



Boarding Safeguarding Policy

Nurturing today's young people, inspiring tomorrow's exemplary citizens

AL JAMIATUL ISLAMIYAH

INSTITUTE OF HIGHER ISLAMIC EDUCATION

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Policy Review & Approval

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Safeguarding Governor	Dr Suhel Ahmed
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SECTION 1 – BOARDING AND THE CHILDREN’S ACT

AJI recognizes that, under the terms of Section 87 of The Children’s Act (1989); ‘Welfare of children accommodated in independent schools – the school has a statutory duty to safeguard and promote a child’s welfare by ensuring protection against significant harm or neglect’.

This statutory duty of care is geared to the individual child, not to the majority, and recognises each child’s right to live his or her life free from abuse of any type. Every child in the Boarding Facilities has the right to develop academically, socially, morally and culturally in an atmosphere of encouragement and trust. The school further recognises that all pupils are equal participants deserving of equal opportunities, and care should be taken not to allow the majority to fade into the background by devoting 80% of time to 20% of the pupils.

The school also understands that the Local Authority Social Services Department must take such steps as are necessary to determine whether this duty of care to the individual is being carried out.

The Act applies to all children who are accommodated at school, not just the boarders who are ordinarily resident. However, it is understood that the Boarding Managers who observe and interact with the children during non-school hours, may be in a unique position to get to know those children extremely well and spot possible signs of harm, neglect or potential radicalisation.

It is worth noting that this duty of care extends to visiting children, since it is the school that is doing the accommodating for that period of time.

In addition to this statutory duty, the school’s boarding provision is measured against the National Minimum Standards for Boarding Schools (Department for Education, in force from 5 September 2022, reissued with minor technical corrections in May 2026). These 23 standards are the baseline against which the Independent Schools Inspectorate (ISI) inspects boarding provision, and this policy, together with the wider suite of boarding policies listed at Appendix A, is designed to meet or exceed them. Each section below indicates the Standard(s) it primarily addresses.

SECTION 2 – CHILD PROTECTION

The boarding staff will follow guidance from the School’s Safeguarding and Child Protection Policy (National Minimum Standards, Standard 8) This Statement of Intent is taken from that Policy:

“The safety and welfare of all our pupils at AJI is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. In all matters relating to child protection the school will follow the procedures laid down by our own (or where appropriate the relevant child’s) Local Safeguarding Children Board (LSCB) which is the Bolton Safeguarding Board (BSB) in accordance with locally agreed interagency procedures together with DfE guidance contained in Working Together to Safeguard Children () (2026) and Keeping Children Safe in Education (KCSIE) September 2026. Incorporating Disqualification under the Childcare Act and The Counterterrorism and Security Act 2015 (The Prevent Duty) www.gov.uk/government/publications/keeping-children-safe-in-education”.

This reference to ‘Working Together to Safeguard Children’ has been updated to the 2026 edition, published by the DfE in March 2026 in place of the 2023 edition, and the reference to KCSIE has been updated to the 2026 edition, which came into force on 1 September 2026 in place of KCSIE 2025. This policy has been re-checked against the published Working Together 2026 and KCSIE 2026 guidance ahead of the 2026/27 academic year, and will be re-checked again whenever the DfE issues a new annual edition.

KCSIE 2026 also introduces changes that boarding staff should be aware of: the condensed ‘Annex A’ summary previously used by staff without direct pupil contact has been withdrawn, and all staff, including those without direct pupil contact, are now expected to read Part One of KCSIE in full; there is a stronger emphasis on early identification of, and response to, mental health concerns including suicidal ideation; there is expanded content on misogyny, violence against women and girls, and their links to harmful sexual

behaviour; and there are new references to the risks of artificial intelligence (AI), including AI-generated or altered ('deepfake') indecent imagery. These changes are reflected throughout this policy, in particular at Sections 5, 6, 9 and 15.

The school's usual procedures, described in its Safeguarding and Child Protection Policy, with regard to becoming aware of an allegation of abuse, or dealing with concerns about a child, will be followed when there are concerns about boarders. The Boarding Managers receive Level 3 training in Safeguarding in order to be aware of signs of abuse or radicalisation. Any concerns that staff hold about the safety and welfare of a pupil will, in the vast majority of cases, be discussed with Mr Mohammed Atcha, the Designated Safeguarding Lead, with the protection of the child being the overriding concern in all cases.

