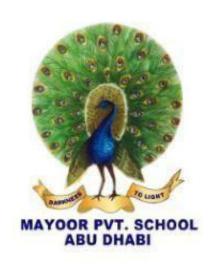


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SAFEGUARDING POLICY

| Prepared By: | Sheela Nair | Occupational Safety & Health Officer | |
|--------------|------------------------|---|--|
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| Created On | 01st March 2025 | | |



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1. REVISION LOG

All revisions to this document shall be recorded in this Revision Log. Each time a revision is recorded, the Revision Log's control No. will be revised accordingly.

| Revision No. | Date | Revision Details | Reason for Revision | Page No. |
|--------------|----------------|------------------|------------------------|----------|
| 3.0 | 1st March 2025 | New Issue | NA | All |
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2. SCOPE

Mayoor Private School is committed to the highest standards of safeguarding and the protection of all its students. We recognize that the safety and well-being of every child is paramount. In accordance with Federal Law No. (3) of 2016 Concerning Child Rights (Wadeema), schools in Abu Dhabi have a duty to promote safe practices and protect children from harm, ensuring their healthy development and growth. This policy outlines Mayoor Private School's priorities and procedures for safeguarding and promoting the welfare and security of our students.

3. PURPOSE

This policy aims to:

- Outline the Abu Dhabi Department of Education and Knowledge (ADEK) requirements for safeguarding and promoting student welfare.
- Establish clear lines of accountability within the school to ensure the full implementation of safeguarding protocols.
- Detailed security requirements, including effective supervision procedures, the duties of security guards, school arrival and dismissal procedures, and a system for managing security breaches.
- Specify ADEK requirements regarding the use of Closed-Circuit Television (CCTV) cameras in schools.
- Define training requirements to ensure all staff members perform their duties responsibly, effectively, and appropriately, fostering a safe learning environment for all students.

4. TERMS AND DEFINITIONS

Additional Learning Needs

Individual requirements for additional support, modifications, or accommodations within a school setting on a permanent or temporary basis in response to a specific context. This applies to any support required by students of determination and those who have special educational needs and/or additional barriers to learning, access, or interaction in that specific context (e.g., dyslexic, hearing or visually impaired, twice exceptional, or gifted and/or talented).

For example, a student with restricted mobility may require lesson accommodations to participate in Physical Education and building accommodations to access facilities but may not require any accommodations in assessments. Equally, a student with hearing impairment may require adaptive and assistive technology to access content in class and may also



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| | require physical accommodations (e.g., sit in the front of the class to be able to lip read) to access learning. | |
|----------------------------------|--|--|
| At Risk of Harm | The inability to safeguard one's own wellbeing | |
| Authorized Personnel | Personnel who are authorized by ADEK or other relevant government entities to visit a school and access its premises and resources for a specific purpose | |
| Bathroom | A room that contains facilities for bathing and personal hygiene. It typically includes a bathtub or shower, a toilet, and a washbasin | |
| Duty of Care | The obligation to safeguard stakeholders, to maintain their health, safety, and wellbeing, and to take steps to reduce the risk of reasonably foreseeable harm while under the school's supervision (on its premises, utilizing its systems, or engaging in school-organized activities off-campus). | |
| Governing Board | The governing body of a school, appointed by the school owners, and including qualified representatives and parents. The Governing Board is the senior authority of the school, with responsibility for the overall governance of its activities. | |
| In Loco Parentis | Meaning "in place of a parent", in situations when parents are absent | |
| Maltreatment | Refers to abuse (physical, emotional, and sexual), and includes neglect, exploitation, bullying, and cyberbullying of a student. | |
| Parent | The person legally liable for a child or entrusted with their care, defined as the custodian of the child as per the Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema). | |
| Safeguarding | The protection of students from the risks of harm, including maltreatment and other types of risks that impact their overall health and development, wellbeing, and safety | |
| Safeguarding Lead (or Committee) | An individual (or group of individuals) responsible for the implementation of the safeguarding policy and practices and ensures compliance by the school community. This position can be filled by any relevant position in the school such as the Child Protection Coordinator, School Counselor, Social Worker, Head of Wellbeing, etc | |



