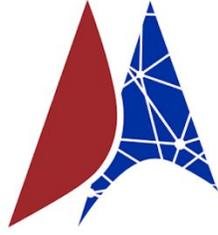


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\* This document is subject to change throughout the academic year

Dubai American Academy



**GEMS**

أكاديمية جيمس دبي الأمريكية

Dubai American  
Academy



# CHILD PROTECTION AND SAFEGUARDING POLICY

2019-20

## Child protection and safeguarding policy

Review date of this policy: June 2019  
Date of publication of this policy: August 2019  
Reviewed by: GEMS Dubai American Academy Safeguarding Team

Designated Safeguarding Lead	Lisa Ramshaw
Deputy Designated Safeguarding Lead - HS	Reema Hadid Supported by HS Principal - Tammy Jochinke
Deputy Designated Safeguarding Lead - MS	Frank Becvar Supported by MS Principal - Lisa Hewitt
Deputy Designated Safeguarding Lead - ES	Antonio Tyson Supported by ES Principal - Craig Cantlie
Principal / Head of School	Tammy Murphy
Nominated Governor	Dr. Saliha Afridi
Term of role	August 2019 – July 2020
Next Review Date	June 2020

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## Policy statement and principles

### MISSION

Dubai American Academy is a vibrant international community, deeply rooted in a culture of kindness that creates and empowers leaders and independent thinkers with integrity, character, and drive.

### IDENTITY STATEMENT

Dubai American Academy offers an enriched American curriculum to students of all nationalities culminating in the International Baccalaureate Diploma Program and/or an American high school diploma. Beyond its rigorous academic program, DAA prepares students to lead successful lives through the exceptional diversity of its community and the extra-curricular experiences that contribute to the development of the whole person.

This policy is one of a series in the school's integrated safeguarding portfolio.

The school's safeguarding arrangements are inspected by KHDA under the judgements for: The protection, care, guidance and support of students, and leadership and management.

This policy is available on the school website and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in school.

### Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of GEMS.

### Policy principles:

- The school's responsibility to safeguard and promote the welfare of children is of paramount importance.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Children who are safe and feel safe are better equipped to learn.
- This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Representatives of the whole school community of students, parents, staff, volunteers and governors will therefore be involved in reviewing, shaping and developing the school's safeguarding arrangements and child protection policy.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in school.
- All staff members will maintain an attitude of 'It could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- If, at any point, there is a risk of immediate serious harm to a child, a referral will be made to relevant statutory body and public services. **Anybody can make a referral.** If the child's situation does not appear to be improving,

any staff member with concerns should press for reconsideration. Concerns should always lead to help for the child at some stage.

- Students and staff involved in child protection issues will receive appropriate support.
- This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review.

### Policy aims:

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities.
- To ensure consistent good practice across the wider network of GEMS.
- To demonstrate the school's commitment with regard to safeguarding and child protection to students, parents and other partners.
- To contribute to the school's safeguarding portfolio.

### Terminology

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child** includes everyone under the age of 18.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

## Safeguarding legislation and guidance

GEMS policy is derived from UK legislation which includes the following documents:

- Keeping Children Safe in Education (2016).
- Working Together to Safeguard Children (2015).
- What to do if you are worried a child is being abused (2015).
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (2015).

The law and guidance set within the UAE is as follows



- UAE Federal Law No. 3 of 2016 on children’s rights (Wadeema’s Law).
- UAE Department for Health, School Health Guidelines for Private Schools 2011.
- UAE School Inspection Framework 2016, Section 5 The protection, care, guidance and support of students .

### Keeping Children Safe in Education, DfE (September 2016)

This is the statutory guidance that all schools and colleges need to consider when carrying out their responsibilities for safeguarding children. Part 1 of this document outlines safeguarding information for all staff and should be read by all staff and regular volunteers. Annex A provides further guidance on specific forms of abuse and safeguarding issues; it should be read by those staff that work directly with children. GEMS have adopted this UK DfE guidance as an international benchmark, however local law and practice must be adopted at all times.

Due to their day-to-day contact with students, staff in school are uniquely placed to observe changes in children’s behavior and the outward signs of abuse, neglect, exploitation and radicalisation. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that all school staff are alert to the signs of abuse, are approachable and trusted by students/students, listen actively to children and understand the procedures for reporting their concerns. The school will act on identified concerns and will provide early help to prevent concerns from escalating.

### Roles and responsibilities

Designated Safeguarding Lead	Lisa Ramshaw
Deputy Designated Safeguarding Lead - HS	Reema Hadid
Deputy Designated Safeguarding Lead - MS	Frank Becvar
Deputy Designated Safeguarding Lead - ES	Antonio Tyson
Principal / Head of School	Tammy Murphy
Nominated Governor	Dr. Saliha Afridi
Term Date	August 2019 – July 2020

All schools are required to appoint a member of the senior leadership team to coordinate child protection arrangements and to ensure that there are appropriate cover arrangements.

### The Designated Safeguarding Lead (DSL):

- Is a senior member of staff from the school’s leadership team and therefore has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff.
- Takes lead responsibility for safeguarding and child protection in the school, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies.
- Is appropriately trained, receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role.
- Acts as a source of support and expertise to the school community.
- Encourages a culture of listening to children and taking account of their wishes and feelings.
- Is alert to the specific needs of children in need, those with special educational needs, looked after children and

young carers.

- Has a working knowledge of relevant UAE law, education inspection process, and inter- agency support.
- Keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from, the student's general file.
- Refers cases of suspected abuse to Children's Social Care, or the Police as appropriate.
- Attends and/or contributes to child protection conferences, strategy meetings.
- Coordinates the school's contribution to child protection plans as part of core groups, attending and actively participating in core group meetings.
- Develops effective links with relevant statutory and voluntary agencies.
- Ensures that all staff sign to indicate that they have read and understood the child protection and safeguarding policy and Staff Behavior Policy (Code of Conduct).
- Has a working knowledge of relevant national safeguarding guidance .
- Ensures that the child protection and safeguarding policy and procedures are regularly reviewed and updated annually, working with the whole school community of students, parents, staff, volunteers and governors, GEMS, regarding this.
- Liaises with the nominated governor, GEMS personnel, and head teacher (where the DSL role is not carried out by the headteacher) as appropriate.
- Keeps a record of staff attendance at child protection training.
- Makes the child protection and safeguarding policy available publicly, i.e. on the school's website or by other means.
- Ensures parents are aware of the school's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- Ensures that the headteacher is aware of the responsibility under *UAE Law*.

## The Deputy Designated Safeguarding Lead(s)

Is/are appropriately trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

**The governing body (GEMS)** ensures that the school:

- Appoints a Designated Safeguarding Lead who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training.
- Ensures that the DSL role is explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- Has a child protection policy and procedures, including a staff code of conduct, that are consistent with GEMS, and statutory, requirements, reviewed annually and made available publicly on the school's website or by other means.
- Has procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the headteacher and allegations against other children.
- Follows safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification by association regulations.
- Develops an induction strategy that ensures all staff, including the headteacher, and volunteers receive information about the school's safeguarding arrangements, Staff Behavior Policy (Code of Conduct) and the role of the DSL on induction.

- Develops a training strategy that ensures all staff, including the headteacher, and volunteers receive appropriate and regularly updated safeguarding and child protection training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively in line with any requirements of GEMS. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- Ensures that all staff, including temporary staff and volunteers, are provided with copies of or access to the school's child protection and safeguarding policy and Staff Behavior Policy (code of conduct) before they start work at the school.
- Contributes to inter-agency working and plans.
- Teaches students about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum.

The governing body (GEMS) nominates a member (normally an exec) to be responsible for liaising with the Government Authority, and other agencies in the event of an allegation being made against the headteacher.