The Prevent Duty referenced above is set out in the current Prevent Duty Guidance for England and Wales (2023), issued under the Counter-Terrorism and Security Act 2015. All concerns about radicalisation or extremism are referred to the Prevent Lead, who will consider referral to the local Channel panel where appropriate, following the process set out in the school's Prevent Policy.

Keeping Children Safe in Education notes that children can be particularly vulnerable in residential settings, therefore we actively promote the development of co-operative, mutually respectful and supportive relationships between boarders, and between boarders and staff. The staff are available to boarders at all times and an Independent Listener from outside the school setting is also available. Boarders are advised during the Boarders' Induction process of where they can seek help, and information is posted on notice boards around the house.

Staff must be routinely vigilant in supervising interpersonal relationships within the boarding house but should never intrude into individual relationships unless there is material cause for concern, with any such approach being made confidentially and discreetly.

Staff must be vigilant and aware at all times where relationships may deteriorate and that within the boarding environment there exists the potential for abuse by peers. This can particularly be the case "behind closed doors" in dormitories. Staff maintain an active presence and all boarders discuss and sign the Boarders' Code of Conduct which emphasises the importance of caring for one another. Pupils are actively encouraged to talk to the staff about their concerns.

Further detail on how child-on-child abuse is identified and responded to is set out in Section 5, and the school's approach to online risks (including risks that arise through boarders' personal devices out of school hours) is set out in Section 9.

SECTION 3 – SAFER RECRUITMENT

All residential staff are subject to the school's usual safer recruitment procedures, which are set out in the school Recruitment, Selection and Disclosures Policy. All adults who come into contact with the children are subject to an enhanced DBS check. (National Minimum Standards, Standard 19; KCSIE Part 3.)

In the case of any visitors to the boarding house, such as external providers for activities, the Visiting Speakers form will be submitted to the DSL and the visitor will be chaperoned at all times by a member of staff. There are currently no persons over 16 not employed by the school but living in the same premises as children. However, staff are aware of the need to assess and comply with safeguarding regulations should that situation change.

Single Central Record

- The school maintains a Single Central Record (SCR) of all pre-appointment checks carried out on staff, supply staff, volunteers, boarding house parents, and regular visitors/contractors who have unsupervised access to boarders, in line with KCSIE Part 3.
- The SCR is reviewed by the DSL and reported to the Safeguarding Governor at least termly, and is made available to the ISI/Ofsted on request.

Regulated Activity and Volunteers

- All staff and regular volunteers working in regulated activity with children undergo an enhanced DBS check with a check of the children's barred list, in addition to identity verification, right-to-work checks, prohibition checks (where relevant), and overseas criminal record checks for staff who have lived or worked outside the UK.
- From 1 September 2026, the Crime and Policing Act 2026 removed the previous exemption that allowed supervised volunteers to work without a barred list check, and KCSIE 2026 reflects this change. A volunteer who teaches, trains, instructs, cares for, or supervises children is now in regulated activity, and requires an enhanced DBS check with children's barred list information, whether or not a member of staff is supervising them. The school reviewed all volunteer arrangements in the boarding house ahead of the start of the 2026/27 academic year to confirm every volunteer with regular, unsupervised, or overnight contact with boarders has the correct level of check, and this is kept under continuing review as volunteer arrangements change.
- Boarding house parents, prefects with pastoral responsibilities, and any host families or educational guardians (see Section 11) are subject to the same safer recruitment standard as employed staff, adjusted as appropriate to their role.

Recruitment Panel and Safer Recruitment Training

- At least one member of every recruitment panel for boarding staff holds current safer recruitment training, renewed at least every five years in line with sector guidance.
- References are always obtained directly from the current/most recent employer and are scrutinised for consistency with the application before an offer is confirmed.

SECTION 4 – PHYSICAL RESTRAINT

The Act addresses the question of physical restraint. In the very rare cases where this may prove necessary, AJI's policy is as follows:

A member of staff of a school may use, in relation to any pupil at the school, such force as is reasonable in the circumstances for the purposes of preventing the pupil from doing (or continuing to do) any of the following: causing personal injury to, or damage to the property of, any person (including the pupil himself), or engaging in any behaviour prejudicial to the maintenance of good order and discipline at the school or among any of its pupils, whether that behaviour occurs during a formal teaching session or otherwise. See Physical Restraints Policy.

