

مدرسة اوريكس العالمية



Oryx International School

CHILD PROTECTION AND SAFEGUARDING POLICY

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1. Purpose

The purpose of this policy is to set out the Group minimum expectations for child protection and safeguarding across all schools. It explains how Oryx International School will safeguard and promote the welfare of children, respond to concerns, support children at risk, and ensure that safeguarding remains embedded in leadership, culture, practice and decision-making.

This policy updates the 2025 Child Protection and Safeguarding Policy into the Group template, removes legacy organisational references, reflects significant safeguarding changes identified for Keeping Children Safe in Education 2026, and provides a master framework for local adaptation.

The policy must be read as a minimum standard. Schools may add local requirements but must not dilute the safeguarding expectations set out here.

- Ensure timely action is taken to safeguard and promote children's welfare.
- Ensure staff understand their responsibilities and know how to report concerns.
- Ensure procedures are clear, recordable, defensible and aligned with local safeguarding arrangements.
- Support consistent practice across Group schools while allowing necessary local contextualisation.

2. Scope

This policy applies to all children under the age of 18 for whom Oryx International School has safeguarding responsibility. It applies during the school day, during school-arranged activities, off-site activities, residential and educational visits, online learning, transport and any situation in which the school has a safeguarding role.

This policy applies to all adults working with or on behalf of the school, whether paid or unpaid.

- all employees, including teaching, support, administrative and leadership staff;
- temporary staff, supply staff, agency staff and contractors;
- volunteers, governors, board members and proprietors;
- trainee teachers, student teachers, interns and visiting specialists;
- third-party providers, clubs, transport providers, host families and organisations using school premises;
- parents, carers and visitors where their conduct raises safeguarding concerns.

3. Legislation and Guidance

This policy is informed by the most current versions of relevant statutory guidance, local legal requirements and international safeguarding expectations. Keeping Children Safe in Education 2026;

- Working Together to Safeguard Children 2026;
- MoEHE in Qatar
- Group Safer Recruitment Policy;
- Group Allegations Against Staff Policy;
- Group Staff Code of Conduct;
- Group Online Safety Policy;
- Group Whistleblowing Policy;
- International Task Force on Child Protection standards and recommended practice.

4. Definitions

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

Child protection is part of safeguarding and refers to activity undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Abuse, neglect and exploitation are forms of maltreatment. They may occur face to face, online, within families, in school, in the community, by adults or by other children. Safeguarding issues are rarely standalone events and often overlap.

Term	Meaning for this policy
Child	Any person under the age of 18.
Staff	Employees, leaders, supply staff, agency staff, volunteers, contractors and any adult acting for the school.
DSL	The Designated Safeguarding Lead, or Deputy DSL when acting in that role.
Family Help	Community-based or targeted support intended to provide help before statutory intervention is required, aligned locally to [Local Family Help/Early Support Arrangements].
Child-on-child abuse	Abuse, harassment, violence, exploitation or harmful behaviour by one child or group of children towards another.
Low-level concern	A concern about adult behaviour towards children that does not meet the harm threshold but may indicate unsafe, inappropriate or unprofessional conduct.
Regulated activity or equivalent local child-facing work	Work with children requiring specific checks or safeguards under the relevant legal framework.

5. Equality, Inclusion and Vulnerability

Oryx International School is committed to anti-discriminatory safeguarding practice. Some children face additional barriers to recognition, disclosure or access to help. Staff must remain alert to vulnerability without making assumptions or applying stereotypes.

Safeguarding practice must be child-centred, evidence-informed, proportionate and respectful of local law, equality duties, privacy, dignity and the need to protect all children.

- children with SEND, disability or health conditions;
- young carers;
- children experiencing mental health difficulties;
- children affected by domestic abuse, substance misuse, housing insecurity or temporary accommodation;
- children at risk of exploitation, forced marriage, FGM, radicalisation or serious violence;
- children who are looked after, previously looked after, adopted or subject to care arrangements;
- children who experience discrimination, prejudice-based bullying, racism, misogyny or other harmful attitudes;
- children who are absent from education, missing education or frequently missing from school.

6. Important Safeguarding Contacts

Contact details must be checked at least termly and whenever there is a staffing or agency change.

Role / Organisation	Name	Contact details / out-of-hours route
[Principal]	Allen Bird	
[DSL]	Michaela Piare	
[Deputy DSL]	Andrea Smith Imran Sidat Jon Hughes Ashleigh Dobinson Susie Wilson Bryan Kelly Sarah Dewey Bunmi Tobun Elaine Rayen	
Additional DSL cover / confidential safeguarding mailbox	n/a	n/a
School HR / Local HR	Gladys Lachtia	
Chair of Board / Governor Safeguarding Lead	Michael Clack	
Regional Head of Schools / Group Safeguarding Lead	Michael Clack	
Local children's social care / statutory equivalent	n/a	n/a
Police / emergency services		999
Local authority designated officer / allegations equivalent	n/a	n/a
Mental health support / crisis route	n/a	n/a
Local online safety / cyber reporting route	n/a	n/a

7. Roles and Responsibilities

Safeguarding and child protection are everyone's responsibility. All adults must act immediately when they have a concern and must never assume that someone else will act.

Role	Core responsibilities
All staff, volunteers and adults	Read and understand this policy and assigned KCSIE or local-equivalent guidance; remain alert to signs of abuse, neglect and exploitation; report concerns immediately; record accurately; maintain professional boundaries; follow the Staff Code of Conduct; and contribute to a culture where children feel safe to speak.
DSL – Michaela Piare Secondary pastoral & Behaviour	Leads safeguarding and child protection; advises staff; manages referrals; oversees safeguarding records; liaises with local agencies; leads information sharing; ensures appropriate support plans and risk assessments; understands online safety, filtering and monitoring; coordinates training; and keeps Principal informed.
Deputy DSLs (SLT & Wellbeing team) with delegated roles Andrea Smith – Attendance Imran Sidat- CP Secondary & Online Safety Jonathon Hughes- CP Primary & Online Safety Sarah Dewey – CP and pastoral Sixth Form Julie Gano- First Aid & Health Amin Hashem – H&S Komal Ali- Behaviour Primary Bunmi Tobin – Wellbeing Elaine Rayen – Wellbeing Susie Wilson Ashleigh Dobinson	Acts in the DSL role when required, supports casework and ensures continuity of safeguarding response.
Principal- Allen Bird	Ensures implementation of this policy; provides resources and authority for the DSL; ensures effective DSL cover; communicates the policy to staff and families; acts as case manager where appropriate; ensures safeguarding is embedded in school culture.
School Board / Governance- Michael Clack	Approves the local policy; seeks assurance; ensures the school has an effective whole-school safeguarding approach; ensures appropriate training; challenges leaders and monitors compliance.
Regional / Group Safeguarding Lead- Michael Clack	Provides Group oversight, challenge and support, especially for complex cases, allegations, cross-border issues, serious incidents, audits and assurance.
School HR- Gladdys Lachia	Supports safe recruitment, staff suitability, allegations processes, training records and secure personnel-related safeguarding records.
IT / Digital Lead- Heads of School & IT Manager -	Supports online safety, filtering and monitoring systems, annual review, records of checks, cyber security and safe use of technology.
SENCO / Inclusion Lead- Komal Ali	Works with the DSL to support children with SEND, communication barriers or health conditions and ensures safeguarding needs are not misattributed to disability or additional needs.

