

Safeguarding Children and Protection Policy

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This Policy will be reviewed annually in line with '[Keeping Children Safe in Education](#)' (KCSIE) or earlier if changes are made to DFE statutory guidance or Child Protection Centre Bahrain

Version	Date	Reason for Revision
1.0	January 2026	Review/Revised DFE Guidance - Keeping Children Safe in Education 2025 & with reference to the DFE Working Together to Safeguard Children 2023.
2.0	September 2026	Review/Revised DFE Guidance - Keeping Children Safe in Education 2026

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1.0 Introduction

This policy is part of a group of safeguarding policies and procedures intended to keep children, staff and the wider community of Nadeen safe. This document outlines our commitment to safeguarding and child protection.

At Nadeen School we have adopted a child centred and proactive approach to Safeguarding. Safeguarding is a shared responsibility for every member of the school community. We believe that everyone has a role to play and creating a strong safeguarding culture is essential to providing the most effective environment for children to thrive in all aspects of their development. We expect everyone to always put the best interests of the child first.

All children in our care, regardless of age, disability, gender, race, culture, heritage, or religion will have the right to the same protection as outlined in this policy. Nadeen School's ethos and setting in Bahrain as an international school embraces all cultures and backgrounds and reinforces anti-discriminatory practices. We also recognise that some of our children are more vulnerable and could be more at risk. We believe that no child should ever experience abuse of any kind and we are fully committed to protecting the children in our care. We also believe that a positive, pro-active, and open home/school relationship is essential in promoting children's welfare.

Nadeen School operates under the laws and regulatory requirements of the Kingdom of Bahrain. Bahrain law and directions issued by the Bahrain Ministry of Education and other competent authorities take precedence. The school nevertheless uses KCSIE 2026 and the Standards for British Schools Overseas as safeguarding benchmarks to provide arrangements broadly comparable with those expected in an independent school in England. Where a KCSIE cannot lawfully be implemented, the school will document the relevant legal restriction, the advice obtained, the alternative safeguarding control adopted and the information provided to inspectors.

2.0 Definitions

2.1 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

2.2 Child Protection is defined for the purpose of this policy as

- Protecting individual children from identified as suffering or likely to suffer significant harm
- Child protection is part of the safeguarding process

2.3 Child and Children

Child(ren) is/are defined for the purpose of this policy as

- For safeguarding purposes, a child is anyone who has not yet reached their eighteenth birthday. Learners aged 18 or over may remain entitled to protection under the school's adult-safeguarding, welfare, contractual and local legal arrangements, but they are not included within the KCSIE definition of a child solely because they remain in full-time education.

2.4 Child Abuse

Abuse, neglect and exploitation are forms of maltreatment. A person may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Harm may occur inside or outside the home, in school, in the community or online. Children may be abused or exploited by adults or by other children. Safeguarding issues rarely occur in isolation and children may experience several overlapping forms of harm.

Staff must remain alert to physical, sexual and emotional abuse; neglect; domestic abuse; modern slavery; criminal, sexual and financial exploitation; stalking; child-to-parent or carer abuse; serious violence; radicalisation; harmful sexual behaviour; and technology-assisted abuse.

3.0 Safeguarding is Everyone's Responsibility

At Nadeen, safeguarding is everyone's responsibility. Everyone who encounters children and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, always, what is in the best interest of the child. No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who encounters them has a role to play in identifying concerns, sharing information and taking prompt action.

All staff have the following responsibilities:

- To contribute to providing a safe environment in which all children can learn and thrive
- Know what constitutes abuse and what to do if a child tells you that he or she is being abused, harmed or neglected
- Know what to do if they are concerned about the behaviour or conduct of an adult in school
- Manage the requirement to maintain an appropriate level of confidentiality
- Refer any concern to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding lead (DDSL) or in their absence a member of the safeguarding team
- Refer any concern about the Principal to the Director of the Board, S. Puri
- Be aware of the child protection process and your role in it
- Read and understand this policy and all associated policies, procedure and knowledge documents

3.1 Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. Fears about sharing information must not stand in the way of the need to safeguard and promote the welfare of children. Data protection does not prevent the sharing of information for the purposes of keeping children safe, provided it is shared in line with this policy.

School staff should be proactive in sharing information with the DSL as early as possible via CPOMS to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging or where a child is already known to have child protection concerns. This includes the sharing of information with the DSL or Principal without parental consent where there is good reason to do so, i.e if the risk of harm to the child would be increased.

Bahrain data-protection law applies. KCSIE 2026 information-sharing principles and, where relevant, the UK Data (Use and Access) Act 2025 are used as benchmarks. Data-protection concerns must never be used as a reason to delay

necessary safeguarding information sharing.

3.2 Legal and Context of Nadeen

Our safeguarding and child protection policies are built upon and support the 1989 international legal framework (as amended) and the United Nations conventions on the rights of the child and follow local legislation as directed by the Ministry of Labour and Social Development - Decision No. (69) of 2016 Regarding the Establishment of the Bahrain Child Protection Centre (Appendix 6) and work with the Child Protection Centre to ensure local legislation is followed. We work within Law No. 37 of 2012 Promulgating the Child Law and Executive Regulations for the Child Restorative Justice and Maltreatment Protection Law Issued by Law No.4 of 2021.

This policy is also informed by the principles and ethos from the United Kingdom. This includes: the Department for Education (DfE) document Keeping Children Safe in Education 2026, effective from 1 September 2026, and Working Together to Safeguard Children 2026, applied as safeguarding benchmarks subject to Bahrain law.. This policy is rooted very much in the context of Bahrain and recognises the limitations in addressing child protection issues whilst subject to Bahraini law, customs and support systems.

This policy also meets the relevant requirements relating to safeguarding and welfare in the DfE [statutory framework for the Early Years Foundation Stage](#)

4.0 Related Documents

This policy should be read in conjunction with the following documents/policies;

- Keeping Children Safe in Education 2026, Part one – to be read in full by all staff.
- BSO Standards compliance and host-country divergence register.
- Whistleblowing Policy
- Safer Recruitment Policy
- School Trips Policy
- Anti-bullying Policy
- Health and Safety Policy
- Intimate Care Appendix 7
- First Aid, Fire Safety and Health and Safety policies.
- Staff Code of Conduct/Handbook
- Online Safety Policy
- Mobile Phone and Personal Device Policy.
- Inclusion Policy
- School Behaviour Policy
- Staff Handbook
- Early Years Policy and Staff Handbook

5.0 Designated Safeguarding Team

Name	Role	Position	Contact Details
Suzanne Rodricks	Designated Safeguarding Lead (DSL) - Whole School	Head of Primary	s.rodricks@nadeenschool.com
Codie Scott	Safeguarding Officer	School Counsellor	counsellor@nadeenschool.com
Kacey Muncaster	DDSL - EYFS	Assistant Headteacher	k.greig@nadeenschool.com
Emma Duffy	DDSL - Primary	Safeguarding & Pastoral Lead - Primary	e.duffy@nadeenschool.com
Jack Gilvear	DDSL - Secondary	Assistant Head - Welfare & Wellbeing	j.gilvear@nadeenschool.com
Chris Short	DDSL - Secondary	Thrive Programme Lead	c.short@nadeenschool.com
Jessy Skaff	Safeguarding Officer	School nurse	nurse@nadeenschool.com
There is a designated email address that anyone can report concerns to - safeguarding@nadeenschool.com			

We will keep our children safe by:

- All members of the safeguarding team have completed the Advanced Designated Safeguarding Training (Level 3).
- A trained DSL or deputy DSL will be available during school operating hours and during school-arranged activities. Robust cover arrangements will apply during planned and unplanned absence. These include a confidential shared safeguarding mailbox, a published escalation route, access to relevant safeguarding records and authority for the covering DSL to make referrals without avoidable delay.
- The DSL or deputy must be contactable when learners are participating in off-site, residential, sporting, work-experience or alternative-provision activities arranged by the school.
- Providing safeguarding updates to staff regularly throughout the year.
- The Safeguarding Team monitors all cause for concern cases and reviews CPOMS data/reports on a regular basis using the information to inform training and updates.

- All staff and teachers partake in termly Safeguarding CPD which take the form of an annual review of the Safeguarding Policy and procedures, and additional safeguarding CPD sessions in Terms 2 and 3.
- Keeping employees aware of common signs and symptoms of abuse via providing regular training and briefings and access to information through National College or the NSPCC.
- Ensuring that the school's open door policy is maintained to promote open discussion amongst the children, staff, and parents.
- Staff must reassure victims that they are being taken seriously and that they will be supported and kept safe. This includes avoiding any language that could minimise the impact of abuse.
- Ensuring that all parties – especially the children and susceptible members of our community - feel listened to and respected at all times.
- Maintaining robust systems in the checking of all staff, volunteers, non-contract employees for suitability and carrying out appropriate background and ID checks, and ensuring that contractors are escorted or accompanied on the school premises during the school day.
- Constantly developing PHSE, Digital-Safety, Health and Safety, Security, and Maintenance policies to implement and promote best safeguarding practice.
- Thoroughly investigating any complaint made about a member of the school community in regard to any form of safeguarding concern. .

5.1 Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, external providers, visitors and board members in the school and is consistent with the procedures of the Bahrain Child protection. Our policy and procedures also apply to extended school and off-site activities.

5.2 Designated Safeguarding Lead :

The Designated Safeguarding Lead (DSL) is the person appointed to take lead responsibility for child protection and safeguarding matters in school. The person fulfilling this role is a senior member of the school's leadership team. There are further members of the school who are members of the safeguarding team, there are additional DSL members of the team dedicated to leading safeguarding in that phase of the school. They work closely with the whole school DSL and Principal to ensure that safeguarding procedures are implemented consistently, concerns are identified and acted upon promptly, and the welfare and safety of all children remain at the heart of decision-making across the school.

Role of the Designated Safeguarding Lead (DSL)- The DSL is the **strategic lead** for safeguarding in the school.

They hold **ultimate responsibility** for:

- Ensuring the school meets its statutory and regulatory safeguarding duties (Bahrain Ministry of Education and related government offices within the Kingdom of Bahrain; UK KCSIE).
- Coordinating safeguarding decisions and referrals. The DSL does not prevent any staff member from making a direct referral or report to the competent safeguarding authority where a child is at immediate risk, where required by Bahrain law, or where the staff member reasonably believes the school's response is insufficient.
- Leading on safeguarding policy development, review, and implementation.