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| Security Breach | An incident that compromises or results in an unauthorized disclosure of or unlawful access to protected space, persons, systems, and/or information. Security breaches stemming from accidental or deliberate action have the potential to cause damage (financial, legal, or school wide consequences, etc.) to school assets or reputation and include both confirmed and suspected incidents. | |
| Staff | An individual employed by a school on a remunerated contractual basis regardless of employment mode (internal, external/third-party, etc.). | |
| Student | A resident who is enrolled in an educational institution in Abu Dhabi. | |
| Student Protection | Synonymous with child protection, all measures, steps, and actions that must be taken to prevent, protect, and support students from risk of maltreatment while they are under the supervision of the educational institution | |
| Supervision | The state of being responsible, having the duty of care, and keeping watch over an individual in the interest of their and others' security while under the care of the school or an individual employed at the school, whether onsite, while utilizing its systems, and/or taking part in all activities organized by the school offsite | |
| Toilet Block | A structure or designated area within the school or outdoor setting that contains multiple toilets and washbasins. | |
| Visitor | For the purpose of this policy, a visitor is any temporary visitor (e.g., a parent or a relative of a student, prospective student and their parents, inspectors, contractors, etc.) entering the school premises. An invited visitor is anyone visiting the school on a temporary basis to interact with students (i.e., a speaker, career fair representative, etc.) and includes volunteers, who are engaged by an educational institution on a non-remunerated basis to interact with students (e.g., parent chaperones, etc.). | |
| Whistleblowing | An instance where an individual passes on information about organizational malpractice (e.g., fraud, corruption, miscarriage of justice, risk of serious harm to an individual, risks or damage to the environment and other actions against public interest) taking place at, or near, their place of employment or education | |



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5. POLICY STATEMENT

5.1 Safeguarding Supervision

5.1.1 Duty of Care and In Loco Parentis

All school staff members have a duty of care towards their students and are responsible for their well-being, safety, and protection while students are under the school's supervision. The Principal assumes in loco parentis responsibility for all students during this time.

5.2 School-Based Safeguarding Policy

5.2.1 Policy Requirements

Mayoor Private School has developed and implemented this Safeguarding Policy, which is actively communicated to the entire school community. This policy incorporates, at a minimum, the following elements:

- 1. A clear statement outlining the school's overall safeguarding processes, procedures, and commitment to student well-being.
- 2. School safeguarding practices aligned with relevant *ADEK well-being policies*, ensuring that all safeguarding matters are handled sensitively, professionally, and in a manner that prioritizes the needs of students.
- 3. A comprehensive security policy detailing how the school protects students from physical and digital security breaches, including procedures for responding to such incidents.
- 4. Mechanisms for measuring and monitoring the effectiveness of safeguarding practices in protecting students from all forms of harm to their health and development.
- 5. Identification of the resources allocated to support the delivery of safeguarding provisions for all students.

5.2.2 Appointment of a Safeguarding Committee/Lead

Mayoor Private School has appointed a Safeguarding Committee/Lead to oversee the school's overall safeguarding strategy. The Safeguarding Committee/Lead will:

- 1. Annually monitor and review the effectiveness of this Safeguarding Policy to ensure it is understood, implemented, and practiced appropriately by the entire school community.
- 2. Ensure the safeguarding policies and procedures adopted by the school's Governing Board are fully implemented and followed.
- 3. In collaboration with the Principal, ensure that all staff, volunteers, and invited visitors are informed of their responsibilities regarding safeguarding procedures.
- 4. Ensure parents have easy access to the school's Safeguarding Policy and all supporting documents through various means, including the school website.



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5. Develop and implement an induction and training program to ensure all staff and volunteers receive comprehensive information on the school's safeguarding arrangements.