7.1 DSL Availability and Cover Arrangements

The DSL must be available during school hours for staff to discuss safeguarding concerns. The school must also set out how DSL support will be accessed during off-site activities, residential visits, extended school provision and out-of-hours activities.

KCSIE 2026 places greater emphasis on robust cover arrangements where the DSL is unavailable. Oryx International School must document cover arrangements, including Deputy DSLs, named escalation routes, and where appropriate a confidential shared safeguarding mailbox or equivalent system that is monitored by authorised safeguarding staff.

- The DSL cover rota must be clear to staff.
- Safeguarding concerns must be received, monitored and acted on without delay.
- Staff must know what to do if the DSL and Deputy DSL are unavailable.
- Safeguarding information must remain confidential while being accessible to those with a professional need to know.

8. Confidentiality and Information Sharing

Timely information sharing is essential to effective safeguarding. Fears about sharing information must not prevent action to promote welfare and protect children from harm.

Information must be shared lawfully, proportionately, securely and with those who need it to safeguard the child or others. Staff must not promise confidentiality to a child because safeguarding information may need to be shared.

KCSIE 2026 strengthens expectations that information shared with a receiving setting is relevant, clear, proportionate and properly contextualised. Where a pupil moves settings and information indicates a risk to the child or others, the DSLs from both settings should communicate directly so that an appropriate risk assessment, safety plan or support plan can be put in place.

- Ask: is sharing necessary to safeguard or promote welfare?
- Share only the information that is relevant, necessary and proportionate.
- Make clear whether information is fact, allegation, opinion or professional judgement.
- Record what was shared, with whom, when, why and by whom.
- If in doubt, seek advice from the DSL, Group Safeguarding Lead or local safeguarding partner.

9. Recognising Abuse, Neglect and Exploitation

All staff must understand that abuse, neglect and exploitation can happen anywhere and by anyone. Children may be harmed inside or outside the home, online or offline, by adults or by other children.

Staff must maintain professional curiosity. Children may not feel ready or able to disclose, may not recognise their experiences as harmful, or may communicate distress through behaviour, presentation, attendance, friendship patterns, online activity or changes in wellbeing.

- physical abuse;
- emotional abuse, including verbal abuse;
- sexual abuse and sexual exploitation;
- neglect;
- domestic abuse and child-to-caregiver abuse;
- child criminal exploitation and child sexual exploitation;
- serious violence, weapons concerns and coercion;
- harmful sexual behaviour, sexual harassment and sexual violence;
- online abuse, grooming, image-based abuse and technology-assisted harm;
- radicalisation and extremism;
- FGM, forced marriage and so-called honour-based abuse;
- bullying, prejudice-based abuse, misogyny and discriminatory behaviour;
- self-neglect or neglect linked to medical needs, where relevant to the child's welfare.

10. Family Help, Early Support and Referrals

In the UK, KCSIE 2026 introduces and expands information on community-based Family Help assessments and referrals to Family Help support, targeted early help and children's social care.

Oryx International School aligns with the principles of KCSIE 2026 locally through the Ministry of Education and Higher Education (MOEHE) and AMAN (The Protection and Social Rehabilitation Centre).

School offered support is intended to provide support as soon as problems emerge. It does not replace the need to make an immediate referral where a child is suffering, likely to suffer harm, or is in immediate danger as per the expectations of Qatari law.

Situation	Expected action
Emerging concerns that do not indicate immediate harm	Speak to the DSL. Consider Family Help, targeted early support, school pastoral support, external signposting or local early support arrangements.
Concerns escalate or do not improve	DSL reviews the case, records actions and refers to Principal .Considers referral to Ministry of Education and Higher Education (MOEHE), the Ministry of Interior (MOI / Police via 999), and AMAN (The Protection and Social Rehabilitation Centre)
Child is suffering, likely to suffer harm or in immediate danger	Make an immediate referral to Principal and ensure RHoS is aware. Escalation may involve Ministry of Education and Higher Education (MOEHE), the Ministry of Interior (MOI / Police via 999), and AMAN (The Protection and Social Rehabilitation Centre) Anyone can make a referral. Inform the DSL as soon as possible.
DSL unavailable	Do not delay. Contact Deputy DSL, Principal, Ministry of Education and Higher Education (MOEHE), the Ministry of Interior (MOI / Police via 999), and AMAN (The Protection and Social Rehabilitation Centre) as appropriate.
Disagreement with agency response	Use local escalation procedures and record the rationale, advice received and next steps. Escalate to RHoS

11. Responding to Disclosures and Concerns

When a child discloses abuse, neglect, exploitation or another safeguarding concern, the adult receiving the information must respond calmly, listen carefully and pass the information on without delay.

- Listen and allow the child to speak freely.
- Do not ask leading questions.
- Reassure the child they have done the right thing by speaking.
- Do not promise secrecy. Explain that information must be shared with safeguarding staff.
- Record the child's words as accurately as possible, distinguishing fact from opinion.
- Sign, date and submit the record through CPOMS
- Report immediately in person (face to face or out of school via a phone call) to the DSL or DDSL (Head of School) or follow emergency procedures where required.
- Do not investigate, confront alleged perpetrators or discuss the concern with unnecessary colleagues.

12. Specific Safeguarding Issues

The following issues must be understood by all staff at a level appropriate to their role. The DSL must ensure staff training and updates include current indicators, reporting routes and local risk factors.

Issue	Policy expectation
Domestic abuse and child-to-caregiver abuse	Domestic abuse can affect children directly and indirectly. Staff must be alert to the impact of coercion, control, violence, verbal abuse, fear and instability on children. KCSIE 2026 references child-to-caregiver abuse as a form of abuse staff should understand.
Child criminal exploitation and child sexual exploitation	Children may be exploited by individuals, groups, organised networks or gangs. They may not be recognised as victims and may be criminalised for actions taken under coercion. Staff must consider coercion, fear, debt, grooming, missing episodes and unexplained possessions.
Serious violence and weapons concerns	Serious violence remains an ongoing safeguarding concern. Any concern that a child is carrying, using or intending to use a weapon must be reported to the DSL, who should undertake a risk assessment and consider external referral.
Mental health and safeguarding	Mental health problems can develop into safeguarding concerns. Staff should not diagnose mental health conditions but should identify warning signs, refer concerns and ensure support is safe, effective and appropriate.
FGM, forced marriage and honour-based abuse	Staff must follow local mandatory reporting and safeguarding procedures. Staff must never examine a child. Concerns must be referred to the DSL and/or statutory agencies in accordance with local requirements.
Radicalisation and extremism	Staff must report concerns that a child may be vulnerable to radicalisation, extremist influence or harmful ideology. The DSL will assess risk and follow guidance from the Ministry of Education and Higher Education (MOEHE), the Ministry of Interior (MOI / Police via 999), and AMAN (The Protection and Social Rehabilitation Centre).
Homelessness, temporary accommodation and housing instability	Housing instability may create safeguarding vulnerabilities and may require information sharing, attendance monitoring and support.
Cybercrime and online harm	Online harm, cyber-enabled abuse, technology-facilitated coercion, image-sharing and cybercrime risks must be addressed through online safety education, filtering, monitoring and safeguarding response.

