

POL/SF003 NLCS Dubai Safeguarding and Child Protection Policy – Whole School

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Table of Contents

Table of Contents	2
1. Introduction	5
2. Purpose	5
3. Management and Safeguarding	6
4. Introduction	7
5. Aims and Objectives	9
6. Scope	9
7. Types of Abuse and Neglect	9
8. Signs of Possible Abuse	12
9. Designated Safeguarding Leads	13
10. What to do if a Student Makes a Disclosure	15
11. Investigations, Referral and Reporting	16
12. Allegations of Abuse – Staff/School Community	18
13. Allegations of Abuse (child on child abuse)	18
14. Safer Recruitment	19
15. Secure School Premises	20
16. Safer Use of Technology	20
17. Training	21
18. Confidentiality and Information Sharing	22
19. Monitoring	22
20. Online Learning	23
APPENDIX 1	25
APPENDIX 2	29
APPENDIX 3	31
APPENDIX 4	32
Safeguarding Referral Form– Report of a Concern	32

Contact Details for Safeguarding at North London Collegiate School Dubai

Safeguarding role	Name	Position	Contact Details
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Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standards as DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of a long-term absence of the DSL, a deputy will assume responsibility for the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSL but ultimate lead responsibility for safeguarding and child protection remains with the DSL.

Senior School

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- Code of Conduct for Staff
- Missing Student Procedures
- Safer Recruitment Policy
- Safer use of Technology Policy

It should also be read in conjunction with:

- KHDA Moral Education Framework
- School taught pastoral programme

The policy is based on the principles of UK and UAE best practice, the Government of the UAE Guidelines and Wadeema's Law.

The policy is drafted in accordance with all relevant legislation including laws and regulations from the Ministry of Interior, Ministry of Family and UAE Federal Government, and the following statutory guidance:

- Wadeema's Law
 - KHDA – Guidelines
 - Keeping Children Safe in Education September 2024(KCSIE)
 - Working Together to Safeguard Children July 2023(WTSC)
 - Disqualification Under the Childcare Act August 2018
 - Children Missing Education September 2019
 - Strategy for dealing with safeguarding issues in charities December 2017
 - Safer Working Practices, Safer Recruitment Consortium, May 2019 (Addendum April 2020)
- Until such documentation is available in detail in the UAE*

Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

3. Management and Safeguarding

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical 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 (Keeping Children Safe in Education, September 2020). The School upholds the basic principle that children have the right to life, safety and are entitled to education (Child Rights Law, UAE).

The Designated Safeguarding Leads' responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out safeguarding duties, encourage a culture of listening to students and to monitor the effectiveness of

policies and procedures in practice. The Vice Principal (Pastoral Care) is responsible for safeguarding in the Senior School and the Head of the Junior School, for the Junior School, including Early Years. Details of the School's Designated Safeguarding Leads are set out in the box on page 3. Further information about the Designated Safeguarding Leads' responsibilities can be located on pages 9 and 10.

If members of staff, students or other members of the School community, including Governors and volunteers, suspects or discovers that a student is the victim of abuse, whether physical, emotional, sexual or as a result of neglect, they must immediately inform one or both of the School's Designated Safeguarding Leads (except in the case of an allegation which itself involves a Designated Safeguarding Lead, in which case the matter should be reported directly to the Principal in accordance with the procedures set out in Appendix 1-3). The School is obliged to take all necessary measures to care and protect their student's rights (Executive Council Resolution 2017, UAE)

If the suspicion relates to a member of staff, including a Designated Safeguarding Lead, volunteer, or students who work with children, a Governor or the Principal, the matter must be dealt with in accordance with the procedures set out in Appendix 1-3.

4. Introduction

NLCS Dubai is committed to safeguarding and promoting the welfare of all students in our care, and expects all staff, governors and volunteers to share this commitment. To achieve this, the School seeks to create a safe school environment and a strong pastoral system. Staff are trained to listen to students' concerns, identify issues early and respond appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child.

The School will take all reasonable measures to:

ensure that we practice safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. (See Safer Recruitment Policy)

ensure that, where staff from other organisations are working with our students on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;

- be alert to signs of abuse, both in the School and from outside and to protect each student from any form of abuse, whether from an adult or another student;
- deal appropriately with every suspicion or complaint of abuse and support students who have been abused in accordance with their agreed child protection plan;

- design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
- be alert to the needs of Students of Determination and their potential vulnerabilities
- operate robust and sensible health and safety procedures ensuring that the School premises areas secure as circumstances permit;
- teach students about safeguarding issues and about how to keep themselves safe (including on-line and when working online at home); and
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

Staff are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. Staff are aware that early identification and support is important. If staff are concerned about the welfare of a child, staff should always act in the best interests of the child and should report any concerns immediately to the DSL. If staff are unsure about any aspect of safeguarding they should speak to the DSL without delay.