6. Ensure compliance with the relevant processes outlined in the ADEK School Student Protection Policy.

5.3 Safeguarding Awareness

5.3.1 Safeguarding Awareness Strategies

Mayoor Private School employs the following safeguarding strategies, at a minimum:

- Cultivating a safe and caring environment where all students can learn, thrive, and develop the
 confidence to express their ideas, feelings, and opinions, prioritizing their best interests in accordance
 with the guiding principles outlined in the Handling Student Maltreatment Concerns within Educational
 Institutions (DAA Child Protection Committee, 2024).
- 2. Maintaining a zero-tolerance approach to student maltreatment and ensuring that all visitors and members of the school community are aware of and can easily follow the procedures outlined in the *ADEK School Student Protection Policy* for reporting any maltreatment concerns.
- 3. Vigilantly monitoring students known or suspected to be at risk of harm, including students with additional learning needs who may be more vulnerable.
- 4. Equipping staff with the knowledge and skills to respond appropriately to safeguarding incidents, reassuring victims and/or witnesses who make a disclosure that they are taken seriously and will be supported.
- 5. Fostering a positive and transparent environment where students and staff feel comfortable communicating with members of the Safeguarding Committee/Lead if they have concerns about the behavior of a student, staff member, or visitor.
- 6. Prioritizing student safety in online spaces, in accordance with the ADEK School Digital Policy.
- 7. Ensuring that no school policy negatively impacts or jeopardizes a student's health or well-being (e.g., restrictions on washroom breaks), aligning with the *ADEK School Wellbeing Policy*.
- 8. Providing accessible, non-judgmental support and counseling services to all students, ensuring they know who to approach for advice and assistance within the school.
- 9. Emphasizing to all parents their legal obligation to enroll their child in school, as per Federal Law No. (39) of 2022 Concerning Compulsory Education, and clarifying that any suspicious incidents (such as excessive absences or the sudden, unexplained withdrawal of a student) will be reported as a maltreatment concern to the relevant authorities, as per the ADEK School Student Protection Policy.

5.4 Safeguarding and the Curriculum

5.4.1 The School Curriculum

Mayoor Private School's curriculum integrates safeguarding measures by:



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- 1. Prioritizing the development of students' self-esteem and self-regulation skills.
- 2. Fostering respect and civility towards others and all living things.
- 3. Enabling the development and improvement of communication skills, including the ability to express consent.
- 4. Cultivating an understanding of all aspects of risk, including online behaviors and social media use.
- 5. Equipping students with self-protection strategies and effective responses to peer pressure.
- 6. Promoting an understanding of personal responsibility for their own and others' safety.

5.5 Safeguarding School Security

5.5.1 Implementing a School Security System

Mayoor Private School maintains a comprehensive security system to protect its assets, data, and individuals from harm.

- 1. **Policy Requirement**: The school is equipped with integrated and fully functional access and security systems, including security video surveillance cameras (CCTV systems).
- 2. **CCTV Systems**: The school's CCTV systems are installed and maintained by an MCC-licensed vendor, in compliance with the Manual of Standards for Surveillance Devices (MCC, 2023).
 - a. **Contract Validity**: A valid maintenance contract with an MCC-licensed vendor is maintained at all times.
 - **b. Coverage**: CCTV cameras provide coverage in the following areas:
- All entrances and exits of school buildings and grounds.
- All walkways and public areas (e.g., corridors, stairs, courtyards, sports halls, sports fields, canteens, libraries).
- Student pick-up and drop-off areas for private vehicles and buses.
- Security areas (e.g., control room) and hazardous areas.
- Exterior areas surrounding the school grounds.
- Learning spaces (e.g., classrooms, labs, studios, maker spaces).
- Entrances to bathroom/toilet blocks and changing rooms.
- All blind spots within the school premises.
- CCTV cameras are *not* installed inside lavatories, changing rooms, or any other areas where there is a reasonable expectation of privacy.
- The school displays signage indicating that the premises are under CCTV surveillance.
- **c. Regular Monitoring and Maintenance**: The school monitors CCTV camera functionality daily, ensuring they are operational and providing appropriate coverage. Any issues affecting functionality are immediately reported to the vendor, and prompt action is taken for rectification, in accordance with the maintenance contract.
- **d. Access to Footage and Recordings:** Access to CCTV footage and recordings is restricted as follows:



