Child Protection and Safeguarding Policy Updated September 2025

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1. Aims

The school aims to ensure that:

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

2. Guidance

This policy is based on the Department for Education, England guidance Keeping Children Safe in Education and Working Together to Safeguard Children 2023, and advice from the Ministry of Education, KSA.

Key Points

- Every member of staff is issued with guidance documentation on joining the school and receives training every year.
- Members of the school do not investigate serious allegations of child abuse themselves as serious allegations will be reported to the relevant authorities. This will include the relevant UK authorities if the child is a British Citizen.
- Designated persons responsible for Child Protection, and the Principal have the responsibility for Safeguarding matters at BISAK.
- Safeguarding is integrated into the school ethos. The school operates Safer Recruitment procedures.
- Safeguarding procedures need to be applied with common sense and judgement.
- Allegations found to be malicious should be removed from personnel records.
- Records must be kept of all other allegations but any that are not substantiated, unfounded or malicious, and should not be referred to in employer references.
- Pupils can access the Saudi Child helpline on 116 111.
- Other reading:
  1. Staff should read and refer to 'Working together to Safeguard Children 2023.
  2. All staff **must** read **Part 1** and should read **Annex A** of Keeping Children Safe in Education 2024.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment.
- Preventing 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.

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

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

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

Sharing of inappropriate images is where children share unsuitable images, videos, or live streams.

Children include everyone under the age of 18.

The schools **safeguarding partners** are:

- UK Embassy – Education Team.
- Ministry of Education, Dammam office.

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to supporting every child. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or additional needs (see section 10).
- May experience discrimination due where they come from or who they identify as.
- Have English as an additional language.
- Are at risk of 'honour-based abuse' or radicalisation.
- Are at risk due to either their own or a family member's mental health needs.
- Are missing from education.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and board members in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

- All staff are required to read Part 1 of Keeping Children Safe in Education (KCSIE).
- Staff who work directly with children should read Annex A of KCSIE.
- All staff will read and review the appropriate sections at least annually.
- All staff will sign a declaration at the beginning of each academic year to say that they have read the guidance.

All staff will adhere to:

- Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies and the Behaviour for Learning Policy.
- Online Safety Policy and the safeguarding response to children who go missing from education.
- The early help 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 'honour-based abuse', and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Identify the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, 'honour-based abuse' and radicalisation.
- Reassuring victims that they are being taken seriously and that they will be supported and kept safe.

5.2 The Designated Safeguarding Lead (DSL)

The DSLs are members of the Extended Leadership Team (ELT). Our DSLs are the Principal and the Headteacher of the Prep School.

Name	Job title
Stephen Viner	Principal
Tammy Naidoo	Headteacher of the Prep School

The DSLs take lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSLs are absent or unavailable, the deputies (DDSL) will act as cover:

Name	Job title
Lee Marsh	Headteacher of Senior School and Sixth Form
Rob van der Eyken	Deputy Headteacher of the Prep School
James Coll	Deputy Headteacher of Senior School and Sixth Form
Jack Odam	Assistant Headteacher of the Prep School
Shaun Barton	Chief Operating Officer
Rosemary Brown-Afari	Head of Year 7

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (UK Embassy, MoE (KSA), Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- The DSL will also keep the Principal informed of any issues, and liaise with the UK Embassy/MoE and designated officers for child protection concerns as appropriate.

5.3 The Board

The Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation.
- The Board will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate.
- All Board members will read Keeping Children Safe in Education in its entirety.

5.4 ELT

The Headteachers and the Principal are responsible for the implementation of this policy, including:
Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction.

- 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/ when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

6. Confidentiality

The school's approach to confidentiality and data protection:

- Will ensure effective information sharing to support safeguarding.
- Will not block the sharing of information if a child's safety is at risk.
- The UK Data Protection Act (DPA) 2018, UK GDPR or KSA Personal Data Protection Law (PDPL) will not be used as barriers to keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Please see the school Privacy Policy.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- The school follow the principles of the UK governments on information sharing advice for safeguarding practitioners including 7 'golden rules' for sharing information and will support staff who must make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

7. Recognising abuse and taking action

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

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

Make a referral to UK Embassy/police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**
Tell the DSL as soon as possible if you make a referral directly.

7.2 If a child makes a disclosure to you
Recognise – Respond – Report – Record – Review

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Report to DSL and/ or DDSL immediately.

