

# **School Safeguarding Policy (AY 2024-26)**

#### Introduction

The commitment to highest standards of safeguarding and student protection is paramount in any educational setting. Schools in Abu Dhabi shall promote safe practices and protect students from harm, maltreatment, and exploitation to ensure the development and growth of every student, as is their right as per Federal Law No. (3) of 2016 Concerning Child Rights. This policy sets out the priorities and processes for safeguarding and promoting the welfare and security of students and lists procedures to adhere to when dealing with allegations of abuse and maltreatment.

#### **Purpose**

- Set out ADEK's requirements in relation to safeguarding and the promotion of student welfare.
- Define a clear line of accountability within the school to ensure safeguarding protocols are fully implemented.
- Define procedures for identifying and reporting cases or suspected cases of student maltreatment.
- Outline the security requirements for the school to ensure effective supervision and duties of security guards, school visiting and departure procedures, and an established system for managing security breaches.
- Set out ADEK's requirements in relation to the use of Closed-Circuit Television (CCTV) cameras in schools.
- Define training requirements to ensure all staff carry out duties responsibly, effectively, and appropriately to facilitate a safe environment for students to grow and learn.

# **Definitions**

Additional Learning Needs	Individual requirements for additional support, modifications, or accommodations within a school setting on a permanent or temporary basis in response to a specific context. This applies to any support required by students of determination and those who have special educational needs and/or additional barriers to learning, access, or interaction in that specific context (e.g., dyslexic, hearing or visually impaired, twice exceptional, or gifted and/or talented).  For example, a student with restricted mobility may require lesson accommodations to participate in Physical Education and building accommodations to access facilities but may not require any accommodations in assessments. Equally, a student with hearing impairment may require adaptive and assistive technology to access content in class and may also require physical accommodations (e.g., sit in the front of the class to be able to lip read) to access learning.
At Risk of Harm	The inability to safeguard one's own wellbeing.
Authorized Personnel	Personnel who are authorized by ADEK or other relevant government entities to visit a school and access its premises and resources for a specific purpose.
Behaviors of Concern	Any pattern of behavior, or perception of behavior, that interferes with or is at risk of interfering with optimal learning, wellbeing, physical safety, and/or engagement in pro-social interaction with peers and adults (Smith & Fox, 2003).
Duty of Care	The obligation to safeguard stakeholders, to maintain their health, safety, and wellbeing, and to take steps to reduce the risk of reasonably foreseeable harm while under the school's supervision (on its premises, utilizing its systems, or engaging in school-organized activities off-campus).
Governing Board	The governing body of a school, appointed by the school owners, and including qualified representatives and parents. The governing board is the senior authority of the school, with responsibility for the overall governance of its activities.
In Loco Parentis	Meaning "in place of a parent", in situations when parents are absent.
Maltreatment	Refers to abuse (physical, emotional, and sexual), and includes neglect, exploitation, bullying, and cyberbullying of a student.
Parent	The person legally liable for a child or entrusted with their care, defined as the custodian of the child as per the Federal Decree Law No. 3 of 2016 Concerning Child Rights.

Safeguarding	The protection of students from the risks of harm, including maltreatment and other types of risks that impact their overall health and development, wellbeing, and safety.
Safeguarding Lead (or Committee)	An individual (or group of individuals) responsible for the implementation of the safeguarding policy and practices and ensures compliance by the school community. This position can be filled by any relevant position in the school such as the Child Protection Coordinator, School Counselor, Social Worker, Head of Wellbeing, etc.
Security Breach	An incident that compromises or results in an unauthorized disclosure of or unlawful access to protected space, persons, systems, and/or information. Security breaches stemming from accidental or deliberate action have the potential to cause damage (financial, legal, or school wide consequences, etc.) to school assets or reputation and includes both confirmed and suspected incidents.
Staff	An individual employed by a school on a remunerated contractual basis regardless of employment mode (internal, external/ third-party, etc.).
Student	A resident who is enrolled in an educational institution in Abu Dhabi.
Student Protection	Synonymous with child protection, all measures, steps, and actions that must be taken to prevent, protect, and support students from risk of maltreatment while they are under the supervision of the educational institution.
Supervision	The state of being responsible, having the duty of care, and keeping watch over an individual in the interest of their and others' security while under the care of the school or an individual employed at the school, whether onsite, while utilizing its systems, and/or taking part in all activities organized by the school offsite.
Visitor	For the purpose of this policy, a visitor is any temporary visitor (e.g., a parent or a relative of a student, prospective student and their parents, inspectors, contractors, etc.) entering the school premises.  An invited visitor is anyone visiting the school on a temporary basis to interact with students (i.e., a speaker, career fair representative, etc.) and includes volunteers, who are engaged by an educational institution on a non-remunerated basis to interact with students (e.g., parent chaperones, etc.).
Whistleblowing	An instance where an individual passes on information about organizational malpractice (e.g., fraud, corruption, miscarriage of justice, risk of serious harm to an individual, risks or damage to the environment and other actions against public interest) taking place at, or near, their place of employment or education.