It is the responsibility of the governing body to ensure that the school's safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the Local Authority, GEMS and national guidance.

### The Superintendent:

- Ensures that the child protection policy and procedures are understood and implemented by all staff.
- Allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures.
- Ensures that students are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum.
- Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer in GEMS within one working day prior to any internal investigation.
- Ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the Designated Officer.
- Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.

### Good practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards students, we need to agree standards of good practice which form a code of conduct for all staff. Good practice includes:

- Treating all students with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving students in decisions that affect them.
- Encouraging positive, respectful and safe behavior among students.

- Being a good listener.
- Being alert to changes in students' behavior and to signs of abuse and neglect and exploitation.
- Recognising that challenging behavior may be an indicator of abuse.
- Reading and understanding the school's child protection policy, Staff Behavior Policy (code of conduct) and guidance documents on wider safeguarding issues, for example bullying, behavior, physical contact, sexual exploitation, extremism, e-safety and information-sharing.
- Asking the student's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language.
- Being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.
- Applying the use of reasonable force and physical intervention only as a last resort and in compliance with school procedures and GEMS guidance.
- Referring all concerns about a student's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care.
- Following the school's rules with regard to communication and relationships with students, including via social media.

## 1. Abuse of position of trust

All school staff are aware that inappropriate behavior towards students is unacceptable and that their conduct towards students must be beyond reproach. Any relationship with a student, even if over the age of consent, is regarded as 'an abuse of a position of trust'.

The school's [Staff Behavior Policy](#) (DAA Staff and Faculty Handbook) sets out our expectations of staff and is signed by all staff members.

## 2. Children who may be particularly vulnerable

Some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability, including prejudice and discrimination, isolation, social exclusion, communication issues, a reluctance on the part of some adults to accept that abuse can occur, as well as an individual child's personality, behavior, disability, mental and physical health needs and family circumstances.

To ensure that all of our students receive equal protection, we will give special consideration to children who are:

- Disabled or have special educational needs.
- young carers.
- Affected by parental substance misuse, domestic abuse and violence or parental mental health needs.
- Asylum seekers.
- Vulnerable to being bullied, or engaging in bullying behaviors.
- Living in temporary accommodation.
- Living transient lifestyles.
- Living in chaotic and unsupportive home situations.
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality.

- At risk of child sexual exploitation (CSE).
- At risk of being drawn into extremism.

This list provides examples of vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

### 3. Early Help

The school recognises that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child’s life. All school staff are trained to notice any concerns about children which may help to identify that they would benefit from early help.

The school is committed to working in partnership with children, parents and other agencies to:

- Identify situations in which children and/or their families would benefit from early help.
- Undertake an assessment of the need for early help; and provide targeted early help services to address the assessed needs of a child and their family, developing an action plan that will focus on activity to improve the child’s outcomes.

The school will be particularly alert to the potential need for early help for any child who:

- Is disabled and has specific additional needs;
- Has special educational needs;
- Is a young carer;
- Is showing signs of engaging in anti-social or criminal behavior;
- Is in a family whose circumstances present challenges for the child, such as adult substance abuse, adult mental ill health, domestic abuse;
- Is showing early signs of abuse and/or neglect; and/or
- Is particularly vulnerable in any of the ways identified in paragraph 6 above.

Careful consideration should be taken regarding who to involve in the ‘Early Help’ process. The process should involve the child and family as well as all the professionals who are working with them. However, if by doing so this puts the child at further risk, relevant best interests decisions should be made, in consultation with UAE inter-agencies.

The school will keep the needs and circumstances of children receiving early help under constant review. If the child’s situation does not improve and/or the child’s parents and/or the child do not consent to early help being initiated, the school will make a judgement about whether, without help, the needs of the child will escalate. If so, a referral to Children’s Social Care may be necessary.

### 4. Attendance

We recognise that full attendance at school is important to the well-being of all our students and enables them to access the opportunities made available to them at school. Attendance is monitored closely. Our attendance policy is set out in a separate document and is reviewed regularly by our SLT.

## 5. Children Missing from Education

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Effective information sharing between parents, schools and authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education.

Attendance, absence and exclusions are closely monitored. The DSL will monitor unauthorised absence and take appropriate action, particularly where children go missing on repeated occasions and/or are missing for periods during the school day.

Where a student has 10 consecutive school days of unexplained absence and all reasonable steps\* have been taken by the school to establish their whereabouts without success, the school will make an immediate referral to relevant UAE authorities, and GEMS appointed persons.

\*Reasonable steps include:

- Telephone calls to all known contacts.
- Letters home (including recorded delivery).
- Contact with other schools where siblings may be registered.
- Possible home visits where safe to do so.
- Enquiries to friends, neighbours etc. through school contacts.
- Enquiries with any other service known to be involved with the student/family.
- All contacts and outcomes to be recorded on the student's file.

The school is required by UAE educational law to have an admission register and, with the exception of schools where all students are boarders, an attendance register. All students must be placed on both registers.

## 6. Helping children to keep themselves safe

The UAE School Inspection Framework stipulates governing bodies and proprietors to ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum.'

Children are taught to understand and manage risk through our advisory and Moral Education lessons, and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and, with the support of staff, work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behavior rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children and students are encouraged to speak to a member of staff of their choosing about any worries they may have.

Discussions about risk will include talking to children about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which is widely referred to as 'sexting'.

It is recognised that a young person may choose to share indecent images with another young person in the context of a romantic relationship and that she or he may do so without any intention to cause harm or distress to anybody. Although technically an offence, 'sexting' of that nature is referred to as 'experimental sexting' and it is usually not necessary or appropriate to criminalise young people in those circumstances, yet UAE law prohibits this.

However, there are clear risks associated with such behavior. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other safeguarding concern.

When concerns are identified, staff will always speak to children and will inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm.

N.B. Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity by under 13 year olds will therefore be referred to the Police.

(Please also refer to 'Youth produced sexual imagery' in section 27 below)

## 7. Support for students, families and staff involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support students, their families, and staff by:

- Taking all suspicions and disclosures seriously.
- Nominating a link person (*usually the DSL*) who will keep all parties informed and be the central point of contact.
- Where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest.
- Responding sympathetically to any request from students or staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of helplines, counselling or other avenues of external support.
- Following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures.
- Cooperating fully with relevant statutory agencies.

## 8. Complaints procedure

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student or discriminating against them in some way. Complaints are managed by the headteacher, other members of the senior leadership team and

governors. An explanation of the complaints procedure is included in the safeguarding information for parents and students.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under the school's child protection procedures.

## 9. Whistle blowing if staff have concerns about a colleague

Staff who are concerned about the conduct of a colleague - including visiting professionals and volunteers - towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague's career. All staff must remember that the welfare of the child is paramount.

The school's **whistleblowing** policy enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place.

Staff are expected to report all concerns about poor practice or possible child abuse by colleagues - including what may seem minor contraventions of the school's [Staff Behavior Policy](#) (DAA Staff and Faculty Handbook) – to the headteacher, to facilitate an early intervention in order to maintain appropriate boundaries and a safe culture that protects children and reduces the risk of serious abuse in school.

Concerns or complaints about the headteacher should be reported to the GEMS designated personnel, whose contact details are displayed in the staff room for any member of staff to use in such an instance.

## 10. Allegations against staff

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students and we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, the school will provide support and a named contact for the member of staff.

**As stated above, all allegations against staff should be reported to the head teacher. In all cases allegations against staff should be passed on to GEMS central management team within 24 hours. Allegations against the headteacher should be reported to GEMS DSL.**

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations concerning staff who no longer work at the school or historical allegations will be reported to the police.

In accordance with GEMS Policy, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

## 11. Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff who will have direct contact with children and volunteers will receive an explanation during their induction which will include:

- The school's child protection and safeguarding policy.
- Signs and symptoms of abuse and neglect.
- Responding to disclosure of abuse or neglect by a child.
- Reporting and recording arrangements.
- The [Staff Behavior Policy](#) (DAA Staff and Faculty Handbook).
- Details of the DSL.