The School recognises its responsibility to put in place effective procedures both for detecting and preventing abuse and for ensuring that parents, staff and Governors are aware of the School’s role in this respect, in line with UK best practice and Federal Government Guidance as mentioned on page 4 of the Policy.

Every complaint or suspicion of abuse from within or outside the School will be taken seriously and in all proper circumstances will be referred to an external agency, such as the Ministry of the Interior (MOI) or other relevant department of the local authority where needed.

In cases of serious harm, the police will be informed from the outset. Any doubts or concerns over apparently borderline cases will be discussed with the relevant authorities on a “no names” basis. The School's child protection procedures are not intended to prevent any person from making an immediate referral to the MOI if there is a risk of immediate serious harm to a child.

The Governors ensure that the School's safeguarding arrangements make reference to, and take procedures and general UK and UAE best practice into account. The Governing Body has nominated one of its members to manage child protection incidents on behalf of the Governing Body and to liaise with external agencies where this is required.

5. Aims and Objectives

To have clear guidelines for members of staff, students and other members of the School community, including Governors and volunteers, for identifying and reporting cases, or suspected cases, of abuse including neglect, physical abuse, emotional abuse or sexual abuse.

To provide a positive, supportive and secure environment where students know that there are adults in School whom they can approach if they need help.

To support students who may have been abused by encouraging self-esteem through the School's Pastoral Care programmes and the UAE Moral Education Framework informed by data from PASS and narratives documented on iSAMS.

To provide members of staff, students and other members of the School community, including Governors and volunteers with clear guidelines as to their role in the safeguarding and protection of students.

6. Scope

This policy is addressed to all members of staff, students and other members of the School community, including Governors, volunteers and external agencies, and is published on the School website. It applies wherever staff or volunteers are working with students even where this is away from the School, for example at an activity centre or on an educational visit.

7. Types of Abuse and Neglect

All staff should be aware that firstly; abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition, and in most cases, multiple issues will overlap with one another; and secondly, harmful behaviours such as substance abuse, sexting and truanting can put children in danger.

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

The four main types of abuse are identified as:

- a. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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.

- b. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and 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.

- c. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- d. **Neglect:** 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 or 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. Worthy of note is 'affluent neglect' which manifests itself in a neglect of a child's basic emotional needs whilst still providing their basic physical needs such as leaving them with inadequate supervision or a lack of attention at home.

Wadeema's Law (2016) and Keeping Children Safe in Education (2023) guidance and also acknowledges the following, amongst others, as specific safeguarding issues:

Child on child abuse: all staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- sexting (also known as youth produced sexual imagery) and
- initiation/hazing type violence and rituals.

Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. The School's procedures for bullying/peer-on-peer abuse are detailed in the School Behaviour Policy.

Children missing from education

Every child shall have the right to education and the State shall work on achieving equal opportunities for every child according to the laws in force. A child missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

Staff should follow the School's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risks of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

The School's procedures are set out in the Attendance and Punctuality Policy and the Missing Student Procedure. Any unavoidable reasons for absence need to be requested in writing from the Vice Principal (Pastoral Care) in the Senior School or Head of the Junior School for Junior School student absences. The Designated Safeguarding Leads will monitor unauthorised absence particularly where children go missing on repeated occasions.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants

and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

8. Signs of Possible Abuse

Possible signs and behaviours which may indicate that a child is being abused include, but are not limited to:

- significant changes in children's behaviour
- deterioration in children's general well-being
- unexplained bruising, marks or signs of possible abuse or neglect
- children's comments which give cause for concern
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home

and/or

- inappropriate behaviour displayed by other members of staff for example excessive one to one attention beyond usual role or responsibilities
- repeated minor injuries
- children who are dirty, smelly, poorly clothed or who appear underfed,
- children who have lingering illness which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of "detachment" or "don't care" attitude
- overly compliant behaviour
- a "watchful attitude"
- sexually explicit behaviour (e.g. playing games and showing awareness, which is inappropriate for the child's age)
- a child who is reluctant to go home, or is kept away from the School for no apparent reason
- does not trust adults, particularly those who are close
- "tummy pains" with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds

- reverting to younger behaviour
- depression, withdrawal
- relationships between a child and adults which are secretive and exclude others.

