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SAFEGUARDING & CHILD PROTECTION POLICY	Prepared By	HR - Admin
	Issued By	HR Department
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D34 SAFEGUARDING AND CHILD PROTECTION POLICY

Edison Group of Schools

Applies To

- Edison International Academy Aspire
- Edison International Academy Al Markhiya
- Edison Global Academy Lusail
- Edison Global Academy Rawdat Al Hamama

Safeguarding commitment: Edison Group of Schools places the safety, dignity, wellbeing and best interests of every student at the centre of all decisions. Safeguarding is everyone's responsibility; the DSL leads and coordinates the school response but does not carry this responsibility alone.

Document control	Approved / completed information
School	Edison Group of Schools
Academic year	2026–2027
Policy owner	Group Safeguarding Lead, each School Principal and each Designated Safeguarding Lead

Document control	Approved / completed information			
Designated Safeguarding Lead	Aspire: Reem Al Samara Fersana Rawdat Al Hamama: Ingrid Palmer	Lusail: Sini Thomas	Al Markhiya: Lulu	
Deputy DSL(s)	Aspire: Rawdat Al Hamama Jasmine rose Niculae Sadoq Khairi Turdieva Abdelrahman Abdelshafi Hakim Revival Elogie Mahmoud	Lusail: Nerissa Gonzalez Nour Al Shebli Ayshath Zulaikha -	Al Markhiya Sherina Sansawi Lalarukh Hameed Farah Tahir Dr. Vimal Priya	Alexandrina Daniela Meerim Amani Manar Ali
Safeguarding oversight	Edison Group Governing Body / Group Executive Leadership / Proprietor			
Academic Documents Controller	Controlled issue, version register, authorised distribution and review reminders only			
Approval date	_____			
Effective date	30 August 2026			
Next review date	August 2027, or sooner following a serious incident, legal/regulatory change or review finding			

Document control	Approved / completed information
Policy status	Whole-school mandatory policy
Classification	Controlled document – safeguarding records are confidential and access-restricted

Edison Group of Schools places the safety, dignity, wellbeing and best interests of every student at the centre of its decisions. Safeguarding is a shared group-wide and whole-school responsibility. The Designated Safeguarding Lead (DSL) leads and coordinates the response but does not carry this responsibility alone. This policy must be available to all employees, agency staff, contractors and volunteers. A parent- and student-friendly safeguarding statement and current reporting routes must be published separately. Names and contact details of the DSL and Deputy DSLs must be displayed in staff areas and communicated during induction. This Group policy establishes the minimum safeguarding standard for every Edison school. Each school must maintain a current local contacts schedule, reporting route and implementation arrangements that comply with this policy.

1. Purpose

This policy is the Edison Group's principal group-wide and whole-school framework for safeguarding and student protection. It establishes the responsibilities of every adult, the authority and operating procedures of the Designated Safeguarding Lead and Deputy DSLs, and the Group's and each school's arrangements for prevention, early identification, reporting, recording, risk assessment, referral, support, escalation and quality assurance.

1. Protect students from maltreatment, abuse, neglect, exploitation, discrimination, bullying, harmful practices and avoidable harm, including online harm.
2. Ensure concerns are noticed, heard, recorded and acted upon promptly, proportionately and in the student's best interests.
3. Clarify that any member of staff may and must report a concern; no employee may investigate independently or delay a report while seeking proof.

4. Provide safe arrangements for allegations involving staff, volunteers, contractors, students or family/community members.
5. Support compliance with applicable State of Qatar requirements, Ministry of Education and Higher Education directions and the Edison Group's and its schools' international accreditation commitments.

2. Scope

This policy applies during each school day and to all Edison Group- or school-controlled activities, premises, digital systems, transport, educational visits, sports, clubs, events, remote learning, work experience, exchanges and any situation in which an adult represents the Edison Group or one of its schools. It applies to all students, including students aged 18 or above, with safeguarding responses adjusted lawfully to age and capacity.

It applies to the proprietor/governing body, school leadership, teachers, teaching assistants, counsellors, nurses, administration, HR, admissions, reception, security, drivers and bus attendants, IT personnel, cleaners, catering staff, coaches, agency staff, contractors, volunteers, visitors and trainees.

3. Policy foundations and reference framework

The Edison Group and each of its schools will apply the law and mandatory directions in force in Qatar. International and British safeguarding guidance may be used as a benchmark where it strengthens practice and does not conflict with Qatar law, culture or Ministry requirements.

- **MOEHE Student Protection and Welfare Policy for Private Schools and Kindergartens (first edition launched 2025)** — Local expectations for safe environments, effective recording and reporting, student wellbeing and coordinated protection.
- **Qatar Law No. 23 of 2015 regulating private schools and its executive requirements** — School licensing, regulatory accountability and compliance obligations.
- **Qatar Law No. 13 of 2016 on Protecting Personal Data Privacy** — Secure, lawful and proportionate handling of personal and special-category safeguarding information.
- **MOEHE Professional and Ethical Charter for Private Education Institutions, second edition 2025** — Professional conduct, ethical responsibilities and alignment with national values and child rights.

“Empower students to learn for life and strive for excellence so that they can contribute positively to the global society”

- **UN Convention on the Rights of the Child** — Best interests, protection, participation, dignity, non-discrimination and development.
- **Keeping Children Safe in Education 2026 and DfE filtering/monitoring standards** — Benchmark expectations for DSL leadership, group-wide and whole-school systems, safer recruitment, allegations management and online safety.

Precedence: Where requirements differ, current Qatar law and MOEHE instructions take precedence. The Principal/DSL must seek advice from the proprietor, MOEHE or competent authorities when uncertain. This policy does not replace emergency services, legal advice or mandatory authority directions.

4. Definitions

Terminology note. The Edison Group uses the term Designated Safeguarding Lead (DSL). Where an MOEHE policy, circular or approved form uses Student Protection and Care Officer (SPCO), Student Protection and Welfare Officer or another prescribed title, the DSL will fulfil or coordinate that function only where formally designated and authorised. The Group Safeguarding Lead and each School Principal must verify the official title, appointment conditions and reporting route against the latest MOEHE requirements before this policy is approved and whenever guidance changes.