NB. All of the above will be explained **before** a new member of staff, governor or volunteer has direct contact with children in school. The school's Child Protection Policy and [Staff Behavior Policy](#) (DAA Staff and Faculty Handbook) will be sent with the letter confirming an appointment with a written requirement that the individual reads the two policies in advance of starting work at the school. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.

All staff, including the headteacher (unless the headteacher is the DSL), volunteers and governors will receive appropriate and regularly updated safeguarding and child protection training and thematic updates as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with UAE guidance and any requirements of GEMS.

The DSL will attend training for newly appointed DSLs and refresher training every two years delivered by KAMET LTD. That training will include up to date information about inter-agency procedures. In addition, the DSL will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development.

All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational

needs and disabilities, looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, extremism.

In addition, the headteacher (and/or other school leaders as appropriate) and at least one governor (usually the chair) will attend safer recruitment training and the school will ensure that there are at least two school leaders and/or governors that have attended safer recruitment training within the past three years.

Supply staff and other visiting staff will be given the school's [Visiting Staff Leaflet](#). This is available with Divisional Secretaries and front reception.

## 12. Safer recruitment

Our school endeavours to ensure that we do our utmost to employ 'safe' staff and allow 'safe' volunteers to work with children.

Safer recruitment means that all applicants will:

- Complete an application form which includes their employment history and explains any gaps in that history.
- Provide two referees, including at least one who can comment on the applicant's suitability to work with children.
- Provide evidence of identity and qualifications.
- If offered employment will be subject to vetting and barring checks relevant to their country of origin.
- If offered employment, provide evidence of their right to work in the UAE.
- Be interviewed by a panel of at least two school leaders, if shortlisted.

The school will also

- Ensure that every job description and person specification for roles in school includes a description of the role holder's responsibility for safeguarding.
- Ask at least one question at interview for every role in school about the candidate's attitude to safeguarding and motivation for working with children.
- Verify the preferred candidate's mental and physical fitness to carry out their work responsibilities.
- Obtain references for all shortlisted candidates, including internal candidates.
- Carry out additional or alternative checks for applicants who have lived or worked outside the UAE.
- Ensure that applicants for teaching posts are not subject to a prohibition order issued by the country of origin.

At least one member of each recruitment panel will have attended safer recruitment training.

All new members of staff and volunteers will undergo an induction that includes familiarisation with the school's Child Protection and Safeguarding Policy and [Staff Behavior Policy](#) (DAA Staff and Faculty Handbook).

All staff are required to sign to confirm they have received a copy of the Child Protection and Safeguarding Policy and [Staff Behavior Policy](#) (DAA Staff and Faculty Handbook).

All relevant staff (teachers, teaching assistants, other classroom based staff, lunchtime supervisors and members of the senior leadership team) and all those who work in before or after school care for children under eight) are made aware of the disqualification and disqualification by association legislation (*state how awareness is raised e.g. with a*

*staff/volunteer briefing, a clause in employment contracts for new staff etc.).*

The school obtains written confirmation from supply agencies and third party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in the school that the school would have undertaken if they were employing the individual directly.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

The school maintains a single central record of recruitment checks undertaken and ensures that the record is maintained.

### **Governors**

All governors will be the subject of enhanced police checks.

### **Volunteers**

Volunteers will undergo checks commensurate with their work in the school and contact with students. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.

### **Supervised volunteers**

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.

### **Contractors**

The school checks the identity of all contractors working on site and requests police checks where appropriate. Contractors who have not undergone checks will not be allowed to work unsupervised or in regulated activity.

## **13. Site security**

Visitors to the school, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe. The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## **14. Behavior Management**

Our behavior policies are set out in our Divisional Handbooks:

- [ES Handbook](#)
- [MS Handbook](#)
- [HS Handbook](#)

## 15. Record Keeping

The school will maintain safeguarding (including early help) and child protection records.

The school will:

- Keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to relevant agencies immediately;
- Keep records in a folder in a meticulous chronological order;
- Ensure all records are kept secure and in locked locations;
- Ensure all relevant child protection records are sent to the receiving school, college or other education establishment when a student moves.

Safeguarding and child protection records will be maintained independently from the student's school file and the school file will be 'tagged' to indicate that separate information is held. Such records will only be accessible to the Designated Safeguarding Lead and school leaders who need to be aware.

Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behavior, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record.

Records of safeguarding/child protection observations or concerns can be completed electronically or as a paper version but it is most important that all staff use one consistent system for the recording of concerns and that all records are passed to the Designated Safeguarding Lead, who should complete the form to confirm what action has been taken.

## 16. Confidentiality and Information Sharing

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another SLT member or outside agency as required.

It is reasonable for staff to discuss day-to-day concerns about students with colleagues in order to ensure that children's general needs are met in school. However, staff should report all child protection and safeguarding concerns to the DSL or headteacher, or in the case of concerns about the headteacher, to GEMS centrally. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child/parent to keep secrets.

Child protection information shall be:

- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than necessary
- Processed in accordance with the data subject's rights
- Secure

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

The school's policy on confidentiality and information-sharing is available to parents and students on request.

## 17. Extended school and off-site arrangements

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. When our students attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

Where extended school activities are provided by and managed by the school, the school's child protection policy and procedures apply. If other organisations provide services or activities on the school site, the school will check that those organisations have appropriate procedures in place, including safer recruitment procedures.

## 18. Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect students we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Seek parental consent
- Use only the student's first name with an image
- Ensure students are appropriately dressed, and
- Encourage students to tell us if they are worried about any photographs that are taken of them.

## 19. Online Safety

Children and young people commonly use electronic equipment, including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat and Instagram.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children. That harm might range from sending hurtful or abusive texts and emails to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Students may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behavior and criminal activity.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behavior and students are not allowed to access those sites in school. Many students own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community

Details regarding online safety can be found in our Divisional Handbooks:

- [ES Handbook](#)
- [MS Handbook](#)
- [HS Handbook](#)

The school's **online safety policy** (detailed in each of the Divisional Handbooks) explains how we try to keep students safe in school and protect and educate students in the safe use of technology. Cyberbullying and sexting by students will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Sexting' below). Serious incidents may be managed in line with our sexual exploitation policy or child protection procedures.

All staff receive online safety training and the school's online safety coordinator is: Abhishek Singh.

## Online communication between staff and students

Staff also receive advice regarding personal online activity, use of social networking and electronic communication with students, about which there are strict rules.

Please refer to DAA's guidance is integrated into each Divisional Handbook:

- [ES Handbook](#)
- [MS Handbook](#)
- [HS Handbook](#)

Staff found to be in breach of these rules may be subject to disciplinary action.

## 20. Child protection procedures

### Recognising abuse

To ensure that our students are protected from harm, we need to understand what types of behavior constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

## **There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect**

### **Physical abuse**

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness

to, a child's basic emotional needs.

Definitions taken from *Working Together to Safeguard Children* (HM Government, 2015).

## Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioral indicators of abuse and report any concerns to the Designated Safeguarding Lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behavior – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; and/or
- display sexual knowledge or behavior beyond that normally expected for their age and/or stage of development.
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

**It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.**

## Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## Taking Action

**Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “It could happen here”.**

Key points for staff to remember when taking action are:

1. Teacher identifies concern and documents reason for referral
2. Teacher reports to counselor
3. Counselor can then investigate the case and communicate with Divisional Principal as appropriate
4. If necessary, the concern will then be communicated to the DSL\*  
\*immediately if there is evidence of physical or sexual abuse and certainly by the end of the day

- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Seek support for yourself if you are distressed or need to debrief

## If a member of staff or volunteer is concerned about a student’s welfare

There will be occasions when staff may suspect that a student may be at risk but have no ‘real’ evidence. The student’s behavior may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. It is fine for staff to ask the student if they are OK or if they can help in any way.