- Acting as the **primary point of contact** for external agencies, including The Child Protection Centre, police, Ministry of Education, and insurers.
- Overseeing record keeping, training provision, and safeguarding culture across the school.
- Reporting safeguarding activity and concerns to the Directors/Governing Body.
- Work with the **Principal and School Board** to keep safeguarding high on the school's agenda.
- Provide safeguarding briefings at staff, departmental, and board meetings.
- Ensure parents know the school's safeguarding policy, understand its purpose, and are aware that referrals may be made to outside agencies if concerns arise.
- Promote safeguarding messages across the curriculum and wider school life.
- Manage and investigate safeguarding allegations against staff or volunteers in accordance with policy and best practice or allocate a member of the safeguarding team to manage or investigate and oversee the investigation if required.
- Liaise with external agencies as required for investigation and resolution.
- Maintain confidentiality and procedural fairness throughout.
- Collect and analyse safeguarding data to identify trends and improve practice.
- Review the effectiveness of safeguarding arrangements regularly.
- Provides termly report to the Board covering patterns in concerns (including low-level concerns)
- Keep safeguarding knowledge and skills up to date through:
 - Formal training.
 - Professional reading and updates (UK and Bahrain).
 - Networking with other DSLs locally and internationally.
 - Attending relevant seminars and workshops.
- Ensure best practice is continually reflected in the school's safeguarding approach.
- The DSL and counsellors will receive termly professional supervision.
Staff dealing with repeated or complex safeguarding issues may receive additional supervision sessions on request.
- Maintain a current map of Bahrain referral pathways, thresholds, emergency contacts and escalation routes - Please see [Appendix 8](#)
- Ensure safeguarding files are transferred securely and separately from the main pupil file when a child changes school.

In summary: The DSL is the decision-maker, policy owner, and primary liaison with outside agencies.

5.3 Deputy Designated Safeguarding Leads (Deputy DSLs or DDSL)

Deputy DSLs are trained to the same safeguarding standard as the DSL and are authorised to:

- Receive and act on safeguarding concerns in the DSL's absence or when delegated.
- Make referrals to external agencies if the DSL is unavailable or has delegated the responsibility.

- Support the DSL in maintaining accurate safeguarding records and monitoring ongoing cases.
- Deliver parts of staff safeguarding training and awareness sessions.
- Provide additional capacity to respond to safeguarding issues promptly.
- Step in to cover the DSL role during planned or unplanned absences.
- Trained to DSL level; act in DSL's absence; deliver staff updates during the year (not only annually).

Shared Responsibilities- Both the DSL and Deputy DSLs:

- Are equally familiar with the school's safeguarding policies and procedures.
- Maintain up-to-date safeguarding training (DSL-level) every two years, plus interim updates.
- Keep detailed, secure records on CPOMS.
- Promote a pro-active safeguarding culture across the school.
- Liaise sensitively with children, staff, and parents on safeguarding matters.

5.4 Senior Leadership Team (SLT) will-

- Work collaboratively with the DSL to ensure safeguarding is prioritised in all areas of school life.
- Model safeguarding best practice in leadership decisions, staff management, and communication.
- Ensure safeguarding is embedded in curriculum planning, extra-curricular activities, and school policies.
- Act promptly when safeguarding concerns are escalated to them.
- Allocate time, resources, and training opportunities for staff to meet safeguarding responsibilities.
- Support the DSL in promoting a whole-school safeguarding culture and challenging unsafe practice.
- Lead on safeguarding within their specific areas of responsibility (e.g. Assistant Headteachers and Assistant Principals ensuring staff follow correct processes).
- Embed online safety as a running and interrelated theme across curriculum, training and systems; allocate resources/time for role-specific online safety training.

5.5 The Principal

The Principal is responsible for the implementation of this policy, including ensuring that all staff (including temporary staff) and volunteers:

- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Acting as a "case manager" as appropriate and in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Ensures that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes: Making sure that the leadership team and staff are aware of the provisions in

place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

- Reviewing the [DfE's filtering and monitoring standards](#), in collaboration with the Assistant Principal of Secondary, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Ensuring the relevant staffing ratios in Early Years are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.
- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff know the role and identity of the designated safeguarding lead (DSL), the behaviour policy and anti-bullying policy.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues.,
- Ensure persistent absence is monitored with the DSL as a safeguarding indicator.
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes: Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

5.6 The Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation
- The Board will receive and scrutinise termly safeguarding assurance covering referrals, response times, attendance, child-on-child abuse, allegations and low-level concerns, filtering and monitoring, safer recruitment, training completion, restrictive interventions, complaints, vulnerable groups and lessons learned.
- The Board will conduct an annual safeguarding audit that includes record sampling, staff and learner voice, site checks, recruitment-file and SCR sampling, and testing of referral and escalation arrangements.
- Appoints a board safeguarding lead (separate from the DSL) to monitor the effectiveness of this policy in conjunction with the board. The Board Safeguarding Representative is Shanee Puri - shanee.puri@nadeenschool.com
- All Board members will receive safeguarding and child-protection training, including online safety, at induction and regular updates thereafter. Training must enable members to challenge leaders and test whether safeguarding arrangements are effective.

5.7 Teaching Staff

At Nadeen School, all teaching staff are safeguarding practitioners. Their role is to identify concerns early, act promptly, and create a safe environment where children can thrive. All concerns must be recorded on CPOMS and assigned to the relevant member of the safeguarding team.

They must have knowledge of the school's Early Help process - how to identify emerging problems and when to liaise with the safeguarding team and how to share information with other professionals where early intervention is needed. See Appendix 2.

5.8 All staff including Learning Support Coaches, external agencies, contractors and volunteers

- Prioritise the safety and welfare of children at all times and act in a manner that upholds the school's safeguarding and child protection procedures.
- Follow the school's safeguarding policies and code of conduct, including guidance on appropriate behaviour, professional boundaries and use of language.
- Sign in and out of the school site on arrival and departure, wear identification at all times, and remain within authorised areas of the school.
- Never be left unsupervised with children unless appropriate safeguarding checks have been completed and explicit permission has been granted by the school.
- Report any safeguarding concerns immediately to the Designated Safeguarding Lead (DSL) or a member of the safeguarding team, including concerns about a child's welfare or the behaviour of another adult.
- Maintain confidentiality and share information only with appropriate members of staff in line with safeguarding procedures.

- Use technology appropriately, including not taking photographs or videos of children unless authorised by the school and in line with consent procedures.
- Adhere to health and safety expectations, including emergency procedures and risk assessments relevant to their role or visit.
- Model appropriate behaviour and act as a positive role model in line with the school's values and safeguarding culture.
- Immediately inform a member of the safeguarding team if they are unsure about any safeguarding practice or feel uncomfortable with a situation involving a child.

6.0 Training and Policy Awareness

When staff and volunteers join Nadeen, they receive induction training. They are informed of the safeguarding arrangements in place and they are made aware of this policy and the relevant safeguarding team members and their role. They are expected to read and sign acknowledgment of the safeguarding policy and the staff code of conduct. They must complete the follow up quiz and sign to confirm that they have read both documents.

All staff, including staff who do not work directly with children, temporary staff and relevant contracted staff, must read and understand Part one of KCSIE 2026 in full, this policy, the Staff Code of Conduct, the Behaviour Policy, the response to children absent from education and the school's safeguarding reporting arrangements. They are given regular training on CPOMS, and explicit briefings on reporting low level concerns, early help processes and procedures.

Annual safeguarding refresher training is provided to all staff at the beginning of the academic year, this is aimed at sharing any amendments to our practice and sharing new knowledge and updates in line with Keeping Children Safe in Education (KCSIE 2026). The revised policy is shared and staff are expected to sign a declaration confirming that they have read the policy and **Part 1 of KCSIE**.

Take part in additional training on emerging safeguarding issues when offered (e.g., online safety, peer-on-peer abuse, FGM awareness).

Understanding will be checked through induction discussion or assessment, not solely through a signed declaration. Completion and understanding will be recorded centrally.

All volunteers, supply staff and regular visitors to the School will be told where the Policy is kept and given the name of the DSL and informed of the School's procedures in reporting concerns. A leaflet summarising the key information for volunteers and regular visitors will also be available at security.

Staff with specific responsibility for safeguarding children will undertake additional training at a level suitable to their role and responsibility, updated every two years. In addition to formal training, the DSL and deputy/ies will update their knowledge regularly.

6.1 Daily Safeguarding Practices and Procedures

Our School procedures for safeguarding children have been prepared in accordance with guidance issued by the U.K. and Bahraini governments.

- DSL present on-site whenever possible. The DSL is a member of the Senior Leadership Team
- At least one Deputy DSL available when the DSL is off-site or unavailable.
- There is a member of the safeguarding team who is responsible for safeguarding children within the Early

Years.

- A safeguarding poster is present around school and all staff know who the DSL is and the relevant deputy DSL within their phase.
- An information leaflet is available for visitors and supply staff.
- Parents have access to the policy on the school website.

6.2 Managing Concerns about a child

Teachers and staff in school are in a unique position to observe children's behaviour over time and often develop close relationships with children.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or Disclosure of Abuse. More often, however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy. This allows the DSL to build up a picture and access support for the child at the earliest opportunity. Reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

All concerns, discussions and decisions (together with reasons) made under the following procedures should be recorded in writing, in full, on CPOMS or the relevant form.

- **Recognise and Act:** Remain alert to signs of abuse, neglect, exploitation, or emerging concerns.
- **Report Without Delay:** If there is a concern that might lead to immediate harm, this must be shared with the DSL or Deputy DSL immediately, do not wait until the end of the day.
- **Record Accurately:** Log incidents or concerns on **CPOMS** as soon as possible, including factual details and actions taken.

All concerns about a child or young person should be reported without delay, and a hand-written record should be made as soon after the Disclosure as possible, using the child's words as far as possible, and on the proforma given in this policy. Members of Staff are able to log a concern via CPOMS. A 24-hour administrative target must never delay immediate verbal escalation or emergency action.

Following receipt of any information raising concern, the DSL will consider what action to take, and all information and actions taken, including the reasons for any decisions made, will be fully documented on CPOMS.

Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration by raising concerns again with the DSL and/or the Principal. Concerns should always lead to help for the child at some point.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this Policy should raise their concerns with the Principal or Safeguarding Board Member.

If you observe anything concerning, please record on CPOMS and alert the 'relevant safeguarding team'. This may include observing a member of staff behaving in a way which you consider to be a low level concern but nonetheless is inappropriate. Concerns regarding staff should be alerted to the DSL and the Principal. If you have a concern regarding the Principal then this should be reported to Shanee Puri.

If you hear something second-hand or from a third-party please do not approach the child or other people involved directly – please write an account immediately and record it on CPOMS assigning it to the DSL/Safeguarding Team. Remember, when in doubt, record it on CPOMS and be assured that your efforts towards keeping our children safe are valued and appreciated.

Records must include the concern, the child's words where relevant, context, body map or supporting material where appropriate, action taken, people consulted, information shared, the child's views, parental involvement or the reason parents were not informed, decisions made and the rationale for those decisions.

6.3 What to do on disclosure of abuse

If a child discloses a concern directly to an adult in school, the following advice to staff will be followed;

If a child approaches you with a concern:

- Listen to what is being said and be supportive.
- Let the child speak freely and don't ask them to share more than they wish to or ask probing questions
- Be aware that they may not feel ready or know how to tell someone that they are being abused
- Do not promise confidentiality. Explain that you will share information with the DSL and only those who need to know in order to keep the child safe.
-
- Ask only open questions such as - Can you tell me what happened?
- Do not force the child to repeat what he/she said in front of another person.
- Reassure the child they are being taken seriously and will be supported.
- Write an account immediately on paper and upload a copy to CPOMS or alternatively type it directly onto CPOMS. If you need time to write this up please organise for someone to cover. The referral should be a factual account of conversations with the child or seen concerns. It should not contain feelings that have not actually been expressed by the child e.g. you can report "XXX said she felt scared at home" but you cannot report that you *felt* the child was scared at home.
- If there is a clear and immediate risk of harm, record this on CPOMS and alert the DSL. The DSL team receives an immediate alert so they can action any concern.
- Pass all information directly to the DSL/Deputy DSL; do not investigate yourself.
- Do not ask the child to produce, forward or display a nude or semi-nude image.
- Do not photograph injuries on a personal device.
- Do not confront the alleged perpetrator or notify parents before consulting the DSL where doing so could increase risk, contaminate evidence or conflict with authority instructions.