- **Safeguarding** — The arrangements used to prevent harm, promote welfare, create safe conditions and respond effectively to concerns.
- **Child / student** — For child-protection purposes, a person under 18. The school applies safeguarding principles to all enrolled students.
- **Child protection** — Action taken where a student is suffering, or may be at risk of suffering, significant or serious harm.
- **DSL** — A suitably senior, trained person with status, authority, time and resources to lead safeguarding and child-protection arrangements.

- **Deputy DSL** — A trained person who performs delegated DSL functions and provides cover. The lead responsibility remains with the DSL.
- **Concern** — Information, observation, disclosure, pattern or professional intuition suggesting that a student's safety or welfare may be compromised.
- **Disclosure** — A student's direct or indirect communication that they or another person may have been harmed.
- **Allegation** — A concern that an adult working with children may have harmed a child, committed an offence, posed a risk or behaved incompatibly with their role.
- **Low-level concern** — Conduct by an adult that is inconsistent with the staff code of conduct, including conduct that may not meet the allegation threshold.
- **Child-on-child harm** — Abuse, harassment, exploitation, violence or harmful behaviour between students, online or offline.
- **Confidentiality** — Need-to-know protection of information; it is not secrecy and cannot prevent necessary safeguarding sharing.

5. Safeguarding principles

Best interests first. Safety and welfare outweigh reputational, operational or relationship considerations.

Immediate action. Staff act on reasonable concern; certainty and proof are not required before reporting.

Listen and respect. Students are heard, taken seriously, treated with dignity and involved according to age, language, communication needs and capacity.

Do no further harm. Responses avoid repeated questioning, confrontation of alleged persons, promises of secrecy, retaliation or unnecessary disclosure.

Inclusive protection. Disability, SEND, language, nationality, gender, health needs, behaviour, attendance, family circumstances or academic performance must never obscure risk.

Professional curiosity. Staff consider patterns and context, respectfully verify inconsistencies and avoid accepting reassuring explanations without assessment.

Need-to-know sharing. Relevant information is shared promptly with those who can protect the student, using the minimum necessary detail.

Accountability. Decisions, reasons, actions, consultations, referrals, outcomes and follow-up are recorded contemporaneously.

No retaliation. Students and adults who report in good faith are protected from victimisation. Malicious reporting is addressed separately and must not be presumed.

Cultural sensitivity without compromise. Qatar's culture and Islamic values inform respectful practice but cannot be used to minimise, conceal or excuse harm.

6. Appointment, authority and capacity of the DSL

Each School Principal appoints a DSL from the senior leadership team and sufficient trained Deputy DSLs to provide reliable cover throughout the school day, activities and foreseeable absences. The DSL must have direct access to the relevant School Principal and authority to convene meetings, access relevant records, require safeguarding action and contact competent authorities without avoidable delay.

6.1 Minimum arrangements

1. A trained DSL or Deputy DSL is available during school operations; staff know how to obtain urgent support when the DSL is off-site.
2. The DSL has protected time, private meeting space, secure record systems, administrative support and an allocated training budget.
3. Role continuity is documented for leave, evenings, trips, transport incidents, examinations, holidays and leadership absence.
4. The DSL's safeguarding judgment cannot be overridden for convenience. Where the relevant School Principal disagrees, both views and the final action are recorded, and the DSL may escalate to Group Executive Leadership, the proprietor or the appropriate authority.
5. The DSL is not the relevant school counsellor, investigator, disciplinary decision-maker or sole source of safeguarding action. These functions must remain distinct where practicable.

7. Roles and responsibilities

7.1 Designated Safeguarding Lead

- **Case management** — Receive and triage concerns; assess immediate safety; establish known facts without investigating; make or coordinate referrals; track outcomes; maintain chronologies; ensure support and safety plans; escalate when action is inadequate.
- **Advice and availability** — Provide timely advice to staff; maintain visible reporting routes; ensure cover; support professional curiosity and appropriate information sharing.
- **Authority liaison** — Act as primary safeguarding contact with MOEHE and competent protection, police, health and support agencies; record advice and outcomes; participate in multi-agency work.
- **Student voice and support** — Ensure the student is heard safely; arrange interpreters/communication support; identify a trusted adult; avoid repeated accounts; explain actions where safe and appropriate.
- **Parents/carers** — Plan timely, respectful communication unless doing so may increase risk, compromise evidence, cause flight/retaliation or conflict with authority advice.
- **Training** — Deliver/commission induction and annual whole-staff training in every school, regular updates and role-specific training; assess understanding; keep a training matrix.
- **Online safety** — Lead safeguarding aspects of filtering and monitoring; review alerts with IT; ensure concerns are actioned; report assurance and gaps to leadership.
- **Attendance and vulnerability** — Review unexplained/repeated absence, missing students, exclusions, elective withdrawal and other vulnerability indicators with attendance/pastoral leaders.
- **Quality assurance** — Complete termly file audits, trend analysis, policy review, safeguarding action plan and annual report; test staff knowledge and reporting accessibility.
- **Transfer and retention** — Ensure secure, timely transfer of safeguarding files separately from academic records; confirm receipt; retain transfer audit trail.

- **Professional support** — Arrange supervision/debriefing for safeguarding staff, manage workload and identify conflict-of-interest arrangements.

7.2 Deputy DSL(s)

1. Undertake the same level of role-specific training and perform delegated functions within competence.
2. Provide operational cover, manage assigned cases, attend meetings and maintain records to the same standard.
3. Escalate complex, high-risk, allegation or conflict-of-interest matters to the DSL/Principal immediately.
4. Keep the DSL informed; delegation does not transfer strategic accountability from the DSL.

7.3 School Principal / Head of School

1. Create a culture in which safeguarding is prioritised, challenge is welcomed and reporting never attracts retaliation.
2. Appoint suitable DSL capacity; provide authority, time, resources, training, supervision and access to external advice.
3. Ensure policies for child protection, safer recruitment, staff conduct, whistleblowing, complaints, attendance, behaviour, online safety, medical care, transport and visits are aligned.
4. Manage allegations against adults with the proprietor/competent authority; never ask the DSL to investigate an allegation involving the DSL or Principal.
5. Review serious incidents, audit findings, staffing risks and overdue actions; approve an annual safeguarding improvement plan.