- Write up your conversation as soon as possible and within the working day in the child's own words. Stick to the facts, and do not put your own judgment on it.
- Sign and date the write-up and pass it on to the DSL. Aside from the DSL, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

7.2.1 What to do when a pupil wants to tell you about something that has happened:

- Listen very carefully.
- Do not promise confidentiality.
- Ask 'open' questions like 'Tell me what has happened', and avoid any leading.
- Questions like 'Did he/she do *!??**! to you?'
- Make written notes as soon as possible, including anything that you have said.
- Do not take it upon yourself to investigate what the pupil has told you.
- Do not tell the person about whom the pupil has complained.
- If you think that a child is at risk, contact either the relevant Head of School/ Deputy/ Principal or Designated Person.

7.2.2 Writing a report on what you have been told.

- Note the date, time, and your name.
- Note the who/ what/ where/ when of the accusation.
- Note your own opinion, if it is relevant, preferably with justification.
- Enter information on CPOMS in as much detail as possible.
- Directly inform the Designated Person of your submission.

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

Where possible, speak to the DSL first to agree a course of action.
If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. In the first instance speak to a member of the ELT.

Early help

If early help is appropriate, the DSL will generally lead on liaising with the UK Embassy or the MoE as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to the UK Embassy if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to UK Embassy or the police, the DSL will make the referral.
The DSL must follow up with the UK Embassy if this information is not made available, and ensure outcomes are properly recorded.

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

7.4 If you have concerns about radicalisation.

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

If in exceptional circumstances the DSL is not available, and if you think a child is at risk from the following:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist-related.

Then speak to a member of the Extended Leadership Team at once.

7.5 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action and speak to the DSL.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

7.6 Concerns about a staff member, supply teacher, volunteer, or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer, or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer, or contractor) posing a risk of harm to children, speak to the appropriate Headteacher or Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the Board.

The Headteacher/ Principal/ Board will then follow the procedures set out in this policy.

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

7.7 Allegations of abuse made against other pupils

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

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is verbally and/or physically violent.
- Involves pupils being forced to use drugs or other illicit products.
- Involves any form of exploitation, inappropriate pictures, or videos.

Procedures for dealing with allegations of child-on-child abuse (formerly peer-on-peer)

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

- You must tell the DSL and record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the UK Embassy social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the UK Embassy Legal team for further advice, if appropriate.

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

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

To achieve this we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils can easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously.
- Ensure staff are trained to understand:

  - How to recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.
  - That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here".
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

    - Children can show signs or act in ways they hope adults will notice and react to.
    - A friend may make a report.
    - A member of staff may overhear a conversation.
    - A child's behaviour might indicate that something is wrong.

  - That certain children may face additional barriers to telling someone.
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
  - The important role they must play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it.
  - That they should speak to the DSL if they have any concerns.

7.8 Sharing of inappropriate images

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of inappropriate images, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their parents.
- Say or do anything to blame or shame any young people involved.
- You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the UK Embassy, MoE or the police.
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents of the pupils involved (in most cases parents should be involved).

The DSL will make an immediate referral to police and/or UK Embassy social care team if:

- The incident involves peer-on-peer.
- There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What the DSL knows about the images or videos suggests the content depicts sexual acts developmental stage or are violent.
- The imagery involves sexual acts and any pupil in the images or videos.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of inappropriate images.

If none of the above apply then the DSL, in consultation with the appropriate Headteacher, Principal and/or other members of staff as appropriate, may decide to respond to the incident without involving the UK Embassy, MoE or police. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to UK Embassy, MoE or police, the DSL will conduct a further review to establish the facts and assess the risks.
They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to UK Embassy, MoE or police immediately.

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the MoE.

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Personal Social & Health Education (PSHE) and computing programmes. Teaching covers the following in relation to the sharing of inappropriate images:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images.
- This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.9 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings are listened to but does not determine what action is taken and what services to provide.

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- We make pupils aware of the reporting systems and processes, e.g. through our PSHE Curriculum.

- We explain to pupils how we protect them when submitting any concerns and give reassurances following a disclosure.

8. Online safety and the use of mobile technology

See additional policies IT Policy and use of mobile phones.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

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

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images, sharing other explicit images and online bullying.
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Anyone at risk should be reported to the Anti-phishing working group (https://apwg.org).

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology.
  - Keeping personal information private.
  - How to recognise unacceptable behaviour online.
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras.

- Make all pupils, parents, staff, volunteers, and the Board aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones .
- If the school has reason to believe the mobile phone contains inappropriate images, or if it is being/has been used to commit an offence or cause personal injury. We will ask parents to attend school to review the phone with a senior member of staff.
- Put in place strong filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

9. Notifying parents or

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

Other staff will only talk to parents about any such concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the Embassy before doing so.
In the case of allegations of abuse made against other children, we will notify the parents of all the children involved.

