EBIS
EGYPT BRITANNIA INTERNATIONAL SCHOOL
GOVERNANCE & COMPLIANCE

Safeguarding and Child Protection Policy

SAFE	RESPECTED	SUPPORTED	HEARD	THRIVING

SAFEGUARDING PRINCIPLE

Safeguarding is everyone's responsibility. EBIS acts in the best interests of the child and maintains the professional mindset that 'it could happen here'.

POLICY OWNER	Principal / Designated Safeguarding Lead
APPROVAL	Board / Proprietor
EFFECTIVE FROM	September 2026
REVIEW CYCLE	Annual, or sooner where guidance or risk changes
UK BENCHMARK	Keeping Children Safe in Education 2026
SCHOOL	EBIS – New Capital

Premium British education • Academic excellence • Character • Leadership • Global readiness

SAFEGUARDING AT EBIS

01 Everyone's responsibility
Every adult shares a duty to protect children from harm.

02 It could happen here
We maintain vigilance and professional curiosity.

03 Best interests of the child
Safety, welfare and the child's voice remain central.

04 Report immediately
Concerns are shared without delay with the safeguarding team.

05 Confidentiality with integrity
Information is shared only where needed to keep children safe.

CORE EXPECTATION

Recognise → Respond → Report → Record → Escalate

1. Purpose, status and scope

EBIS is committed to safeguarding and promoting the welfare of every child. Safeguarding is everyone's responsibility. The school adopts a child-centred approach, acts in the best interests of the child, and maintains the professional mindset that 'it could happen here'.

This policy applies to all pupils under the age of 18 and to all adults working in or on behalf of EBIS, including the Proprietor and Board, leaders, employees, temporary and supply staff, volunteers, contractors, consultants, peripatetic staff, interns, visitors and adults working with pupils off site or online.

EBIS operates in Egypt. Egyptian law and lawful local reporting requirements therefore take precedence. In addition, as a British international school intending to seek British Schools Overseas (BSO) accreditation, EBIS adopts the safeguarding principles and expectations of current UK guidance as a benchmark for practice where these are compatible with host-country law.

2. Legislative, regulatory and guidance framework

This policy is informed by the following current frameworks and guidance:

- Keeping Children Safe in Education (KCSIE) 2026, including Part One, Parts Two to Five and relevant annexes.
- Working Together to Safeguard Children 2026, used as a benchmark for child-centred, multi-agency and early-help practice.
- British Schools Overseas: Standards for Schools, particularly the requirement to safeguard and promote pupils' welfare in line with host-country law and to address online safety within child-protection arrangements.
- Current UK guidance on information sharing, safer recruitment, filtering and monitoring, Prevent and safeguarding children from radicalisation, used as relevant international benchmarks.
- All applicable Egyptian child-protection, criminal, employment, data-protection, cybercrime and education legislation and any Ministry of Education requirements.

The Department for Education has no jurisdiction over schools outside England. References to UK legislation or statutory guidance in this policy describe the safeguarding standard adopted by EBIS; they do not replace Egyptian law or create a UK statutory referral route in Egypt.

3. Related policies

- Staff Code of Conduct and Safer Working Practice
- Safer Recruitment Policy
- Online Safety / Acceptable Use of Technology Policy
- Behaviour and Anti-Bullying Policy
- Attendance and Children Missing Education procedures
- SEND / Inclusion Policy
- Health and Safety Policy
- First Aid and Medical Policy
- Complaints and Whistleblowing Policies
- Data Protection / Records Management Policy
- Curriculum, PSHE / relationships and wellbeing provision

4. Definition of safeguarding

For EBIS, safeguarding and promoting the welfare of children means:

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

Safeguarding includes child protection, early help, attendance and children missing education, mental health, child-on-child abuse, sexual violence and harassment, online safety, exploitation, radicalisation, bullying and discrimination, domestic abuse, neglect, harmful practices, health and safety and safer recruitment.