Recording, Reporting and Review

- Every use of physical restraint (reasonable force) is recorded in writing on CPOMS by the member(s) of staff involved, as soon as possible and no later than the end of that working day, including: the pupils and staff involved, the reason force was necessary, what was done, its duration, and the pupil's response and welfare afterwards.
- The DSL or DDSL is informed of every use of restraint on the same day, and the pupil's parent/guardian is informed as soon as reasonably practicable, normally within 24 hours.
- Any injury, however minor, is recorded on the school's accident/incident log and, where the threshold is met, reported in line with Section 13 (Notifiable Incidents).
- The Safeguarding Governor reviews all recorded incidents of restraint at least termly to identify any patterns that may indicate a need for additional support, training, or a change in approach for an individual pupil or member of staff.
- Only staff who have received recognised physical intervention/de-escalation training use restraint, other than in a genuine emergency where no trained member of staff is available.

SECTION 5 – CHILD-ON-CHILD ABUSE, BULLYING, SEXUAL VIOLENCE & HARASSMENT

The boarding staff will follow guidance from the School's Anti-Bullying Policy. Bullying in any of its many guises is forbidden and staff must act promptly against it.

Signs of bullying which may be particular to the boarding house are:

- difficulty concentrating during prep.
- not wanting to stay at school.
- social isolation or avoiding particular pupils.
- the desire to remain with an adult.

Every member of staff must be an active presence in the boarding facilities and make sure that bedrooms, common rooms and other areas of the building are monitored. If bullying is suspected the member of staff must intervene, listen carefully to reports, record any incidents and offer support to the victim. Bullying is a serious offence and in most cases the incident will be referred to the management team. Further guidance can be found in the Anti-Bullying Policy.

Child-on-Child Abuse, Sexual Violence and Sexual Harassment

In line with KCSIE Part 5, the school recognises that children can, and do, harm other children, and that this can include girls being sexually harassed and boys being predominantly, though not exclusively, responsible for the initiation of this behaviour. Child-on-child abuse can include (but is not limited to): bullying (including online); physical abuse; sexual violence and sexual harassment; abuse in intimate personal relationships between peers; and initiation/hazing-type violence and rituals.

The school maintains a zero-tolerance culture towards sexual violence and sexual harassment. Staff will never dismiss such behaviour as 'banter', 'just having a laugh', or 'part of growing up', and will not require the victim to explain the incident in front of the alleged perpetrator(s).

- All staff are trained to recognise signs of child-on-child abuse, including harmful sexual behaviour, and to respond in line with the school's Child Protection and Anti-Bullying Policies.
- Every report is recorded on CPOMS, referred to the DSL, and risk-assessed for both the victim and the alleged perpetrator, considering the ongoing safety of all pupils sharing boarding accommodation.
- Where an allegation involves possible criminal behaviour, the DSL will consider a referral to children's social care and/or the police in line with local safeguarding partnership procedures, without requiring the victim's agreement to be a precondition of taking protective action.
- Boarding staff are particularly alert to the heightened risks in residential settings — including in dormitories, bathrooms, and unsupervised free time — and maintain active, visible supervision at these times, as set out in Section 2.

SECTION 6 – COUNSELLING, MENTAL HEALTH & EMOTIONAL WELLBEING

The Boarding Managers should be the first line of recourse and defence for all the boarders. However, in some situations, a distressed boarder might find it difficult to seek help, in which case a discussion with the School Counsellor might be recommended.

Mental Health Support

Reflecting new content in KCSIE 2026, the school recognises that mental health difficulties can, in some cases, be an indicator that a child is at risk of, or is experiencing, abuse, neglect, or exploitation. Boarding staff are alert to changes in a boarder's presentation, sleep, eating, or engagement, and will discuss any such concerns with the DSL, who will consider whether early help, a referral to the School Counsellor, or a referral to external mental health services (including CAMHS, where indicated) is appropriate.