10. Pupils with additional needs

We recognise that pupils with additional needs can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

11. Complaints and concerns about school safeguarding policies

11.1 Complaints against staff

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

11.2 Other complaints

Complaints against contractors will be handled in accordance with the same procedures for dealing with allegations of abuse made against staff. For site concerns please contact the COO.

11.3 Whistleblowing

- Please see Whistleblowing Policy.

12. Record-keeping

We will hold records in line with our records retention schedule.
All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child.
Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for at least 10 years after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.
If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and if any other agencies are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Our records:

- Are on CPOMS (some may be paper based where applicable).
- Are secured in a locked filing cabinet within a locked office.
- Will be retained for 10 years.
- Have restricted access and is limited to DSL, Deputy DSLs, and pastoral support.

13. Training

13.1 All staff

All staff members will undertake safeguarding and child protection at induction and annually thereafter. This includes whistleblowing procedures and online safety, ensuring staff understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.

Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a safe environment.
- Have a clear understanding of the needs of all pupils.
- All staff will have training on the anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually.
- Contractors will also receive safeguarding training.
- Volunteers will receive appropriate training, if applicable.

13.2 The DSL and Deputy DSLs

The DSL and Deputy DSLs will undertake the advanced child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent Awareness training.

13.3 The Board

All board members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.
As the Board may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

13.4 Recruitment – interview panels.

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

13.5 Staff who have contact with pupils and families

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

14. Monitoring arrangements

This policy will be reviewed **annually** by the Extended Leadership Team. At every review, it will be approved by the full Board.

Appendix 1: Types of Abuse

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

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

Emotional abuse is the 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.

Sexual abuse involves:

- Forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect involves 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 because of maternal substance abuse.

Once a child is born, neglect may involve a parent 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 caregivers).
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer Recruitment and ACROs/DBS checks – policy and procedures

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).
- Include a copy of, or link to, our Child Protection and Safeguarding Policy.

Shortlisting

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history.
    - Whether they are included on the barred list.
    - Whether they are prohibited from teaching.
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales.
    - Any relevant overseas information.
    - Sign a declaration confirming the information they have provided is true.

Seeking references and checking employment history

- We will obtain references after interview. Any concerns raised will be explored further with referees and taken up with the candidate prior to employment.

When seeking references, we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity .
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for at least 2 years afterwards.
- Verify their professional qualifications, as appropriate.

- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

  - For all staff, including teaching positions: criminal records check for overseas applicants.
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked.

- Check that candidates taking up a leadership position* are not subject to a prohibition from management (section 128).

(*Leadership positions are most likely to include, but are not limited to, Assistant/ Deputy Headteachers, Headteachers and Principals).

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- For any UK nationals we will refer to the DBS, all other nationals will be formally referred to their appropriate Embassy for anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

  - We believe the individual has engaged in relevant conduct; or
  - We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
  - We believe the 'harm test' is satisfied in respect of the individual (i.e., they may harm a child or vulnerable adult or put them at risk of harm); and
  - The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate Kingdom of Saudi Arabia check. This will be:

- A local police check, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain a local police check where available and references for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an ACRO check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

The UK Embassy will support with checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix 3: Allegations of abuse made against staff

Section 1: Allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer, or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

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

A 'case manager' will lead any investigation. This will be the relevant Headteacher, Principal or the Board where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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 assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the UK Embassy, as well as the police and UK Embassy social care team where they have been involved.

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 which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation.
- Discuss the allegation with our supervising manager at the Ministry of Education. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the UK Embassy before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or supervising manager at the Ministry of Education, where necessary). Where the police and/or supervising manager at the Ministry of Education are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or supervising manager at the Ministry of Education, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to the UK Embassy and/or supervising manager at the Ministry of Education.
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the UK Embassy.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents of the child/children involved about the allegation as soon as possible if they do not already know. The case manager will also inform the parents of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the school is made aware that the UK Secretary of State for Education has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures:

- We will pause using a contracted member of staff pending an investigation.
- The Principal or COO will discuss with the company/contractor whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the company/contractor fully, but the school will take the lead in collecting the necessary information.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using a company/contractor, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 5 working days.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the UK Embassy Education Officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false, or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false, or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to UK Embassy for further advice will be made.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false, or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false, or malicious, the case manager will consider the appropriate next steps with support from the UK Embassy if required. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

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

The case manager will take advice from the UK Embassy, as appropriate, to agree:

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

Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. (Records will be held or destroyed depending on IICSA notification) We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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 which 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.