7.4 Managing Director/ Legal Advisor/ SLT

1. Provide independent oversight and constructive challenge; confirm legal/regulatory compliance and sufficient safeguarding resources.
2. Receive anonymised termly assurance reports covering trends, referrals, training, safer recruitment, online safety, attendance risks, allegations and action-plan progress.
3. Appoint an appropriate person to handle allegations involving the Principal and establish escalation arrangements involving senior leaders or owners.

4. Review this policy at least annually and after serious incidents or significant changes.

7.5 All staff, volunteers and contractors

1. Maintain professional boundaries and follow the Staff Code of Conduct, acceptable-use, physical-contact and one-to-one working rules.
2. Recognise indicators, listen, preserve exact words, report immediately and make an accurate same-day written record.
3. Never investigate, confront, mediate, photograph injuries without authority, search devices informally, promise secrecy or contact parents before DSL advice.
4. Escalate if a student remains at risk or no action appears to have been taken. Report concerns about adults through the allegation/whistleblowing route.
5. Complete required training and confirm annually that they have read the policy and know the current DSL/deputies.

7.6 Role-specific responsibilities

- **HR / Recruitment** — Safer recruitment; identity, qualification, reference, police/other checks as required; employment-history scrutiny; central compliance record; safeguarding clauses; induction; allegation records; contractor assurances.
- **School Counsellor / Wellbeing Team** — Provide trauma-informed support within competence; share risk information with the DSL; do not offer absolute confidentiality; keep therapeutic and safeguarding records appropriately connected but access-controlled.
- **School Nurse / Medical Team** — Assess and treat immediate health needs; record injuries and explanations; preserve potential evidence; notify the DSL promptly; follow medical emergency and authority instructions.
- **Attendance / Admissions / Registrar** — Verify identity and authorised collection arrangements; monitor absence, repeated lateness, withdrawal, missing education and unexplained destination; notify the DSL of risk patterns; secure transfer records.

- **IT / Data Protection / Systems** — Maintain filtering, monitoring, access controls, logs, backups and secure case systems; promptly report alerts; preserve relevant digital evidence; never determine safeguarding outcomes alone.
- **Transport Manager, Drivers and Bus Attendants** — Apply handover, route, attendance and missing-student checks; report concerns immediately; never transport a student outside authorised arrangements; keep communications professional.
- **Security / Reception / Facilities** — Visitor control, badges, supervision, collection permissions, perimeter safety, CCTV preservation, restricted-area controls and immediate reporting.
- **Trip / Activity Leaders and Coaches** — Risk assess safeguarding, accommodation, changing, transport, ratios, communications, medical information, emergency contacts and international/local referral arrangements.
- **Academic Documents Controller** — Maintain the approved policy master, version history, distribution list, review calendar and staff acknowledgement evidence. The ADC must not access case files, screen concerns, rate risk or approve safeguarding decisions unless separately authorised and trained for a safeguarding role.
- **Students and parents** — Use reporting routes, share relevant information, follow safety arrangements and treat others respectfully. Their participation supports—but never replaces—the school's duty to safeguard.

8. Recognising safeguarding concerns

Safeguarding indicators rarely prove abuse on their own. Staff should consider changes, patterns, context, the student's communication and whether explanations are consistent with development and circumstances. Concerns may arise from direct disclosure, observation, third-party information, online monitoring, attendance, medical findings, behaviour, work samples or professional intuition.

8.1 Recognising physical signs across different skin tones

Staff must not rely on colour alone when considering a possible injury. On darker skin, bruising or inflammation may be less visually obvious and may appear as a shadow, swelling, warmth, tenderness or a change in texture. Staff should also notice guarding, pain, altered movement and changes in behaviour. The apparent colour of a bruise must never be used to estimate its age or determine whether harm occurred. Staff record objective observations and report them; they do not diagnose or investigate.

8.2 Cultural and religious context

Some lawful cultural, religious or therapeutic practices may leave temporary marks. Staff must respond respectfully and without assumption, but culture, religion or family explanation must never be used to dismiss a reasonable concern. Equally, a mark must not be labelled as abuse without an authorised assessment. The required response is to observe and record objectively, attend to any immediate medical need and report promptly to the DSL. Staff must not interrogate the student or family.

8.3 Barriers to disclosure

Students may find it difficult to disclose because of age, disability, communication need, limited English or Arabic, fear, loyalty, shame, uncertainty about confidentiality, family circumstances or concern about consequences. Each school provides more than one accessible reporting route and arranges competent, independent language or communication support when needed. Another child or a person who may be involved in the concern must not be used as an interpreter.

- **Physical abuse** — Unexplained or repeated injuries; injuries inconsistent with explanation; fear of going home; flinching; concealed injuries; harmful physical punishment.
- **Emotional abuse** — Persistent humiliation, threats, rejection, coercive control, intimidation, scapegoating, exposure to domestic conflict, extreme withdrawal or anxiety.
- **Sexual abuse/exploitation** — Sexual knowledge or behaviour not developmentally expected; pain/injury; grooming; coercion; image sharing; exploitation for gifts, status, money or access; concerning adult/student relationships.
- **Neglect** — Persistent hunger, poor hygiene, untreated medical needs, unsafe supervision, unsuitable clothing, chronic fatigue, failure to access education or necessary care.

- **Child-on-child harm** — Bullying, sexual harassment, violence, coercion, hazing, image-based abuse, discriminatory abuse, cyberbullying, extortion, initiation or group harm.
- **Online harm** — Grooming, exploitation, harmful content, impersonation, threats, doxxing, sextortion, non-consensual images, unsafe challenges, excessive surveillance/control or contact by unknown adults.
- **Domestic/family harm** — Student witnesses or experiences violence, coercive control, threats, forced isolation, family conflict or unsafe caregiving.
- **Exploitation/trafficking** — Unexplained money/gifts, controlling relationships, repeated missing episodes, movement controlled by others, forced work, criminal or sexual exploitation.
- **Mental health / self-harm / suicide risk** — Statements of hopelessness or wanting to die, self-injury, plans, means, severe distress, disordered eating or sudden marked change. Mental health concerns may be a safeguarding concern and require urgent assessment.
- **Harmful practices** — Any threatened or actual practice causing physical or emotional harm, including forced marriage or female genital mutilation, handled in accordance with Qatar law and competent-authority advice.
- **Radicalisation/extremism** — Susceptibility to violent or hateful ideology, dehumanising content, threats or preparation for violence; distinguish from legitimate religious observance or political discussion.
- **SEND/disability vulnerability** — Communication barriers, intimate care, dependency, social isolation, behaviour interpreted as disability rather than distress, or higher exposure to bullying/exploitation.
- **Staff conduct** — Boundary breaches, favouritism, private messaging, unnecessary one-to-one isolation, inappropriate images, humiliating language, unsafe restraint, secrecy, gifts or sexualised conduct.