13. Child-on-Child Abuse, Harmful Behaviour and Sexual Violence/Harassment

Children can abuse other children. Child-on-child abuse will never be passed off as “banter”, “part of growing up” or “just having a laugh”. It is a safeguarding issue for all children involved, including victims, alleged perpetrators, witnesses and wider peer groups.

KCSIE 2026 expands the child-on-child abuse section to emphasise overlapping safeguarding issues, times of increased risk around the school day, misogyny, the preventable nature of abuse and the importance of recognising behaviours and indicators early.

- bullying, prejudice-based abuse and online abuse;
- physical harm or threats;
- abuse linked to gangs, coercion or exploitation;
- harmful sexual behaviour, harassment or violence;
- sharing of nudes or semi-nudes;
- initiation or hazing behaviours;
- misogyny, discriminatory language or peer cultures that normalise harm;
- abuse during travel, immediately after school, online or during unsupervised periods.

13.1 Response to Child-on-Child Abuse

Where an allegation or concern arises, staff must record and report it to the DSL immediately. Staff must not investigate. The DSL must consider immediate safety, risk assessment, support, external referral and whether the matter may be criminal or require specialist advice.

- Complete a written record.
- Assess immediate safety of all children involved.
- Consider separation, supervision, timetable adjustments or transport arrangements.
- Consult local safeguarding partners/police where required.
- Provide support plans for victim, alleged perpetrator and affected children.
- Review wider school culture, locations, timings or behaviours that may require preventative action.
- Record decisions, rationale and review dates.

13.2 Preventative Culture

The school will take proactive steps to prevent child-on-child abuse through curriculum, supervision, adult modelling, reporting systems, pastoral support and a zero-tolerance approach to harmful behaviour.

- Teach healthy relationships, consent, boundaries, respect, online safety and reporting.
- Challenge sexualised, derogatory, misogynistic, discriminatory or harmful language.
- Ensure students know how to report concerns safely and confidentially.
- Monitor hotspots, transition times, toilets/changing areas, transport and online spaces.
- Review patterns of concerns to identify cultural, environmental or systemic issues.

14. Sharing Nudes and Semi-Nudes

All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether the sharing appears consensual or non-consensual. The response must be proportionate and must consider age, development, circumstances, vulnerability, coercion, exploitation and risk of further harm.

Staff must report any incident immediately to the DSL and must not view, copy, print, forward, save, upload or ask a child to share imagery.

Do	Do not
Report immediately to the DSL.	Do not view, copy, print, save, upload or forward imagery.
Reassure the child that support is available.	Do not ask children to disclose unnecessary details.
Record the concern factually.	Do not blame, shame or minimise.
Preserve devices only where directed by DSL/police/local procedure.	Do not delete imagery or ask the child to delete it unless advised through appropriate safeguarding route.
Consider immediate safety, coercion, exploitation and mental health risk.	Do not discuss widely or share information without a safeguarding need to know.

14.1 DSL Initial Review

The DSL will undertake an initial review and decide whether immediate referral is required. The DSL should consider whether the incident involves an adult, coercion, blackmail, grooming, exploitation, violence, age-related concerns, significant vulnerability, wide distribution, immediate risk or criminality.

- whether there is immediate risk to any child;
- whether parents/carers should be informed and how;
- whether Ministry of Education and Higher Education (MOEHE), the Ministry of Interior (MOI / Police via 999), and AMAN (The Protection and Social Rehabilitation Centre) should be contacted;
- whether the image has been shared widely or via platforms requiring removal;
- whether another school or organisation must be contacted;
- what support and risk management is required for all children involved;
- how the incident and rationale will be recorded.

15. Online Safety, Filtering, Monitoring, Generative AI and Mobile Technology

Online safety is an integral part of safeguarding. Technology is a component in many safeguarding and wellbeing issues, including grooming, exploitation, bullying, harassment, harmful content, coercion, image-sharing, radicalisation, misinformation, financial exploitation and cybercrime.

KCSIE 2026 includes new guidance and resources to support schools in understanding safety and legal requirements around the use of generative AI in teacher-facing and pupil-facing materials. Schools should ensure AI use is governed by safeguarding, data protection, academic integrity and professional conduct expectations.

All schools should have a mobile phone policy and clear procedures explaining how it is implemented in their setting.

Risk category	Examples and controls
Content	Exposure to illegal, inappropriate or harmful content. The school will use age-appropriate curriculum, filtering, monitoring and reporting routes.
Contact	Harmful interaction with others online, including grooming, exploitation, peer pressure or adults posing as children. Staff must teach safe communication and report concerns.
Conduct	Online behaviour that causes or increases harm, including bullying, harassment, sharing images or unsafe self-disclosure. Expectations must be clear in codes of conduct and acceptable use agreements.
Commerce	Online gambling, scams, phishing, financial exploitation and inappropriate advertising. Staff must teach digital literacy and report schemes targeting children.
Generative AI	AI tools may create safeguarding, privacy, misinformation, bias or inappropriate content risks. Schools must define approved tools, data controls, staff responsibilities and pupil-facing safeguards.
Mobile technology	Mobile phones, cameras, smart watches and personal devices must be managed through local policy, with clear rules for use, storage, searching, confiscation and reporting.

15.1 Filtering and Monitoring

The school will identify and assign roles and responsibilities for filtering and monitoring, block harmful and inappropriate content without unreasonably affecting teaching and learning, and maintain effective monitoring strategies that meet safeguarding needs.

KCSIE 2026 highlights that schools should review filtering and monitoring systems at least annually, including checks that filtering is working appropriately on all devices connected to the internet, and should keep a record of these checks.

- The Executive Principal retains overall accountability.
- The DSL must understand filtering and monitoring arrangements and use safeguarding information to inform review.
- The IT/Digital Lead will maintain technical records and report concerns.
- All staff must know how to report online safety concerns and filtering failures.
- The annual review must consider school-owned and connected devices, networks, remote learning, BYOD arrangements and emerging risks.

15.2 Use of Generative AI

Generative AI must not be used in ways that compromise safeguarding, confidentiality, children's privacy, data protection, assessment integrity or professional judgement. Schools must insert local procedures for approved AI tools, staff use, pupil use and data processing.