6.4 Barriers to Sharing Concerns

It is important to realise that not everybody will be comfortable with sharing their concerns but it is important to generate a culture whereby people feel they can do so.

Children

- Feeling there is no-one to talk to (who will listen and can be trusted)

- Fear of not being listened to, understood, taken seriously or being believed
- A belief in self-reliance
- A sense of futility about sharing problems and a belief that nothing will change
- Embarrassment

Adults

- Not wanting to burden others
- Fear of getting oneself or someone else into trouble
- Other adults trivialising or overreacting and making matters worse
- Fear of lack of control
- Limited knowledge of formal helping services and what they do
- Stigma of involvement with formal agencies

6.5 Children absent from education and children missing education

Repeated or prolonged absence, unexplained absence, patterns of lateness and absence associated with particular days or subjects may be indicators of abuse, neglect, exploitation, mental-health need, trafficking, criminal exploitation or risk of disappearance. Attendance and safeguarding information will be reviewed together.

Staff are made aware at induction of our managing attendance procedures. The school will make timely first-day contact. We have at least 2 emergency contact numbers registered at school. The safeguarding and pastoral leaders will follow up on any extended absences, conduct welfare checks and escalate concerns according to assessed risk. and work with families whose attendance has become a cause for concern.

Actions and decisions must be recorded. Removal from roll must comply with Bahrain requirements and must not occur solely because contact has been lost.

6.6 Safe Handling and Response to Unsafe Situations

Nadeen School is committed to ensuring the safety, dignity, and wellbeing of all learners and staff. Safe handling is used **only when necessary**, and always in a manner consistent with safeguarding expectations, de-escalation approaches, and our inclusion philosophy.

Safety is always the top priority. The primary goal in any situation is to prevent harm to the child, to other children, and to staff.

The following guidance must be followed by all staff when responding to unsafe or potentially harmful situations:

- Use the least amount of physical intervention possible, for the shortest time required to restore safety.
- Communicate clearly with the learner at all times, using a calm and reassuring tone. Also communicate with any staff present before, during, and after the incident.
- Always report and document any incident involving physical contact or physical intervention, following safeguarding and inclusion procedures.

6.6.1 Positive Physical Intervention/Use of Reasonable Force

Guidelines for the use of reasonable force are referred to in the staff code of conduct.



Restrictive intervention will be used only when lawful, necessary, reasonable, proportionate and the least restrictive available response. Prevention, communication, environmental adjustment and de-escalation must be attempted wherever circumstances permit.

Any intervention must take account of the child's age, development, communication needs, trauma history, disability, medical condition and individual plan. It must never be used to punish, humiliate or secure compliance where there is no immediate safety justification.

As a school we acknowledge that when applying reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.

The School understands that physical intervention of a nature that causes injury or distress to a child may be considered under safeguarding children or disciplinary procedures.

A record of all incidents of physical intervention that occur will be maintained by each DSL and are uploaded to CPOMS.

The School recognises that touch is appropriate in the context of working with children, and all staff are given 'safe working practice guidance' to ensure that they are clear about their professional boundaries.

The School recognises that the adoption of a 'no contact' policy could leave staff unable to fully support and protect children.

Every intervention must be reported promptly, recorded, reviewed by an appropriate leader, communicated to parents unless doing so creates a safeguarding risk, and considered for referral where injury, distress or inappropriate conduct may have occurred. The child and staff involved must be offered debriefing. Patterns must be reported to the Board.

7.0 Supporting Children

The school provides age-appropriate safeguarding education through both the curriculum and external agencies. This includes programmes delivered by organisations such as the NSPCC and Childline, alongside PSHE lessons and peer-support initiatives such as Buddies. Learners participate in Anti-Bullying Week and Internet Safety Week, and the school delivers online safety workshops for learners, staff and parents to raise awareness and promote safe practices.

7.1 Early Help-See Appendix 2

Staff are trained to identify emerging safeguarding needs at the earliest opportunity and share concerns with the Designated Safeguarding Lead (DSL). Where appropriate, Early Help is coordinated with available Bahraini and community-based services. All Early Help plans and related actions are recorded on CPOMS and reviewed regularly to ensure appropriate support is in place.

7.2 Responding to Safeguarding Concerns

Any concern or allegation of harm is taken seriously and acted upon promptly. The DSL will assess the concern and information available, clarify information where necessary without conducting an investigation, consider immediate risk and determine the appropriate safeguarding response, including reporting to and referral to relevant external authorities if necessary. This may include referral to the Child Protection Center, the Police (Samaheej Police Station, Bahrain), or other relevant external agencies - Please refer to [Appendix 8](#)



7.3 External Agencies and Support

The school works in partnership with external agencies to safeguard learners. Available referral points in Bahrain include the Ministry of Education, the Child Protection Center at the Ministry of Social Development, members of the School Advisory Board, the Police, the Criminal Investigation Department (CID), Embassies, and the Naval Base where concerns involve serving American military personnel.

Where the school arranges alternative provision, therapy, tutoring, work experience or another off-site placement, the school retains safeguarding responsibility. Before placement, the school will assess suitability, safeguarding arrangements, staff checks, attendance reporting, information sharing, emergency arrangements and the child's individual needs. The placement will be reviewed regularly, and any unexplained absence or safeguarding concern will be reported immediately.

7.4 Learners and Information Sharing

When a child joins Nadeen School, the school requests safeguarding information from the previous school in a timely manner. Relevant safeguarding records, professional reports, and therapist or medical documentation are required at the point of application and enrolment. Where a child has a safeguarding or child protection history, this information is securely transferred to the next school when the child leaves. Persistent absence and attendance patterns are monitored as potential safeguarding indicators, with concerns recorded on CPOMS and Early Help considered where appropriate.

8.0 Physical Contact with Children

Normal signs of affection, such as high-fives, holding hands, soothing contact (such as a gentle back rub if crying, sitting on the lap. In the event a child is distressed or seeking comfort, staff may proceed with appropriate reassurance if the physical contact is initiated by the child. This can include use of comforting and soothing language and age-appropriate physical contact such as an arm around a shoulder or picking a child up. At no time may a child be pulled or moved by grabbing their arm or wrist, or pulled/pushed into position.

In a school setting it is understood that staff will have varying degrees of contact with the children throughout the day. Common and routine tasks outlined below provide guidance on what is expected within Nadeen School. If unsure about a particular situation not outlined below the staff member must call another staff member to be present and contact a member of the senior leadership team for assistance.

8.1 Supervision of Children

Where appropriate and age-appropriate, children must be encouraged to take care of their personal hygiene and cleanliness while at school. Routine or anticipated intimate care is the responsibility of a family-arranged, approved support person under an agreed care plan. In the event of an unexpected or emergency situation requiring bathroom assistance or a change of clothing where only Nadeen staff are available, a staff member may provide the minimum necessary assistance to preserve safety, dignity, and welfare in the presence of another adult, followed by prompt parental notification. No one from outside of the school staff should be instructed to assist in this field of intimate care. Parents must be informed prior to collection that this intimate care has been provided.

8.2 Swimming

Some classes participate in a swimming programme. Children are entitled to respect and privacy when changing their clothes however; there must be the required level of supervision to safeguard young people with regard to health and safety considerations and to ensure that other unacceptable behaviour does not occur. Where a child needs additional support for changing written parental permission will be sought so as to maintain dignity. This will be uploaded to CPOMS.

Parents will be asked to encourage increased independence by practicing swimming routines at home. Both wet and dry changing facilities are available on the ground and first floor. Again adult supervision will be maintained in both.

9.0 Changes to Family Circumstances

We understand that our child's lives can be disrupted by major changes in their family such as the separation or divorce of their parents and that some child's wellbeing may be affected whilst they adjust. The child's Teacher and other key staff who have been made aware of the change in family circumstances will be sensitive to the child's situation and support them as best they can. In the event that both parents are travelling or that there is any other radical change to routine, we ask that parents advise the school so that we can offer the child additional support as required.

In a small number of cases, one or both parents may approach the School with concerns over the rights of the other parent to access the site and/or information on their child and they may wish to restrict these rights. Unless there is legal documentation to support this, the School is unable to prevent a parent from accessing the School site or accessing information held by the School on their child as per the normal systems in place for parental access. This documentation would need to make clear that the one parent is the legal sole custodian for the child and/or that there are specific instructions in place regarding the child. In cases where the legal documentation is not in English, the parent is responsible for providing a certified English translation.

10.0 Child Specific Instructions

In some cases, the School's Security team may need to be informed of changes to parental access to the site. For example, if a parent has sole custody and raises a concern that the other parent may attempt to enter the site to access the child. In other cases, a parent may be concerned that someone other than a parent may attempt to gain access to their child through the School. For example, an ex-nanny who has retained her Additional Pass. In these cases, a Child Specific Instruction will be created and sent to Security from the facilities team designated as responsible for Child Specific Instructions. This memo will be in English and Arabic and, wherever possible, include photos of the child and adults(s) forming the subject of the notice. Instructions to Security will vary but may include that the Principal/Vice Principal be informed should the adult come to the site.

In each and every case, the child's Head of School will be the member of staff responsible for making any of the changes to parental access described in this section. Child Specific Instructions will only be issued with authorisation from the child's Head of School. Child Specific Instructions will be recorded on the child specific instructions log which is shared by the Principal, both Vice Principals. This document must be attached to the CPOMS chronology for the child. Child Specific Instructions will be routinely reviewed and re-issued to Security each September by the designated member of the Facilities team after contact with the child's Head of School.

As a school, we request all safeguarding information from the previous school within 5 days of the child's admission date.

11.0 Anti-Bullying

Our policy on anti-bullying is set out in a separate Anti-bullying policy.

All incidents of bullying including cyber-bullying, racist, gender related will be dealt with in line with the school's anti-bullying policy.

We recognise that some children including those with special needs might be more susceptible to being bullied. All bullying and child on child incidents are reported and logged on CPOMS.

11.1. Racist Incidents

Our Policy on racist incidents is set out within the Anti-Bullying Policy and acknowledges that repeated racist incidents or a single serious incident may lead to action in relation to our behaviour and staff code of conduct.

All racist incidents are recorded on CPOMS.

11.2. Child-on-child abuse (including harassment and violence)

As a school, we recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings.

We use the updated guidance on this from [Keeping Children Safe in Education 2026](#) to minimise the risk of child on child abuse and deal with any allegations.

Children may be harmed by other children or young people. Staff are aware of the harm caused by child on child abuse and will use the School's anti-bullying procedures where necessary. However, all staff recognise that children are capable of abusing their peers and will be clear about the School's policy and procedures regarding child on child abuse. All alleged child on child abuse will be investigated and will be taken seriously.