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- 1. **Monitoring**: CCTV footage is monitored from a dedicated control room by vendor-appointed CCTV specialist(s).
- 2. Principal Access: The Principal is authorized to access live CCTV footage from their office.
- **3. Staff Access:** The Principal and vendor-appointed CCTV specialist(s) are authorized to retrieve and view recordings. The Principal may authorize other staff to view footage on a need-to-know basis, maintaining a record of all such authorizations.
- **4. ADEK Access**: The school provides access to CCTV footage and recordings to authorized ADEK personnel upon request.
- **e. Copying and Distribution**: Copying or distributing CCTV recordings is strictly prohibited and punishable by law, in accordance with Federal Decree Law No. (34) of 2021 on Combating Rumors and Cybercrimes.
- **f. Escalation**: If an incident captured on CCTV requires clarification beyond the school level, ADEK is immediately notified.
- **g. Deletion**: CCTV recordings are retained for a minimum of 90 days according to MCC version 2.0 dated 10/09/2024 under Group A.

5.5.2 Security Guards

Mayoor Private School ensures that security guards:

- 1. Are stationed at all entry points/gates at all times. They will not leave their posts unless temporarily relieved by another authorized individual.
- 2. Hold the necessary licenses, as per the ADEK School Staff Eligibility Policy.
- 3. Remain vigilant and ensure the safety and security of the school premises, utilizing the school's security system for support.
- 4. Maintain a visitor log, recording each visitor's name, ID, signature, telephone number, purpose of visit, arrival time, and departure time.
- 5. Issue visitor access passes only after collecting a form of photo identification and verifying that it matches the individual's identity.
 - a. The school may issue permanent access passes to registered individuals involved in the routine pick-up and drop-off of students (e.g., parents, nannies, drivers).
 - b. Security guards will verify that each access pass matches the individual's identity. They will ensure that anyone whose permanent access pass has been canceled or revoked is denied entry using the invalid pass and is required to sign in as a general visitor.
- 6. Maintain communication between the entry gate security guard and the school reception/administration to authorize entry for unfamiliar individuals.
- 7. Are provided with documented handover procedures to ensure a smooth transition should the school change security providers.

5.5.3 School Visiting Procedures



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Mayoor Private School has established procedures for visitors, with the Principal retaining the right to deny or allow entry for good cause. The following procedures are in place:

- 1. All visitors must sign in at the security gate and obtain a visitor access pass in exchange for valid identification.
- 2. Visitors must visibly display their access passes at all times while on school grounds. Classroom entry is restricted unless by invitation.
- 3. Invited visitors must remain under the supervision of a designated staff member while on school premises, unless they are authorized personnel
- 4. Upon completion of their visit, visitors must sign out at the security gate and return their visitor access passes.
- 5. Granting Access to Authorized Personnel: The school grants authorized personnel (e.g., government inspectors, compliance specialists) full access to its premises and relevant resources (e.g., school reports, records, keys to locked areas), in accordance with Federal Decree Law No. (18) of 2020 on Private Education and its amendments. The school will facilitate their monitoring and interaction with staff, students, and parents, as needed.
 - a. Prior to granting access, the school will verify the personnel's identity and ensure the validity of their request.
 - b. The school will ensure that any access granted aligns with the requirements and purpose of the personnel's visit.
 - c. When access is provided to school reports and records, the Principal will maintain a record of the personnel accessing the information, the specific reports and records accessed, and the purpose of access. These records will be maintained according to the *ADEK School Records Policy for* administrative
 - d. Authorized personnel are permitted to be on school premises unaccompanied by a staff member.

