 or written - Appendix 5). If no indicators are found or appear to develop, the monitoring will cease. If indicators and concerns continue, appropriate action will be taken and recorded.

As part of good practice, parents should be advised that their child is to be monitored and involved in the process as much as possible.

An electronic(CPOMS) or paper file including all information including 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.

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, such as the Designated Safeguarding Leads, Head Master, Counsellor, Housemistress or 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(or a paper file). Nothing is to be kept on the school MIS. 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 staff member leaves BCD any Child Protection issues should be passed on to the new school in the form of a phone call to the new Head Master from either the Head Master or the CEO whenever possible.

If authorities become involved in a behavioural incident, the College will notify parents immediately and provide guidance throughout the process. Should the authorities wish to speak to a pupil or pupils, a member of the College Leadership Team or a parent must always be present during the meeting.

7. Adults on site

All adults on site, including teaching staff, admin, visitor, external provider, canteen staff, maintenance, cleaning staff etc should be wearing a school provided lanyard at all times. The colour of the lanyard is dependent on the role the adult has within school. The lanyard will be provided to the adult when they sign-in at reception.

8. Monitoring and Review

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

The DSL provides termly safeguarding reports to the Board of Governors and a detailed annual safeguarding report. These reports enable the Board to discharge its oversight responsibilities and ensure robust monitoring of safeguarding practice.



9. Approved by

Head Master on behalf of the College:

Simon Crane, Head Master

Chair on behalf of the Governors:

Craig Lamshed, Board Member

Change History Record

Version No.	Description of Change	Owner	Date of Issue
1.0	Minor edits throughout, updated contact details	JDO	November 2019
2.0	Section 3.8 added to cover distance learning	JDO	March 2020
3.0	Updated school timings, updated staff titles and references to Keeping Children Safe in Schools	JDO	September 2020
4.0	Updated Deputy Safeguarding Information	JDO	November 2020
5.0	Updated external reference documents	JDO	September 2021
6.0	Reviewed and updated references to CPOMS	JDO	April 2022
7.0	KCSIE updated & included information for adults on site	JDO	September 2022
8.0	KCSIE typo update	JDO	October 2022
9.0	Update Governor and DFE reference	JDO	January 2023
10	Inserted section on Timescales	JDO	January 2023
11.0	Reworded a key section	SCR	February 2023

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12.0	Updated KCSIE	JDO	September 2023
13.0	Feedback suggestions from CEO	JDO	November 2023
14.0	Updated KCSIE	JDO	September 2024
15.0	Updated Low-Level Concerns	JDO	April 2025
16.0	KCSIE 2025 and BSO recommendations updated	JDO	September 2025
17.0	Update regarding involvement of external agencies	JDO	January 2026

Brighton College Dubai Policies and Guidelines

Policy Statement

Brighton College Dubai 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:

- DFE Guidance Keeping Children Safe in Education
- KHDA Guidance and Guidelines for Private Schools
- MOE United Arab Emirates School Inspection Framework
- DSIB School Inspection Supplement
- The College's Academic Plan written for KHDA approval
- 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.

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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.

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.
- 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
- Pregnancy – particularly when reluctant to name father
- Venereal disease, sexually transmitted diseases
- Soiling or wetting in children who have been toilet trained
- Self-mutilation/suicide attempts



APPENDIX 2

(Please complete this document by hand, not electronically)

DISCLOSURE/RECORD OF CONCERN FORM

Name of pupil:	
Class/Form:	
Date of Birth:	
Gender:	
Name & designation of reporting person:	
Date & time of recording:	
Details of Discussion/Observation/ concern: Please keep factual – if you can include direct quotes from pupil, please show this as a direct quote. Ensure you include if disclosure was overheard/third party information/direct. DO NOT QUESTION OR LEAD THE PUPIL DURING DISCLOSURE. Continue on an additional sheet if needed	