Where a pupil discloses thoughts of self-harm or suicide, staff follow the school's Mental Health and Wellbeing Policy and will not keep this information confidential from the DSL, even where the pupil asks them to.

Young Carers

The school recognises that some boarders may have, or may have had, caring responsibilities for a family member before joining the school, and that this can affect a young person's emotional wellbeing, resilience, and need for support while away from home. Where staff become aware that a boarder is a young carer, this is recorded and shared with the DSL so that appropriate pastoral support can be put in place.

SECTION 7 – INCIDENT RECORDING

All incidents will be recorded on CPOMS safeguarding software, any statements and forms used for initial investigation will be uploaded on one central CPOMS database. All boarding staff have access to CPOMS.

Referral to Children's Social Care and the LADO

- Where a concern meets the threshold for significant harm, the DSL makes a referral to Bolton Children's Social Care without delay, and confirms any verbal referral in writing within 48 hours in line with Working Together to Safeguard Children 2026.
- Where a concern or allegation is made about a member of staff, volunteer, or other adult working with boarders, the DSL contacts the Local Authority Designated Officer (LADO) in line with the school's Allegations Against Staff procedure, regardless of whether the individual resigns before the matter is investigated.

Low-Level Concerns

In line with KCSIE, the school also records 'low-level' concerns about an adult's behaviour that do not meet the threshold for a LADO referral but which, if left unrecorded, could indicate an emerging pattern (for example, behaviour that is inconsistent with the Staff Code of Conduct but does not appear to have caused harm). These are recorded confidentially, reported to the DSL, and reviewed periodically to identify any patterns across the boarding house.

Retention

Safeguarding records are retained in line with the school's Data Protection and Records Retention Policy and, as a minimum, until the pupil's 25th birthday, reflecting DfE and Information Commissioner's Office guidance for child protection records.

SECTION 8 – MISSING BOARDERS

(National Minimum Standards, Standard 9 – Safety of boarders.)

The school has clear procedures for responding if a boarder cannot be accounted for, whether during the boarding day, at curfew/roll-call, or overnight. All boarding staff are trained in these procedures as part of their induction.

- Boarding staff take an accurate roll-call/headcount at set points in the day, including at curfew and lights-out, and any discrepancy is investigated immediately, not left until the next scheduled check.
- If a boarder cannot be located after a reasonable search of the premises and grounds, the DSL (or, out of hours, the senior member of staff on duty) is informed immediately.
- The school contacts the boarder's parents/carers (and educational guardian, where applicable) as soon as practicable, and contacts the police without delay if the boarder is not found quickly or if there is any concern for their immediate safety.
- Every missing-boarder incident, however briefly the pupil was unaccounted for, is recorded on CPOMS, reviewed by the DSL, and used to identify whether any pattern (for example, a particular pupil going missing repeatedly) indicates an unmet need, such as bullying, mental health difficulty, or exploitation.
- Repeated absence or 'missing from education' episodes are treated as a potential indicator of a range of safeguarding concerns, including sexual or criminal exploitation, in line with KCSIE.

SECTION 9 – ONLINE SAFETY

(National Minimum Standards, Standard 8; KCSIE Part 1 – online safety.)

The school recognises that boarders have access to personal mobile devices and the internet outside the school day to a greater extent than day pupils, and that this brings both benefit and risk. The school's approach follows the KCSIE framework of content, contact, conduct, and commerce risks.

- Boarding house Wi-Fi is filtered and monitored in line with the school's IT Acceptable Use and Filtering & Monitoring Policy, and filtering/monitoring effectiveness is reviewed at least annually.
- The Boarders' Code of Conduct sets out expectations for appropriate use of personal devices, including at night, and staff are alert to signs of excessive or secretive device use that may indicate a risk (for example, online grooming, exposure to harmful content, or cyberbullying).
- Boarders receive age-appropriate online safety education, including how to recognise and report grooming, sexting/youth-produced sexual imagery, and online radicalisation, as part of the wider PSHE and Prevent curriculum.
- Any online safety incident is recorded on CPOMS and handled by the DSL in the same way as any other safeguarding concern; where a report involves potential criminal activity (for example, indecent images or online grooming), the DSL will consider a police referral.
- In line with KCSIE 2026, staff are alert to the risk of AI-generated or digitally altered ('deepfake') indecent or semi-indecent imagery of pupils, which is treated with the same seriousness as any other indecent image and referred to the DSL and, where appropriate, the police without delay.
- The boarding house follows the school's Mobile Phone Policy, which reflects DfE statutory guidance on mobile phones in schools (in force from 1 September 2026) and sets out when and where boarders may use personal devices, recognising that boarding brings different practical considerations outside the school day than for day pupils.
- Parents are given guidance, during induction and periodically thereafter, on how to talk to their child about safe and appropriate use of the internet and social media while boarding.