Learning lessons

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.
Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

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

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

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

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority. Examples of such behaviour could include, but are not limited to:
  - Being overly friendly with children.
  - Having favourites.
  - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.

Sharing low-level concerns

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

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns as per section 7.7 of this policy.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Responding to low-level concerns

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

- Directly to the person who raised the concern, unless it has been raised anonymously.
- To the individual involved and any witnesses.
- The Principal or relevant headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

Record keeping

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

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR.

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

References

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

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

Appendix 4: Specific Safeguarding Issues

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, or issues directly surrounding the family.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Are at risk of issues directly surrounding the family.
- Come from the families of service personnel.
- Go missing or run away from home or care.
- Cease to attend a school.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the supervising manager at the Ministry of Education and/or the UK Embassy if a child leaves the school without a new school being named, this also includes adhering to requirements with respect to sharing information with the supervising manager at the Ministry of Education, where applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, and issues directly surrounding the family.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation (CCE)

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money to new locations, forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to UK Embassy and the police, if appropriate.

Child sexual exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend.
- Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Older children may also experience domestic abuse and/or violence in their own personal relationships.
Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the Designated Safeguarding Lead) before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

So-called 'Honour-Based' Abuse

So-called 'Honour-Based' Abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Terrorism** is an action that:

  - Endangers or causes serious violence to a person/people.
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.
Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.
Signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities, they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or X (formerly Twitter).
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.
Staff/ volunteers should **always** act if they are worried.

Peer-on-peer (child-on-child) abuse

Peer-on-peer (child-on-child) abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing or taking of inappropriate images.

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content. If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex.
- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
Some groups are potentially more at risk. Evidence shows that girls, children with additional needs and children of other choices are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male.
- Having been frequently absent or permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

Although it may cause some concern, no parent or visitor is able to enter the BISAK site if wearing a niqab or any face covering. BISAK will provide medical face masks and an area for removing the face covering should the need arise.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists will be asked to show photo ID and:

- Will be asked to show their DBS certificate when possible, or ACRO or Saudi Police check, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as an educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out.

All other visitors, including visiting speakers, will be always accompanied by a member of staff. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Supervise children in the reception area with duty staff.
- Contacting parents immediately.
- Incident will be recorded on CPOMS.

Missing pupils

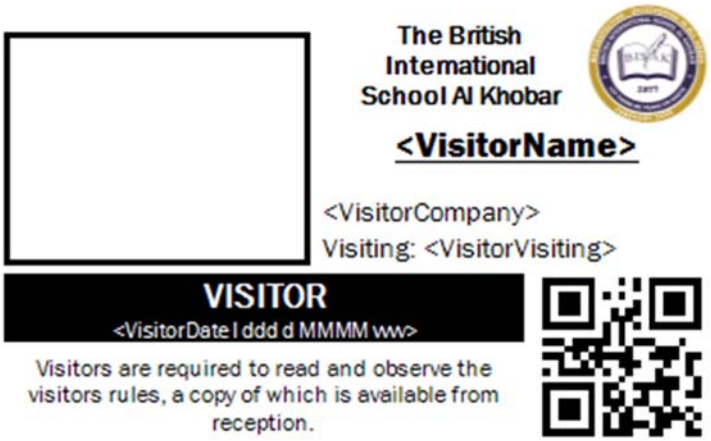
Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will be:

- Contacting parents.
- Duty staff will look after the child until a meeting with the parents is completed.
- Incident will be recorded on CPOMS.

Supervision of pupils

- There must be supervision by a person who is in regulated activity.
- The supervision must be regular and day to day; and
- The supervision must be “reasonable in all circumstances to ensure the protection of children”.

Appendix 5: Visitors



Throughout your visit, safeguarding our pupils and your safety is our priority.

- **FIRE/EMERGENCY –** in the event of an emergency, all visitors must leave the premises immediately via the nearest safe exit and report to the designated assembly point in the car park.
  - **Do not re-enter the premises** until you are advised it is safe to do so.

- **ACCIDENTS/INCIDENTS – all accidents, injuries and near misses must be immediately reported.**
- **FIRST AID – please ask a member of staff who will assist you.**
- **THE DESIGNATED SAFEGUARDING LEADS (DSL) are Mr Viner and Ms Naidoo. The Deputy Leads are Mr** Marsh, Mr van der Eyken, Mr Coll, Mr Odam, Mr Barton.

Visitors in school – Code of Conduct available in the reception area and on request

Appendix 6: Contractors



Throughout your visit, safeguarding our pupils and your safety is our priority.