9. Immediate response: the first 15 minutes

Immediate danger or serious injury: Call Qatar emergency services on 999, obtain medical assistance and notify the DSL/Principal without delay. Do not wait for internal paperwork or parental consent where emergency action is necessary to protect life or safety.

- **1. Make safe** — Stay calm. Move the student from immediate danger without creating additional risk. Maintain appropriate supervision. Do not confront the alleged person.
- **2. Listen** — Allow the student to speak in their own words. Use only minimal open prompts such as "Tell me what happened" or "Is there anything else you want me to know?"
- **3. Reassure honestly** — Say that they did the right thing by speaking, that the concern will be taken seriously and that information will be shared only with people who need to help. Do not promise secrecy or a specific outcome.
- **4. Preserve** — Do not ask the student to repeat the account. Preserve messages, devices, CCTV or clothing without handling more than necessary. Do not take photographs unless directed under an approved procedure.
- **5. Report** — Contact the DSL/Deputy immediately in person or through the designated urgent channel. If unavailable and risk is urgent, contact the Principal and appropriate emergency/protection authority.
- **6. Record** — Make a signed, dated, timed record as soon as possible and on the same day: exact words, observations, context, actions and people informed. Separate fact from professional opinion.
- **7. Continue duty of care** — Follow the DSL's safety instructions and remain appropriately available. Do not discuss with colleagues or independently contact family members.

10. Reporting and escalation procedure

Risk level	Examples	Response time and route
Emergency / immediate	Immediate danger, serious injury, active assault, missing high-risk student, credible imminent self-harm/suicide threat.	Call 999/medical emergency support; inform DSL and Principal immediately; secure the scene/evidence; record actions.
Urgent / same hour	Recent serious disclosure; unsafe collection; alleged perpetrator has access; significant online exploitation; serious staff allegation.	Direct verbal report to DSL/Deputy immediately. DSL assesses safety, consults authorities and acts before the student leaves where required.
Prompt / same day	Emerging neglect, repeated bruising, worrying behaviour, peer harassment, boundary concern, concerning absence pattern.	Submit safeguarding concern before leaving duty and speak to DSL. DSL triages the same working day.
Cumulative / early help	Lower-level but repeated welfare, attendance, family or wellbeing indicators.	Record each concern. DSL/pastoral team reviews chronology, support, consent and escalation thresholds; monitor to a dated plan.

If the DSL is unavailable: Report to a Deputy DSL. If no safeguarding lead is available and delay may increase risk, contact the Principal and relevant authority/emergency service directly, then inform the DSL as soon as possible. A staff member who remains concerned must escalate; "I told someone" is not the end of the duty.

10.1 DSL triage and decision record

1. Immediate safety and medical needs; location of the student and alleged person; access/contact risk.
2. Nature, timing, frequency and seriousness of concern; previous chronology and known vulnerabilities.
3. Student's wishes and feelings, communication needs, trusted adult and safe method of contact.
4. Whether parents can be informed safely; risk of retaliation, evidence loss, pressure, flight or conflict of interest.
5. Need for competent-authority consultation/referral, police involvement, health assessment, specialist support or internal safety plan.
6. Interim controls: supervision, timetable/transport change, contact restriction, digital account protection, staff redeployment or suspension decision by authorised leaders.
7. What is known, unknown and inferred; decision, rationale, consultation, owner, deadline and review date.

10.2 Escalation and professional disagreement

Where an employee believes that a student remains unsafe, a referral has not been made when needed, or action is delayed, they must raise the concern again with the DSL, then the Principal, then the proprietor/governing body or competent external authority. Whistleblowing procedures apply where internal reporting is unsafe or compromised. All escalations and responses are recorded.

11. Responding to a disclosure

- **Listen; remain calm; take the student seriously.** — Do not express shock, disbelief, blame or anger.
- **Use minimal open prompts and allow silence.** — Do not ask leading, repetitive or "why" questions.

- **Explain that you need to share with people who can help.** — Do not promise confidentiality or tell the student everything will be fine.
- **Record exact words, demeanour and visible signs.** — Do not rewrite the account into clinical or legal language.
- **Ask only what is necessary to determine immediate safety.** — Do not investigate, test the story or seek proof.
- **Report promptly and preserve relevant evidence.** — Do not contact the alleged person or family before DSL advice.

12. Referral, external liaison and parental communication

12.1 Referral principles

1. Immediate safety and emergency action take priority over internal approval. Where there is an immediate threat to life or serious injury, staff contact police, ambulance or emergency services on 999 and notify the DSL/Principal as soon as safely possible. Non-emergency referrals and notifications follow the current MOEHE and competent-authority route. No internal process may create an unsafe delay.
2. The AMAN Protection and Social Rehabilitation Center hotline is 919; the centre provides protection/support services for women and children affected by violence and family breakdown.
3. MOEHE contact channels and any school-specific official reporting route must be maintained in the safeguarding contacts schedule and verified each term.
4. The DSL records the name/role of the person consulted, time, advice, information shared, reference number, decisions, follow-up date and outcome.
5. If a referral is not accepted and risk remains, the DSL seeks reasons, submits additional information, escalates through the appropriate channel and continues the relevant school safety plan.

12.2 Parents and carers

Parents should ordinarily be partners in safeguarding and informed in a timely manner. However, the DSL may delay or withhold notification when informing them could place the student or another person at

greater risk, compromise evidence or an authority process, lead to intimidation/flight, or contradict competent-authority advice. The decision and rationale must be recorded and reviewed.

1. Communication is respectful, factual, culturally and linguistically accessible, and avoids naming other students or sharing confidential third-party information.
2. Where parents disagree with protective action, the relevant school continues necessary safeguarding duties and explains complaint/review routes where appropriate.
3. A student's request not to tell parents is considered carefully but cannot bind the relevant school where safety requires sharing.