Security Access and Visitors Procedure

5.5.4 School Departure Procedures

Mayoor Private School has established departure procedures to ensure students are released only to parentauthorized individuals, effectively transferring supervision from the school to the home. These procedures include:

- 1. Verification that only parent-authorized individuals are picking up students.
- 2. For individuals not pre-registered and without permanent access passes, parents must inform the school in writing in advance, providing the name and identification details of the designated pick-up person.
- 3. In cases of sudden emergencies or late notice changes, parents must call the school, providing the name of the designated pick-up person. The school will log the call, including the authorized person's



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name, and communicate this information to security guards and the teachers/staff supervising the student.

- 4. The school will verify the identity of the designated pick-up person at the gate (via identification) and again when releasing the student from school supervision.
- 5. Identification is not required if the individual is already a known member of the school community (e.g., another parent) whose identification is already on record with the school.

5.5.5 Acceptable School Drop-Off and Pick-Up Timings

Mayoor Private School communicates acceptable drop-off and pick-up times to parents.

- 1. The school provides supervision for students 45 minutes before the start of the school day and 90 minutes after school hours. Parents are notified of their responsibility for their children outside of these designated times.
- 2. In instances where parents drop off children at school without prior notification, the school cannot be held legally responsible for the child's safety.

5.5.6 School Arrival and Departure Notification for Unaccompanied Cycle 3 Students

With written parental consent, Cycle 3 students may arrive at and depart from school unaccompanied.

- 1. The school will maintain a system to record and notify parents of these students' arrival and departure times.
- 2. Parents of accompanied students in grades below Cycle 3 may also request arrival and departure notifications, which the school will provide.

5.5.7 Special Events

Mayoor Private School implements enhanced security measures for safeguarding during special events. These measures include:

- 1. Events are generally limited to immediate family (parents and siblings). Parents wishing to invite other guests must pre-register them with the school by providing a copy of their valid ID. Guests who are not pre-registered must register upon arrival at the school gate and provide a copy of their valid ID.
- 2. Clear signage is displayed, indicating designated visitor areas within the school.
- 3. Increased security personnel are present when a larger number of visitors is anticipated.
- 4. All external service providers and their employees are pre-approved, and contracts stipulate that they have undergone appropriate security checks. Service providers must submit their trade license and a valid work permit for each employee.

5.5.8 Safeguarding the Privacy of the School Community

Mayoor Private School takes measures to protect the privacy and identities of its community members in both physical spaces (e.g., reception area) and digital spaces (e.g., email lists, WhatsApp groups), in accordance with the *ADEK School Digital Policy*. The school exercises discretion regarding:



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- 1. Maintaining reception areas free of individually identifiable information, such as displayed timetables/class schedules or photographs and names of school community members.
- 2. Avoiding the sharing of personal details (e.g., email addresses, mobile numbers of students, parents, or teachers) without explicit consent, except as authorized by applicable laws and ADEK policies.

5.5.9 Managing Security Breaches

Mayoor Private School has systems in place to manage security breaches and prevent dangerous/harmful events, including unauthorized access to school grounds or confidential information. The following measures are in place, at a minimum:

- 1. The school has a system for locking down the school (manually or automatically), including a security breach procedure and response plan led by the Safeguarding Committee/Lead, with appropriate reporting mechanisms.
- 2. All school staff are aware of and trained on the security breach procedure.
- 3. The designated Safeguarding Committee/Lead (including deputies in their absence) meets the requirements outlined in this policy (Section 2.2), including being in good physical health.
- 4. The school maintains regular service on its alert systems, if applicable, for vocal announcements, timed bells, or alarms, in accordance with local regulations.
- 5. In line with the *ADEK School Digital Policy*, the school has the capability to respond to security breaches by backing up critical data from the school IT system and activating its business continuity plan.
 - a. Every digital incident is recorded, documented, signed by the Principal, and stored for auditing purposes, in accordance with the *ADEK School Records Policy*.
- 6. The school conducts regular emergency planning and drills, as per the ADEK School Health and Safety Policy.
- 7. The school complies with local regulatory requirements and reports any security breach incidents to ADEK and/or the appropriate authorities.