#### **Policy**

## 1. Safeguarding Supervision

1.1 Duty of Care and *In Loco Parentis*: All members of staff in the school have the duty of care towards their students and are responsible for their wellbeing, safety, and protection whilst they are under the school's supervision. The Principal accepts *in loco parentis* responsibility for all students whilst under the school's supervision.

## 2. School-Based Safeguarding Policy

- 2.1 Policy Requirements: BRS has developed and implemented a Safeguarding Policy and communicate this actively to the whole school community. BRS includes the following elements in the Safeguarding Policy, at a minimum:
  - **1.** Statement of the school's overall safeguarding processes, procedures, and aspirations.
  - 2. School safeguarding practices created in line with the underpinning BRS wellbeing policies, ensuring that all safeguarding matters are handled sensitively, professionally, and in ways that support the needs of students.
  - **3.** A security policy that outlines how the school intends to protect students from and during (in the event of) physical and digital security breaches.
  - **4.** Mechanisms to measure and monitor the delivery of safeguarding practices to protect students from all types of harm to their health and development.
  - **5.** Identification of resources provided to deliver safeguarding provisions for all students.
- 2.2 Appointment of a Safeguarding Committee or Lead: BRS has appointed a Safeguarding Committee or Lead, to oversee the school's overall safeguarding strategy. The school, through the Safeguarding Committee or Lead, shall:
  - 1. Annually monitor and review the effectiveness of the school's Safeguarding Policy to ensure it is known, understood, and practiced appropriately by the school community.
  - 2. Ensure the safeguarding policies and procedures adopted by the school's governing board are fully implemented and observed.
  - **3.** With the Principal, ensure that all staff, volunteers, and invited visitors are informed of their responsibilities in relation to safeguarding procedures.
  - **4.** Ensure parents have access to the school's Safeguarding Policy and all supporting documents, through all appropriate means (e.g., the school website).

- **5.** Develop an induction and training strategy to ensure all staff and volunteers receive information on the school's safeguarding arrangements.
- **6.** Ensure compliance with relevant processes set out in the *BRS Student Protection Policy*.

## 3. Safeguarding Awareness

- 3.1 Safeguarding Awareness Strategies: BRS has adopted strategies for safeguarding, including the following elements, at a minimum:
  - 1. Ensure the provision of a safe and caring environment in which all students can learn, thrive, and develop the confidence to voice ideas, feelings, and opinions in an atmosphere that prioritizes their best interests, in line with the guiding principles stipulated in the Dama Alaman in Schools and Nurseries Handbook.
  - 2. Guarantee adherence to a zero-tolerance approach to student maltreatment and ensure that any visitor or member of the school community who has any maltreatment concerns about a student is aware and able to easily follow the processes set out in the BRS Student Protection Policy.
  - 3. Monitor students known or thought to be at risk from harm, including students with additional learning needs, who could experience heightened vulnerability.
  - **4.** Ensure staff know how to respond to safeguarding incidents and reassure victims and/or witnesses who make a disclosure that they are being taken seriously and supported.
  - 5. Ensure students and staff feel part of a positive and transparent environment where they can freely liaise with members of the Safeguarding Committee or Lead in instances where a concern or worry is raised about the behavior of a student, staff, or visitor.
  - 6. Be vigilant of student safety in online spaces as per the BRS Digital Policy.
  - 7. Ensure that no policy within the school shall adversely harm or jeopardize the health or wellbeing of a student (e.g., placing limitations on washroom breaks) in line with the *BRS Wellbeing Policy*.
  - **8.** Provide support and counseling that is accessible, free of judgment, and available to all students, so that students know whom to turn to for advice and support within the school.
  - 9. Ensure every parent understands that they are obligated to enroll their child in school as per Federal Law No. (39) of 2022 Concerning Compulsory Education, and that sudden unexplained withdrawal of a student from school may be reported as a maltreatment concern, as per the BRS Student Protection Policy.