13. Allegations and concerns about adults

Non-negotiable: Any concern about an adult's conduct toward a student—whether in school, online, outside school or in a previous role—must be reported. The person receiving the concern must not investigate or alert the subject of the allegation.

- **Any employee, supply worker, volunteer, contractor, coach or visitor** — Principal and DSL, using the allegation procedure.
- **School Principal / Head of School** — Proprietor, Managing Director or designated governance lead; not the Principal.
- **DSL** — Principal; safeguarding case allocation transfers to an uninvolved Deputy DSL/independent lead.
- **Proprietor / governance lead** — Alternative independent owner/governance contact and competent authority.
- **Immediate danger or suspected criminal offence** — 999/police or competent authority, alongside internal reporting.

13.1 Management requirements

1. Protect the student, preserve evidence and prevent contact or interference while avoiding premature conclusions.

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2. Seek competent-authority and HR advice before interviewing the subject, imposing disciplinary action, notifying parents or communicating widely.
3. Consider neutral interim safeguards. Suspension is not automatic and is a management decision based on risk and advice, not a finding of guilt.
4. Maintain separate safeguarding and employment records, strict confidentiality and clear welfare support for the student, reporter and staff member as appropriate.
5. Record conclusion and learning: substantiated, unsubstantiated, unfounded, malicious or false only where an authorised process supports that outcome. Do not label a report malicious merely because it is unproven.

13.2 Low-level concerns

Low-level concerns are reported to the Principal/authorised manager and recorded centrally so patterns can be identified. Examples include over-familiarity, favouritism, inappropriate private communication, unapproved one-to-one situations, humiliating language, unnecessary touching, gifts or conduct inconsistent with the staff code. The response may include clarification, coaching, supervision, formal management action or escalation under the allegations procedure.

14. Child-on-child abuse, bullying and sexual harassment

1. The Edison Group and each school recognise that students can harm other students and that abuse must not be dismissed as banter, experimentation, friendship conflict or “part of growing up”.
2. The DSL conducts separate risk assessment and support planning for the harmed student, alleged student and affected peers; disciplinary and safeguarding processes may run in parallel but have different purposes.
3. Victims are not required to meet, mediate with or apologise to an alleged student. Restorative approaches are used only when safe, voluntary, developmentally appropriate and not a substitute for protection.
4. Each school manages location, timetable, transport, device/contact, supervision and peer-group risks without placing an unfair burden on the harmed student.
5. Non-consensual sexual images must not be copied, forwarded or routinely viewed. Devices and evidence are preserved and handled under authority/DSL guidance.

15. Online safety, filtering and monitoring

- **DSL** — Lead safeguarding response to online concerns; review reports/alerts; ensure actions, student support and authority liaison; report assurance and themes.
 - **IT / technical provider** — Maintain age-appropriate filtering, monitoring, device management, logs, access control and alerting; document checks; act on defects; preserve data.
 - **School Principal / Group governance** — Approve risk appetite, resources and accountability; ensure filtering does not replace education/supervision; review effectiveness at least annually and after incidents.
 - **Staff** — Supervise technology use; teach safe reporting; use approved accounts/platforms; report harmful content/contact; never conduct informal digital investigations.
 - **Students/parents** — Follow acceptable-use rules; use reporting/blocking tools; protect credentials; avoid sharing harmful content; seek help early.
1. The Edison Group and each school review generative AI, social media, personal devices, remote learning, camera/microphone use, deepfakes, impersonation, image-based abuse and data privacy within online-safety risk assessments.
 2. Safeguarding monitoring is proportionate, transparent and subject to privacy and access controls. Alerts are triaged by trained people; technology does not determine guilt or discipline.

16. Attendance, missing students and collection safety

1. Repeated absence, unexplained lateness, sudden withdrawal, missing education and absence around particular days/people may indicate safeguarding risk and must be reviewed in context.
2. Registers are accurate and timely. Unexplained absence is followed up promptly using verified contacts and escalated to the DSL where risk indicators exist.
3. If a student is missing on site, from transport or during an activity, activate the missing-student procedure immediately, search safely, preserve supervision, notify leadership/parents/999 as risk requires and record the timeline.

4. Students are released only to authorised persons under verified arrangements. Disputed, impaired, threatening or unsafe collection is escalated; staff do not physically negotiate without security/emergency support.

17. Students with additional vulnerability

The DSL ensures reasonable adjustments and heightened professional curiosity for students with SEND/disabilities, communication differences, intimate-care needs, chronic illness, mental-health needs, prior trauma, language barriers, care arrangements, family separation, frequent mobility, discrimination exposure or other vulnerability.

1. Behaviour, silence or inconsistency must not automatically be attributed to disability, language or culture.
2. Use an independent, competent interpreter or communication support; do not rely on another child or a potentially involved family member.
3. Individual safety, intimate-care, behaviour-support and medical plans must identify safeguarding controls and reporting routes.

18. Self-harm, suicide and serious mental-health risk

Urgent safety: A student expressing current suicidal intent, a plan, access to means, recent attempt or severe medical risk must not be left alone. Obtain emergency medical help/999, remove immediate means only where safe, and notify the DSL/Principal and parent unless authority advice or risk assessment indicates otherwise.

1. Staff ask direct, calm safety questions within their training; asking about suicide does not create suicidal thoughts. They do not provide therapy beyond competence.
2. The DSL coordinates a written return-to-school/safety plan, named trusted adults, supervision, environmental controls, parent communication, clinical advice and scheduled review.
3. Confidentiality is limited by safety. Peers who receive disclosures are supported and instructed to seek adult help, not carry sole responsibility.

19. Physical intervention, searching and intimate care

1. Physical intervention is a last resort to prevent immediate harm and must be lawful, necessary, proportionate, brief and never punitive. Only trained staff act except in unforeseeable emergency.
2. Any intervention, injury, medical check, witness account, parent communication and debrief is recorded and reviewed for safeguarding implications.
3. Searching students, belongings or digital devices follows an approved school procedure and Qatar requirements. Safeguarding risk, dignity, same-gender considerations and evidence preservation are addressed.
4. Intimate care is planned, consent-sensitive, dignified and documented, with appropriate staffing and clear action if a student becomes distressed or makes a disclosure.