5. Safeguarding culture and pupil voice

The Board, Principal and safeguarding team will establish a culture in which safeguarding is visible, routinely discussed and embedded in decision-making. Children will be taught how to recognise unsafe situations, how to seek help and how to report concerns. Staff must listen to children, take concerns seriously and avoid assumptions that someone else will act.

- No concern is too small to share.
- Absence of a disclosure does not mean that abuse has not occurred.
- Staff must consider the child's wishes and feelings while recognising that these cannot override the need to act to keep a child safe.
- The school will seek to remove barriers to reporting, including barriers linked to SEND, communication, language, age, gender, culture, fear, shame, discrimination or power imbalance.
- The school promotes an inclusive and anti-discriminatory safeguarding culture and challenges racism, discrimination and prejudicial behaviour.

6. Roles and responsibilities

6.1 Proprietor / Board

- Ensure safeguarding arrangements comply with relevant Egyptian law and meet the BSO safeguarding standard.
- Ensure this policy is reviewed at least annually and is available to parents.
- Appoint an appropriately trained DSL with sufficient authority, time, resources and deputies.
- Ensure all staff read KCSIE 2026 Part One in full as part of the school's adopted safeguarding standard and confirm understanding.
- Ensure safer recruitment, allegations, low-level concerns, whistleblowing, online filtering and monitoring, safeguarding training and record keeping are effective.
- Receive regular safeguarding reports and assure themselves that weaknesses are remedied without delay.
- Ensure a senior board/proprietor safeguarding link has appropriate training and oversight.

6.2 Principal

- Ensure the policy is implemented consistently and that safeguarding has appropriate staffing and resources.
- Ensure allegations concerning adults are managed promptly, fairly and in accordance with this policy and host-country law.
- Work with the DSL and Board to ensure safeguarding risks are understood and acted upon.

6.3 Designated Safeguarding Lead (DSL)

The DSL holds lead responsibility for safeguarding and child protection. This responsibility should not be delegated, although appropriately trained Deputy DSLs may carry out safeguarding activities under the DSL's oversight.

- Manage referrals, concerns, disclosures, risk assessments and safeguarding plans.
- Maintain oversight of early help and emerging concerns.
- Maintain secure, accurate and timely safeguarding records and chronologies.
- Advise staff and provide safeguarding training and updates.
- Maintain oversight of online safety, including filtering and monitoring arrangements.
- Work with parents and external agencies where safe and appropriate.
- Ensure safeguarding files transfer securely when pupils move school.
- Maintain professional knowledge through appropriate DSL training and regular updates.

- Provide safeguarding reports and analysis to the Principal and Board without compromising individual confidentiality.

6.4 All staff

- Safeguard pupils' welfare and act immediately on any concern.
- Know the identity and availability of the DSL and Deputy DSLs.
- Read KCSIE 2026 Part One in full and understand the school's safeguarding systems.
- Complete induction and ongoing safeguarding training.
- Report concerns promptly through the school's safeguarding reporting system and verbally to the DSL where urgency requires.
- Never investigate suspected abuse themselves.
- Maintain appropriate professional boundaries and comply with the Staff Code of Conduct.
- Raise concerns about adults, including low-level concerns, and use whistleblowing routes when necessary.

7. Recognising abuse, neglect and exploitation

Staff must be alert to indicators of abuse and understand that children may experience multiple and overlapping forms of harm. Abuse may occur in families, institutions, communities or online and may be perpetrated by adults or other children.

- Physical abuse
- Emotional abuse
- Sexual abuse, including child sexual abuse and online sexual abuse
- Neglect
- Domestic abuse and coercive control affecting a child
- Child sexual exploitation and child criminal exploitation
- Trafficking and modern slavery
- Serious violence, gang-related harm and criminality
- Radicalisation and extremist influence
- Harmful practices, including female genital mutilation and forced marriage, where relevant
- Abusive behaviour in intimate or teenage relationships
- Online grooming, sextortion, image-based abuse, synthetic/AI-generated sexual content and other technology-assisted abuse

8. Early help and thresholds of concern

EBIS will provide timely support when difficulties emerge and will not wait for a concern to become acute before acting. The DSL maintains oversight of early-help cases and escalation.