- **FIRE/EMERGENCY –** in the event of an emergency, all visitors must leave the premises immediately via the nearest safe exit and report to the designated assembly point in the car park.
  - **Do not re-enter the premises** until you are advised it is safe to do so.

- **ACCIDENTS/INCIDENTS –** all accidents, injuries and near misses must be immediately reported.
- **FIRST AID –** please ask a member of staff who will assist you.
- **THE DESIGNATED SAFEGUARDING LEADS (DSL) are** Mr Viner and Ms Naidoo. The Deputy Leads are Mr Marsh, Mr van der Eyken, Mr Coll, Mr Odam, Mr Barton.

Appendix 7: Supply Staff & Volunteers





Throughout your visit, safeguarding our pupils and your safety is our priority.

- **FIRE/EMERGENCY** – in the event of an emergency, all visitors must leave the premises immediately via the nearest safe exit and report to the designated assembly point in the car park.
  - **Do not re-enter the premises** until you are advised it is safe to do so.

- **ACCIDENTS/INCIDENTS** – all accidents, injuries and near misses must be immediately reported.
- **FIRST AID** – please ask a member of staff who will assist you.
- **THE DESIGNATED SAFEGUARDING LEADS (DSL) are** Mr Viner and Ms Naidoo. The Deputy Leads are Mr Marsh, Mr van der Eyken, Mr Coll, Mr Odam, Mr Barton.

Appendix 8: Visitors in school - Code of Conduct



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Visitor Information

A very warm welcome to BISAK. We hope that your visit to BISAK is an enjoyable experience and that you find the environment safe, happy and welcoming.

It is the responsibility of all adults to safeguard and promote the welfare of children and young people.

Remember that your actions, no matter how well-intentioned could be misinterpreted.

Be mindful of the need to avoid placing yourself in vulnerable situations.

Safeguarding Statement:
We are committed to safeguarding and promoting the welfare of children. We expect all staff, volunteers and visitors to share this common commitment.

This leaflet contains information about our expectations of you whilst visiting the school. If you are unclear about anything, please speak to a member of staff.

3

Conduct

If you are concerned about the conduct of a member of staff, following an observation or disclosure, you must:

- Immediately inform the Principal.
- In his absence, immediately inform the Headteacher of either Preparatory School or Senior School.

Keeping Yourself Safe

- Be polite and courteous. Be careful how you interact with or speak to a child as the child may interpret it differently.
- Never give your personal contact details to children or young people.
- Avoid physical contact with children unless you are preventing them from immediately harming themselves or others.
- Avoid being on your own with a child; always ensure that a door is open and that you are visible to others.
- It's best not to do anything for a child that he or she can do for himself or herself. Always tell someone if a child touches you or speaks to you inappropriately. Log down the incident, time and date it and pass it on to one of the Safeguarding Team.
- Dress appropriately i.e., dress in a way such that:
  - It is not likely to be viewed as offensive, revealing, or sexually provocative.
  - Does not distract, cause embarrassment, or give rise to misunderstanding.
  - Is absent of any political or otherwise contentious slogans
  - Is not considered to be discriminatory and is culturally sensitive.
  - Remember...if in doubt...ask!

Visitor Procedures

Visitors must sign in at Reception.

- The visitor sticker **must** be worn at all times.
- Visitors **must** remain under the supervision of a designated member of staff.
- All visitors must sign out at **Reception** office and return their visitor pass before leaving the site.

4

Safeguarding

If a child does or says anything that makes you feel uncomfortable, it is your duty to immediately tell the nearest member of staff.

Child abuse can happen to any child regardless of gender, culture, religion, social background, ability or disability.

A copy of the School's Safeguarding Policy is located on the BISAK website and a hard copy is located at the front reception.

Types of harm

We all have a responsibility to keep children (under the age of 18) safe, both at home and in school. Harm is identified in four ways:

- **Physical** - when a child is deliberately hurt or injured.
- **Sexual** - when a child is influenced or forced to take part in a sexual activity. This can be a physical activity or non-physical, (e.g., being made to look at an inappropriate image).
- **Psychological** or **Emotional** - when a child is over-protected, feels intimidated, made to feel frightened, worthless, or unloved (e.g., by shouting, using threats or making fun of someone). It can also be when children see anyone fighting or using violence. This can also involve placing inappropriate expectations upon a child.
- **Neglect** - when a child is not being taken care of (e.g., poor hygiene, poor diet, not coming to school or being left home alone).
- **Peer on peer** – Any kind of physical, sexual, emotional, or financial abuse or coercive control exercised between children.
- **Disguised compliance** – when a parent's or carer's behaviour can make it difficult for school staff to recognise abuse or neglect at an early enough stage or delay reporting it.