20. Safer recruitment and induction

- **Workforce planning and advertisement** — Role risk assessment, safeguarding commitment and required eligibility/check wording.
- **Application and shortlisting** — Complete history, explanation of gaps, identity consistency, qualification/license review and objective criteria.
- **Interview** — At least one safeguarding-trained interviewer; questions on boundaries, reporting, professional judgment and suitability.
- **Pre-employment checks** — Identity, right to work, qualifications, references, criminal/police and other checks required by Qatar/MOEHE and school procedure; resolve discrepancies before unsupervised access.
- **Contractors/agency staff** — Written assurance and evidence of appropriate checks, identity verification on arrival, induction and supervision/escort controls.
- **Induction** — Policy, DSL routes, code of conduct, allegations/low-level concerns, whistleblowing, online safety, confidentiality, emergency action and knowledge check before or at first contact.
- **Central record and audit** — HR owns the compliance record; Principal/DSL/governance review gaps and restrict deployment until requirements are satisfied.

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21. Training, induction and professional supervision

- **All staff/regular volunteers** — Safeguarding induction before or at commencement; annual formal refresher; brief updates at least termly; scenario-based knowledge checks.
- **DSL and Deputy DSLs** — Role-specific training on appointment; formal update at least every two years or sooner when required; continuous updates; local referral, allegation, record and online-safety competence.
- **Principal/governance/HR** — Strategic safeguarding, safer recruitment, allegation management, whistleblowing, oversight, data protection and critical incident learning.
- **Nurse/counsellor/SEND/attendance/transport/IT/security/trip leaders** — Role-specific risk recognition, reporting, evidence, confidentiality and emergency procedures.
- **Students** — Age-appropriate curriculum and reporting routes: safe/unsafe touch, trusted adults, consent, bullying, online risk, image sharing, help-seeking and peer support boundaries.
- **Parents/carers** — Accessible guidance on reporting, online safety, attendance, collection, wellbeing, boundaries and how the school responds.

Training attendance alone is insufficient. The DSL samples staff understanding, observes practice, reviews reporting quality and addresses misconceptions. Safeguarding leaders should receive regular reflective supervision and wellbeing support without disclosing case information beyond authorised arrangements.

22. Record keeping and confidentiality

22.1 Recording standard

1. Record date/time of event and report; student identifiers; exact words; factual observations; body map only under approved procedure; context; immediate safety; persons informed; decisions and rationale; referral/reference; actions, owners and review dates.
2. Distinguish fact, quotation, professional opinion and third-party information. Never erase or silently amend an original record; add a dated correction or supplementary note.
3. Maintain a clear chronology and link related students/incidents without copying unnecessary information.

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22.2 Storage and access

1. Safeguarding records are stored separately from routine academic/personnel files in an access-controlled system with audit logs, secure backup and role-based permissions.
2. Access is limited to those who need information to protect or support. Email and messaging are not the permanent case record; relevant messages are captured securely.
3. Retention, disposal, disclosure and breach response follow Qatar data protection requirements, MOEHE directions and the Edison Group retention schedule and applicable school schedule. Litigation/investigation holds override routine disposal.
4. The Academic Documents Controller controls the policy and general compliance evidence only. Case-file access requires separate written authorisation from the Principal/DSL and must be necessary, proportionate and logged.

23. Information sharing

The DSL uses a need-to-know test: Is sharing necessary to protect a student or another person? Is the recipient able and authorised to act? What is the minimum relevant information? Is consent safe and appropriate? How will sharing and the decision be recorded? Fear of breaching confidentiality must not cause unsafe delay, but indiscriminate sharing is prohibited.

1. Tell the student/parent what will be shared where safe and appropriate; do not seek consent if doing so may increase risk or compromise action.
2. Verify recipients, use secure channels, mark information confidential and request confirmation of receipt/action.
3. Record decisions to share or not share, including reasons and advice obtained.

24. Transfer of safeguarding records

1. Before admission, the relevant school seeks relevant safeguarding information through lawful, secure channels where appropriate.
2. When a student transfers, the DSL sends safeguarding records promptly, securely and separately from the general student file to the receiving safeguarding lead, subject to applicable requirements.
3. Confirm recipient identity and receipt; retain a transfer log and any copy required by the retention schedule.

4. For urgent risk, the DSL speaks directly to the receiving DSL in addition to record transfer.

25. Curriculum and prevention

Safeguarding is taught through a planned, age-appropriate, culturally respectful curriculum and reinforced through school life. Content aligns with Qatar requirements and equips students to recognise unsafe situations, seek help and act responsibly without transferring adult safeguarding responsibility to them.

1. Healthy relationships, respect, consent and personal boundaries.
2. Bullying, discrimination, harassment, peer pressure and bystander action.
3. Online privacy, grooming, scams, harmful content, image sharing, AI/deepfakes and reporting/blocking.
4. Emotional literacy, mental-health help-seeking and safe peer support.
5. Trusted adults, emergency help, confidentiality limits and multiple reporting routes.
6. Safe travel, transport, educational visits and community awareness.

The DSL reviews curriculum coverage and incident trends with subject/pastoral leaders. Potentially sensitive lessons are risk assessed; students receive advance support and safe disclosure routes, and teachers know how to respond to disclosures prompted by lessons.

26. Safeguarding in specific settings

- **One-to-one work** — Visible/interruptible setting where possible; approved purpose/time; professional communication; record concerns; avoid unnecessary isolation.
- **Remote learning** — Approved accounts/platforms; suitable backgrounds/clothing; no personal contact details; recording only under policy; parent/student reporting routes.
- **Changing/toileting/intimate care** — Dignity, appropriate supervision, no voyeurism or phones/cameras, individual plans and immediate reporting of concerns.
- **Educational visits/residentials** — Named safeguarding lead, local emergency/referral information, rooming and supervision plan, medical/communication needs, missing-student plan and incident recording.
- **Transport** — Accurate manifests, pre/post route checks, authorised handover, no unsupervised detours, CCTV/access controls where used, prompt missing/late escalation.

- **Photography/media** — Documented permission/other lawful basis, approved devices/storage, no identifying or sexualised images, controlled publication and withdrawal process.
- **Visitors/contractors** — Identity, purpose, badge, safeguarding briefing, supervision based on risk, restricted access and sign-out.
- **After-school activities** — Same reporting standards, staffing checks, collection controls, medical information, communication boundaries and DSL on-call route.