Level	Indicative concern	Typical response
1 – Universal / monitoring	Low-level or isolated pastoral concern	Class/tutor support, observation, routine pastoral action.
2 – Early help	Emerging, repeated or multiple concerns	Targeted support, parent engagement where safe, support plan and DSL oversight.
3 – Safeguarding concern	Indicators of abuse, neglect, exploitation or significant risk	Formal safeguarding assessment, risk management and consideration of external referral.

Level	Indicative concern	Typical response
4 – Emergency / high risk	Immediate danger, serious harm, acute self-harm/suicide risk or serious criminal concern	Immediate protective action and contact with appropriate Egyptian emergency/police/child-protection services.

Thresholds are a professional decision-making tool, not a barrier to reporting. Staff report concerns; the DSL determines and records the response.

9. Reporting a safeguarding concern or disclosure

9.1 Immediate response

- Listen carefully and remain calm.
- Take the child seriously and reassure them that they have done the right thing by speaking.
- Do not promise confidentiality.
- Do not ask leading, investigative or repeated questions; use only open prompts needed to clarify immediate safety.
- Explain that information must be shared with people who can help keep them safe.
- If immediate danger exists, obtain urgent assistance and inform the DSL without delay.

9.2 Recording and action

- Report the concern to the DSL or Deputy DSL as soon as possible and on the same day.
- Record the concern promptly on the school's approved safeguarding management system. Until the new school confirms its platform, references in this policy are deliberately system-neutral.
- Record facts, dates, times, locations, observations and the child's own words where appropriate; distinguish fact from professional opinion.
- Verbal reporting must be followed by a written record.
- The DSL will review previous concerns, assess risk, decide next steps, record rationale and ensure follow-up.

Where a member of staff believes that a child remains at risk despite action taken, they must escalate the concern to the DSL, Principal or Board/Proprietor as appropriate and may contact the appropriate local authority or emergency service directly where necessary to protect the child.

10. Child-on-child abuse, sexual violence and sexual harassment

> EBIS recognises that children can abuse other children and that such abuse may occur inside or outside school and online. It will never be dismissed as 'banter', 'part of growing up' or an inevitable part of school life.

- bullying, including prejudicial and cyberbullying;
- physical abuse and violence;
- sexual violence and sexual harassment;
- harmful sexual behaviour;
- consensual and non-consensual sharing of nude or semi-nude images;
- upskirting and image-based abuse;
- initiation/hazing-type behaviour;
- abuse in intimate personal relationships between children;
- coercion, exploitation, threats, sextortion and online harassment.

The DSL will consider the wishes of the victim, immediate and ongoing risk, age and developmental stage, power imbalance, SEND or other vulnerabilities, the wider context, evidence preservation, support for all children

involved and whether external referral is required. The school will avoid automatically placing the burden of safety arrangements on the victim.

Victims will be supported, listened to and protected from retaliation or repeated exposure. Children alleged to have caused harm will also receive appropriate safeguarding, pastoral and behavioural intervention without minimising the impact on the victim.

11. Mental health, self-harm and suicide risk

Mental health concerns may be an indicator or consequence of abuse, neglect, exploitation or other harm. Staff must report concerns where a pupil's presentation, behaviour, attendance, online activity, disclosure or self-harm indicates safeguarding risk.

- Immediate risk of serious self-harm or suicide is treated as an emergency safeguarding matter.
- The DSL coordinates risk assessment, parental involvement where safe, internal support and referral to qualified external professionals.
- The school does not diagnose mental illness; it identifies risk, safeguards the child and facilitates appropriate professional support.

12. SEND and other vulnerable pupils

Children with SEND, communication needs, medical needs or other vulnerabilities may face additional safeguarding risks and additional barriers to disclosure. Staff must avoid attributing changes in behaviour, injury, distress or communication solely to a child's additional need.