Staff should use report these concerns to the DSL as per any other concern about a child's welfare.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help process.

## If a student discloses to a member of staff or volunteer

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the student know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement. If they jump in immediately the student may think

that they do not want to listen but if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with students staff will:

- Allow them to speak freely
- Remain calm and not overreact – the student may stop talking if they feel they are upsetting their listener
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- Not be afraid of silences – staff must remember how hard this must be for the student
- **Under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the student’s mother think about all this (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. when did this happen, where did this happen?)
- At an appropriate time tell the student that in order to help them, the member of staff must pass the information on
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- Avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong
- Tell the student what will happen next
- Let them know that someone (either you or another named person, e.g. the DSL) will come to see them before the end of the day
- Report verbally to the DSL
- Write up their conversation as soon as possible
- Seek support if they feel distressed or need to debrief

## Notifying parents

The school will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from relevant UAE agencies.

## Making a referral to Children’s Social Care

The DSL will make a referral to UAE agencies, and the police, if it is believed that a student is suffering or is at risk of suffering harm

The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay.

## Reporting to GEMS

All concerns relating to any aspect of a child’s safety must be logged in GEMS data management system HSE (as per GEMS policy). Where there is concern about the immediate welfare of child, the DSL should contact GEMS central

management team for advice and guidance immediately. Any inter agency involvement with UAE statutory, and public bodies, including the police or Social Services, must be flagged with the GEMS DSL.

In 2019-20 there is a new online system for reporting safeguarding and HSE concerns (working title Phoenix HSE).

- The online reporting system is accessed through Phoenix with your normal login. Quick link here: <https://hse.gemseducation.com>
- The permissions will be for the DSL/Deputy DSL's.
- All staff will be able to log concerns once the trial period has ended with the DSL able to see all reported concerns and triage accordingly – training to follow.

## 21. Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures. All students and parents receive a copy of the procedures on joining the school and the subject of bullying is addressed at regular intervals in advisory/transformation and discovery time.

If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the headteacher and the DSL will consider implementing 'early help' or child protection procedures.

Please also refer to issues in relation to children who are sexually harmful or abusive towards other children below.

## 22. Children with sexually harmful or inappropriate behavior

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures as above where necessary. However, there will be occasions when a student's behavior warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

Abusive behavior by one child towards another will not be tolerated, minimised or dismissed as 'banter' or 'part of growing up'.

When dealing with abuse of students by other students, staff will be mindful of the potential for prejudice-based bullying; racist, disability, homophobic and transphobic abuse; gender-based violence and teenage relationship abuse. Whilst mindful of the particular vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.

Members of staff who become concerned about a student's sexualised behavior, including any known online sexualised behavior, should record their concerns and report them to the DSL as soon as possible, as with any other safeguarding concern.

The management of children and young people with sexually harmful behavior is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behavior may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

Any instances of sexual harm caused by one student to another and any situation where there are concerns about power imbalance, coercion or force will be discussed with UAE agencies, and potentially the police.

In responding to cases involving children or young people who have committed sexually abusive behaviors, GEMS Schools are encouraged to communicate with the Lighthouse Foundation via GEMS central team.

In circumstances where a child displays sexualised inappropriate behavior but evidence of sexual harm towards other children is not clear cut, the school may seek consultation and advice from GEMS designated personnel.

In deciding the most appropriate response, relevant considerations will include:

- The nature and extent of the inappropriate/abusive behaviors. In respect of sexual abuse, it is necessary to distinguish between normal childhood sexual development and experimentation; and sexually inappropriate or aggressive behavior
- The context of the abusive behaviors
- The child/young person's development, family and social circumstances
- The need for services, specifically focusing on the child/young person's harmful behavior as well as other significant needs; and/or
- The risks to self and others, including other children in the school, household, extended family, peer group and wider social network.

The school is committed to participating in plans both to provide students who are at risk from other children and those students who may present a risk to other children with appropriate services to address any concerns and, wherever possible, to facilitate ongoing access to education in school for all children concerned, subject to appropriate risk assessments and risk management plans.

## **Youth produced sexual imagery ('sexting')**

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved.

Young people who share sexual imagery of themselves or their peers are breaking the law. However the school believes it is important to avoid criminalising young people unnecessarily. The school will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to YPSI is more or less serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about a YPSI issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (i.e. it should be confiscated).

Staff will not look at or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).

The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made UAE Agencies and police.

The police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported YPSI incident is experimental as in Section 11 above or aggravated.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behavior by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.

Review of what response is necessary will facilitate consideration of whether:

- There are any offences that warrant a police investigation
- Child protection procedures need to be invoked
- Parents/carers require support in order to safeguard their children
- A multi-agency sexual exploitation (MASE) meeting is required
- Any of the perpetrators and/or victims require additional support.

Examples of aggravated incidents include:

- Evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim)
- Evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves
- Pressure applied to a number of students (e.g. all female students in a class or year group) to create and share indecent images of themselves
- Pressurising a student who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- Dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- Sharing of indecent images places a young person is at immediate risk of harm, for example the young person is presenting as suicidal or self-harming

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident, or whether the school is able to contain the situation in partnership with all parents of the students involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will usually consult with the police to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

**Viewing the Imagery** - adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a student.

If a decision is made to view imagery, the DSL will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- Is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery then the DSL will:

- Never copy, print or share the imagery; this is illegal
- Discuss the decision with the headteacher, Children's Social Care or the Education Safeguarding Manager
- Ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the headteacher
- Ensure viewing takes place with another member of staff present in the room, ideally the headteacher, another DSL or a member of the senior leadership team. The other staff member does not need to view the images
- Wherever possible ensure viewing takes place on school or college premises, ideally in the headteacher or DSL's office
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- Record the viewing of the imagery in the student's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents

**Deletion of Images** - if the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

### 23. Sexual exploitation of children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. Children and young people are often unwittingly

drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to the trafficking of children.

The school teaches children about consent and the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation of children and all concerns are reported immediately to the DSL. The DSL will consider the need to make a referral to UAE agencies, and the police. Parents will be consulted and notified as above.

## 24. Radicalisation and Extremism

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The government defines extremism as vocal or active opposition to fundamental UAE values.

Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas.

The school has defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school.

During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. The school is committed to preventing students from being radicalised and drawn into any form of extremism or terrorism. The school promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing students with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all students are valued and listened to within school.

School staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area, and a specific understanding of how to identify individual children who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern.

The school recognises the importance of providing a safe space for children to discuss controversial issues, and

building their resilience and the critical thinking skills they need in order to challenge extremist perspectives.

The school will discuss any concerns about possible radicalisation identified in school with a child's parents/carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk, and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation.

The school expects all staff, volunteers, governors, visiting professionals, contractors and individuals or agencies that hire school premises to behave in accordance with the school's Staff Behavior Policy (Code of Conduct), will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website [www.educateagainsthate.com](http://www.educateagainsthate.com) informative and useful. The website is designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for teachers, staff and school and college leaders.

## 25. Staff reporting directly to child protection agencies

Staff should ordinarily follow the reporting procedures outlined in this policy. However, any staff member can refer their concerns directly to UAE agencies, or the police if:

- The situation is an emergency and the DSL, the deputy DSL, the headteacher and/or the chair of governors are all unavailable
- They are convinced that a direct report is the only way to ensure the student's safety, or
- For any other reason they make a judgement that a direct referral is in the best interests of the child.

In any of those circumstances, staff may make direct child protection referrals and share information without being subject to censure or disciplinary action. However, staff should inform the DSL and/or headteacher at the earliest opportunity that they have done so unless in their judgement doing so would increase the risk of harm to the child.