Child on Child abuse can take many forms. These forms are most likely but not limited to the following- bullying, including cyber-bullying, physical including hitting, kicking, slapping, biting or any physical harm, making or sharing of nudes or semi-nudes., sexual violence, sexual harassment, initiation/hazing type violence and rituals, upskirting

Abuse is abuse and should never be tolerated or passed off as 'banter', just having a laugh or 'part of growing up'. Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

We take the following steps to minimise or prevent the risk of child on child abuse:

- We promote an open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them. Staff will endeavour always to create surroundings where everyone feels confident and at ease in school;
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of such behaviour
- PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities; and
- We ensure that the school is well-supervised, especially in areas where children might be vulnerable.

Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the

harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult, and the same procedures will apply in respect of any child who is suffering or likely to suffer significant harm.

Child-on-child abuse is preventable. It is a safeguarding concern for the victim and for the child alleged to have caused harm. It may involve serious physical harm, threats involving weapons, sexual harassment, sexual violence, coercion, stalking, abuse in intimate relationships, bullying, cyberbullying, upskirting, hazing or the making or sharing of nude or semi-nude images.

Staff must recognise and challenge misogyny, misandry, sexualised hostility, racism and other prejudicial or derogatory behaviour. This includes harmful online ideologies, incel-related content and material that normalises coercion, violence or hatred. Such conduct may be both a behaviour matter and a safeguarding concern.

Risk assessments and safety plans must be documented and reviewed.

Depending on the nature of abuse, the School may need to consider providing measures to protect and support the victim, the alleged perpetrator and other learners and/or staff in the School by means of a risk assessment. The risk assessment should be recorded and kept under review.

11.3 Children with Special Educational Needs, Disabilities and/or Health Issues

We recognise that children with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners.
- The potential for learners with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so.
- Communication needs being mistaken for non-compliance.
- Behaviour being attributed to disability without considering abuse.
- Dependency on adults for intimate or medical care.
- Limited access to trusted reporting routes.
- Social isolation and susceptibility to grooming.
- Reduced credibility being wrongly attached to a child's account.
- Difficulty identifying online fiction, manipulation or AI-generated content.

We offer extra pastoral support for these learners.

Any abuse involving learners with SEND will require close liaison with the DSL (or deputy) and the Assistant Principal for Excellence and Achievement and the Thrive Coordinator.

11.4 Children requiring mental-health support

Mental-health concerns may be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation. Staff must record and refer concerns to the DSL rather than assuming that counselling alone is an adequate safeguarding response.

11.5 Children with medical conditions

Safeguarding planning must consider medication, emergency care, intimate care, communication, mobility, dependency on adults and the increased risk of neglect or abuse.

12.0 Online Safety/E-Safety

At Nadeen School, we recognise that online safety is an essential element of safeguarding. Technology is embedded in the daily lives of children, and therefore we take a whole-school approach to reducing online risks, supporting safe use of technology, and educating our learners to navigate online spaces safely. The procedures and guidelines around digital safety can be found in the digital safety policy.

12.1 Artificial Intelligence (AI)

12.1.1 Scope and Oversight

Generative AI tools, adaptive systems, and automated software can support educational, administrative, and safeguarding processes. However, AI must augment—not replace—professional judgement, authentic learning, safeguarding practices, relationships, or pastoral care. AI will never be used to make the sole or final decision regarding safeguarding, pastoral support, discipline, or learner welfare.

12.1.2 Risk Alignment and Prohibited Uses

AI can create or amplify severe safeguarding and welfare risks. In accordance with school risk-classification protocols:

- **Prohibited Safeguarding Risks:** No member of the school community may use AI to generate, seek, distribute, or expose others to harmful, illegal, explicit, discriminatory, deceptive, or age-inappropriate content; create deceptive impersonations, deepfakes, or cloned voices; simulate a therapeutic, counselling, or emotionally dependent relationship; or engage in bullying, grooming, exploitation, or harassment.
- **Prohibited Processing:** Entering personal, sensitive, or safeguarding data into public or unapproved AI tools is strictly prohibited. Unapproved processing of safeguarding data or solely automated high-impact decisions must not proceed under any circumstances.

12.1.3 Approved Tools and Risk-Based Authorisation

Staff and learners may only use AI tools that have been formally authorised by the school for a defined, specific purpose. Approval for staff use does not automatically permit learner access or data processing.

- Before introducing any new AI tool or high-risk use (including pastoral analytics or intervention targeting), a documented risk assessment and impact review must be completed and approved by the Designated Safeguarding Lead (DSL), Senior Leadership Team (SLT), Data Protection, and IT leads.
- Higher-risk applications require formal impact assessments, enhanced logging, and notification or consent where legally required under Bahrain's Personal Data Protection Law (PDPL).

- Risk assessments must be reviewed annually or immediately whenever a tool, its terms of service, its data-handling protocols, or its operational scope changes.

12.1.4 Data Protection and Data-Minimisation

Safeguarding information will be processed, retained and shared in accordance with the Personal Data Protection Law, applicable implementing decisions and the School's data protection procedures. Confidentiality and data protection requirements shall not be used to prevent or delay the lawful sharing of information necessary to safeguard a child, comply with a statutory reporting obligation or cooperate with a competent authority.

Staff must strictly apply data-minimisation principles. Safeguarding records, identifiable learner information, medical data, photographs, assessment records, or confidential communications must never be entered into, uploaded to, or processed by an AI tool unless that specific tool and data use-case have received explicit, written authorisation following a formal impact assessment. Information must be anonymised wherever possible.

12.1.5 Graduated Access and Supervision

Learner access to AI must strictly adhere to the school's phase-by-phase framework, accompanied by age-appropriate filtering, monitoring, and human oversight:

- EYFS and Key Stage 1 (Nursery to Year 2): No direct learner interaction with open-ended Generative AI.
- Key Stage 2 (Years 3–6): Direct teacher supervision using approved, age-appropriate tools for carefully curated tasks only.
- Key Stages 3, 4, and 5 (Years 7–12): Controlled access strictly within teacher-set boundaries and aligned with examination-board regulations.

12.1.6 Critical Evaluation and Verification

AI outputs cannot be assumed to be accurate, safe, or unbiased. Staff must exercise professional judgement, verify facts and sources, and review material for bias, stereotyping, or harmful content before using it in teaching, assessment, pastoral decision-making, or communication. AI-detection software will never be used as the sole basis for making allegations or taking disciplinary action.

12.1.7 Reporting and Safeguarding Procedures

School filtering and monitoring systems apply to all AI activities on school or personal devices, networks, and accounts.

- The DSL must be consulted before AI is used in any safeguarding, pastoral, or behavioural context.
- Any actual or suspected attempt to use AI for grooming, bullying, exploitation, deepfake creation, impersonation, or accessing/generating harmful material must be reported immediately through established safeguarding procedures.
- Concerns involving AI will be investigated and managed in accordance with this policy, the Online Safety Policy, the AI Policy, the Anti-Bullying Policy, the Behaviour Policy, and applicable Bahrain law. Where necessary, the DSL will manage parental notifications, evidence preservation, and referrals to external authorities.

Generative artificial intelligence (AI) tools are increasingly available to staff, learners and parents/carers. These include generative chatbots, image and video generators, automated learning tools and other systems capable of producing text, images, audio, video or computer-generated content.

Nadeen School recognises that AI can support teaching, learning, administration and safeguarding. However, it can also create or increase safeguarding risks, including:

- exposure to harmful, inaccurate or age-inappropriate content;
- bullying, grooming, harassment or exploitation;
- the creation or distribution of deepfakes or synthetic media;
- the creation of sexualised or abusive images;
- impersonation, fraud and manipulation;
- breaches of privacy or confidentiality;
- biased or discriminatory outputs; and
- the disclosure or misuse of personal information.

Only AI tools approved by the school may be used for school purposes. Access must be appropriate to the learner's age, maturity and educational needs and must be subject to suitable staff oversight.

Before a new AI tool is introduced, the school will complete and document an appropriate safeguarding, privacy and information-security risk assessment. The assessment will consider:

- the age and vulnerability of intended users;
- how personal information is collected, stored and used;
- access controls and staff supervision;
- the accuracy, reliability and potential bias of outputs;
- the risk of harmful content, grooming, impersonation, deepfakes or sexualised imagery;
- the effectiveness of filtering and monitoring arrangements; and
- the procedure for reporting and responding to concerns.

The assessment must be reviewed whenever the tool, its terms of use, its data-handling arrangements or the way in which the school uses it changes.

Staff must apply data-minimisation principles when using AI. No member of staff may enter, upload or disclose safeguarding records, identifiable learner information, medical information, photographs, videos, assessment records, confidential communications or other sensitive information to an AI service unless the service has been expressly approved by the school for that purpose and the proposed use complies with the school's data-protection and information-security requirements.

AI-generated content must not be assumed to be accurate or unbiased. Staff must exercise professional judgement and check the accuracy, suitability and source of material before using it for teaching, assessment, decision-making or communication.

The school's filtering and monitoring requirements apply to AI services. Any suspected use of AI to bully, groom, exploit, impersonate or harm another person, create or share harmful or sexualised material, or access prohibited content must be reported immediately through the school's safeguarding procedures.

Safeguarding concerns involving AI will be recorded and managed in accordance with this policy, the Online Safety Policy, the Anti-Bullying Policy, the Behaviour Policy and applicable Bahrain law. Where necessary, the Designated Safeguarding Lead will consider parental notification, preservation of evidence and referral to the appropriate external authority.

12.2 Social Media

The School recognises the importance and prevalence of social media, both in private and in public for our employees. Professional etiquette is required and expected at all times when using private and professional social media.

12.2.1 Expectations regarding use of media

- Employees **may not** provide statements to the press or other media channels
- Employees may interact on School-moderated social media ex: School Facebook/Instagram page by liking and sharing posts, and can include comments if these are supportive.
- It is recommended that employees do not interact with current parents and current learners of the school on social media.
- Employees may interact with past-parents and past-learners via social media on the proviso that all Nadeen School related information, be it past, present, or future, remain strictly confidential at all times, even after employment has ceased.
- Employees are to refrain from posting unauthorised photographs and other details pertaining to School matters on social media or other sites.
- Commenting on School matters on the internet and through social media is not permitted. Posting School matters on personal forums or commenting on comment threads is also deemed to be unprofessional and a breach of confidentiality. Professional etiquette is required.
- A written warning will be issued to employees who post content deemed unacceptable or unprofessional on social media sites and disciplinary action will be taken where required.

12.2.2 Public interaction on social media

- All professional social media accounts may be set to public.
- All professional social media accounts may not contain identifiable images of learners from Nadeen School but may contain images of professional work done within the school.
- Staff may use or republish photos already published by the school.

12.2.3 Private interaction on social media

- All personal social media accounts must be set to private.
- Employees are not permitted to comment on public media in a way that could bring themselves or the school into disrepute.
- This includes reference to all matters related to cultural and professional conduct expectations while being

an employee of the school.

- We recommend that employees do not interact with current parents or current learners of the School on private social media ex: being friends on/via personal Facebook accounts
- In the event that an employee is also a current parent of the School this point gives weight to the fact that they are an employee of the School first
- Employees are not permitted to access their personal email accounts or personal social media accounts during school time, unless during a designated break time.