- Provide accessible reporting routes and trusted adults.
- Use communication methods appropriate to the child.
- Consider additional supervision and online-safety risks.
- Coordinate safeguarding, inclusion, pastoral and counselling support.
- Monitor attendance, behaviour and wellbeing patterns for cumulative risk.

13. Attendance and children missing education

Absence can be a safeguarding warning sign. The school will monitor patterns of absence, repeated lateness, unexplained absence from lessons, prolonged absence and children who leave education unexpectedly.

- Attendance and safeguarding information will be triangulated where concerns exist.
- Unexplained or concerning absence will be followed up promptly with parents/carers and escalated to the DSL when risk indicators are present.
- The school will maintain robust admission and withdrawal records and comply with Egyptian Ministry of Education requirements.
- Where a child cannot be located or there is reason to believe they may be at risk, the school will take immediate safeguarding action and contact the police or appropriate emergency services where there is an immediate safeguarding risk.

14. Online safety, filtering and monitoring

Online safety is integral to safeguarding. The school will protect pupils from harmful and inappropriate online material while recognising that filtering alone cannot eliminate risk.

- The DSL has safeguarding oversight of online safety; IT and relevant leaders support technical implementation.

- Appropriate filtering and monitoring will operate on school-managed networks and devices and will be reviewed at least annually and following significant system changes or incidents.
- The school will consider the four broad areas of online risk: content, contact, conduct and commerce.
- Safeguarding responses will address grooming, exploitation, cyberbullying, radicalisation, self-harm content, sexual imagery, sextortion, deepfakes/synthetic media and misuse of generative AI.
- Pupils will receive age-appropriate online-safety education, including privacy, consent, digital footprints, reporting, misinformation and responsible use of AI.
- Staff will be trained to understand filtering and monitoring responsibilities and how to report alerts or concerns.
- The Board will receive assurance that filtering and monitoring arrangements are effective and proportionate.

15. Radicalisation and extremism

EBIS will remain alert to indicators that a child may be vulnerable to extremist influence or radicalisation. The school adopts the safeguarding principles reflected in UK Prevent guidance as an international benchmark, while any action or referral in Egypt will follow Egyptian law and appropriate local routes.

Concerns about extremist influence are safeguarding concerns and must be reported to the DSL. Curriculum provision will promote critical thinking, respect, tolerance, responsible citizenship and the ability to challenge harmful or extremist narratives in an age-appropriate and culturally appropriate way.

16. Safer recruitment and the Single Central Record

EBIS will operate safer recruitment procedures designed to deter, reject and identify people who may pose a risk to children. The school will maintain a Single Central Record (SCR) of required recruitment and vetting checks.

- identity and right-to-work / legal employment checks;
- verification of qualifications and employment history;
- scrutiny of gaps and inconsistencies in employment history;
- at least two appropriate references, including the current or most recent relevant employer where practicable;
- criminal-record / police-clearance checks required in Egypt and relevant overseas jurisdictions;
- appropriate UK checks for candidates with a UK work history or where such checks are legally and practically available, including teaching prohibition and Section 128 checks for relevant roles;
- online searches of shortlisted candidates as part of due diligence, handled proportionately and lawfully;
- checks and safeguarding assurances for supply staff, volunteers, contractors and third-party providers;
- a trained safer-recruitment panel member involved in recruitment decisions.

No adult will undertake unsupervised work with pupils until required safeguarding checks are satisfactorily completed, except in genuinely exceptional circumstances where lawful, necessary and supported by a written, time-limited risk assessment approved by the Principal and DSL. Outstanding checks must be actively tracked and recorded.

17. Allegations and concerns about adults

EBIS distinguishes between allegations that may meet the harm threshold and low-level concerns that do not meet that threshold. Both must be taken seriously.

17.1 Harm-threshold allegations

A concern may meet the harm threshold where an adult may have harmed a child, committed a possible criminal offence against or related to a child, behaved towards a child in a way indicating they may pose a risk of harm, or behaved in a way that may indicate they are unsuitable to work with children.

- Concerns about a member of staff are reported immediately to the Principal (or designated case manager).