## 26. Involvement of outside agencies:

Dubai Foundation for Women and Children (DFWAC)

This is the first licensed non-profit shelter in the UAE for women and children who are victims of domestic violence, child abuse and human trafficking. It was established in July 2007 by His Highness Sheikh Mohammed bin Rashid Al Maktoum, Vice President and Prime Minister of the UAE and Ruler of Dubai, to offer victims immediate protection and support services in accordance with international human rights obligations. The Foundation provides a helpline, emergency shelter, and support services to women and children victims. DFWAC aims to protect physically, sexually and emotionally abused women and children, prevent ongoing abuse and the escalation of violence and promote social awareness through education and outreach.

DFWAC provides:

- A safe shelter
- Case management
- Medical care
- Psychological support
- Counselling
- Legal, consular and immigration assistance

- Helpline 800 111 or email [help@dfwac.ae](mailto:help@dfwac.ae)
- Website – [www.dfwac.ae](http://www.dfwac.ae)



**Major Shahein**  
Dubai Police  
Human Rights Department

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+971 506355377 Mobile  
[almazmi@dubaipolice.gov.ae](mailto:almazmi@dubaipolice.gov.ae)



**Miss Fatma Albloshi**  
Dubai Police (Child & Women...  
Head of Awareness & Educati...

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[f.murad@dubaipolice.gov.ae](mailto:f.murad@dubaipolice.gov.ae)  
<http://www.dubaipolice.gov.ae>

Dubai Police Human Rights Department 24/7 Duty Officer 056 6862121  
Latifa Hospital Child Welfare Unit

Tel: 04 2193000  
Fax: 04 3241717  
PO Box 4115 Dubai, UAE  
Working Hours: 24 Hours  
Community Development Authority (Centre)

Any child in Dubai who needs help, protection from abuse, or advice can pick up the phone and dial 800-988 any time. Four social workers and psychologists at the Child Protection Centre in Al Barsha are on standby to assist residents under 18 years of age to ensure their rights are protected and upheld. The recently opened centre under the Community Development Authority (CDA) is part of CDA's comprehensive strategy to make Dubai the most secure and ideal environment for children to live. It is tasked with rehabilitating, providing counselling, visiting and assisting children in need.

Al Ameen Reporting (Dubai & Federal Police)

The Al Ameen Service officially launched in September 2003. Using this service, the people of Dubai can communicate confidentially with the authorities to keep abreast of developments in Dubai, and on issues that concern them.

[www.alameen.ae/en/](http://www.alameen.ae/en/)

## 27. Related safeguarding portfolio policies

- Staff Behavior Policy (code of conduct)
- Physical intervention and the use of reasonable force
- Behavior
- Personal and intimate care
- Complaints procedure
- Tackling bullying
- Physical contact
- Whistleblowing

- SEN
- Missing children
- Safer recruitment
- Managing allegations
- Grievance and disciplinary

## 28. Special Circumstances

### Work experience

The school has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervising students on work experience. [specify where the procedures are kept and who holds responsibility for them]

### Children staying with host families

The school may make arrangements for students to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the school will take all reasonable steps to ensure the suitability of the host family, as if they were a volunteer of the school.

### Local issues

*Insert information about any issues that may be specific to the school's local area or population, for example gang activity, youth violence or any active extremist groups from which children may need to be safeguarded.*

## Appendix 1

### **Suggested wording for information about Child Protection and Safeguarding to be included in School\* Prospectus**

Schools are strongly advised to inform parents/carers of their safeguarding and child protection procedures, their statutory responsibilities to safeguard and promote the welfare of children and the requirements to report child protection concerns to Children’s Social Care. GEMS POLICY requires Designated Safeguarding Lead to ensure that the school’s safeguarding and child protection policy is available publicly (e.g. via the school website) and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in that process.

The following information can be used in the school’s brochure:

‘Under UAE governmental guidance, schools must make arrangements to safeguard and promote the welfare of children. Parents/carers should know that the law requires all school staff to pass on information which gives rise to a concern about a child’s welfare, including risk from neglect, physical, emotional or sexual abuse. Staff will seek, in general, to discuss any concerns with the parent/carer and discuss the need to make a referral to UAE agencies if that is considered necessary. This will only be done where such discussion will not place the child at increased risk of significant harm or cause undue delay. The school will seek advice from UAE agencies when they have reasonable cause to suspect a child may be suffering or likely to suffer significant harm. Occasionally, concerns are passed on which are later found to be unfounded. Parents/carers will appreciate that the school’s Designated Safeguarding Lead carries out their responsibilities in accordance with the law and acts in the best interests of all children.’

## Standards for Effective Child Protection Practice in Schools

*The school's child protection and safeguarding responsibilities are inspected under the 'Quality of Leadership and Management' and 'The protection, care, guidance and support of students' judgements in school inspections. The following standards may assist schools in evaluating their practice. They should be used jointly by the Designated Safeguarding Lead and the Designated GEMS Manager for Safeguarding to ensure the school is effective in safeguarding and child protection matters.*

In best practice, schools:

1. Have an ethos in which children feel secure, their viewpoints are valued and they are encouraged to talk and are listened to;
2. Provide suitable support and guidance so that students have a range of appropriate adults to whom they can turn if they are worried or in difficulties;
3. Work with parents to build an understanding of the school's responsibilities to safeguard and promote the welfare of all children and a recognition that this may occasionally require children to be referred to investigative agencies as a constructive and helpful measure;
4. Ensure all staff are able to identify children who may benefit from early help; provide coordinated offers of early help; and ensure that children receive the right help at the right time to address concerns and risks and prevent issues escalating;
5. Are vigilant in cases of suspected child abuse, recognising the signs and symptoms, have clear procedures whereby all members of staff report such cases to the Designated Safeguarding Lead or – in her/his absence – the deputy Designated Safeguarding Lead.
6. Monitor children who have been identified as in need of early help or at risk; maintain clear records of students' progress and welfare *in a secure place*; maintain sound policies on confidentiality; provide appropriate information to other professionals; and submit reports to and attend child protection conferences;
7. Provide and support regular child protection training and updates for **all** school staff and ensure that Designated Safeguarding Leads attend refresher training every two years to ensure their skills and expertise are up to date; and ensure that targeted funding for this work is used solely for this purpose;
8. Contribute to an inter-agency approach to safeguarding and child protection by developing effective and supportive liaison with other agencies;
9. Use the curriculum to teach children about safeguarding and raise their awareness and build confidence so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others;
10. Provide clear policy statements for parents, staff and children and young people on this and on both positive behavior policies and the school's approach to bullying;
11. Have a clear understanding of the various types of bullying – face to face, online, physical, verbal and indirect - and act promptly and firmly to combat it, making sure that students are aware of the school's position on this issue and who they can contact for support;
12. Take particular care that students with SEN in mainstream and special schools, who may be especially vulnerable to abuse, are supported effectively with particular attention paid to ensuring that those with communication difficulties

are enabled to express themselves to a member of staff with appropriate communication skills;

13. Have a clear policy about the handling of allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures and that they are followed correctly at all times.
14. Have a written whole school policy, which is produced, owned and regularly reviewed by all school staff, taking into account the views of children, parents/carers and governors, and which clearly outlines the school's position and positive action in respect of the aforementioned standards;
15. Have a Single Central Record in place.

Reporting Forms / Body Maps / Log Sheets

INFORMATION/FRONT SHEET

Full Name:		DOB:	Class/Form:	Additional needs:	
Gender:		Ethnicity:			
Home Address:			Telephone:		
			E mail:		
Status of file and dates:					
OPEN					
CLOSED					
TRANSFER					
Any other child protection records held in school relating to this child or a child closely connected to him/her? YES/NO WHO?					
Members of household					
Name	Relationship to child	DOB/Age	Tel No		
Significant Others (relatives, carers, friends, childminders, etc.)					
Name	Relationship to child	Address		Tel No	
Other Agency Involvement					
Name of officer/person	Role and Agency		Tel No	Date	


Complete for all incidents of concern including where a 'logging the concern' sheet has not been completed. If one has been completed then add a note to this chronology to cross reference (significant information may also be added).