12.3 Monitoring and Filtering

Batelco - Our internet provider applies global filters as a service in Bahrain.

They also use our **Fortigate firewall** that applies web filtering and applications controls, the firewall blocks certain categories such as advertising sites and games plus social media for teachers, any suspicious websites are reported are also blocked in addition to any websites requested by teachers/admins after granting approval from IT Manager and SLT, that is to either allow or block the sites. Additionally the school management reserves the right to check devices manually including web browsing history and visited pages.

Also, we use **Google for Education license** that also provides a layer of protection and restrictions.

The designated safeguarding lead (DSL) and the Principal have responsibility for understanding the filtering and monitoring systems and processes in place as part of their remit.

The effectiveness of filtering and monitoring will be reviewed at least once every academic year by the SLT member with operational responsibility, supported by the DSL and IT staff or provider.

Testing must cover all school-managed and internet-connected devices, user groups, networks and relevant locations. It must include safeguarding categories, circumvention attempts, generative AI services, alerts, escalation arrangements, staff understanding and the impact on pupils with additional needs.

The school will retain dated records of tests, findings, actions, responsible persons and completion dates. Material failures will be reported immediately to the Principal, DSL and Board Safeguarding Lead.

The Safeguarding team along with the IT manager have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as outlined above.

12.4. Photography/Use of Phones

Staff **must not** use personal devices to photograph or video learners. Only school-managed devices/systems may be used. Parental consent is recorded centrally; images are stored and shared via approved platforms only.

On occasions the school will use photographs of children or their work on the school website/instagram or in other publications, including social media operated by the school. It is policy that learners' names may accompany photographs but only after written permission has been given by the parent/guardian.

No personal cameras or mobile phones should be used or present in the Early Years section of the school.

13.0 Record-Keeping

The DSLs / DDSs may copy child protection records generated by the School prior to transfer and retain for as long as is necessary where there is justification for believing that the records may be required as evidence of the School's

involvement with the child for statutory purposes (e.g. court cases or serious case reviews). When the records are no longer required, they will be securely disposed of, this will be in accordance with our GDPR policy.

All safeguarding records must:

- Be factual, objective, and free from personal opinion
- Be submitted as soon as possible and on the same day; immediate risk must always be escalated verbally without delay.
- Include dates, times, actions taken, and DSL decision-making
- Be stored securely on CPOMS
- Avoid use of personal devices or private storage

All safeguarding records are shared with the child's new school using the school's safeguarding and child protection proforma.

Child-protection records must be kept separately from the general educational file, with access restricted to authorised staff. Records must be capable of audit and must show amendments, access and transfer.

All safeguarding records are shared with the child's new school using the school's safeguarding and child protection proforma. When a child transfers, the safeguarding file must be transferred securely, separately and as soon as practicable. Receipt must be confirmed. The DSL should consider whether a direct discussion with the receiving DSL is required.

Retention periods and disposal arrangements must comply with the school's approved retention schedule.

14.0 Notifying Parents/Carers/Guardians

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

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

If we believe that notifying the parents or carers would increase the risk to the child, this will be discussed with the Principal and if appropriate the relevant authority.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

15.0 Visitors, Volunteers, External Providers and Contractors

At no time are volunteers or visitors to the school left with children unsupervised. All volunteers within the school population are given a copy of the [Safeguarding policy and relevant handbook](#) to read and sign prior to starting at



the school. All contractors and outside providers are given additional guidelines prior to commencing work at the school

Low-level concerns about visitors/contractors are also recorded and reviewed for patterns.

15.1 Volunteers

All volunteers into the school are normally chosen from within the community, once a positive relationship has been established. This includes members of the Friends of Nadeen. If a volunteer is scheduled to come into the school for more than 'just a one-off visit' then all relevant checks are completed including police checks.

The school will determine the checks and controls required for each volunteer from the activity undertaken, frequency, supervision arrangements, opportunity for contact with children, access to confidential information and applicable Bahrain requirements. The decision and rationale will be recorded.

KCSIE 2026 reflects the removal in UK law of the former "supervision exemption" from regulated activity. Supervision alone must therefore not automatically be treated as an adequate substitute for appropriate suitability checks when applying KCSIE as a BSO safeguarding benchmark.

Note regarding ID checks: by virtue of having a valid Bahrain residence permit any adult will have gone through a security check by the Ministry of Interior. However, in line with KCSIE 2026, Nadeen will request that police checks are carried out if the residence permit is over 3 years old.

15.2 Visitors to the School and External Providers

Before work begins, the school must obtain written confirmation of the checks completed by the contractor or provider, assess the nature and location of the work, determine supervision and access controls, verify identity on arrival and communicate safeguarding and emergency procedures.

The school remains responsible for responding to concerns about contractors and third-party staff. A concern must not simply be transferred to the employing organisation without school oversight, recorded action and consideration of external reporting.

- All visitors or people without school-issue ID must present a government-issue ID in order to gain entry to the site. All visitors are given a red-lanyard to wear. Under no circumstances are visitors left with children unattended.
- Contract work is done out of school hours where possible when children are not on site.
- Contractors who are required on site during school hours will be accompanied by a member of staff and not left on site unaccompanied at any point during their visit. If contractors are to be left by themselves then they must have gone through the appropriate checks.
- Staff responsible for employing external providers and contractors are also responsible for ensuring that these people understand and adhere to the school's safeguarding policies and expectations.

The DSL and the DDSL work in partnership and have weekly meetings, a member of the Executive Leadership Team also attends this meeting.

The DSL will report any child protection issues to the relevant Vice Principals or Principal immediately.

15.3 Children, Parents and Visitors

Children, parents, and visitors are entitled and expected to voice any concern to the school at any time by contacting a member of the safeguarding team. There are posters of the team displayed around school and on the website.

15.4 Lateness & Late Pick-up of Learners

Parents/guardians who are consistently late for learner collection (once a week or more) will be contacted by the school pastoral team.

Excessive late pick-ups may result in restrictions or loss of access to extended care services or after-school activities.

16.0 Whistleblowing

Staff may raise concerns without fear of retaliation. Staff who are concerned about the conduct of another staff member, volunteer or parent are expected to report their concern to the Principal. The school recognises that this places staff in a difficult position and ensures through its approach that whistleblowers will face no adverse reaction or consequences as a result of their sharing. If the concern relates to the Principal, then this should be reported to the Executive Chair of the Board, Shanee Puri.

Staff must be given an external reporting route where they reasonably believe that internal safeguarding concerns have not been addressed. The route must reflect services lawfully available in Bahrain; UK-only contacts must not be presented as locally operative unless they are accessible and appropriate.

17.0 Safer Recruitment

As a responsible employer, we exercise safer recruitment procedures that help deter and reject people who might abuse children. All members of the HR, Executive Leadership Team and Senior Leadership complete the safer recruitment training. Further information can be found in Appendix 4.

All gaps in employment are explored and recorded.

18.0 Single Central Record (SCR)

Nadeen School maintains a **Single Central Record (SCR)** to ensure that all staff, volunteers, contractors, and governors working with children have undergone the necessary background checks in accordance with statutory guidance.

- **Maintenance and Oversight:** The SCR is maintained and regularly updated by the **Human Resources (HR) team** to reflect all new appointments, renewals, and relevant changes.
- **Scope of Checks:** The type of background checks required is determined by an individual's role, nationality, previous countries of residence, and in alignment with the requirements set out in **KCSIE 2026**.
- **Monitoring:** The **Designated Safeguarding Lead (DSL)** monitors the SCR at key intervals throughout the year to ensure full compliance with safeguarding requirements and reports findings to the Senior Leadership Team as appropriate.

- **Compliance:** Maintaining an accurate and up-to-date SCR is a statutory obligation and a critical component of the school's safeguarding framework.

The SCR section must explicitly record, where applicable:

- Identity check and date.
- Right to work in Bahrain.
- Qualifications.
- Bahrain police/security clearance.
- ICPC where the person has worked or works in the UK, as required by the BSO standards.
- Overseas criminal-record or equivalent checks.
- Professional standing and prohibition checks.
- References and verification.
- Medical fitness.
- Role and start date.
- Person who completed each check.
- Supply and agency assurance.
- Proprietor/Board checks.
- Volunteers, trainee teachers and self-employed personnel.
- Risk assessment and supervision where any check is outstanding.

The DSL samples the SCR termly; HR maintains it; governors receive annual assurance.

19.0 Early Years

The Head of Early Years will hold an approved qualification at level 3 or above and at least half of all other staff must hold at least an approved level 2 qualification. We will make sure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff and always within sight or hearing.

20.0 Staff Annual Declaration

On an annual basis all staff will be required to complete the Staff Annual Declaration which ensures their knowledge and understanding of safeguarding related policy, procedure, key contacts in the school and (for all relevant staff) provides for a personal safeguarding declaration. Where an aspect of the annual declaration is not applicable to the role undertaken by the individual, then they should enter "N/A" against the relevant entry on the Declaration before signing and returning it.

21.0 Monitoring

This policy will be reviewed annually by Suzanne Rodricks, Designated Safeguarding Lead. At every review, it will be approved by the Senior Leadership Team and final approval will be made by the Principal.



The Board Safeguarding Lead will monitor implementation of the policy.

Bahrain's Law No. 4/2026 and Law No. 27/2005 (Education Services) explicitly state that the philosophy of any educational institution must not undermine or conflict with Islamic, national, and societal values, constants, and Arab identity.

Appendices:

Appendix 1 - Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Physical Indicators	Behavioural Indicators
Unexplained bruises – in various stages of healing – grip marks on arms; slap marks; human bite marks; welts; bald spots; unexplained/untreated burns; especially cigarette burns (glove like); unexplained fractures; lacerations; or abrasions; untreated injuries; bruising on both sides of the ear – symmetrical bruising should be treated with suspicion; injuries occurring in a time pattern e.g. every Monday	Self-destructive tendencies; aggressive to other children; behavioural extremes (withdrawn or aggressive); appears frightened or cowed in presence of adults; improbable excuses to explain injuries; chronic runaway; uncomfortable with physical contact; come to school early or stays last as if afraid to be at home; clothing inappropriate to weather – to hide part of body; violent themes in art work or stories

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include

interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Emotional abuse may include verbal abuse such as persistent criticism, belittling, humiliation or name-calling.

Emotional Abuse

Physical Indicators	Behavioural Indicators
Well below average in height and weight; "failing to thrive"; poor hair and skin; alopecia; swollen extremities i.e. icy cold and swollen hands and feet; recurrent diarrhoea, wetting and soiling; sudden speech disorders; signs of self-mutilation; signs of solvent abuse (e.g. mouth sores, smell of glue, drowsiness); extremes of physical, mental and emotional development (e.g. anorexia, vomiting, stooping).	Apathy and dejection; inappropriate emotional responses to painful situations; rocking/head banging; inability to play; indifference to separation from family indiscriminate attachment; reluctance for parental liaison; fear of new situations; chronic runaway; attention seeking/needing behaviour; poor peer relationships.