- Concerns about the Principal are reported directly to the Chair/Proprietor.
- The school will take immediate steps to safeguard children, preserve fairness and confidentiality, and obtain appropriate legal advice and, where necessary, liaise with the police or other relevant authorities.
- Suspension is not automatic and will be considered only where proportionate to risk and lawful under Egyptian employment law.
- The school will consider referral to relevant Egyptian authorities and, where applicable, professional or overseas regulatory bodies.

17.2 Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted in a way inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, even where the behaviour does not meet the harm threshold.

- Staff are encouraged to self-refer and report concerns about colleagues.
- Low-level concerns are recorded in writing, reviewed for patterns and retained securely.
- Where a pattern suggests the harm threshold may be met, the matter is escalated immediately.
- Low-level concerns about the Principal are reported to the Chair/Proprietor.

18. Whistleblowing

Staff must be able to raise safeguarding concerns without fear of retaliation. Where a member of staff believes safeguarding practice is unsafe, concerns are being suppressed or the school has failed to act appropriately, they should use the school's whistleblowing procedure and may raise the matter with the Board/Proprietor or the Board/Proprietor, police or another relevant authority where appropriate.

No person will be disadvantaged for raising a genuine safeguarding concern in good faith.

19. Information sharing, confidentiality and records

- The safety and welfare of the child is the primary consideration when deciding whether information should be shared.
- Information is shared on a need-to-know basis, proportionately and in accordance with applicable Egyptian data-protection law.
- Consent is not required where seeking it would place a child at risk, cause unreasonable delay or prevent necessary safeguarding action, subject to applicable law.
- Safeguarding records are separate from routine academic records, access-controlled and securely stored.
- Records include concerns, decisions, rationale, actions, referrals, outcomes and follow-up.
- When a pupil transfers, the safeguarding file is transferred securely, separately and promptly to the receiving school, with confirmation of receipt where practicable.
- Records are retained and disposed of according to applicable law and an approved retention schedule.

20. Parents and carers

EBIS seeks to work in partnership with parents and carers. Parents will normally be informed about concerns and involved in support planning unless doing so may place a child at increased risk, compromise an investigation or conflict with lawful safeguarding advice.

The safeguarding policy and contact details for the safeguarding team will be made available to parents. The school will communicate clearly that safeguarding decisions are made in the best interests of the child.

21. Curriculum and prevention

Safeguarding is supported through an age-appropriate curriculum and wider school culture. Provision will include relationships, respectful behaviour, consent, boundaries, anti-bullying, online safety, personal safety, wellbeing, help-seeking, discrimination, exploitation and responsible citizenship, adapted to the Egyptian context and the needs and maturity of pupils.

22. Training and induction

- All staff receive safeguarding and child-protection training at induction and regular updates thereafter.
- All staff read KCSIE 2026 Part One in full as part of EBIS's adopted safeguarding benchmark and confirm understanding.
- Training covers the school's reporting system, DSL arrangements, Staff Code of Conduct, child-on-child abuse, sexual harassment and violence, online safety, filtering and monitoring, mental health, SEND vulnerabilities, attendance, exploitation, radicalisation, low-level concerns and whistleblowing.
- The DSL and deputies receive role-specific safeguarding training at least every two years and update their knowledge at regular intervals, including at least annually.
- The Board/Proprietor receives safeguarding and child-protection training appropriate to its strategic oversight role.
- Training records are maintained and compliance is monitored.

24. Monitoring, quality assurance and review

- The DSL provides regular safeguarding reports to the Principal and Board/Proprietor, including trends, training, referrals, online-safety assurance and actions for improvement.
- Safeguarding records and decision-making are subject to periodic case audit.
- The SCR and safer-recruitment compliance are audited regularly.
- Pupil voice, attendance, behaviour, wellbeing, online-safety and safeguarding information are triangulated to identify patterns and emerging risks.
- The policy is reviewed at least annually, after a significant incident, when local law or UK benchmark guidance changes, or when safeguarding learning indicates that revision is required.

Next scheduled review	01/09/2027