## 4. Safeguarding and the Curriculum

- 4.1 The School Curriculum: BRS ensures that its applied curriculum addresses safeguarding measures by:
  - 1. Focusing on the development of students' self-esteem and self-regulation.
  - 2. Fostering a sense of respect and civility towards people and other living things.
  - 3. Enabling the development and improvement of communication skills and expression of consent.
  - **4.** Developing an understanding of all aspects of risk including online behaviors and usage of social media.
  - **5.** Assisting students in developing strategies for their self-protection and responses to peer pressure.
  - **6.** Developing an understanding of how to best be responsible for their own and others' safety.

## 5. Safeguarding the School's Security

- 5.1 Implementing a School Security System: BRS has implemented a comprehensive security system to safeguard the school's assets, data, and people against any risk of harm.
  - 1. Policy Requirement: BRS is equipped with integrated and fully functioning access and security systems, including security video surveillance cameras (CCTV systems).
  - 2. CCTV Systems: BRS has installed and maintained CCTV systems via an MCC-licensed vendor, in compliance with the Manual of Surveillance Devices (MCC, 2022).
    - a. Contract Validity: BRS maintains a valid maintenance contract at all times with an MCC-licensed vendor.
    - b. Coverage: BRS ensures that the CCTV cameras provide coverage/ restrictions of the following areas:
      - 1) All entrances and exits of the school buildings and grounds.
      - 2) All walkways and public areas (corridors, stairs, courtyard, sports hall, sports fields, canteen, libraries).
      - 3) Student pickup and drop-off areas for private vehicles and buses.
      - 4) Security areas (e.g., control room) and hazardous areas.
      - 5) Exterior areas surrounding the school grounds.
      - 6) Learning spaces (e.g., classrooms, labs, studios, maker spaces). Entrances to lavatories and changing rooms.
      - 7) All blind spots within the school premises.
      - 8) CCTV cameras shall not be installed inside lavatories, changing rooms, or any other areas where there is a reasonable expectation of privacy.

- 9) BRS has placed signs within the school premises indicating to the public that the area is under CCTV surveillance.
- c. Regular Monitoring and Maintenance: BRS monitors the functioning of their CCTV cameras on a daily basis and ensures they are working and providing appropriate coverage. In case any issues are identified that affect their functionality, the school shall inform the vendor immediately and ensure prompt action is taken to rectify the issue in line with the terms of their contract.
- d. Access to Footage and Recordings: BRS has restricted access to CCTV footage and recordings as follows:
  - Monitoring of CCTV Footage: BRS has a monitoring and control room for the purpose of monitoring CCTV footage. BRS ensures that only the vendor-appointed CCTV specialist(s) monitor the footage.
  - 2) The Principal is authorized to access live CCTV footage of the school premises from their office.
  - 3) Access Permission for Staff: The principal and vendor-appointed CCTV specialist(s) are authorized to retrieve and view CCTV recordings. The Principal is authorized to permit other staff members to view CCTV footage on a need-basis at the Principal's discretion. BRS maintains a record of all individuals granted permission to view the footage, where applicable.
  - Access Permission for ADEK Personnel: BRS shall provide access to CCTV footage and recordings to authorized ADEK personnel upon request.
  - 5) Copying and Distribution: The copying or distribution of CCTV recordings is strictly prohibited and punishable by law, in line with the Federal Decree Law No. (5) of 2012 on Combating Cybercrimes.
- e. Escalation: Where an incident captured in a CCTV recording requires clarification beyond the school level, the school shall immediately notify ADEK in order to deal with the incident.
- f. Deletion: The school shall retain CCTV recordings for a minimum of 180 days.

#### 5.2 Security Guards: BRS ensures that security guards:

- 1. Are present at any given time at all entry points/ gates. They shall not leave their posts unless there is someone to replace them temporarily.
- 2. Hold authorized licenses, as per the BRS Staff Eligibility Policy.
- **3.** Remain alert and ensure safety and security on the school premises, supported by the school's security system.
- **4.** Maintain a visitor's log by recording the visitor's name, ID, signature, telephone number, purpose of visit, time of arrival, and time of departure.
- 5. Issue visitors access passes only upon collection of a form of photo ID and verifying that it matches the identity of the physical person.
  - a. The school is authorized to issue permanent access passes to registered visitors involved in the routine pick-up and drop-off of students i.e., parents, nannies, drivers, etc. Security guards shall verify that each access pass matches the identity of the physical person and ensure that anyone whose permanent access pass has been canceled/revoked

cannot enter the school with the invalid access card (they would need to sign in as would a general visitor).