SECTION 10 – WHISTLEBLOWING

(KCSIE Part 1 – a culture of vigilance and the ability of staff to raise concerns about adults.)

All boarding staff, volunteers, and contractors are made aware, through induction and the Staff Code of Conduct, that they have a professional responsibility to share any concern about the conduct of a colleague towards a boarder, however senior that colleague is, and that failing to do so may itself be a safeguarding failure.

- Concerns about a colleague's conduct can be raised directly with the DSL, the DDSL, the Safeguarding Governor, or, where the concern involves the Head or DSL, directly with the Chair of Governors.
- Staff may also raise a concern using the school's Whistleblowing Policy, and externally with the NSPCC Whistleblowing Advice Line (0800 028 0285) if they feel unable to raise it internally.
- No member of staff will be penalised for raising a concern in good faith, even if the concern is not subsequently upheld.

SECTION 11 – EDUCATIONAL GUARDIANS

(National Minimum Standards, Standard 22.)

- Where a boarder has an educational guardian, the school satisfies itself — before the arrangement begins and at least annually thereafter — that the guardian (and any adult living in the guardian's household who would have contact with the boarder) has been subject to safer recruitment checks appropriate to their role, including an enhanced DBS check.
- The school obtains written confirmation of the guardianship arrangement, including emergency contact arrangements, and ensures the guardian understands their role in supporting the boarder's welfare during exehats, half-terms, and emergencies.
- Where a guardian is arranged through an accredited guardianship organisation (for example, an AEGIS-accredited provider), the school records this accreditation; where a guardian is arranged privately, the school carries out its own equivalent checks.
- The DSL maintains a record of all current guardianship arrangements and reviews these at least annually to ensure they continue to meet the boarder's welfare needs.

SECTION 12 – BOARDERS’ VOICE & COMPLAINTS

(National Minimum Standards, Standards 13 and 14.)

The school actively seeks and listens to boarders’ views, wishes, and feelings about their boarding experience, and ensures boarders know how to raise a concern or complaint without fear of being penalised for doing so in good faith.

- Boarders can speak informally to any member of boarding staff, to the Independent Listener referred to in Section 2, or formally through the school’s Complaints Policy.
- Boarders’ councils or equivalent forums (where in place) give pupils a structured way to feed back on their boarding experience, and outcomes are reported back to boarders so they can see their views have been considered.
- Parental complaints relating to boarding are recorded and responded to in line with the school’s Complaints Policy, and the school ensures no boarder is penalised, directly or indirectly, because their parent has raised a complaint in good faith.
- A summary of complaints relating to boarding (anonymised as appropriate) is reported to the Safeguarding Governor and the Governing Board at least annually to identify any trends.

SECTION 13 – NOTIFIABLE INCIDENTS & REGULATORY REPORTING

(Education (Independent School Standards) Regulations 2014, as amended; ISI Regulatory Requirements.)

The school understands its statutory duty to notify the Department for Education and, where relevant, Ofsted/ISI and the Charity Commission (as the school’s regulators/oversight bodies) of certain serious incidents affecting boarders without delay, including but not limited to:

- Any allegation of serious harm or abuse by a member of staff towards a pupil, including where the individual has resigned.
- Serious accidents, illness, or the death of a boarder.
- Any event that means the school can no longer meet the National Minimum Standards for Boarding Schools, even temporarily.
- Any regulatory action taken against the school in connection with its boarding provision.

The DSL, in consultation with the Head and Safeguarding Governor, is responsible for making these notifications and for keeping a written record of what was reported, when, and to whom.

SECTION 14 – CCTV & ELECTRONIC SURVEILLANCE

(National Minimum Standards, Standard 8; UK GDPR and Data Protection Act 2018.)