These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

The student's exposure to exploitation by illegal organisations and in organised crime, such as planting the ideas of intolerance and hatred or inciting the student to carry out acts of violence and intimidation are also seen as threatening to the his/her physical, psychological, moral or mental integrity and requires the right to protection.

Staff should bear in mind that additional difficulties may exist when recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration, that children with SEND can be disproportionately impacted by, for example, bullying without outwardly showing any signs, and there can be communication barriers in overcoming these difficulties.

9. Designated Safeguarding Leads

The Designated Safeguarding Lead is a member of the Senior Team and takes lead responsibility for safeguarding and child protection in the School. The School will ensure that the Designated Safeguarding Lead is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's Form Tutor, who will notify the relevant Designated Safeguarding Lead in accordance with these procedures.

In accordance with Annex B of the UK Keeping Children Safe in Education guidance, the main responsibilities of the Designated Safeguarding Leads are:

Managing referrals

- to take lead responsibility for promptly referring all cases of suspected abuse of any student at the School to the relevant agencies.

- to support members of staff, students and any other members of the School community, who make direct referrals.
- to take lead responsibility for promptly referring to the relevant authorities all child protection concerns which involve a member of staff.
- to take lead responsibility for promptly making referrals to the Disclosure and Barring Service (DBS) or the authorities in a member of staff's country of origin, where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child.
- to take lead responsibility for promptly making referrals to the police where a crime may have been committed which involves a child.

Working with others

- To liaise with the Principal in respect of police investigations or investigations which involve the School;
- To liaise with the relevant authorities regarding all child protection concerns which involve members of staff, students and in some cases, other members of the School community and volunteers; and to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- To conduct home visits as needed. Only a DSL can conduct a home visit with a DDSL or relevant teacher present. Prior notice must be given and consent granted to visit.

Raising awareness

- To ensure this Policy is known, understood and used appropriately.
- To ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- To ensure this Policy is available publicly.
- To ensure that parents are aware that referrals about suspected abuse or neglect could be made.
- To ensure staff are aware of training opportunities and the latest local policies on safeguarding, and to ensure that the School's Pastoral Care programmes and the UAE Moral Education Framework teach students about safeguarding, including safer use of the internet and social media.

Child Protection file

- Where children leave the School, to ensure their child protection file is copied for any new school or college as soon as possible, but transferred separately from the main student file, ensuring secure transit, and obtaining confirmation of receipt. This will also be requested from a child's transferring school upon entry to NLCS

Dubai. Where schools use CPOMS, the student individual CPOMS number will be shared.

Undertake training

- To undergo training, at least every two years, to acquire the knowledge and skills required to carry out the role;
- To ensure knowledge and skills are refreshed at regular intervals, as required, but at least annually to keep abreast of developments relevant to their role so they:
- Understand the assessment process for providing early help and intervention;
- Have a working knowledge of how local authorities may conduct a child protection review conference and be able to attend and effectively contribute when required to do so;
- Ensure each member of staff and the School community, including Governors and volunteers, has access to and understands this Policy and child protection procedures, and in particular, new and part- time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Can keep detailed, accurate, secure written records of concerns and referrals;
- Obtain access to resources and attend relevant refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all members of staff, students and other members of the School community, including Governors and volunteers in any measure the School puts in place to protect them.

10. What to do if a Student Makes a Disclosure

The School provides a range of opportunities for a student to be listened to. These include, but are not limited to one-to-one tutor interviews, House forums, daily interactions with form tutors, counselling sessions and drop-ins and an open door policy led by the Pastoral team. If a student discloses directly to a member of staff or volunteer, he/she must:

- immediately stop any other activity to listen
- listen carefully to the student and keep an open mind - do not interrupt the student or be afraid of silences
- limit the questioning to the minimum necessary for clarification using “what, when, how, where” but avoid using leading questions such as, “has this happened to your siblings?” which may prejudice an investigation
- not make any attempt to investigate the incident themselves or decide as to whether or not the student has been abused;

- reassure the student, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy
- depending on the situation, suggest it would be helpful to continue the discussion with the DSL present
- make notes of the details of the disclosure using the child's words where possible. This note should be made as soon as possible by completing the Child Protection Reporting form. (Appendix 4)
- reassure the child they have done the right thing and tell them they are not to blame
- offer ongoing support
- inform the DSL as soon as possible, and immediately if the child is at risk of harm

Records should:

- be handwritten on a safeguarding form and/or logged on CPOMS;
- be accurate and descriptive, including the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence
- not make assumptions
- not include any opinions
- indicate sources of information
- be clear and concise
- be signed by the person making it and use names, not initials
- be kept securely and handed to the Designated Safeguarding Lead as soon as possible.
- all evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be safeguarded and preserved and passed to the Designated Safeguarding Lead in person.