- Do not input identifiable child safeguarding information into public AI tools.
- Do not rely on AI to make safeguarding decisions.
- Check AI-generated resources for accuracy, bias, age-appropriateness and safeguarding risk.
- Ensure AI-generated pupil-facing materials meet school curriculum, safeguarding and equality expectations.
- Report AI-related safeguarding concerns to the DSL and IT/Digital Lead.

16. Children Requiring Mental Health Support

The school recognises that mental health problems can develop into safeguarding concerns. Staff must not attempt to diagnose mental health conditions, but they play an important role in identifying warning signs, referring concerns and ensuring children receive appropriate support.

Any mental health support or intervention offered or signposted by the school should be safe, evidence-informed, appropriate to need and suitable for the phase of education.

- promote positive mental wellbeing and prevention;
- observe and identify early signs of mental health difficulty;
- provide early targeted support where appropriate;
- refer to specialist services or Local Mental Health Support Route where needed;
- act immediately where there is risk of harm, self-harm or exploitation.
- Complete a risk assessment if appropriate

16.1 Mental Health Crisis, Self-Harm and Suicide Risk

The school recognises that some mental health concerns may present an immediate risk to a child's safety and wellbeing. Where a child is assessed as being at risk of suicide, suicidal ideation, serious self-harm, or has recently engaged in self-harming behaviours that present a significant risk, the school must prioritise the safety of the child and others.

In such circumstances:

- The Designated Safeguarding Lead (DSL) will ensure that appropriate safeguarding procedures are followed and that parents/carers are informed with a meeting with the Executive Principal, unless doing so would place the child at further risk.
- Immediate referrals to relevant emergency, health or specialist services will be made where appropriate.
- The school is not a medical or clinical setting and is therefore unable to provide the level of mental health assessment, monitoring or intervention required where there is an active risk of suicide or significant self-harm.
- Where there is an identified risk of suicide or significant self-harm, the child may be required to remain off-site until they have been assessed by an appropriate medical or mental health professional.
- Before a return to school can be considered, written confirmation from a qualified medical or mental health professional must be provided to indicate that the child is medically fit to return to an educational setting and that any identified risks are appropriately managed.
- Any medical recommendations or adjustments should be shared with the school, subject to parental consent, to support an effective support plan.
- Prior to returning to school, a reintegration meeting must take place involving the child (where appropriate), parents/carers, the DSL, School Counsellors and any other relevant school staff. The purpose of the meeting is to review the professional advice received, assess any ongoing risks and agree a personalised support and safety plan.
- A risk assessment will be completed and reviewed regularly by the DSL, with identified support strategies, responsibilities and monitoring arrangements clearly documented.
- The school will continue to work collaboratively with parents/carers, healthcare professionals and external agencies to support the child's wellbeing, attendance and safety.

17. Children with SEND, Health Conditions and Young Carers

Children with SEND, disabilities or health conditions may face additional safeguarding barriers. Staff must avoid assuming that signs of abuse, neglect or exploitation are explained by a child's condition without further professional curiosity.

KCSIE 2026 introduces specific emphasis on young carers and safeguarding children with medical conditions. Schools must be alert to how caring responsibilities or unmet medical needs may affect attendance, attainment, behaviour and wellbeing.

Group	Safeguarding expectations
Children with SEND or disability	Ensure accessible reporting routes, reasonable adjustments, close liaison between DSL and SENCO/Inclusion Lead, and careful consideration of communication barriers.
Children with medical conditions	Consider whether repeated absence of medication, failure to provide medical information or unmanaged health needs indicate neglect, abuse or exploitation.
Young carers	Identify caring responsibilities early and consider how they affect attendance, learning, behaviour, fatigue, anxiety and emotional wellbeing.
Children with language barriers or EAL	Provide accessible communication and avoid assuming silence means absence of concern.
Children with mental health needs	Ensure concerns are not dismissed as "just mental health" where safeguarding indicators are present.

18. Attendance, Missing Education and Temporary Accommodation

Attendance is a safeguarding matter. Absence, persistent lateness, unexplained absence, sudden changes in attendance or missing education may indicate abuse, neglect, exploitation, mental health concerns, caring responsibilities, accommodation instability or other safeguarding risks.

The school will use attendance information alongside pastoral, safeguarding and academic information to identify children who may need help or protection.

- follow local absence procedures and escalation thresholds;
- notify the DSL where attendance patterns indicate safeguarding risk;
- consider children with social workers, young carers, SEND and mental health concerns;
- maintain safe admission, withdrawal and transfer procedures;
- consider temporary accommodation or unstable housing as a potential vulnerability.

19. Allegations, Low-Level Concerns and Whistleblowing

Concerns or allegations about staff, supply staff, agency staff, contractors, volunteers, governors or other adults must be reported immediately in accordance with the Group Allegations Against Staff Policy and local procedures.

Where the concern relates to the Executive Principal, staff must report to [Chair of Board / Regional Head of Schools / Group Safeguarding Lead / Local Allegations Route]. Where there is a conflict of interest, staff must use the alternative route set out in this policy.

KCSIE 2026 clarifies that where allegations involve supply teachers, trainee teachers or contracted staff, schools and third-party organisations share safeguarding responsibilities. Schools remain responsible for gathering the facts and managing the safeguarding process while liaising with the employing agency or business.

Concern type	Action
Allegation that may meet harm threshold	Report to Principal or Vice Principal. Follow allegations policy and local statutory referral route.
Low-level concern	Record and report in accordance with the Low-Level Concerns Procedure. Review patterns and ensure appropriate response.
Whistleblowing concern	Use the Whistleblowing Policy where safeguarding practice is unsafe, poor or potentially failing.
Concern involving third-party staff	School gathers facts and manages safeguarding response while liaising with the agency/provider.
Immediate risk	Contact police/emergency services or local equivalent immediately and inform DSL/Principal as soon as possible.

20. Safer Recruitment and Suitability

Safer recruitment is a core safeguarding control. This policy should be read alongside the Group Safer Recruitment Policy, Safer Recruitment Commitment and local HR procedures.

No adult should work unsupervised with children unless required safeguarding, identity, suitability and local legal checks have been completed or a written risk assessment has been approved in exceptional circumstances.

- advertisements must state safeguarding commitment;
- application forms must include full employment history;
- shortlisting must assess gaps and concerns;
- interviews must include safeguarding questions;
- references must be obtained directly;
- identity, qualification, right-to-work and criminal-record checks must be completed;
- overseas checks must be completed where required;
- volunteers, contractors, agency staff and third-party adults must be risk assessed and checked appropriately;
- the Single Central Record or local equivalent must be accurate, stored securely (paper copy in VP office) and regularly reviewed.

21. Record-Keeping and Safeguarding File Transfer

All safeguarding concerns, discussions, decisions and reasons must be recorded in writing. Records must be clear, factual, timely, dated, signed or attributable, secure and stored separately from the main pupil file where required.