- 6. Maintains a communication link between the security guard at the entry gate and the school reception/ administration to authorize the entry of unknown persons.
- 7. Are provided with the appropriate handover procedures to facilitate the transition in the event of the school changing security providers.
- 5.3 School Visiting Procedures: BRS has developed procedures for visiting the school. The Principal shall have the right to deny or allow visitors in the school with good cause. The school's procedure for visitors shall include the following as a minimum:
  - 1. All visitors to the school shall sign in at the security gate and obtain a visitor's access pass in exchange for a valid form of ID.
  - 2. Visitors shall display their access passes, which are to be visibly worn at all times whilst on the school premises. Visitors are not authorized to enter classrooms unless invited.
  - 3. Invited visitors shall remain under the supervision of a designated member of staff unless they are authorized personnel (see Section 5.3.5) whilst on the school premises.
  - **4.** Upon completion of the school visit, visitors must sign out at the security gate and return their visitor access passes upon leaving the school premises.
  - 5. Granting Access to Authorized Personnel: BRS provides authorized personnel (e.g., government inspectors) with access to their full premises and relevant resources (e.g., school reports, records, access to keys for locked areas, etc.), as per Federal Decree Law No. (18) of 2020 Concerning Private Education. Where required, BRS shall enable such personnel to monitor and interact with staff, students, and parents.
    - a. BRS shall verify the identity of the personnel and ensure they have a valid purpose for their requests, prior to providing access to the school's premises or resources.
    - b. The school shall ensure that any access granted is in line with the requirements and purpose of the personnel's visit.
    - c. Where access is provided to any school reports and records, The Principal shall keep a record of the personnel to whom the access was provided, the reports and records accessed by them, and the purpose for providing access. The school shall preserve these records in line with the requirements for administrative records, as per the BRS Records Policy.
    - d. Authorized personnel are authorized to be present on school premises without being accompanied by a member of staff.
- 5.4 School Departure Procedures: BRS has established school departure procedures to verify that student departures follow the parent-authorized methods for transitioning student supervision from the school to the home, such as ensuring that:
  - 1. Only parent-authorized persons are picking up students.

- 2. For persons who are not pre-registered and have permanent access passes, parents shall inform the school in advance in writing and provide the ID of the nominated person.
- 3. In sudden emergencies or late notice change of plans, parents shall call to inform the school, of the name of the person picking up their child and the school shall log the conversation including the name of the authorized person and forward the names to the security guards and teachers/ individual(s) supervising the concerned student.
- 4. The school shall check the identity of the nominated person at the gate (via presentation of a form of ID) and when handing over the student from the school's supervision.
- 5. IDs are not required if the person is already a member of the school community (e.g., another parent), and the school already has their ID on record.
- 5.5 Acceptable School Drop-Off and Pick-Up Timings: BRS communicates to parents acceptable drop-off and pick-up timings.
  - 1. BRS ensures the supervision of students 45 minutes before the start of the school day and 90 minutes after school hours and must notify parents of their responsibility toward their children outside of these two periods.
  - 2. In instances where parents drop off children at the school without the school's knowledge, the school shall not be legally responsible for the safety of the child.
- 5.6 School Arrival and Departure Notification for Unaccompanied Cycle 3 Students: Upon written consent by parents, students in Cycle 3 are authorized to arrive at and depart from school unaccompanied.
  - 1. BRS has established a system to record and notify parents of their arrival and departure times.
  - 2. Parents are authorized to request notification of arrival and departure times for accompanied students in any grade below Cycle 3, and the school shall provide such notifications.
- 5.7 Special Events: BRS ensures that they have increased security measures in place for safeguarding the school during special events. The school shall ensure that:
  - 1. Events are only open to the immediate family (parents and siblings of the student). Parents who wish to invite other guests must pre-register them with the school by providing a copy of a valid ID. Guests who are not pre-registered are required to register on arrival at the school gate and subsequently provide a copy of a valid ID.
  - 2. Signage indicating accessible areas for visitors within the school premises is clearly displayed.
  - 3. Increased security is present when a larger number of visitors are expected.