Health and Safety

We are aware of the need to feel secure and comfortable in our school.

FIRE

- If you hear the fire alarm, make your way out of the building

Photographs

Photographs must not to be taken without express permission of the school, no matter what they show. If images are taken, you will be asked to delete them in front of a senior member of staff.

Mobile Phones

The use of mobile phones is not permitted. They may **only** be used in an emergency.

CCTV

CCTV is in operation around the school.

Designated Safeguarding Leads (DSL)

The Designated Safeguarding Leads (DSL) are listed on the posters that are displayed at the front reception and throughout the school.

Accidents/Illness

Should you have an accident or feel unwell during your visit, report to the main school office. If you are unable to make your way to the office, inform any member of staff about your situation.

If you have a significant medical issue that may impact your time at BISAK, please ensure the nursing team is aware.

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CONTRACTORS IN SCHOOLS

CODE OF CONDUCT

SAFETY IS YOUR RESPONSIBILITY
Do not carry out any actions that may put you, or anyone else in danger. Avoid any conduct which would lead any reasonable person to question their motivation and intentions.

SAFEGUARDING
It is the responsibility of all adults to safeguard and promote the welfare of children and young people.

AVOID CONTACT WITH CHILDREN
Never give your personal contact details to children or young people, including mobile telephone number.

WORK AND BE SEEN TO WORK
Work in an open and transparent way.

USE APPROPRIATE TOILETS
Never be in contact with children without school supervision. Only use toilets that are marked 'Adult'. Never enter a children's toilet, even if a repair is to be carried out in there, without supervision from a member of school staff.

WORK AREA
Stay within the agreed work area and access routes. Obtain permission if you need to go outside the agreed work area or access routes.

STAFF INFORMED
Keep staff informed of where you are and what you are doing

DO NOT USE INAPPROPRIATE LANGUAGE, IN ANY LANGUAGE
We have staff and children onsite that speak and understand many languages and dialects.

DRESS
Dress appropriately i.e. dress in a way such that it:
- Is not likely to be viewed as offensive, revealing, or sexually provocative.
- Does not distract, cause embarrassment or give rise to misunderstanding.
- Is absent of any political or otherwise contentious slogans.
- Is not considered to be discriminatory and is culturally sensitive.

PHOTOS
Photos are not to be taken without express permission of the school no matter what they show.

VULNERABLE SITUATIONS
Remember your actions no matter how well intentioned could be misinterpreted. Be mindful of the need to avoid placing yourself in vulnerable situations.

REPORT
If at any time you feel uncomfortable in a situation, whether with a child or an adult report it to the school site team, or receptionist immediately.

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Appendix 9: Pupil Safeguarding Information Poster



Appendix 10: Reporting form – (Only use this form if CPOMS is unavailable)

Pupil Safety and Welfare Concerns Form (Confidential)
If it is **extremely urgent** inform the Designated Deputy Safeguarding Lead or the Safeguarding Lead **immediately**.

Pupil's Name: _____ **Class/Tutor Group: _____**

Date/Time of Incident:	Date of writing:
Staff Name Print: _____ Signature: _____ Job Title:	
Record factually: Concerns? Who? What (If recording a verbal disclosure by a child, use their words)? When (date and time of incident)? Any witnesses?	
Pupil's account/perspective?	
Professional opinion where relevant.	
Any other relevant information (distinguish between fact and opinion). Previous concerns, etc.	
Actions? Include names of anyone to whom your information was passed and when.	

Please use the back of this page or attach a separate sheet if you need to write additional information.
Check to ensure your report is clear to someone else reading it. Please return to the relevant School's Deputy Safeguarding Lead in a sealed envelope.

Date delivered: _____
Received by: _____

Appendix 11: Privacy Policy

Data Controller & Activity

The British International School of Al Khobar (BISAK/the School) looks after the personal data of pupils and their parents. We do this responsibly and in line with the Personal Data Protection Law (PDPL) of Saudi Arabia. We are the Data Controller for the information that we collect and use.
BISAK is an independent, not-for-profit school that provides international education from early years through to pre-university. Our focus is on helping pupils achieve academically while also supporting their personal growth and wellbeing.
As part of this, we run lessons, extracurricular activities, pastoral care, exams, and wider school events. We work closely with families, staff, and trusted partners to make sure our pupils receive the best possible support and opportunities.