Safeguarding records must distinguish between fact, allegation, professional judgement and action taken. Records must be accessible only to those with a professional need to know.

When a child moves school, the DSL will ensure safeguarding records are transferred securely, separately from the main file, and in time to enable the receiving school to put support in place. Where concerns are significant or complex, the DSL should speak directly with the receiving DSL.

When a child is admitted to Oryx International confirmation is sought from the previous school if there are any safeguarding concerns. This is followed up by the DSL.

- clear summary of concern;
- child's words where relevant;
- date, time and location;
- people involved;
- action taken and by whom;
- advice received;
- decisions and rationale;
- referrals made;
- support/risk plan and review dates;
- information shared and with whom.

22. Training

All staff receive annual safeguarding and child protection training (Level 1) at induction and regular updates thereafter. All staff (except DSL and DDSLs) undertake NCSL Child Protection online training. Training must be integrated with the whole school safeguarding approach, online safety, behaviour, attendance, curriculum, pastoral support and staff conduct.

DSLs and Deputy DSLs receive appropriate specialist training (Level 3) and regular updates to maintain their knowledge and skills. Board members must receive safeguarding training sufficient to provide strategic challenge and assurance.

Audience	Minimum training expectations
All staff	Induction, annual updates, reporting procedures, online safety, filtering and monitoring, child-on-child abuse, confidentiality, information sharing and local referral routes.
Staff working directly with children	Assigned KCSIE/local-equivalent reading, specific safeguarding issues, professional curiosity and disclosure response.
DSL / Deputy DSL	Specialist training at required intervals, annual updates, local agency arrangements, information sharing, online safety, mental health, exploitation and allegations.
Board / Governors	Strategic safeguarding responsibilities, policy oversight, safer recruitment, allegations, online safety and challenge role.
Contractors / volunteers	Role-appropriate safeguarding induction, code of conduct, reporting route and supervision expectations.
Recruitment panels	Safer recruitment training aligned with Group policy and local arrangements.

All staff are required to complete these training courses every year.

	Course	Platform	When
Returning Staff			
1	Annual Certificate in safeguarding – Refresher Keeping Children Safe in Education 2026 Part 1 *NEW*	National College	Thursday 27 th August
2	Annual Refresher in Online safety	National College	Thursday 27 th August
3	*new* for 2026 Linked to EU AI Act compliance		Thursday 27 th August

	AI & online safety: mitigating risks and compliance (basic) /Top up Certificate in AI Safeguarding for staff	National College	
4	Certificate in Data Protection & GDPR for Staff	National College	Thursday 27 th August
5	Annual Refresher in cyber security	National College	Thursday 27 th August
6	Certificate in Risk Assessments	National College	Thursday 27 th August

NEW to specific roles in school **only complete if this applies to you**

	What?	Where?	Who?
1	Whole School SEND Inclusion	The National College	SendCo, learning support staff, counsellors
2	Advanced certificate in Child Protection for Leaders for International Schools Advanced Certificate in safeguarding for designated leaders	National College	Principal, DSL, DDSL
3	How to be an Effective Fire Warden or Fire Marshal H&S Officer	TES Develop	Elected fire wardens/marshals
4	Child Protection in Sport & Active Leisure	TES Develop	Sport staff, ECA leads, coaches
5	Certification in Child Protection and Safeguarding: Music	TES Develop	Music staff, ECA leads, music tutors
6	Certificate in Personal and Intimate Care for Nurseries	National College	EYFS staff
7	Administration of Medication in Schools	TES Develop	School medical staff, first aiders

C. All staff are required to complete these training courses once every two years

1	Certificate in Fire Safety	National College	Thursday 27 th August
2	Certificate in First Aid Awareness	National College	Thursday 27 th August
3	Certificate in Health & Safety for Staff	National College	Thursday 27 th August

D. Specific staff are required to carry out the following courses within the time frames identified **only complete if this applies to you**

Every two years			
	What?	Where?	Who?
1	Child Protection Advanced Principals, Designated Safeguarding Leads + Deputies Advanced certificate in Child Protection for Leaders for International Schools Advanced Certificate in safeguarding for designated leaders	TES Develop National College	Principal, DSL, DDSL
2	Safer Recruitment for International Schools Annual Certificate in Safer Recruitment for International Schools	TES Develop National College	HR team, Principals, all staff who interview and recruit

3	Food Hygiene & Safety	TES Develop	H&S lead, business manager, staff teaching or leading ECAs involving food
4	*new* for 2026 Linked to EU AI Act compliance AI Literacy and Safeguarding Literacy AI Role Specific training for all staff dealing with 'High risk' AI applications	Target specific student approved AI platforms MAC and HR – if AI is being used	
Every three years			
1	Understanding the Role of the Safeguarding Lead for International Schools Designated	TES Develop	DSL, DDSL
2	Child Protection in Sport & Active Leisure	TES Develop	Sport staff, ECA leads, coaches
3	Certification in Child Protection and Safeguarding: Music	TES Develop	Music staff, ECA leads, music tutors

23. Monitoring and Review

This policy will be reviewed annually by the Executive Principal, DSL and RHOS, and sooner if statutory guidance, Group requirements, inspection findings, audit outcomes, serious incidents or local legal requirements change.

Compliance will be monitored through safeguarding audits, training records, record-keeping checks, recruitment checks, online safety review, filtering and monitoring review, case sampling and governance assurance.

24. Related Policies

This policy should be read alongside the following Group and local policies. Schools must insert local equivalents and remove any policies that do not apply.

- Safer Recruitment Policy;
- Safer Recruitment Commitment;
- Allegations Against Staff Policy;
- Staff Code of Conduct;
- Low-Level Concerns Procedure;
- Whistleblowing Policy;
- Online Safety Policy;
- Mobile Phone Policy;
- Data Protection and Records Retention Policy;
- Behaviour Policy;
- Attendance Policy;
- Anti-Bullying Policy;
- Educational Visits Policy;
- SEND / Inclusion Policy;
- Health and Safety Policy;
- First Aid and Medical Conditions Policy;
- Use of School Premises / Lettings Policy.