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

- Physical contact, including assault by penetration or non-penetrative acts.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Physical Indicators	Behavioural Indicators
Bruises, scratches, bite marks or other injuries to breasts, buttocks, lower abdomen or thighs; bruises or bleeding in genital or anal areas; chronic ailments such as recurrent abdominal pains or headaches; difficulty in walking or sitting; frequent urinary infections; avoidance of lessons especially PE, games, showers; unexplained pregnancies where the identity of the father is vague; anorexia/gross over-eating.	What the child tells you withdrawn; chronic depression; excessive sexual precociousness; Seductiveness; children having knowledge beyond their usual frame of reference e.g. young child who can describe details of adult sexuality; parent/child role reversal; over concerned for siblings; poor self-esteem; self-devaluation; lack of confidence; peer problems; lack of involvement; massive weight change; suicide attempts (especially adolescents); hysterical/angry outbursts; lack of

	emotional control; sudden school difficulties e.g. deterioration in school work or behaviour; inappropriate sex play; repeated attempts to run away from home; unusual or bizarre sexual themes in children's art work or stories; vulnerability to sexual and emotional exploitation; promiscuity; exposure to pornographic material.
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Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical Indicators	Behavioural Indicators
Looks very thin, poorly and sad; constant hunger; lack of energy; untreated medical problems; special needs of child not being met; constant tiredness; inappropriate dress; poor hygiene; repeatedly unwashed; smelly; repeated accidents, especially burns.	Tired or listless (falls asleep in class); steals food; compulsive eating; begging from class friends; withdrawn; lacks concentration; misses school medicals; reports that no carer is at home; low self-esteem; persistent non-attendance at school; exposure to violence including unsuitable videos.

Some children may present signs from more than one category.

Not all cases will be considered an immediate safeguarding risk. For example, a child who persistently comes to school untidy and unwashed and presents no other signs may not be in immediate danger, however we ask that staff report such concerns on CPOMS.

Other Types of Abuse

Domestic Abuse All children can be exposed to and affected by domestic abuse in their home life where domestic abuse may occur between family members. This can have an impact on emotional and psychological development. A



child may blame themselves for the abuse or may have had to leave the family home as a result. Some types of domestic abuse are intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Exploitation is the intentional ill-treatment, manipulation, or abuse of power and control over a child or young person; to take selfish or unfair advantage of a child or young person or situation, for personal gain. It may manifest itself in many forms such as child labour, slavery, servitude, engagement in criminal activity, begging, benefit or other financial fraud or child trafficking. It extends to the recruitment, transportation, transfer, harbouring or receipt of children for the purpose of exploitation. Exploitation can be sexual in nature.

Child on Child Abuse Children and young people can be abused by other children or young people. Abuse can occur within families, in schools or youth groups, online, and across age ranges. A younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled. Such abuse should always be taken as seriously as abuse perpetrated by an adult but it is important to remember that children and young people who abuse other children and young people may have experienced abuse and neglect themselves.

Harmful Sexual Behaviour includes using sexually explicit words and phrases, inappropriate touching, using sexual violence or threats, full penetrative sex with other children or adults. It is sometimes difficult to distinguish between normal childhood and adolescent sexual development and experimentation, and sexually inappropriate abusive or aggressive behaviour. Professional judgement may be required and concerns should be referred to your Designated Safeguarding Lead.

Sexual Images. Children and young people who generate and share sexually explicit images of themselves or others need to be aware that they are committing a criminal offence. This is sometimes referred to as 'sexting' and involves the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet. By sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with the permission of the child or young person. 'Sexting' can also refer to written messages.

Sexual Exploitation of Children and young people Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent CANNOT be given even where the child believes they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Bullying is defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group). The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development. Bullying causes physical and/or emotional harm and can result in significant problems of low self-esteem, social isolation, anxiety, and depression for the children and young people subjected to it. Bullying occurs in a variety of settings and can take place off and online.

Appendix 2 - Level of Need Supporting Document

This document is a guide to assessing and meeting the needs of children and their families at Nadeen. It is a framework to underpin our internal systems and processes, and should be used as a guide to support our safeguarding teams in understanding and assessing the needs of a learner and/or family who may require additional support. It is important that Pastoral/Welfare Assessments are based on a 'big picture' view of the child and their circumstances. This means that a clear system of identification, assessing, reporting, and acting is in place and consistent across all phases of the school.

The following Levels of Need are based on the UK Common Assessment Framework (CAF) model, within our context as a leading international school in the region. They are designed to support our school safeguarding and pastoral teams when making decisions about what level of support learners need and what tools and other departments/agencies are available to support this process. Higher level (L3 & 4) cases would ordinarily be escalated through the levels of need with the appropriate chronology. However, in some cases a new case will need to bypass early help and proceed to a Level 3 or 4 if the nature of the concern is serious enough or identified as a child protection matter:

Level of Need and Required Action

Level of need identified	Description	Level 3 Pastoral/Welfare Assessment required?	Action /Support
Universal services are services that are available to everybody and can be accessed by anyone without additional support.	Learner is thriving without requirement for additional support and all needs are being met by universal services, for example School Nurse, external health or class teacher, pastoral lead..	No	Ensure that all learners and families are aware of the Support Services and Provisions such as School Nurse, Local Health Services and Support Groups/People that are available to them to access both internally and externally.

Level of need identified	Description	Level 3 Pastoral/Welfare Assessment required?	Action /Support
Level 1: Noted Concern	Learner may require or would benefit from additional input or support from a department in school or an external agency/agencies.	Discussed at the phase safeguarding meeting. Monitored and reviewed. No Pastoral/Welfare assessment required.	Learners, children, young people, or families may need to access relevant universal services for advice/support such as school, counselling, medical, tutor, support staff. This also relates to minor pastoral observations such as behaviour, attendance, punctuality, and health. Concern is monitored and recorded. Key staff are informed, and the case is reviewed and documented through CPOMS management system and meetings.
Level 2: Additional Support (Early Help)	Learner may require or would benefit from additional input or support from an external agency/agencies.	If a clear issue or area of need is identified – School Safeguarding -Pastoral/Welfare Assessment or Care Plan may not be necessary. If several issues or more complex needs are identified, a School Pastoral/Welfare Assessment should be undertaken.	Targeted support through pastoral/support systems, work with another school professional or direct to relevant universal service for additional support. Based on results of Welfare Assessment – access appropriate early help services and set up a Welfare Meeting to develop a Pastoral/Welfare Plan.

Level of need identified	Description	Level 3 Pastoral/Welfare Assessment required?	Action /Support
Level 3: Academic/Pastoral Welfare Assessment & Plan	Learners are experiencing multiple and/or complex needs. The learner is struggling to effect change without the support and intervention of additional services in school. There is a need for a greater level of support including perhaps a home visit.	Pastoral Welfare Assessment should be undertaken and recommendations made for colleagues/services to meet assessed levels of need.	When a child begins to display emerging needs requiring additional support, services already working with the child should support the family by undertaking a Pastoral Welfare Assessment and developing an outcome Plan. This will identify support from within the school community or a specific intervention. Appropriate support can be accessed by the Key Lead Professional involved with the Pastoral/Welfare Plan. Home Visit possibly required. All actions are recorded on the management system.
Level 4: Child In Need/Child Protection	The learner is unlikely to achieve or maintain a reasonable standard of health or development without the provision of support services. The learner's health or development is likely to be significantly impaired, or further impaired without the provision of additional services. This is recorded as a serious Child Protection Case. A Serious Case Review Meeting will have taken place.	Likely that a Welfare Assessment has been done. At this stage refer the case externally, Medical Service, NGO, Police or Embassy Assistance. During the investigation, a School Welfare Assessment and Plan may be of benefit as part of this process. You may put together a multi-agency team to support which may involve professionals that are external to Nadeen School.	Immediate referral externally where appropriate and possible. All details are recorded in detail on the management system and there is a clear record of actions and intervention on learner's chronology. A Child Protection Risk Assessment will be completed and logged on the management system. Home Visit if possible Possible Safety Plan (Using Clear Protocols): • Suicide • Grooming • Self Harm • Eating Disorder • Child on Child Abuse

Appendix 3: Managing safeguarding concerns or allegations about staff, supply staff, trainee teachers, volunteers and contractors

All allegations against staff, supply staff, volunteers and contractors will be investigated by a 'case manager', this will be the DSL or a relevant member of the Safeguarding team or the Chair of the Board where the Principal is the subject of the allegation.

For supply staff, trainee teachers and contracted personnel, the school and the third-party organisation share safeguarding responsibilities. The school will agree and record who leads each action, what information will be shared and how the child will remain protected.

Consideration must be given to referral to the applicable Bahrain authority and, where relevant to a UK employment or regulatory connection, whether a referral to a UK body is lawful and required.

Low-level concerns must be stored securely, reviewed for patterns and considered alongside complaints, grievances, safeguarding incidents and information received during recruitment.

The case manager will be identified at the earliest opportunity.

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

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

The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties, depending on the circumstances.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold (risk of harm, possible offence, unsuitability) and allegations that do not, also known as 'low-level concerns'. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Low-Level Concerns (LLC) Procedure

A low-level concern is any concern about a staff member's behaviour towards a child that does not meet the harm threshold but may indicate that the staff member acted in a way that is:

- inconsistent with the Staff Code of Conduct, or
- a potential early warning sign of a behaviour pattern that could become abusive over time.

Examples of Low-Level Concerns

- Using overly intimate language or nicknames
- Having 'favourites'

- Being alone with a pupil in a private, unsupervised space
- Unnecessary physical contact
- Excessive social contact or gift-giving
- Comments about a learner's appearance
- Poor professional boundaries (e.g., texting outside school channels)

Procedure for Reporting Low Level Concerns (LLC)

- Any staff member can report an LLC directly to the DSL or Principal.
- Reports can be made verbally or in writing and should be emailed to safeguarding@nadeenschool.com.
- Staff do not need to be certain, concerns should be shared even if unsure.

How Low Level Concerns are managed

- DSL reviews the concern and determines if it remains low level.
- Patterns of behaviour are monitored.
- The staff member may receive reflective feedback, mentoring, supervision, or additional training.
- Low-level concerns are not disciplinary unless patterns escalate or harm becomes evident.

Higher-level concerns will be escalated to the Head of Primary and Secondary and in the case of the Vice Principals, the Principal.

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

1. Immediate Protection and Reporting

- Ensure the safety of the child or vulnerable adult.
- Separate the staff member from the individual concerned, if necessary.
- Staff must **report** any allegations immediately to the Designated Safeguarding Lead (DSL).
- The Principal must be immediately informed of the allegation and be actively involved in ensuring that safeguarding protocols are enacted without delay.
- Consult or refer to external entities where required.
- Agree on an investigation route.
- HR is notified at this stage to provide immediate guidance on employment implications and documentation protocols.

2. Engagement with External Agencies

- Assess local legal requirements (MoE): Engage local child protection authorities, police, or legal bodies where possible/necessary.
- If local protection systems are weak or unsafe, follow **internal safeguarding procedures** to protect the child while managing risks (e.g. alternative care arrangements, involving embassies or international agencies).

- The Principal is responsible for ensuring compliance with local and international safeguarding obligations and for liaising with external agencies when required.
- Head of HR supports Principal and DSL by providing documentation , employment history and ensuring compliance with local labour laws.