Contact Details

School can be contacted at:

- Phone: (+966) 13 831 7300 **Ext**: 100
- Website: www.bisak.org
- Full Saudi Postal Address: EAAA3909, As Sadafah, 34215

If you would like more information about how your personal data is used, or if you wish to exercise any of your data protection rights, you may contact our Data Protection Officer:

- Email: DPO@bisak.org
- Telephone: 013 831 7300

The DPO is here to help with questions about how school collects, uses, and protects personal data.

Personal Data to Be Collected

School collects different types of personal data to provide education, support pupil wellbeing, and meet our legal and safeguarding responsibilities. Families are informed about this either before or at the time the data is collected. Some data is mandatory for us to deliver our services, while other information may be optional and collected with consent.

We group this information into two broad categories:

General Personal Data

This includes information we need to run the school and keep in touch with families:

- Contact details (names, Saudi national postal addresses, phone numbers, email addresses).
- Identification documents (passport copies, national IDs, residency permits).
- Academic records (enrolment forms, assessments, grades, progress reports).
- Attendance information.
- Behaviour and pastoral records.
- Financial and payment information (fee records, billing, bank transfers).
- Account details for accessing school systems and portals.
- Images and videos from classes, school events, or extracurricular activities (with consent).
- CCTV footage on school premises for security.

Sensitive Personal Data

This includes information that requires extra protection under the Saudi PDPL:

- Health and medical records (allergies, medication, vaccination, special educational needs).
- Information collected for safeguarding and child protection purposes.
- Religion, nationality, or other details required for legal or regulatory reasons.
- Biometric data if used (for example, ID cards or access systems).
- Any other information that may reveal sensitive details about a pupil or family.

Other Data
In addition, school may collect:

- Information from third parties (such as previous schools or regulatory bodies).
- Technical data from the use of our website or online platforms (cookies, login activity, or location data where relevant).

How We Collect and Use Personal Data

School collects personal data in two main ways:

Data collected directly from families and pupils

This is information you provide to us, for example when you fill out application forms, update pupil records, or communicate with the school. This can include paper forms, verbal communication, online enrolment portals, emails, meetings, or telephone calls. This data is open to change based on circumstances within the school.

Data collected indirectly
This is information gathered through our systems and services. Examples include:

- Technical data such as cookies and website analytics when you use our website or online platforms.
- Security systems such as CCTV.
- Information provided by third parties such as previous schools or regulators where needed.

Purpose and legal basis for collection
We only collect and use personal data where it is relevant to our role as a school and where we have a clear legal basis under the Saudi Personal Data Protection Law (PDPL). These include:

- Fulfilling our contract with parents – for example, using pupil and parent details to deliver education, issue reports, manage enrolment, and communicate about school life.
- Protecting health, safety, and welfare – for example, recording medical information to provide appropriate care, safeguarding pupils, or sharing concerns with relevant authorities.
- The school's legitimate interests – for example responding to enquiries, managing timetables and activities, keeping archives, or engaging debt collection services where fees remain unpaid.
- Consent (in limited cases) – for example, when we ask permission to use photographs or videos for promotional material, publications, or social media. You may withdraw consent at any time.
- Meeting legal obligations – for example, compliance with Ministry of Education requirements, statutory reporting, health and safety duties, or external CCTV required under Saudi law.

Images, videos, and consent

We rely on consent for optional uses of pupil photographs or videos, such as promotional material, school publications, or social media. Parents can choose whether to give this consent for their children, and if consent is not given, we will take steps to avoid the pupil's inclusion in these materials (for example, adjusting seating or excluding them from filming areas).

For school events and performances, parents and guests should be aware that filming or photography may take place as part of normal school activity. While we can manage consent for pupils, it is not practical to obtain or track consent from all parents and guests who attend. In these situations, BISAK relies on its legitimate interests under the PDPL. It may not be possible to prevent incidental appearances of parents or guests in wide-angle shots or group recordings.

If parents or guests do not wish to be filmed or photographed, they should inform the school in advance or speak to a member of staff on the day of the event. Wherever reasonably possible, staff will guide them to designated seating areas or ensure that steps are taken to minimise their inclusion in recordings or photographs.
Footage and images captured during school events are used for the purposes of documenting school life, celebrating pupil achievements, and promoting the school within our community and, where appropriate, in external publications, on our website, and across official school social media channels. All use will be in line with BISAK's data protection responsibilities under the PDPL.

Keeping collection to the minimum
In all cases, BISAK limits personal data to the minimum necessary for the stated purpose. We collect information in fair and transparent ways and do our best to keep it relevant, accurate, and appropriate. We also rely on parents to let us know promptly if their personal details, or any information we hold about them, change so that our records remain up to date.