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Any action taken:	
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Action to be taken:	
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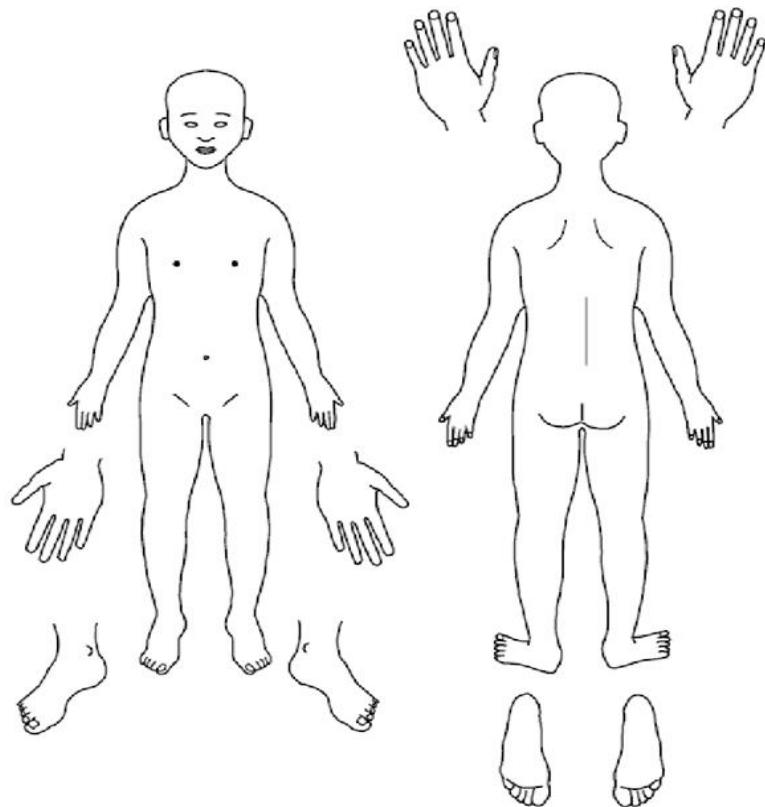
Name of DSL	
Signature of reporting person	

APPENDIX 3

BODY MAP FOR REPORTING OF DISCLOSURE/CONCERN

Name of pupil:	
Class/Form:	
Date of Birth:	
Gender:	
Name & designation of reporting person:	
Date & time of recording:	

Indicate site of injury or concerning marks using a cross on the relevant area of the body map. Provide additional detail/ description in the space provided in the table underneath. Once completed, please pass on to the Designated Safeguarding Officer (Joe Donaghey) or the Deputy DSL (Sarah Brannon).



Name of DSL	
Signature of reporting person	

APPENDIX 4

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 - it might not be)

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 or a written Disclosure/Record of Concern Form (Appendix 2)
(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)

Record Your Report (Appendix 2)
(Don't make a child repeat an allegation unnecessary)

APPENDIX 5

Pupil Monitoring Log

Name of pupil:	
Class/Form:	
Date of Birth:	
Gender:	
Name & designation of reporting person:	
Date concern submitted:	

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Log continuation on additional sheets: YES / NO

DSL Signature:

Date:

APPENDIX 6

Safeguarding Lead Responsibilities

Name	Role	Email
Joe Donaghey	Deputy Head Pastoral, DSL	jdonaghey@brightoncollegedubai.ae
Sarah Brannon	Head of Prep School, Deputy DSL	sbrannon@brightoncollegedubai.ae
Katy Cooke	Head of Pre-Prep, Deputy DSL	kcooke@brightoncollegedubai.ae
Simon Crane	Head Master	scrane@brightoncollegedubai.ae

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Jane Clewlow	Vice Principal and Head of Senior school	jclewlow@brightoncollegedubai.ae
Andy Kay	Assistant Head Prep	akay@brightoncollegedubai.ae
Chris Bland	Assistant Head Senior School	cbland@brightoncollegedubai.ae
Sarah Brooks	Assistant Head Pre Prep	sbrooks@brightoncollegedubai.ae
Dr Rensburg	School Counsellor	lrensburg@brightoncollegedubai.ae

Briefing Sheet for Temporary Staff

For staff on short contracts in Brighton College Dubai:

While working in Brighton College Dubai, you have a duty of care towards the Head Master here. This means that at all times you should act in a way that is consistent with their safety and welfare.

In addition, if at any time you have a concern about a pupil or young person, particularly if you suspect or think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school Designated Safeguarding Lead (DSL), who is Joe Donaghey (Deputy Head Pastoral) or the Deputy Designated Safeguarding Lead, Sarah Brannon (Head of Prep School).

This is not an exhaustive list, but you may have become concerned as a result of:

- Observing a physical injury, which you think may have been non-accidental.
- Observing something in the appearance of a pupil or young person which suggests they are not being sufficiently well cared for.
- Observing behaviour that leads you to be concerned about a pupil or young person.
- A pupil or young person telling you that they have been subjected to some form of abuse.

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the pupil has been led in any way.

If a pupil talks to you about abuse, you should follow these guidelines:

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- Rather than directly questioning the pupil, just listen and be supportive.
- Never stop a pupil who is freely recalling significant events, but don't push the pupil to tell you more than they wish.
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect.
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it, and give your record to the Designated Safeguarding Lead, who should contact the authorities/outside agencies if appropriate.

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, in the Deputy Head Pastoral's Office - Joe Donaghey.

Remember, if you have a concern, discuss it with the DSL.

APPENDIX 7

Safeguarding Lanyards

Individual	Lanyard Type	Individual	Lanyard Type
Staff		Parent	
Visitor		Driver/Nanny	
Contractor		Sixth form pupils	

Always ensure a culture of challenge by stopping and asking visitors/adults who you are not familiar with, to show you their lanyard

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