APPENDIXES

Appendix A: School Adaptation Checklist

Area	School to confirm	Complete
Document control	Insert local document ID, approver, approval date, effective date and review date.	☐
School identity	Replace [School Name], [Principal], [DSL], [Deputy DSL], [School Approver] and all local placeholders.	☐
Local law	Insert [Local Safeguarding Law], [Local Regulatory Requirements], mandatory reporting duties and law-enforcement/social care equivalents.	☐
Contacts	Complete safeguarding contacts, out-of-hours DSL cover and emergency routes.	☐
Family Help	Insert local Family Help/early support/referral arrangements and thresholds.	☐
Referrals	Insert local referral portals, escalation routes and statutory agency contacts.	☐
Information sharing	Confirm local data protection requirements and transfer procedures.	☐
Online safety	Insert local filtering, monitoring, AI and mobile-phone arrangements.	☐
Child-on-child abuse	Insert local risk assessment/support planning process and student reporting routes.	☐
Medical conditions / young carers	Insert local pastoral and health support processes.	☐
Record keeping	Insert safeguarding recording system, retention schedule and secure transfer process.	☐
Training	Insert annual training plan and staff declaration process.	☐
Approval	Record approval and communicate final version to staff, parents and relevant stakeholders.	☐

Appendix B: KCSIE 2026 Change Summary

- Family Help and community-based assessment language added.
- Expanded examples of children who may benefit from support before statutory intervention.
- Child-to-caregiver abuse and verbal abuse referenced within abuse awareness.
- Child-on-child abuse expanded to include higher-risk times around the school day, misogyny, preventability and early recognition.
- CCE and CSE wording strengthened to include organised networks, gangs, known perpetrators and criminalisation under coercion.
- Mental health wording clarified: staff identify warning signs but do not diagnose.
- Serious violence updated, including weapon concerns and DSL risk assessment.
- DSL cover arrangements strengthened, including arrangements when DSL is absent.
- Information-sharing expectations clarified: relevant, proportionate and contextualised information shared with receiving settings.
- Online safety updated to include generative AI and mobile-phone-free expectations.
- Filtering and monitoring review must take place at least annually and include checks on connected devices.

- New or expanded content added on young carers and safeguarding children with medical conditions.
- Sharing nude/semi-nude images clarified: all incidents require a safeguarding response.
- Part four clarification that safeguarding responsibilities are shared with agencies/providers where allegations involve third-party staff.

Appendix C: Types and Indicators of Abuse

Physical abuse

May involve causing physical harm to a child. Indicators may include injuries without adequate explanation, fear of adults, repeated accidents, patterns of absence, or concerning explanations. Staff must report concerns and must not investigate.

Emotional abuse

May involve persistent emotional maltreatment, humiliation, intimidation, rejection, isolation, verbal abuse, exposure to domestic abuse or harmful expectations. Staff should be alert to changes in behaviour, confidence, relationships or presentation.

Sexual abuse and exploitation

May involve coercion, grooming, exploitation or abuse. Staff must report concerns immediately and avoid asking leading or unnecessary questions.

Neglect

May involve persistent failure to meet basic physical, emotional, educational, medical or supervisory needs. Indicators may include hunger, inadequate clothing, poor hygiene, untreated medical needs, repeated absence, fatigue or lack of supervision.

Online abuse

May include grooming, bullying, coercion, image-sharing, harmful content, exploitation, radicalisation, scams or harassment. Concerns must be reported to the DSL.

Exploitation

May involve criminal, sexual, financial or other exploitation, often through coercion, debt, gifts, threats, gangs or organised networks.

Appendix D: Referral and Escalation Flowchart

Step	Action	Record
1	Concern identified or disclosure received.	Record facts and child's words where relevant.
2	If immediate danger, contact police/emergency services/local equivalent.	Record referral and actions.
3	Report to DSL or Deputy DSL without delay.	Record time and recipient.
4	DSL reviews concern, checks history and assesses risk.	Record decision and rationale.
5	Consider Family Help, school support, external referral or statutory referral.	Record plan, responsible person and review date.
6	If response is inadequate or risk escalates, use escalation route.	Record escalation and outcomes.
7	Review child's circumstances until risk reduces and support is effective.	Record review outcomes.

Appendix E: Disclosure Response Prompt Sheet

Use	Avoid
"I am listening."	Do not promise secrecy.
"You have done the right thing by telling me."	Do not ask leading questions.
"I will need to share this with the safeguarding lead so we can help keep you safe."	Do not investigate or confront anyone.
Record the exact words used by the child.	Do not add opinion or interpretation as fact.
Report immediately to the DSL.	Do not delay because information feels incomplete.

Appendix F: Family Help and Local Referral Record

Field	Completion guidance
Child name / class	[Insert]
Concern summary	What has been seen, heard, disclosed or reported?
Immediate risk?	Yes / No / Unknown. If yes, refer immediately.
Family Help considered?	What local support or community-based assessment is appropriate?
Parent/carer involvement	Record discussion unless this increases risk.
DSL decision	Support in school / Family Help / external referral / statutory referral / police.
Actions and owner	Who will do what and by when?
Review date	Set date and criteria for escalation.
Outcome	Record whether concerns improved, escalated or require further action.

Appendix G: Child-on-Child Abuse Risk Assessment and Support Plan

Area	Considerations
Children involved	Victim, alleged perpetrator, witnesses, wider peer group and siblings.
Immediate safety	Separation, supervision, timetable, transport, online contact, safe spaces.
Nature of concern	Physical, emotional, online, discriminatory, sexual, coercive, exploitative, repeated or one-off.
Context	Location, time of day, peer culture, previous concerns, power imbalance, vulnerability.
External referral	Ministry of Education and Higher Education (MOEHE), the Ministry of Interior (MOI / Police via 999), and AMAN (The Protection and Social Rehabilitation Centre).
Support plan	Named adult, counselling, pastoral support, curriculum support, family communication.
Review	Dates, outcomes, further action, policy/culture learning.

Appendix H: Nude or Semi-Nude Image Incident Record

Field	Details
Date/time reported	[Insert]
Reported by	[Insert]
Children involved	[Insert initials or secure reference]
Immediate risk	[Yes/No/Unknown and action taken]
Image viewed?	Only if unavoidable and in line with safeguarding procedure. Record rationale.
Adult involvement / coercion / exploitation	[Insert assessment]
Referral decision	Ministry of Education and Higher Education (MOEHE), the Ministry of Interior (MOI / Police via 999), and AMAN (The Protection and Social Rehabilitation Centre)
Parent/carer communication	[Record if/how informed or why not]
Support plan	[Insert]
Actions to remove/report content	[Insert platform/police/local route]
Review date	[Insert]

Appendix I: Online Safety, AI, Filtering and Monitoring Audit

Area	Evidence / action required	Complete
Named filtering and monitoring owner	Insert role/name and responsibilities.	☐
Annual review completed	Date, participants, findings and actions recorded.	☐
All connected devices checked	School devices, BYOD, guest network and relevant connected devices considered.	☐
Filtering effectiveness tested	Age-appropriate filtering tested and issues logged.	☐
Monitoring procedures reviewed	Alerts, escalation and DSL involvement confirmed.	☐
Generative AI controls	Approved tools, data protection, staff expectations and pupil-facing safeguards agreed.	☐
Mobile phone policy	Rules, storage, searching/confiscation and reporting routes clear.	☐
Training	Staff and students educated on online risks and reporting.	☐

Appendix J: Information Sharing Decision Record

Question	Record
What information is being shared?	[Insert]
Why is sharing necessary?	Safeguarding / welfare / risk to child / risk to others / statutory request.
Who is receiving it?	[Insert role, organisation and contact]
Is it relevant and proportionate?	[Explain]
Is it clearly contextualised?	[Explain what the receiver needs to understand]
Has consent been sought?	[Yes/No/Reason not sought]
How was information shared securely?	[Insert]
Decision and rationale	[Insert]
Review/follow-up required	[Insert]