Personal Data Processing

Personal data is only processed for purposes that are directly linked to education, pupil welfare, and the safe running of the school. Processing means any activity we carry out with information, such as collecting it, storing it, using it, sharing it when necessary, and eventually deleting it.
All processing is done lawfully under the Saudi PDPL, using the appropriate legal basis, and is always limited to the minimum data needed for the task.

Data Sharing and Use of Processors

School may share personal data with third parties only where necessary to fulfil educational or legal requirements, or where we have another lawful basis under the PDPL. Examples include:

- Educational authorities (such as the Ministry of Education, Noor and MADARES platforms).
- A pupil's previous school for academic or safeguarding information.
- A pupil's new school, college, or university when leaving school.
- Government bodies where required by law or regulation such as ZAKAT.
- Appropriate authorities in line with our Safeguarding and Child Protection Policy.

In addition, school uses carefully chosen service providers (processors) to deliver services on our behalf, such as IT systems, cloud storage, learning platforms, payment services, and professional advisers. These providers act only on the school's instructions and are bound by contracts that require them to protect personal data in line with the PDPL.
Where personal data is transferred outside the Kingdom of Saudi Arabia, including through cloud-based services, school ensure compliance with PDPL requirements and applies appropriate safeguards.

Data Storage, Retention and Destruction

Personal data is stored securely, either on school systems or with approved service providers. Some of these providers may be based outside Saudi Arabia, and we ensure that any such transfers meet PDPL requirements. We keep personal data only for as long as it is needed to provide education and support services, to comply with the law, or to resolve disputes. For example, CCTV footage is stored for 30 days before being overwritten. Once data is no longer required, we securely delete or destroy it so it cannot be accessed or recovered.

Security Measures

School applies appropriate technical, organisational, and administrative measures to protect personal data from unauthorised access, use, or disclosure. This includes access controls, encryption, secure storage, monitoring, and other safeguards suited to the type and sensitivity of the information.

Your Rights

Parents and pupils have rights under the PDPL regarding the personal data we hold. These include the right to:

- Be informed about how personal data is collected, used, and shared.
- Request data from school about themselves or their child.
- Request correction or updating of inaccurate or incomplete data.
- Request deletion of personal data, where permitted by the PDPL and not prevented by legal or safeguarding requirements.
- Withdraw consent for optional uses, such as photographs or videos for promotional purposes, at any time.
- Submit a complaint if they believe their data protection rights are not respected.

Some rights may be subject to exemptions, for example where fulfilling a request would affect the rights of others or conflict with safeguarding or legal duties. Requests will be handled promptly, and parents may be asked to confirm identity before we proceed.

Pupils will also be informed in an age-appropriate way about how their data is used, particularly where it concerns their health, wellbeing, or behaviour.

Complaints and Objections

If you have concerns about how your personal data is handled, or if you believe we have not enabled you to exercise your rights, you can raise a complaint with the school by contacting the Data Protection Officer.
If you are not satisfied with the school's response, you may also raise a complaint with the Competent Authority, the Saudi Data & AI Authority (SDAIA), via the National Data Governance Platform at dgp.sdaia.gov.sa.

Updates

This Privacy Policy will be reviewed and updated when needed.

Once reviewed, please complete and return to HR.

A. I am committed to safeguarding practices at BISAK

B. I _____ have completed the following:

1. I have read and understand the Child Protection and Safeguarding Policy 2026
2. I have read Keeping Children Safe in Education: Part One
3. I have completed and passed the TES (EduCare) Child Protection Refresher 2026
4. I have completed and passed the TES (EduCare) Keeping Children Safe in Education: Part One 2026

(For staff joining the school after October 2026 they will be required to complete the assigned safeguarding courses on TES EduCare).

For points three and four your certificates must be submitted to HR, along with this signed form.

C. I declare that I have not been convicted of any criminal offences in the past academic year.

Signed: _____ Date: _____

Volunteers Form

A. I am committed to safeguarding practices at BISAK

B. I _____ have completed the following:

1. I have read and understand the Child Protection and Safeguarding Policy 2026
2. I have read Keeping Children Safe in Education: Part One
3. I have completed and passed the TES (EduCare) Child Protection for International Schools 2026
4. I have completed and passed the TES (EduCare) Keeping Children Safe in Education: Part One 2026
5. I have completed and passed the TES (EduCare) Prevent Duty

For points three, four and five, your certificates must be submitted to the Prep School Office, along with this signed form.

C. I declare that I have not been convicted of any criminal offences in the past year.

Signed: _____ Date: _____

This document is to be reviewed and updated annually.