- Any CCTV or other electronic surveillance in or around the boarding house is used only for the purposes of safeguarding and the security of the premises, and never in private spaces such as bedrooms, changing areas, or bathrooms.
- The location of cameras, the purpose of surveillance, retention periods, and who has access to footage are set out in the school's CCTV/Surveillance Policy and Privacy Notice, which is available to pupils, parents, and staff.
- Footage is stored securely, accessed only by authorised staff for a legitimate safeguarding or security purpose, and retained no longer than necessary in line with the school's Data Protection Policy.

SECTION 15 – STAFF TRAINING, INDUCTION & SUPERVISION

(National Minimum Standards, Standard 20; KCSIE Part 1 and Part 2.)

- All boarding staff receive safeguarding induction training before starting unsupervised contact with boarders, covering this policy, the Child Protection Policy, the Staff Code of Conduct, Prevent, and online safety.
- Following the withdrawal of the condensed 'Annex A' summary in KCSIE 2026, all boarding staff, including those without direct pupil contact, read Part One of KCSIE in full as part of their induction and annual update, rather than a shortened summary.
- The DSL and Deputy DSL undertake formal safeguarding training updated at least every two years, with the DSL keeping their knowledge and skills refreshed at regular intervals in between (at least annually) as required by KCSIE.
- All boarding staff receive safeguarding and child protection updates at least annually, including specific training on child-on-child abuse, sexual violence and harassment, online safety, and Prevent, in line with KCSIE.
- Staffing levels and the deployment of waking/sleeping staff in the boarding house are set out in the Staffing and Supervision arrangements referenced in Appendix A, and are kept under review to ensure boarders have appropriate access to a trusted adult at all times, including overnight.

SECTION 16 – GOVERNANCE & MONITORING

(National Minimum Standards, Standards 1 and 2.)

- The Safeguarding Governor (Dr Suhel Ahmed) has specific oversight of boarding safeguarding, meets with the DSL at least termly, and reports to the full Governing & Trust Boards on the effectiveness of boarding safeguarding arrangements at least annually.
- This policy is reviewed at least annually, or sooner following any significant incident, change in legislation, or Ofsted/ISI inspection finding, and any revision is approved by the Governing & Trust Boards before it takes effect.
- The Governing & Trust Boards satisfy themselves, through the Safeguarding Governor's reports and periodic direct engagement with boarders and staff, that the school's culture supports boarders in raising concerns and that those concerns are acted upon.

APPENDIX A – RELATED POLICIES

This Boarding Safeguarding Policy should be read alongside the following school policies, which contain further operational detail:

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Physical Restraints Policy (Use of Reasonable Force)
- Staff Code of Conduct
- Recruitment, Selection and Disclosures Policy
- Prevent Policy
- Complaints Policy
- Whistleblowing Policy
- IT Acceptable Use and Filtering & Monitoring Policy
- Mental Health and Wellbeing Policy
- CCTV/Surveillance Policy and Privacy Notice
- Data Protection and Records Retention Policy
- Boarders' Handbook and Code of Conduct
- Fire Safety Policy and Boarding Health & Safety arrangements

APPENDIX B – KEY SAFEGUARDING CONTACTS

- **Designated Safeguarding Lead (DSL):** Mr Mohammed Atcha —
Safeguarding@boltondarululoom.org.uk
- **Deputy Designated Safeguarding Lead (DDSL):** Mr Gulfam Khan
- **Safeguarding Governor:** Dr Suhel Ahmed
- **Prevent Lead:** Mr Mohammed Atcha

Local Authority Designated Officer (LADO), Bolton:

Bolton Safeguarding Children Partnership
Department of Children Services, Bolton Council
Castle Hill Centre
Castleton St
Bolton, BL2 2JW
Email: ldao@bolton.gov.uk
Phone: 01204 337474

Bolton Safeguarding Board (children's social care referrals):

Tel: 01204 331500
Out of hours emergency: 01204 337777

NSPCC Helpline (advice for adults concerned about a child):

Tel: 0808 800 5000

NSPCC Whistleblowing Advice Line:

Tel: 0800 028 0285

Childline (for pupils):

Tel: 0800 1111

Independent Listener:

Shoaib Rokad - 07865074161
Junaid Ilyas - 07877221395