Appendix K: Safeguarding Contacts and Local Authority Details

Contact	Details
School name	Oryx International School
Principal	Allen Bird
DSL	Michaela Piare
Deputy DSL	Andrea Smith Imran Sidat Jonathan Hughes Sarah Dewey Komal Ali Ashleigh Dobinson Susie Wilson Bunmi Tobin Elaine Rayen Amin Hashem Julie gano
Safeguarding mailbox	safeguarding@oryxschool.qa
Ministry of Education and Higher Education (MOEHE), the Ministry of Interior (MOI / Police via 999), and AMAN (The Protection and Social Rehabilitation Centre)	
Local police / emergency route	999
Local authority designated officer / equivalent	n/a
Family Help / Early Support route	n/a
Mental health crisis support	Hamad Hospital
Online safety / cyber reporting route	n/a
Group Safeguarding Lead	Michael@orbital.education

Appendix L: Staff Induction and Annual Declaration

Declaration item	Staff confirmation
I have read and understood this policy.	☐
I know who the DSL and Deputy DSL are.	☐
I know how to report a safeguarding concern.	☐
I know what to do if the DSL is unavailable.	☐
I understand I must not promise confidentiality.	☐
I understand online safety, filtering and monitoring expectations.	☐
I understand child-on-child abuse reporting procedures.	☐
I understand the Staff Code of Conduct and low-level concerns procedure.	☐
I have completed required safeguarding training.	☐
Name, signature and date	[Insert]

Appendix M: Local Safeguarding Procedure Insert

Schools should insert local flowcharts, statutory thresholds, agency names, emergency portals, reporting forms and escalation pathways here. This appendix should be removed if those procedures are embedded elsewhere in the policy.

Review question	School evidence / notes
What local procedure or evidence applies?	[Insert]
Who owns this area?	[Insert role]
When was it last reviewed?	[Insert date]
What action is required?	[Insert]
Review date	[Insert]

Appendix N: Board Assurance Checklist

The Board should review whether the policy is approved, contextualised, communicated, implemented, supported by training, reflected in practice and monitored through audit.

Review question	School evidence / notes
What local procedure or evidence applies?	[Insert]
Who owns this area?	Principal
When was it last reviewed?	August 2026
What action is required?	[Insert]
Review date	August 2027

Appendix O: Safeguarding Audit Evidence List

Suggested evidence includes training records, staff declarations, SCR audit, online safety review, filtering checks, case file sampling, leadership minutes, pupil voice, parent communications and records of local adaptation.

Review question	School evidence / notes
What local procedure or evidence applies?	Annual audit Monthly SCR review Monthly filtering checks Weekly SLT Safeguarding report Monthly RHoS meeting
Who owns this area?	DSL
When was it last reviewed?	June 2026
What action is required?	Delegated tasks to DDSL
Review date	Dec 2026

Appendix P: Local Premises, Toilets, Changing and Residential Safeguarding Review

Schools should record local arrangements for safeguarding around toilets, changing areas, showers, residential accommodation, trips and activities, ensuring arrangements comply with local law and protect the dignity, privacy and safety of all children.

Review question	School evidence / notes
What local procedure or evidence applies?	Corridor monitors (New Image) – safeguarding toilets Risk assessments Students are able to come to school in PE kits (reduces need for changing rooms)
Who owns this area?	DSL
When was it last reviewed?	termly
What action is required?	June 2026
Review date	termly

Appendix Q: Student Reporting Systems Review

Schools should review whether children know how to report concerns, whether reporting routes are visible and accessible, whether children trust the system, and whether feedback from students informs safeguarding practice.

Review question	School evidence / notes
What local procedure or evidence applies?	Posters around school . Wellbeing Displays in every corridor. Embedded in curriculum.
Who owns this area?	DSL
When was it last reviewed?	Safeguarding Audit – March 2026
What action is required?	Student feedback to inform our practices
Review date	Safeguarding Audit- March 2027

Appendix R: Curriculum Safeguarding Map

Schools should map where safeguarding themes are taught, including healthy relationships, consent, online safety, harmful behaviour, exploitation, mental health, prejudice, reporting and help-seeking.

Review question	School evidence / notes
What local procedure or evidence applies?	We must follow Qatar legislation
Who owns this area?	Curriculum Leads & DSL
When was it last reviewed?	June 2026
What action is required?	Monitoring of lessons and information shared
Review date	June 2027

Appendix S: Group Safeguarding Alignment Statement

This appendix aligns the Group Child Protection and Safeguarding Policy 2026 with the Group-wide safeguarding framework and Safeguarding Tier Matrix. It is mandatory for local school contextualisation and must be read alongside the main policy, local safeguarding addenda and the Group Safeguarding Tier Matrix.

Alignment principle: The child's welfare is paramount. Where local law exceeds this policy, local law must be followed. Where this policy sets a higher safeguarding standard than local law, the Group standard must be followed unless local law prohibits it.

Alignment area	Requirement now reflected in this policy
Group safeguarding commitment	The safety and welfare of every child is the Group's highest priority. No operational, reputational or commercial consideration should override a child protection concern.
Governance model	Safeguarding accountability is structured at Group, regional and school/local level, with strategic oversight, operational leadership and local implementation.
Global DSL / Group safeguarding lead	The Group-level safeguarding lead provides standards, guidance, oversight, escalation support, serious case coordination and Board reporting.
Regional oversight	Regional Heads of Schools and the Director of Education provide regional monitoring, monthly DSL engagement, escalation support, quality assurance visits and scrutiny of safeguarding records.
School implementation	The Principal holds overall responsibility for safeguarding culture and implementation. The DSL leads day-to-day safeguarding and child protection.
Safeguarding platform and records	Concerns must be recorded promptly on CPOMS or the school's Group-approved safeguarding system, with factual, dated and attributable records.
Tiered escalation	All concerns must be categorised using the Group Safeguarding Tier Matrix so that response times, reporting routes and escalation are consistent.
Quality assurance	Safeguarding is monitored through audits, record sampling, training compliance, safeguarding reports, dashboards, QA visits and learning reviews after serious incidents.