27. Complaints, whistleblowing and protection from retaliation

1. Safeguarding concerns are not delayed or diverted into the ordinary complaints process where protective action is required.
2. Staff may use the whistleblowing route when leadership is implicated, internal action is unsafe or a serious risk is not addressed.
3. The Edison Group and every school prohibit retaliation against students, parents, staff or others who report in good faith. Any retaliation is treated as a serious conduct concern.
4. A complaint outcome does not replace safeguarding risk assessment, and safeguarding information is not disclosed merely because a complaint is made.

28. Quality assurance, monitoring and reporting

- **Daily / ongoing** — Triage new concerns; track urgent actions; check DSL cover; review online alerts and high-risk attendance. Owner / evidence: DSL/DDSL case log, action list, cover rota..
- **Weekly** — Review open high-risk cases, overdue actions, referrals awaiting outcome, missing/absence patterns and safety plans. Owner / evidence: DSL case review; attendance/pastoral meeting record..
- **Monthly** — Sample record quality; check allegation/low-level concern patterns; review training starters/leavers and system access. Owner / evidence: DSL, Principal, HR, IT audit records..

- **Termly** — Safeguarding committee review; anonymised trend report; student voice; staff knowledge sample; premises/transport/online checks; action-plan update. Owner / evidence: DSL report; minutes; dashboards; audit evidence..
- **Annually** — Policy review; whole-school safeguarding audit; safer recruitment and central-record audit; filtering/monitoring review; curriculum map; training plan; governance assurance. Owner / evidence: Principal, DSL, governance, HR, IT, ADC controlled-document register..
- **After serious incident** — Rapid review: what happened, why, barriers, decision quality, communication, system learning and time-bound actions. Owner / evidence: Independent/leadership review with anonymised learning report..

28.1 Minimum safeguarding indicators

1. Timeliness from concern to DSL review; overdue actions/referrals; repeat concerns; case closure quality; student voice and safety-plan review.
2. Training/induction completion and knowledge-check results; DSL coverage; supervision completed.
3. Safer recruitment compliance and unresolved gaps; visitor/contractor exceptions.
4. Attendance/missing patterns; bullying and child-on-child harm; online alerts; injuries; allegations and low-level concern themes.
5. Student/parent/staff confidence in reporting; accessibility across languages and SEND; curriculum coverage.

Reports to governance are anonymised and sufficiently detailed to support challenge without exposing identities. No target should discourage reporting; an increase may reflect improved confidence rather than worsening practice.

29. Policy review and document control

1. The Principal and DSL review the policy at least annually and following new MOEHE requirements, legal change, serious incident, audit finding or material operational change.
2. The Academic Documents Controller maintains the master copy, approval record, version number, issue date, distribution list, review reminder and archive of superseded versions.

3. The DSL validates safeguarding content and operational contacts before issue. The Principal/governance approves. The ADC does not alter safeguarding content without documented owner approval.
4. Staff receive material-change briefings and acknowledgement is recorded; replacement versions are clearly marked and obsolete copies withdrawn from active use.

Appendix A. Safeguarding response flow

Stage	Action	Accountable person
1. Concern noticed/disclosed	Make safe; emergency response if required; listen; do not investigate.	Any adult
2. Immediate report	Tell DSL/DDSL directly; same-day written record.	Person receiving concern
3. Triage	Assess danger, medical need, access risk, chronology, student voice and parent/referral considerations.	DSL/DDSL
4. Protect and refer	Implement safety controls; consult/refer to 999, AMAN 919, MOEHE or other competent service as appropriate.	DSL/Principal
5. Record decision	Facts, advice, rationale, information shared, owner and deadline.	DSL/DDSL
6. Support	Trusted adult, health/wellbeing support, learning adjustments and family communication where safe.	DSL and assigned team
7. Review/escalate	Check action and student safety; escalate inadequate/no response.	DSL/Principal

Stage	Action	Accountable person
8. Close/transfer	Close only with reason, outcome and ongoing plan; transfer securely if student moves.	DSL

Remember: REPORT → RECORD → REFER/RESPOND → REVIEW. Staff do not need proof. If the child is still unsafe, escalate.

Appendix B. Safeguarding concern record – required fields

Field	Required information
Reporter	Name, role, contact, date and time submitted.
Student	Full name, student ID, date of birth/year/class, language/SEND/communication needs.
Event/concern	Date, time, location, how concern arose, who was present.
Student's words	Exact words in quotation marks; questions/prompts used.
Observations	Behaviour, demeanour, visible injury or contextual information; factual description only.
Immediate action	Safety/medical action, people contacted, evidence preserved.
Others involved	Names/roles/relationship; identify whether information is direct or third party.
DSL use	Risk triage, chronology checked, student wishes, parent decision, consultation/referral, rationale, actions/owners/deadlines.

Field	Required information
Follow-up	Outcome, safety-plan review, student feedback, closure/transfer decision.
Authentication	Reporter signature/date; DSL reviewer/date; amendments clearly dated.

Appendix C. DSL case review checklist

1. Is the student safe now, today and before leaving school?
2. Have health needs and emergency risks been addressed?
3. Has the student been heard once, safely, with communication support?
4. Does the record preserve exact words and distinguish fact/opinion?
5. Has the full chronology and sibling/peer context been reviewed?
6. Could informing parents increase risk or compromise action?
7. Is external consultation/referral needed, and has advice been recorded?
8. Are interim controls specific, proportionate, owned and time-bound?
9. Does the student have a trusted adult and accessible reporting route?
10. Are other students or adults at risk?
11. Have digital/CCTV/medical records been preserved lawfully?
12. Is follow-up scheduled, and what will trigger escalation?
13. Has the student's view of safety been checked after action?
14. Is closure justified, recorded and subject to review/transfer?

Appendix D. Training and competence matrix

Role group	Induction	Refresher/update	Competence evidence
All employees	Before/at start	Annual + termly updates	Attendance, declaration, scenario/quiz, reporting-route check.
DSL/DDSL	Before or immediately on appointment	Formal role update at least biennially; continuous updates	Certificate, supervision, case audit, referral simulation.
Principal/governance	On appointment	Annual strategic update	Challenge minutes, audit sign-off, allegation scenario.
HR/recruitment panel	Before recruitment duties	Annual/when rules change	Safer recruitment record and file/SCR audit.
IT	Before system administration	Annual + threat changes	Filtering/monitoring review, alert drill, access audit.
Nurse/counsellor/SEND/attendance	Role commencement	Annual + case learning	Role scenarios, record sample, referral knowledge.
Transport/security/trips/coaches	Before duty	Annual/each trip where relevant	Briefing record, missing/collection drill, incident sample.
ADC	Before policy-control duty	Annual document-control update	Version, distribution, acknowledgement and review logs; no case access.