3. Internal Investigation Process

- A 'case manager' will be identified who will begin an impartial internal investigation.
- Decide whether the staff member should be suspended or relocated during the investigation.
- Ensure procedures are **documented and compliant** with international safeguarding standards, including KCSIE 2026.
- The Principal is responsible for ensuring compliance with local and international safeguarding obligations and for liaising with external agencies when required.
- The Principal is accountable for ensuring that the process upholds the rights and dignity of all parties.
- Head of HR works in partnership with the Principal and the case manager to ensure that the investigation process aligns with Bahrain employment law, Nadeen safeguarding policy and staff code of conduct..
- Head of HR ensures fair treatment and legal protection for the accused staff member.

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an additional adult/assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and after parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example a different department in the school or to work from home.

4. Confidentiality and Support

Confidentiality is critical to protect both the complainant and the accused.

- The accused individual will be informed of the concerns or allegations and likely course of action as soon as possible after speaking to the Principal. Where the police are involved, the case manager will only share such information with the individual as has been agreed with those parties.
- The accused staff member should also be supported until the investigation concludes.

- The Principal must ensure that both support systems and confidentiality protocols are in place, documented, and regularly reviewed.
- Head of HR ensures that staff are signposted to appropriate wellbeing services and that confidentiality clauses in contracts are upheld.
- If immediate suspension is considered necessary, agree and record the rationale for this. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with Head of HR and the Principal what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, Head of HR and the Principal will take steps as agreed to initiate the appropriate action in school and/or liaise with the police and/or external parties as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

5. Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Consider **local legal consequences**, depending on jurisdiction

- The Principal must ensure any necessary referral to external agencies is completed in coordination with the Head of HR.
- Head of HR ensures any referrals to statutory /regulatory / law enforcement bodies are actioned in coordination with the DSL and the Principal.

The parents or carers of the child/children involved will be kept informed of the progress of the case, this will only be in relation to their child – no information will be shared regarding the staff member.

6. References

When providing employer references, we will:



- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

7. Learning Lessons

- All information/updates throughout the investigation to be logged on CPOMS.
- Report incidents to funders, donors, or regulators if required (e.g. Charity Commission, FCDO).
- Review safeguarding procedures and identify any actions required to improve future practice.
- The Principal must lead the post-case reflection process with the relevant members of the safeguarding team to identify learning points and ensure recommendations are implemented.
- Head of HR collaborates with the DSL and the Principal during post- incident reviews to refine HR procedures (e.g. safer recruitment, onboarding, whistleblowing policies).

Appendix 4: Safer Recruitment Policy and Procedures

As a responsible employer, we exercise recruitment procedures that help deter and reject people who might abuse children.

In line with best practice all those involved in the recruitment of staff have completed the safer recruitment training , this includes all members of the HR, Executive Leadership Team and Senior Leadership Teams complete the safer recruitment training.

At least one of the Interview Panel Members must have completed Safer Recruitment Training

Members of the Recruitment Community must successfully complete the Safer Recruitment Training and obtain the Certificate in Safer Recruitment.

Gaps in Employment

All application forms should be scrutinised to ensure they are fully and properly completed, and that the information provided is consistent and does not contain any discrepancies, including identifying any gaps in employment. Where there are gaps in employment, a note of this should be made and used in consideration of whether to short list the applicant. Together with obvious gaps in employment, the reasons for a history of repeated changes of employment without any clear career or salary progression should be explored and verified. This can also include a mid-career move from a permanent role to supply teaching or temporary work. Recruitment procedures must ensure:

- Consistent application form.
- Shortlisting by at least two people.
- Recording of shortlisting decisions
- Exploration and recording of gaps, discrepancies and unexplained employment changes.

References

Applicants should give a minimum of two professional reference contacts from two separate employers on the Application Form. A key purpose of the reference is to verify the applicant's suitability to work with children. These reference contacts must therefore include the most recent employer and the most recent employment working with children (if different).

References should be sought on all short-listed school-based applicants, including internal ones and should be from a senior person within the organisation.

The School must request all written references directly from the referee.

We do not accept open references as part of the recruitment process e.g., "to whom it may concern". A minimum of two returned and satisfactory references are required in the personnel file.

As a rule, character references are not acceptable; this includes references from relatives or people writing solely in the capacity of friends. If there is a good reason the applicant cannot supply the requisite number of referees (e.g., because they are recent graduates or have only held a small number of jobs), references may be sought from high quality alternatives (e.g., University tutor).

References should be requested using the Employer Reference Request Form. If a reference is received electronically and has not been signed by hand by the referee, evidence must be sought and retained in the employee file to demonstrate that the reference was provided by the expected referee and email address.

Background Checks

Our recruitment procedure includes a background check process that helps to deter and/or reject people who may be a risk to children. At the time of writing there is no all-encompassing international check available for employees or employers to check suitability to work with children.

An offer of employment must be conditional upon:

- the receipt of at least two satisfactory written references
- verification of the applicant's identity (if that could not be verified at the interview)
- Right to work
- Local Police Check (CPR)
- the receipt of overseas criminal records checks for all other countries in which the applicant has lived or worked for three months or more in the past ten years (if applicable) and for the country they completed their teacher training in (if outside the country)
- The receipt of a Letter of Professional Standing (if teaching and previously taught overseas)
- verification of the applicant's medical fitness
- verification of appropriate qualifications/professional status (where required) • signed annual disqualification declaration
- satisfactory completion of the probationary period

All checks should be recorded in writing, verified (date and signature) documented and retained on the employee's personnel file.

A summary of the checks must be recorded on the Single Central Record.

The above checks must be completed before an applicant takes up the post, this may result in delaying the commencement of employment.

Any exception to this must have been discussed with the Principal, the DSL and the Head of HR following which they confirm their agreement that it is necessary for the individual to start work before all the vetting checks are complete and that the proposed measures that will be taken are appropriate to safeguard learner's welfare.

Any exceptional permission to appoint without all recruitment vetting checks completed will be subject to the following conditions:

- all vetting checks must have been applied for
- at least two written references must have been received, and the Recruiting Manager must have spoken personally over the telephone (or face to face) with the remaining referee(s), asked and obtained answers to all of the questions on the reference request form, and a full written note must have been taken of these discussions and placed on the personnel file
- at least one reference must be received from the most recent employer and where the role has involved working with children.
- verification of the individual's identity, right to work in the country, qualifications and medical fitness must have been completed

- the annual disqualification declaration must be completed
- Risk Assessment must be completed using the appropriate Risk
- a Risk Assessment must be completed using the appropriate Risk Assessment template on the SCRT and this must be suitably approved on the employee record
- steps must be taken to ensure mitigating arrangements, which will include appropriate supervision and restrictions on certain types of activity (such as school trips), are put in place pending completion of the vetting checks and documented on the Risk Assessment Form, which must be reviewed by the Principal every two weeks, and updated notes produced as an audit trail
- details of supervisory measures and restrictions on work must be discussed and agreed with the new employee prior to them starting.
- whilst the check remains outstanding, a note that there is a risk assessment in place should be recorded on the Single Central Record.

If any of the information contained in the pre-employment checks is unsatisfactory or has discrepancies, this should be followed up by the relevant person recruiting supported by a member of the HR Department. Any disclosure information relating to a conviction should be notified to the Principal and the Executive Chair for careful consideration of suitability to the post. Serious, deliberate fraud or deception in connection with an application for employment may amount to a criminal offence. In such cases the employer should, in addition to any planned disciplinary action, consider reporting the matter to the relevant authorities and/or regulators.

Overseas Checks

Staff that have lived and/or worked outside of the country must undergo the same background checks as all other applicants, plus additional criminal/Police record checks (overseas checks) to account for their time spent overseas. Copies of documents should be verified (date and signature), retained on the personnel file and recorded on the SCR.

Criminal/Police record checks must be sought for:

- all other countries in which the applicant has lived and/or worked for a period of three months or more in the past ten years. Please note that checks are not required prior to the age of 16.
- country where applicant completed teacher training (or relevant teaching qualifications)

If an overseas check is not in English, a reputable translation company should be used to translate the document. To ensure data protection, no member of the school staff or department must be asked to assist with translation, unless they are a member of the Interview Panel. Please contact a member of the HR Department for further support.

In the event that criminal/Police record checks are not available or forthcoming from a country, alternative documents to evidence their time spent in the country must be sought, such as certificates of good conduct (where available) or, if they worked in the country, full employment references. If no employment references are available, character references from professionals that knew the individual in the country can be sought. This should be recorded on an Overseas Criminal Checks Risk Assessment Form and filed on the applicant's personnel file.

Any disclosures on overseas checks will need to be discussed with the Principal and Head of HR to allow an informed recruitment decision to be made.

Military Personnel: If an applicant has spent time overseas serving in the Armed Forces, criminal/Police record checks should still be requested for all countries where the individual has spent three months or more in the past ten years.

Disqualification



At offer stage, (and annually at the start of Autumn term or thereafter) an Annual Disqualification Declaration Form is required from each member of staff who provide childcare for children up to the age of five during school hours and up to the age of eight in wrap around care and those directly involved in managing the early years provision, confirming that they are not disqualified under the Childcare (Disqualification) Regulations 2018.

The declaration must be signed and retained on the personnel file. There is not a requirement for this check to be recorded on the SCR.

Safeguarding Declaration

All applicants will be required to sign a Safeguarding Declaration within the Contract of Employment to evidence their commitment.

Non-Employee Groups

In order to safeguard the learners in our care we require a similar rigorous approach to recruitment for all non-employee Groups. We obtain written notification from any agency or third-party organisation that present staff to work within the school that they have completed all the checks we would have undertaken if employing directly required for the post. The school must also conduct their own identity check to ensure that the person presenting for work at the school is one and the same person for whom the third-party organisation have confirmed the checks have been undertaken. Under no circumstances should any non-employee in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity. To this end, guidance has been produced for third party contractors and non-employees (including supply, self-employed and volunteers).

Appendix 5 : EYFS specific safeguarding policy and procedure

Safeguarding and promoting the welfare of children is central to our practice in the Early Years. In line with the updated Early Years Foundation Stage (EYFS) statutory framework, we ensure that all children are cared for by suitably qualified staff who are appropriately supported, supervised, and deployed to meet their needs effectively.

The EYFS places a strong emphasis on staff supervision, qualifications, and ratios, recognising that high quality care and education depend on knowledgeable, reflective, and well supported practitioners. Supervision provides staff with regular opportunities for professional dialogue, coaching, and confidential discussion of sensitive safeguarding matters, ensuring that children's welfare remains paramount at all times.

These requirements set out clear expectations for how staff are organised, how children are supervised particularly during higher-risk times such as eating and how parents are informed and involved. By adhering to the EYFS framework, we create a safe, nurturing, and well managed environment in which all children can thrive.

1. Supervision for staff

- Any staff member who works directly with children and families will receive regular supervision.
- This supervision is a professional support process, not just monitoring and will be provided by the school counsellor and/or the Assistant Headteacher for Early Years. It allows staff to:
 - Get guidance, coaching and training
 - Talk confidentially about sensitive safeguarding or welfare concern
 - Reflect on their practice to ensure the best interests of children are always prioritised

2. Supervision of children

- Children will be adequately supervised at all times, with extra care during higher-risk moments (e.g. eating).
- Leaders will decide how to deploy staff to ensure children's individual needs are met.