Appendix T: Group Safeguarding Governance and Accountability Model

Level	Role / body	Core accountability
Group	Group Board	Holds ultimate accountability for safeguarding across the Group, approves the policy, receives safeguarding reporting and ensures safeguarding has appropriate Board-level oversight.
Group	Board Safeguarding Committee / Board safeguarding lead	Provides strategic oversight of safeguarding policy, monitoring, enforcement and improvement.
Group	Global DSL / Group Safeguarding Lead	Sets and maintains Group safeguarding standards; provides advice; oversees serious incidents, cross-border coordination, statutory referrals and safeguarding reporting.
Group	Director of Education	Oversees safeguarding quality and educational implementation across schools, supports regional leaders and leads or contributes to post-incident review where required.
Regional	Regional Head of Schools	Provides regional oversight; receives formal notification from Tier 2 upwards; monitors schools; supports Principals and DSLs; conducts safeguarding-focused QA.
School	Principal / Head of School	Owens implementation, culture, resources, staff training, reporting to regional leadership and immediate protective action in school.
School	Designated Safeguarding Lead	Receives, assesses, records and responds to safeguarding concerns; manages referrals, support plans, risk assessments and local agency liaison.
School	All staff	Recognise, record and report concerns without delay, maintain professional boundaries and never investigate or promise confidentiality.

- Safeguarding must be a standing agenda item at relevant leadership, governance and regional meetings.
- Serious safeguarding incidents must be escalated through the Tier Matrix and must not be delayed by hierarchy or availability.
- Concerns about the Principal must not be routed through the Principal and must be escalated directly to the Regional Head of Schools, Director of Education and/or Global DSL according to the Tier Matrix.
- Concerns about the RHoS must be escalated to the Global DSL.
- The Group expects non-retaliation for safeguarding reporting made in good faith.

Appendix U: Group Safeguarding Tier Matrix

All safeguarding concerns must be assessed using the Group Tier Matrix. The tier determines the response timeframe, notification route and required action. When in doubt, staff and leaders must escalate rather than contain risk locally.

Tier	Description	Response timeframe	Typical examples	Minimum required action
Tier 1 - Minor concern	No immediate harm. Unverified concern or single low-level issue where DSL judgement can contain at school level.	Within 48 hours	Unverified child protection concern; single low-level staff conduct concern; isolated unkind comment; isolated inappropriate content access; general distress without active harm.	Record on CPOMS or approved system; DSL informs Principal verbally; monitor for patterns; include numbers in monthly safeguarding report and annual safeguarding report.
Tier 2 - Moderate concern	Credible concern below immediate harm threshold. Internal investigation or structured review required.	Within 24 hours	Emerging neglect or emotional abuse pattern; inappropriate but non-predatory boundary breach; sustained unkind behaviour; past/current self-harm without active suicidal intent; staff messaging students on non-school platforms without sexual content.	DSL records full detail; informs Principal; Principal appoints appropriately trained senior staff member to lead internal investigation; RHoS informed in writing within 24 hours; affected children supported; outcome recorded.
Tier 3 - Serious concern	Credible risk of harm or significant breach of trust. Formal referral likely and suspension may be required.	Within 4 hours	Credible physical harm disclosure; restraint causing injury; grooming indicators; sexual harassment or assault; active self-harm requiring first aid; suicide plan; radicalisation; fear of FGM, forced marriage or honour-based abuse; trafficking indicators.	DSL acts immediately; written record completed rapidly; Principal informed; RHoS, Global DSL and Director of Education formally notified; local statutory or police referral considered; affected children protected; incident logged on risk register.
Tier 4 - Critical / immediate	Child or adult has been harmed or is in immediate danger. Emergency response, police referral and Group CEO notification required.	Immediate, within 1 hour	Serious physical injury; physical sexual contact between staff and student; sexual assault or rape; attempted suicide requiring emergency response; confirmed trafficking/CSE; confirmed FGM; active threat; systemic abuse; staff arrest or criminal charge related to role.	Emergency services contacted where required; child/adult made safe first; Principal considers immediate suspension; DSL notifies RHoS, Global DSL and Director of Education within 1 hour; Global DSL notifies Regional CEO and Group CEO; regulatory notifications considered; post-incident review conducted.

Appendix V: Escalation Chain by Tier

The following escalation chain must be used alongside local statutory reporting duties. CPOMS or the school's Group-approved safeguarding system must be used to record and update concerns wherever available.

Role	Tier 1	Tier 2	Tier 3	Tier 4
DSL	Records concern and responds within 48 hours where needed.	Records full details immediately, informs Principal and supports investigation.	Acts immediately; records full details; informs Principal; notifies RHoS, Global DSL and Director of Education within 4 hours.	Leads immediate safeguarding response; records after immediate safety action; informs Principal, RHoS, Global DSL and Director of Education within 1 hour.
Principal / Head of School	Informed verbally; no formal action unless pattern emerges.	Appoints appropriately trained senior staff member to lead internal investigation within 24 hours.	Oversees matter and considers/authorises suspension where required.	Informed immediately; oversees matter, considers/authorises suspension and informs RHoS immediately by phone.
Regional Head of Schools	Reviewed through monthly safeguarding reporting.	Informed within 24 hours and reviews through monthly reporting.	Formally informed within 4 hours.	Informed immediately by phone and email.
Global DSL / Group Safeguarding Lead	Reviewed through annual safeguarding reporting.	Consulted where cross-jurisdiction or repeat pattern exists.	Formally informed within 4 hours and leads/advises on Group response, police referral and cross-border matters.	Formally informed within 1 hour; leads Group response and notifies Regional CEO and Group CEO within 2 hours, subject to practical timezone constraints.
Director of Education	No formal action required unless pattern or escalation.	No formal action unless required by context.	Formally informed within 4 hours.	Formally informed within 1 hour.
Regional CEO	No formal action.	No formal action.	Reviewed through Group reporting unless criminal/police referral escalates.	Formally informed by Global DSL and notifies Group CEO.
Group CEO / Group ExCo / Board Safeguarding Committee	No formal action.	No formal action.	Reviewed through Group reporting where applicable; serious criminal/police cases may be escalated similarly to Tier 4.	Group CEO informed; Group ExCo, Board Safeguarding Committee and other required governance bodies notified in line with the Tier Matrix.

Appendix W: Alignment Changes for Local School Implementation

Area to update locally	Required school action
Safeguarding contacts	Add Global DSL / Group Safeguarding Lead, RHoS, Director of Education, Regional CEO and local statutory contacts where applicable.
Reporting thresholds	Map local reporting thresholds to the Group Tier Matrix and ensure staff understand when to escalate immediately.
CPOMS / safeguarding platform	Confirm whether CPOMS or another Group-approved system is used; state how concerns are recorded, updated and audited.
Monthly reporting	Confirm process for Principal monthly safeguarding report to RHoS, including Tier 1 numbers and Tier 2+ details as required.
Serious incident escalation	Insert local emergency procedures and ensure Tier 3 and Tier 4 escalation routes are visible to DSLs, Principals and senior leaders.
Board assurance	Reflect the Board Safeguarding Committee / Board safeguarding lead role and annual safeguarding report expectations.
Jurisdiction-specific addendum	Add national legislation, mandatory reporting agencies, local safeguarding thresholds, inspection frameworks, local background check requirements and emergency numbers.
Ancillary policies	Ensure local policies align with the register of safeguarding-related policies, including safer recruitment, staff code of conduct, online safety, anti-bullying, allegations, whistleblowing, intimate care, crisis response and lockdown procedures.