- 4. All outside service providers and their employees are pre-approved, and contracts stipulate that they have undergone security checks. Service providers shall submit their trade license and a valid work permit for each employee.
- 5.8 Safeguarding the Privacy of the School Community: BRS ensures that it has measures to safeguard the privacy and identities of the school community in physical spaces (e.g., the reception area) and in digital spaces, (e.g., email lists, WhatsApp groups) as per the BRS Digital Policy. The school shall practice discretion with regard to the following:
  - 1. Keeping reception areas free of individually identifiable elements such as displaying timetables/ class schedules, or photographs and names of members of the school community.
  - 2. Avoiding sharing personal details i.e., emails and mobile numbers of students, parents, or teachers without consent, except as authorized by applicable laws and ADEK policies.
- 5.9 Managing Security Breaches: BRS has established systems for managing security breaches to prevent the occurrence of a dangerous/ harmful event, including intruders from gaining unauthorized access to the school grounds or confidential information. The following shall apply to the school at a minimum:
  - 1. BRS has established a system to lock down the school (manually or automatically) which includes a security breach procedure and a response plan, led by the Safeguarding Committee or Lead, with appropriate reporting mechanisms in place.
  - 2. Ensure all school staff are aware of and have received training on the security breach procedure.
  - 3. The designated Safeguarding Committee or Lead (including deputies in their absence) shall fulfill requirements as stipulated in this policy (see Section 2.2) including being of sound physical health.
  - 4. The school maintains regular service of alert systems, if applicable, for vocal announcements and timed bells or alarms in line with local regular requirements.
  - **5.** In line with the *BRS Digital Policy*, the school can respond to security breaches by backing up important data from the school IT system and activating their business continuity plan.
    - a. BRS ensures that every digital incident is recorded, documented, and signed by the Principal and stored for auditing purposes, in line with the BRS Records Policy.
    - **6.** Conduct school emergency planning and subsequent drills, in line with the BRS Health and Safety Policy.
    - 7. Comply with local regulatory requirements and report any security breach incidents to ADEK and/or appropriate authorities.

#### 6. Training

- 6.1 Training and Continuous Professional Development (CPD): BRS provides the following training and CPD to staff, at a minimum:
  - **1.** Safeguarding training at induction, including for the governing board, staff, and volunteers. The staff training should include the following:
    - a. Identifying signs of student maltreatment or other safeguarding issues including what to do if the staff or volunteer or someone else is worried about a student.
    - b. Alerting staff to be vigilant to the specific requirements of students at risk of harm, including students with additional learning needs.
    - c. Understanding the importance of not disregarding certain behaviors (e.g., banter, practical jokes), which can lead to a culture of unacceptable behaviors in an unsafe environment, preventing students from coming forward to report them.
    - d. Detailing written records of events in a secure and accurate matter and respecting confidentiality as per the BRS Digital Policy.
    - e. Taking necessary actions in emergency situations, to prevent harm and danger.
    - f. Sharing information on a need-to-know basis only and not discussing the issue with colleagues or the parent community.
    - g. Making support available for individual staff members who may be suffering from wellbeing-related concerns, as per the *BRS Staff Wellbeing Policy*.
    - h. Understanding of the school's security system and security breach protocol.
  - 2. While training is not required for invited visitors, the school ensures that they have read and signed the school's Safeguarding Policy.

#### 7. Whistle blowing

- 7.1 Whistle blowing Mechanism: BRS has implemented a whistle blowing mechanism to enable any individual to raise concerns or allegations of organizational malpractice in confidence.
  - 1. For anyone who raises a concern, the school shall protect their identity and ensure that they should not be made to feel ashamed for reporting the concern. In case their identity becomes known, the school shall take measures to protect the individual from any negative repercussions such as harassment, reprisal, and stigmatization.
  - 2. For anyone who has a concern raised against them, the school shall, to the best of its ability, protect their identity where possible and protect them from any negative repercussions until any investigation process is completed.

#### 8. Inclusion

8.1 Inclusive Provision: BRS ensures that the Safeguarding Committee or Lead works closely with the Wellbeing Committee or Lead, Head of Inclusion, School Counselor, Social Worker, Health & Safety Officer as well as other relevant stakeholders (e.g., teachers, parents) to promote the safeguarding and security of all students. The school ensures that the safeguarding practices and associated policies and initiatives taken into account the individual needs, communication and behavior styles, and engagement of students with additional learning needs, in line with the BRS Inclusion Policy.

## 9. Compliance

9.1 This policy is effective as of the start of the Academic Year 2024/25 (Fall term). The school is expected to be fully compliant with this policy by 1 February 2026.

Approved By:

Dr.Rishikesh Padegaonkar Principal Bright Riders School

Next Review: AY 2026-2027