Lockdown

<u>Digital Data Security Breach Procedures and Corrective Actions</u>

5.6 Training

5.6.1 Training and Continuous Professional Development (CPD)

Mayoor Private School provides the following training and CPD to staff, at a minimum:

- 1. **Safeguarding Training at Induction**: Safeguarding training is provided at induction for the Governing Board, all staff, and volunteers. This training includes:
- 2. a. Identifying signs of student maltreatment or other safeguarding issues, including procedures to follow if a staff member, volunteer, or another individual has concerns about a student.



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b. Highlighting the specific needs of students at risk of harm, including students with additional learning needs, and emphasizing the importance of vigilance.

- c. Reinforcing the importance of addressing all behaviors, including seemingly minor issues (e.g., banter, practical jokes), as these can contribute to a culture of unacceptable behavior and an unsafe environment, preventing students from reporting concerns.
- d. Detailing procedures for creating secure and accurate written records of events, and emphasizing the importance of respecting confidentiality, in accordance with the *ADEK School Digital Policy*.
- e. Outlining necessary actions to take in emergency situations to prevent harm and danger.
- f. Emphasizing the principle of sharing information on a need-to-know basis only, and avoiding discussion of sensitive issues with colleagues or the parent community.
- g. Informing staff of available support for well-being concerns, as per the ADEK School Staff Wellbeing Policy.
- h. Providing comprehensive training on the school's security system and security breach protocol.
- 2. While formal training is not required for invited visitors, the school will ensure they have read and acknowledged the school's Safeguarding Policy by signing a confirmation form.

5.7 Whistleblowing

5.7.1 Whistleblowing Mechanism

Mayoor Private School has a confidential whistleblowing mechanism that allows anyone to raise concerns or allegations of organizational malpractice.

- 1. The school will protect the identity of anyone who raises a concern and ensure they do not feel ashamed for reporting it. If their identity becomes known, the school will take measures to protect them from any negative repercussions, such as harassment, reprisal, or stigmatization.
- 2. For individuals against whom a concern is raised, the school will, to the best of its ability, protect their identity where possible and protect them from negative repercussions until any investigation is completed.

Mayoor Whistleblowing Policy

5.8 Inclusion

5.8.1 Inclusive Provision

Mayoor Private School ensures that its **Safeguarding Committee/Lead collaborates** closely with the **Wellbeing Committee/Lead, Head of Inclusion, School Counselor, Social Worker, Health & Safety Officer, and other relevant stakeholders (e.g., teachers, parents) to promote the safeguarding and security of all students**. The school's safeguarding practices, policies, and initiatives consider the individual needs, communication and behavior styles, and engagement of students with additional learning needs, consistent with the *ADEK School Inclusion Policy*.



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5.9 Compliance

Compliance to this policy will be evaluated through QMS Internal Audits, ADOSH-SF-V4.0 and



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6. REFERENCES

6.1 Internal References

| Whistleblower Protection Procedure | MPS.QMS.AP54 |
|------------------------------------|--------------|
| Security Guard Rota | MPS.QMS.AP55 |
| Incident Reporting Log | MPS.QMS.AP56 |
| Training & CPD Plan | MPS.QMS.AP57 |
| Student Emergency Pick up Log | MPS.QMS.AP54 |

6.2 External References

| External References |
|--|
| ADEK School Safeguarding Policy_v.1.1 |
| ADEK School Records Policy |
| Federal Decree Law No. (34) of 2021 on Combating Rumors and Cybercrimes. |
| Federal Decree Law No. (31) of 2021 Promulgating the Crimes and Penalties and its amendments |
| Federal Decree Law No. 3 of 2016 Concerning Child Rights |