Name:		
DOB:		Class/Form:
Date	Information/Details of concerns or contact	Print Name and Signature

**Logging a concern about a child's safety and welfare**  
 Part 1 (for use by any staff)

<b>student's Name:</b>	<b>Date of Birth:</b>	<b>Class:</b>
<b>Date and Time of Incident:</b>	<b>Date and Time (of writing):</b>	
<b>Name:</b> ..... <b>Print</b>		
<b>Signature</b>		
<b>Job Title:</b>		
<b>Record the following factually: What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?</b>		
<b>What is the student's account/perspective?</b>		
<b>Professional opinion where relevant.</b>		
<b>Any other relevant information (distinguish between fact and opinion). Previous concerns etc.</b>		
<b>What needs to happen? Note actions, including names of anyone to whom your information was passed and when.</b>		

**Check to make sure your report is clear to someone else reading it.  
 Please pass this form to your Designated Safeguarding Lead.**

Part 2 (for use by DSL)

<p><b>Time and date information received, and from whom.</b></p>	
<p><b>Any advice sought – if required (date, time, name, role, organisation and advice given).</b></p>	
<p><b><u>Action taken</u> (referral to outside agencies /monitoring advice given to appropriate staff) with reasons.</b></p> <p><b>Note time, date, names, who information shared with and when etc.</b></p>	
<p><b><u>Parent's informed?</u> Y/N and reasons.</b></p>	
<p><b><u>Outcome</u></b></p> <p><b>Record names of individuals/agencies who have given information regarding outcome of any referral (if made).</b></p>	
<p><b>Where can additional information regarding child/incident be found (e.g. student file, serious incident book)?</b></p>	
<p><b>Should a concern/confidential file be commenced if there is not already one? Why?</b></p>	
<p><b>Signed</b></p>	
<p><b>Printed Name</b></p>	



**Logging concerns/information shared by others external to the school (Pass to Designated Person)**

<b>student's Name:</b>	<b>Date of Birth:</b> <b>Class/form:</b>
<b>Date and Time of Incident:</b>	<b>Date and Time of receipt of information:</b> <b>Via letter / telephone etc.</b>
<b>Recipient (and role) of information:</b>	
<b>Name of caller/provider of information:</b>	
<b>Organisation/agency/role:</b>	
<b>Contact details (telephone number/address/e-mail)</b>	
<b>Relationship to the child/family:</b>	
<b>Information received:</b>	
<b>Actions/Recommendations for the school:</b>	
<b>Outcome:</b>	
<b>Name:</b>	
<b>Signature:</b>	
<b>Date and time completed:</b>	
<b>Counter Signed by Designated Safeguarding Lead</b>	
<b>Name:</b>	
<b>Date and time:</b>	

**Body Map Guidance for Schools**

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

**\*At no time should an individual teacher/member of staff or school take photographic evidence of any injuries or marks to a child's person, the body map below should be used. Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. Social Care direct or Police.**

**When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:**

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

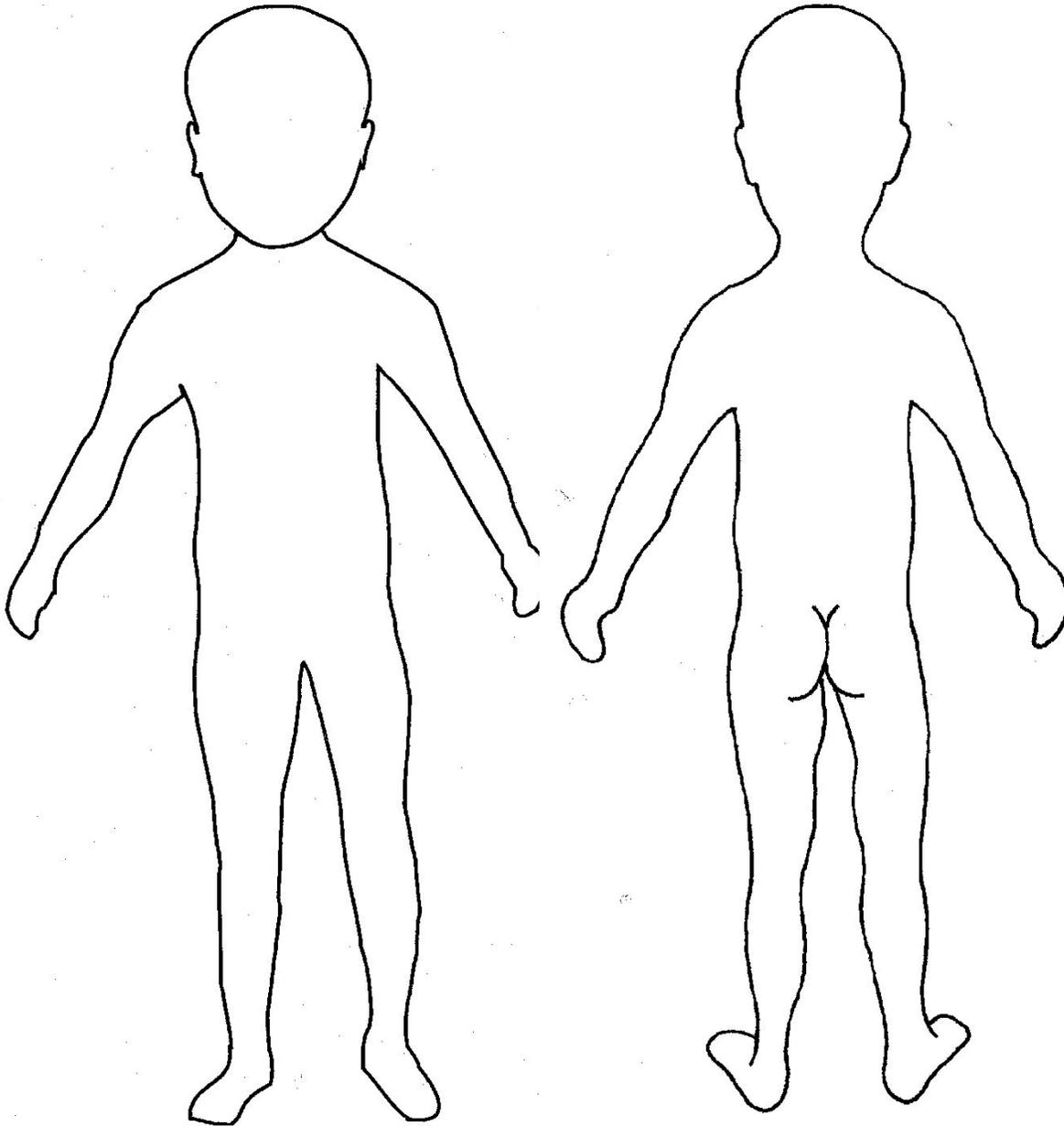
Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

**Ensure First Aid is provided where required and record**

A copy of the body map should be kept on the child's concern/confidential file.