3. Communication with parents

- Parents and carers will be informed about how staff are organised.
- Where appropriate and practical, the setting will try to involve parents in decisions about staffing and care arrangements.

4. Visibility and hearing of children

- Children will usually be within both sight and hearing of staff.



- At all times, children will be within either sight or hearing, ensuring constant supervision and safety

Appendix 6 Ministry of Labour and Social Development - Decision No. (69) of 2016 Regarding the Establishment of the Bahrain Child Protection Centre

English Translation

Ministry of Labour and Social Development

Decision No. (69) of 2016

Issued on: 13 July 2016

Published on: Thursday, 21 July 2016 – Issue No. 7271

Regarding the Establishment of the Bahrain Child Protection Centre

After reviewing:

- The Child Law promulgated by Law No. (37) of 2012, particularly Article (43) thereof;
- Decision No. (10) of 2007 regarding the establishment of the Bahrain Child Protection Centre;
- Decision No. (1) of 2015 regarding the formation of the Board of Directors of the Child Protection Centre;
- And based on the proposal of the Undersecretary for Social Development Affairs;

The following has been decided:

Article (1)

A centre named “**Child Protection Centre**” shall be established, as stipulated in Article (43) of the Child Law issued by Law No. (37) of 2012.

This centre shall replace the **Bahrain Child Protection Centre**.

Article (2)

The Child Protection Centre shall operate under the **Social Welfare Directorate** at the Ministry of Labour and Social Development and shall assume all duties and powers necessary to protect children from abuse, including but not limited to:

1. Taking all **immediate and direct measures** necessary to protect children from abuse.
2. Studying the cases of children exposed to abuse from **health, psychological, and social perspectives**, and taking appropriate action.
3. Following up, on a regular basis, on cases of children exposed to abuse when returned to their parents or legal guardians, including legal and economic follow-up.
4. Providing **temporary and urgent alternative care** outside the family for children exposed to abuse when necessary, including cases where:
 - The child’s life is at risk, or
 - The child has been subjected to sexual assault by parents or guardians.
5. Taking all necessary measures to **rehabilitate the abused child and their family**, ensuring the child’s safe return to a stable environment. This includes:
 - Medical treatment

- Psychological rehabilitation
- Educational and awareness programmes
- Skills development
- Addressing addiction issues of parents or guardians, where applicable

6. Providing a **24/7 hotline** to receive reports and complaints related to child abuse.

Article (3)

Decision No. (10) of 2007 regarding the establishment of the Bahrain Child Protection Centre is hereby repealed.

Article (4)

The Undersecretary for Social Development Affairs shall implement this decision, which shall come into effect from the day following its publication.

Issued by:

Jameel bin Mohammed Ali Humaidan

Minister of Labour and Social Development

Date: 8 Shawwal 1437 AH

Corresponding to: 13 July 2016

Appendix 7 - Intimate Care

Families are responsible for arranging suitable additional support so that children who need intimate care are safely looked after during the school day. Routine or anticipated intimate care must be provided by a family-arranged, approved support person under an agreed care plan. In the event of an unexpected or emergency need, appropriately trained Nadeen staff may provide the minimum necessary assistance to preserve safety, dignity, and welfare, with another adult present or nearby where practicable, followed by accurate recording and prompt parental notification.

1 What intimate care means

Intimate care includes help with private or personal tasks such as:

- using the toilet or changing nappies or continence pads
- changing underwear or sanitary products
- washing private parts of the body
- support with catheters, stomas or similar medical equipment

These tasks will not be carried out by Nadeen employees.

2 Family responsibility

Families must inform the school if their child needs intimate care. Before the child attends without a parent or carer, the family must arrange a suitable person to provide that care. This may be a parent, carer, nurse or other support worker.

Families are responsible for ensuring that the support person:

- is appropriately trained and able to meet the child's needs
- has all checks, permissions and insurance required by Nadeen and applicable law
- is available whenever the child is at school and needs intimate care
- follows the child's agreed care plan and Nadeen's safeguarding and site rules
- brings or arranges any personal supplies and specialist equipment the child needs
- has an approved replacement if the usual support person is absent

If suitable support is not available, the family must collect the child or agree another safe arrangement with Nadeen. A child must not be left without the care they need.

3 The child's support plan

Nadeen, the family and the support person will agree to a written plan before care is provided on site. The child should be involved as far as their age and understanding allow.

The plan must state:

- what care the child needs and when it is likely to be needed
- the name and contact details of the approved support person and replacement
- how the child communicates choice, discomfort or refusal

- the child's privacy, cultural and religious needs
- the room, equipment, hygiene and waste arrangements
- what to do if the child is distressed, refuses care or there is an emergency
- how care, incidents and concerns will be recorded and shared

The plan will be kept securely and reviewed at least once a year, or sooner if needs change or there is a concern or incident.

4 Requirements for support people

- Sign in and out, wear identification and follow Nadeen's visitor and safeguarding procedures.
- Provide care only to the named child and avoid unnecessary contact with other children.
- Protect the child's dignity and privacy and encourage independence where possible.
- Use respectful language and only the touch needed to provide the agreed care.
- Follow hygiene, cleaning and safe waste disposal arrangements.
- Never take photographs, use a personal device during care, promise secrecy, shame a child or use force.
- Report any injury, unusual reaction, disclosure or safeguarding concern immediately.

Nadeen may refuse or withdraw permission for a support person to work on site if safeguarding, conduct, competence or site requirements are not met. The family must then arrange an approved alternative.

5 Nadeen's role

Nadeen will coordinate the support plan, identify a suitable private space, explain site procedures and monitor the arrangement. Nadeen staff may support access to the room, contact the family or summon emergency help, but they will not provide intimate care.

Nadeen's safeguarding duty continues at all times. Staff must act if a child appears unsafe, unwell or in distress. In an emergency, staff will provide only the first aid or emergency response they are trained and authorised to give, contact the family and call emergency services when needed.

6 Safeguarding concerns

Any concern about the child or the support person must be reported immediately to Nadeen's Designated Safeguarding Lead or deputy. This includes injury, unexplained marks, distress, a disclosure, refusal to receive care from a particular person, unsafe practice or concern about an adult's conduct.

Staff must listen, make a factual record and follow Nadeen's safeguarding procedures. They must not ask leading questions, confront the adult concerned or investigate the matter themselves.

7 Quick guide

Situation	What staff must do
Child needs regular care	The family arranges an approved support person and agrees a plan with Nadeen.

Support person is absent	The family provides an approved replacement or collects the child. Nadeen staff do not provide the care.
Unexpected intimate care need	Contact the family or approved support person. Keep the child safe and preserve dignity while waiting.
Child is distressed	The support person pauses if safe and follows the plan. No one should force the care.
Emergency	Nadeen staff will provide only authorized first aid, notify the family, and call emergency services if necessary. If a child requiring assistance needs the bathroom urgently and only Nadeen staff are available, a staff member will assist the child in the presence of another adult, and parents will be informed as soon as practicable. For non-emergency or recurring situations, please follow the standard protocols detailed in this Appendix.
Safeguarding concern	Tell the DSL immediately, make a factual record and do not investigate it yourself.

Appendix 8 – Bahrain Safeguarding Referral and Emergency Contacts

Purpose

This appendix provides a quick-reference guide to the key safeguarding referral, emergency and escalation routes available to Nadeen School in the Kingdom of Bahrain.

Staff should follow the safeguarding procedures set out in this policy and should not delay an external referral where a child is at immediate risk, where reporting is required by law, or where a staff member reasonably believes that the school's response is insufficient.

1. Child Protection Centre

Child Protection Centre & Child Helpline

Telephone: 998

Email: 998@social.gov.bh

The Child Protection Centre provides a 24-hour reporting and support route for concerns relating to child abuse, neglect, violence or other risks to a child.

Where appropriate, the DSL or DDSL will coordinate the referral with the Child Protection Centre. However, staff are not prevented from making a direct referral where immediate action is required.

2. Police / Emergency Reporting

Emergency Police / Emergency Services: 999

Call **999** where there is an immediate or serious risk to a child, where urgent police intervention is required, or where there is an emergency requiring police, ambulance or fire services.

For non-emergency police matters, the appropriate police authority should be contacted through the relevant reporting route.

3. Ministry of Education – Safeguarding and School Incident Reporting

Safeguarding concerns and school incidents requiring Ministry of Education involvement should be reported through the **Child Protection and School Incidents Department** (حماية الطفل والحوادث المدرسية).

Head of Child Protection and School Incidents

Hessa Al Qusayr – حصة القصير

Email: Hessa.j@moe.gov.bh

Assistant

Sara Bualai

Email: sara.zakareya@moe.gov.bh

Direct Contact – In Case of Emergency

Mobile: 36806068

Landline Contacts

17896028

17896871

The DSL will normally coordinate communication with the Ministry of Education where Ministry involvement is required. In an emergency, or where immediate safeguarding action is required, the relevant Ministry contact may be contacted directly.

4. Internal Safeguarding Escalation

All safeguarding concerns should be reported promptly through the school's internal safeguarding arrangements:

Staff member identifies a concern



Record on CPOMS and report to the DSL / DDSL



DSL / DDSL assesses and takes appropriate action



Principal – where further escalation is required



Board Safeguarding Representative – where the concern remains unresolved or concerns relate to the Principal

Board Safeguarding Representative

Shanee Puri

shanee.puri@nadeenschool.com

The policy provides that staff may escalate a concern where they believe that it has not been responded to appropriately. Concerns regarding the Principal should be referred directly to the Board Safeguarding Representative.

5. Escalation Where There Is No Response

If a safeguarding concern has been reported internally and the staff member believes that it has not been responded to appropriately:

1. Escalate to the **Principal** or **Board Safeguarding Representative**, as appropriate.
2. Where the concern relates to the Principal, report directly to the **Board Safeguarding Representative**.
3. Where a child is at immediate risk, or where the staff member reasonably believes that the school's response is insufficient, the staff member may make a **direct referral to the appropriate external safeguarding authority**, including the Child Protection Centre, Ministry of Education or Police.
4. External referral should **not be delayed** while waiting for an internal response where immediate safeguarding action is required.

Audit trail

Details

FILE NAME ACD - Safeguarding Policy Nadeen School 2026/27 v2.0

STATUS ● Signed

STATUS TIMESTAMP 2026/09/27
05:23:38 UTC

Activity



principalpa@nadeenschool.com **sent** a signature request to:

- Paul Sherlock (p.sherlock@nadeenschool.com)
- Shanee Puri (shanee.puri@nadeenschool.com)
- Suzanne Rodricks (s.rodricks@nadeenschool.com)

2026/09/23
06:15:15 UTC



Signed by Shanee Puri (shanee.puri@nadeenschool.com)

2026/09/27
05:23:38 UTC



Signed by Paul Sherlock (p.sherlock@nadeenschool.com)

2026/09/26
06:34:08 UTC



Signed by Suzanne Rodricks (s.rodricks@nadeenschool.com)

2026/09/23
06:20:44 UTC



This document has been signed by all signers and is **complete**

2026/09/27
05:23:38 UTC

The email address indicated above for each signer may be associated with a Google Account, and may either be the primary email address or secondary email address associated with that account.