Appendix E. Annual safeguarding audit evidence

Domain	Selected evidence
Leadership/governance	Approved policy; DSL appointment and cover; governance minutes; termly reports; action plan; budget/resources; supervision record.
Training/culture	Training matrix and certificates; induction acknowledgements; knowledge checks; staff/student/parent surveys; reporting posters and accessible routes.
Case management	Anonymised file audit; chronologies; risk and safety plans; referral/consultation logs; escalation and closure quality; secure transfer log.
Safer recruitment/adults	Central compliance record; recruitment files; contractor assurances; code of conduct; allegation and low-level concern process/audit.
Online safety	Filtering/monitoring review; risk assessment; alert logs; acceptable use; incident response; curriculum; IT/DSL/governance checks.
Attendance/operations	Absence and missing-student reviews; collection/transport logs; visitor records; trip risk assessments; medical/intimate-care controls.
Curriculum/student voice	Safeguarding curriculum map; lesson samples; student voice; reporting knowledge; targeted provision for SEND/language needs.
Information governance	Access permissions; audit logs; retention/transfer schedule; breach response; secure storage; ADC version/distribution controls for policy documents.
Improvement	Incident learning reviews; trend analysis; completed actions; evidence of impact and remaining risks.

Appendix F. Safeguarding contacts and internal cover schedule

Contact / role	Details to complete and verify termly
DSL	Reem Al Samara – rsamarah@edisonqatar.com Sini Thomas - sinithomas@edisonqatar.com Lulu Fersana - lfersana@edisonqatar.com Ingrid Palmer - ipalmer@edisonqatar.com
Deputy DSL 1	Jasmine Rose – Nerissa Gonzalez – ngonzales@edisonqatar.com Sherina Sansawi – ssansawi@edisonqatar.com Alexandrina Daniela Niculae - alexandrina.daniela@edisonqatar.com
Deputy DSL 2	Sadoq Khairi – Nour Al Shebli – nshibli@edisonqatar.com Lalarukh Hameed – lanzar@edisonqatar.com Meerim Turdieva - meerim.jumakadyrovna@edisonqatar.com
Principal	Name: Johanna Chawla Contact: 33216982 Name: Wedad Dawoud Contact: 30031001 Name: Maryam White Contact: 33776858 Name: Candice Benny Contact: 55892940
Proprietor / governance safeguarding contact	Name/contact: _____
Emergency services – Qatar	999
AMAN Protection and Social Rehabilitation Center	Hotline 919 +974 4409 0999 info@aman.org.qa
MOEHE general contact	155 +974 4404 4444 info@edu.gov.qa

Contact / role	Details to complete and verify termly
Nearest medical/emergency facility	Name/contact: _____
IT filtering/monitoring emergency contact	Name/contact: _____
Out-of-hours / trip safeguarding route	_____

Appendix G. Related school policies and procedures

1. This Whole-School Student Safeguarding and Protection Policy
2. Staff Code of Conduct and Professional Boundaries
3. Safer Recruitment and Vetting Procedure
4. Allegations Against Staff and Low-Level Concerns Procedure
5. Whistleblowing Policy
6. Student Behaviour and Anti-Bullying Policy
7. Attendance, Missing Student and Collection Procedures
8. Online Safety, Acceptable Use, Filtering and Monitoring Policy
9. Data Protection, Confidentiality, Records Retention and Breach Response
10. Health, First Aid, Medication, Intimate Care and Mental Health Procedures
11. Physical Intervention and Searching Procedures
12. Educational Visits, Transport, Activities and Visitor Management
13. Complaints Policy and Critical Incident / Emergency Response Plan

Appendix H. Staff safeguarding declaration

I confirm that I have received, read and understood the DSL Policy and related safeguarding requirements.
I know the current DSL and Deputy DSL reporting routes, understand that I must report concerns

immediately, will not investigate independently or promise secrecy, and will escalate if a student remains at risk.

Employee name	Role	Signature	Date

Appendix I. Parent and student safeguarding summary

Every student has the right to feel safe, be treated with dignity and receive help when worried about themselves or someone else. Students and parents may speak to the DSL, a Deputy DSL, the Principal, counsellor, nurse, class teacher or another trusted member of staff. A concern will be listened to, recorded and shared only with people who need information to provide protection or support. No Edison school can promise secrecy where safety may be at risk.

A student will not be blamed for reporting a concern in good faith. Parents will normally be involved as partners, unless doing so could increase risk, compromise evidence or conflict with advice from a competent authority. Emergency help is available through 999. Each school must publish current internal names and contact routes separately in accessible language and formats.

References and official sources

Ministry of Education and Higher Education, Qatar – launch of Student Protection and Welfare Policy for Private Schools and Kindergartens (2025):

<https://www.edu.gov.qa/ar/News/Details/15402000>

MOEHE – Professional and Ethical Charter for Private Education Institutions, second edition (2025): <https://www.edu.gov.qa/ar/News/Details/16462800>

MOEHE – Private school licensing and Law No. 23 of 2015:

<https://www.edu.gov.qa/ar/Content/PrivateSchoolLicenses>

Al Meezan – Qatar Law No. 13 of 2016 on Protecting Personal Data Privacy:

<https://www.almeezan.qa/LawOwner.aspx?id=7121&language=ar>

AMAN Center – hotline service: <https://www.aman.org.qa/en/service/67>

UK Department for Education – Keeping Children Safe in Education 2026:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

UK Department for Education – filtering and monitoring core standard (updated 2026):

<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-core-standard>

Policy implementation note: Before approval, the Principal and DSL must confirm all internal names, reporting channels, authority contacts, retention periods and mandatory MOEHE forms against the latest official requirements. This policy should be professionally translated into Arabic if issued bilingually; safeguarding terminology and emergency instructions must be quality-checked by an authorised bilingual reviewer.