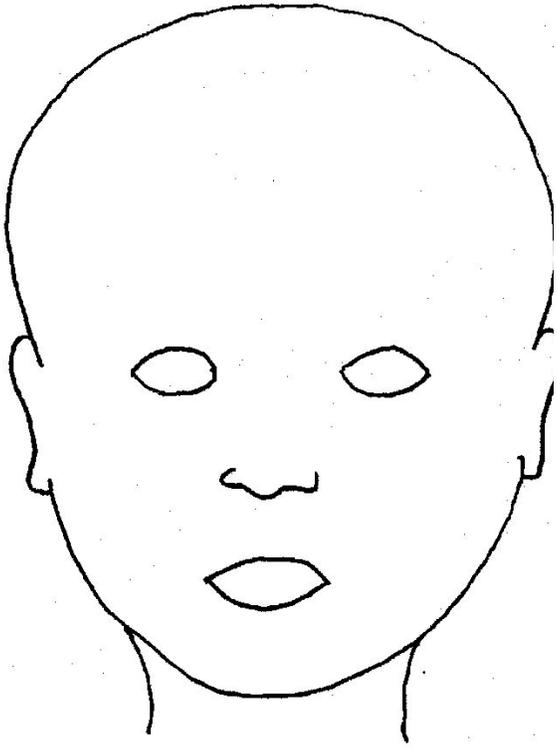
(This must be completed at time of observation)

Name of student: ..... Date of Birth: .....  
Name of Staff: ..... Job title: .....  
Date and time of observation: .....

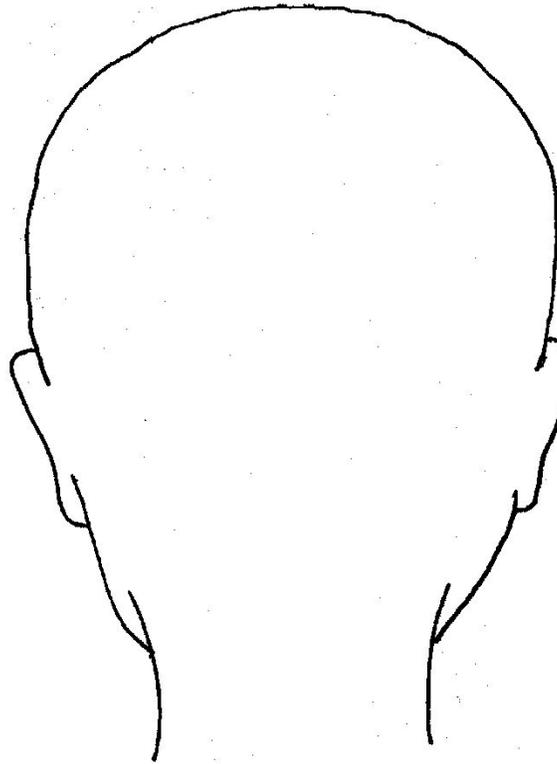


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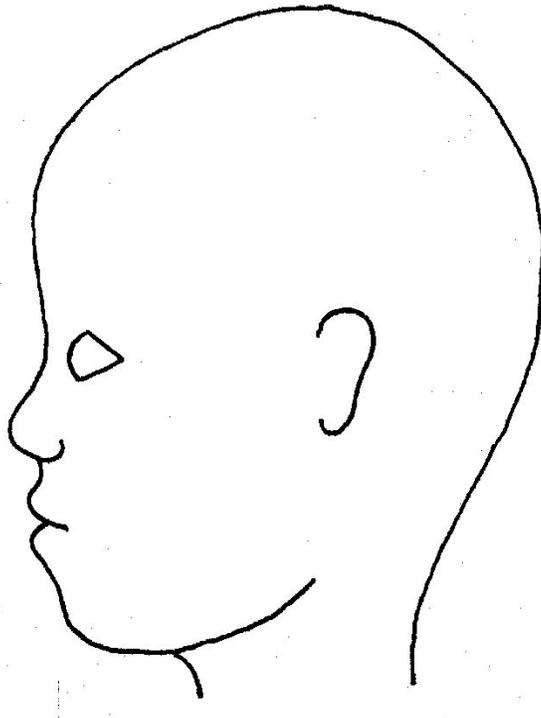
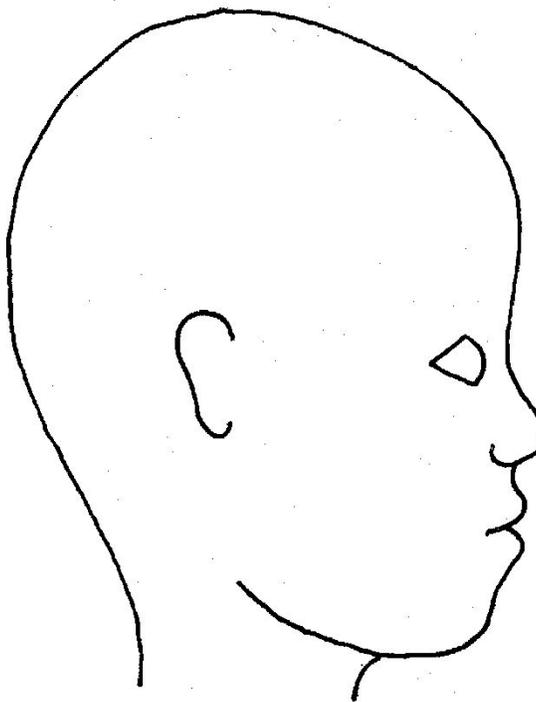
.....



FRONT

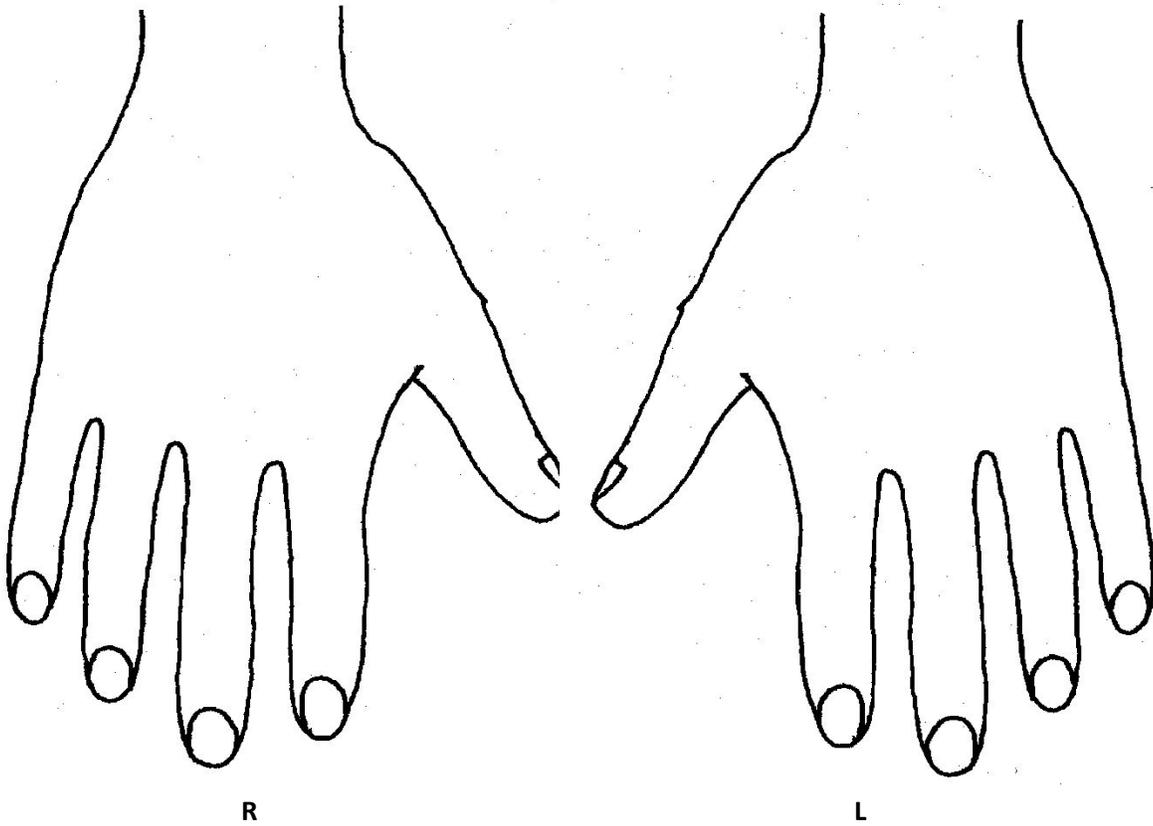


BACK



RIGHT

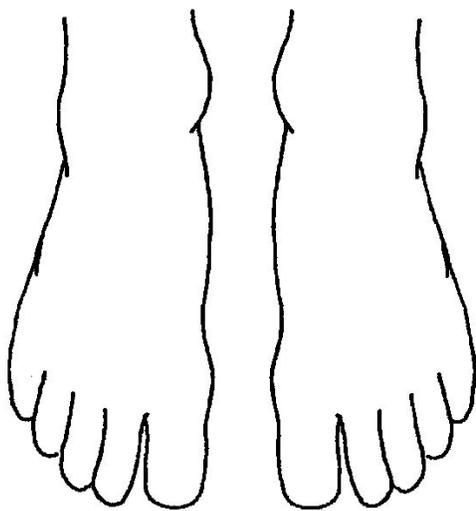
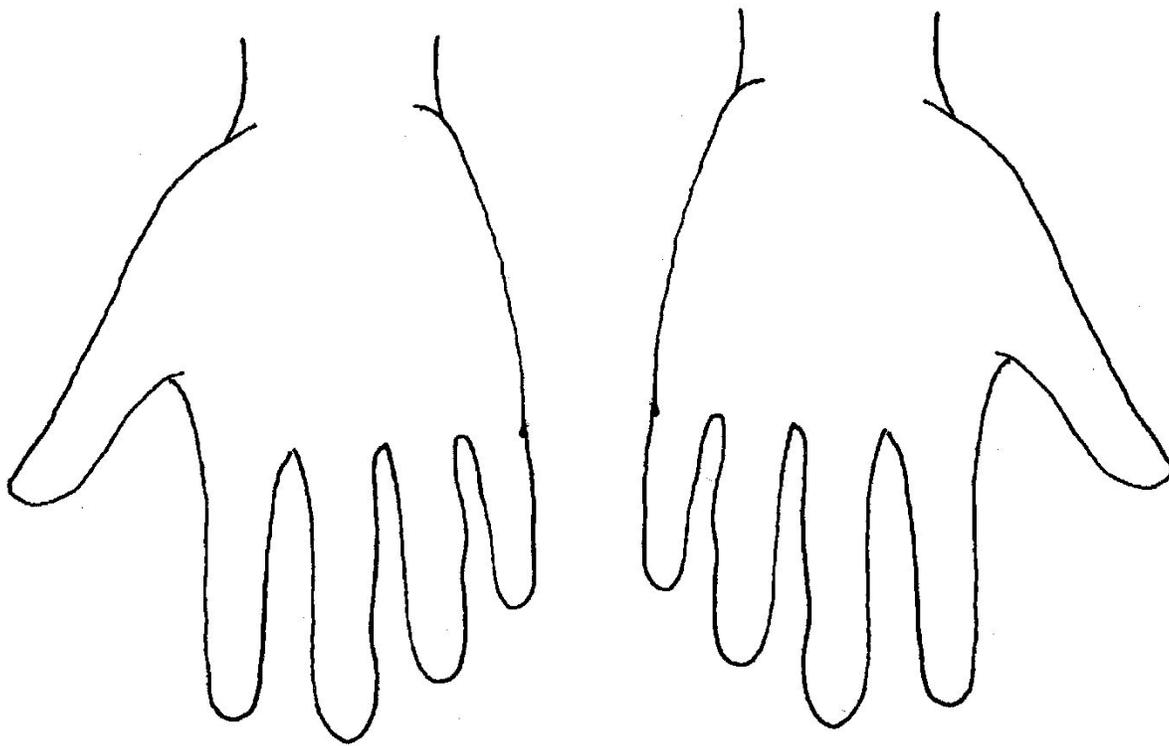
LEFT



R

L

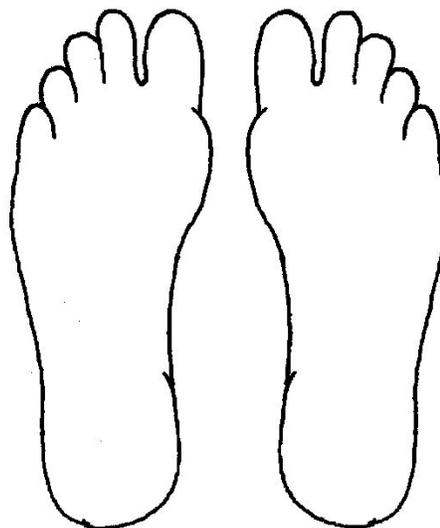
BACK



R

TOP

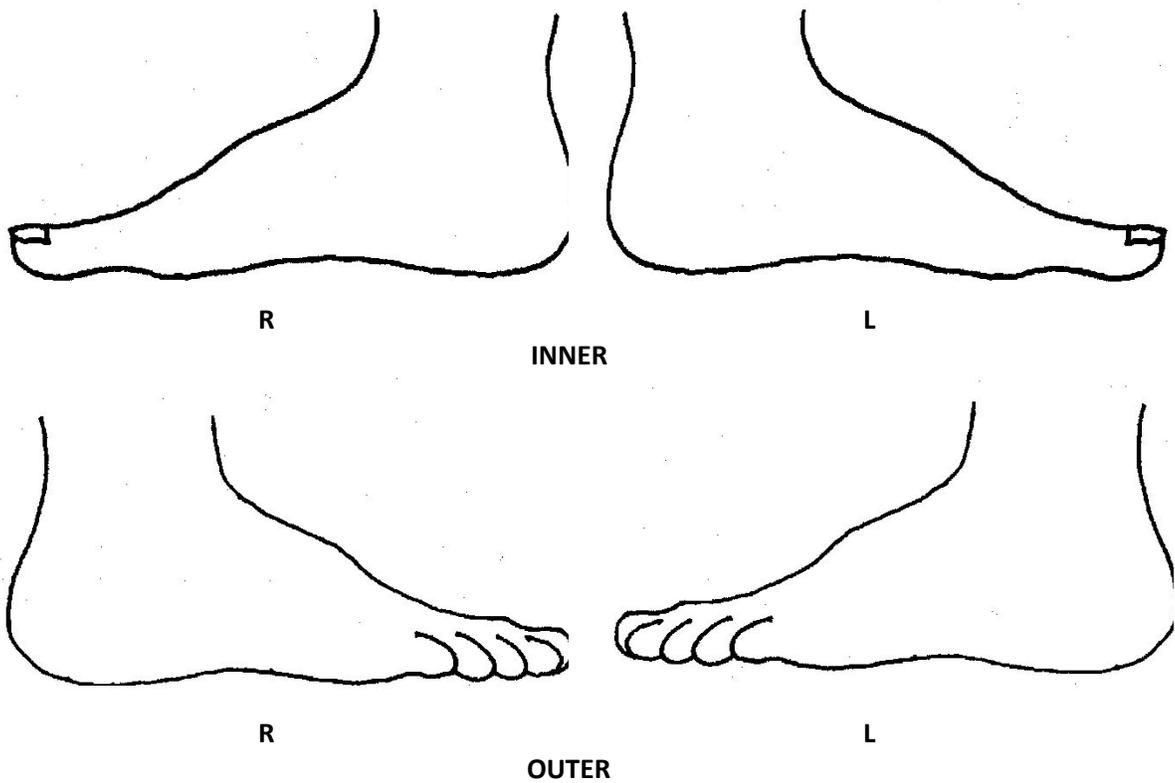
L



R

BOTTOM

L



Printed Name,  
Signature and Job  
title of staff:

.....