All suspicions or complaints of abuse must be reported immediately to the relevant Designated Safeguarding Lead (except in the case of an allegation which itself involves a Designated Safeguarding Lead, in which case the matter should be reported directly to the Principal in accordance with the procedures set out in Appendix 1- 3).

If it is not possible to report to one of the Designated Safeguarding Leads, you can report to the Deputy Designated Safeguarding Leads.

All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing and securely stored by the Designated Safeguarding Leads.

The Governing Body will ensure that members of staff, students and other members of the School community, including Governors and volunteers are aware that it is their responsibility to:

- protect children from abuse
- be aware of the School's child protection procedures in this policy
- know how to access and implement the procedures, independently if necessary
- keep a sufficient record of any significant complaint, conversation or event
- report any matters of concern to the Designated Safeguarding Lead
- undertake appropriate training, including refresher training which will be updated regularly in accordance with KHDA requirements.

It is not the responsibility of School staff to investigate suspected abuse. The School is not an investigation or intervention agency for child protection but it has an important role to play at the recognition and referral stages.

On being notified of a complaint or suspicion of abuse, the Designated Safeguarding Lead will:

- operate safeguarding procedures in line with the local Law
- consider the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to the police
- take into account the wishes or feelings of the student. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a student's wishes
- take into account duties of confidentiality, so far as applicable
- inform relevant parties on a need to know basis including family members as appropriate

If there is doubt over whether a referral should be made, the Designated Safeguarding Lead will consult with the relevant authorities on a no-name basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay (and in any event within 24 hours). The Designated Safeguarding Lead, or the referrer, should follow up on the referral.

The Designated Safeguarding Lead will keep the Principal informed of the case unless the complaint involves the Principal in which case the Chairman of Governors (or Vice Chairman in their absence) will be consulted. Staff must not investigate suspected abuse or any allegations against other staff, but should refer the matter to the Designated Safeguarding Leads immediately, who will, in turn, inform the Principal.

If the child's situation does not appear to be improving the Designated Safeguarding Lead or the staff member with concerns should press for re-consideration to ensure concerns have been addressed and that the child's situation improves.

Children in need:

A child in need is defined under section 17 of the UK Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who has a disability.

In circumstances where a student has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Designated Safeguarding Lead will liaise with the relevant authorities.

The MOI is developing strategies to ensure a safer, more secure environment for children living and visiting the UAE. The MOI does publish guidelines on what would constitute child abuse and there are agencies which, depending on the assessment of a professional, would deal with cases of abuse. The MOI also issues guidelines for safety to children on their website. This policy has taken these guidelines and the need to refer children to agencies and professionals into consideration.

12. Allegations of Abuse – Staff/School Community

The School has procedures for dealing with allegations of abuse against members of staff, including the Principal, students and other members of the School community, such as Governors and volunteers who work with children. These strike a balance between the need to protect children from abuse, and the need to protect members of staff, students and other members of the School community, including Governors and volunteers from false or unfounded allegations. These procedures are set out in Appendix 1-3 and follow Part 4 of the UK Keeping Children Safe in Education guidance and relevant UAE regulations. Under the UAE Labour Law an employee is entitled to know the allegation raised against them and be given an opportunity to defend themselves.

Detailed guidance is given to ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student. This guidance is contained in the Code of Conduct for Staff and includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with students.

Staff and volunteers should also feel able to raise concerns about poor or unsafe safeguarding practices at the School, potential failures by the School or its staff to properly safeguard the welfare of students or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.

13. Allegations of Abuse (child on child abuse)

All staff should be aware that children are capable of abusing their peers i.e. child-on-child abuse. Child on child abuse can manifest itself in many ways, for example, physical, sexual, and emotional bullying and/or abuse; gender based violence and online abuse including sexting. Members of staff, students and other

members of the School community, including Governors and volunteers should be aware that gender issues can be prevalent when dealing with this type of abuse, and that child on child abuse should not be tolerated or passed off as ‘banter’. The threshold for dealing with such abuse is when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Such abuse may be referred to local agencies.

In the School, the taught pastoral programme and the Moral Education Programme of the UAE, aims to enable students to lead responsible, healthy and assertive lives and to develop skills and knowledge which will equip them with the ability to deal with a range of issues. A unit of lessons on good relationships is included in the taught pastoral programme. The unacceptable nature of all forms of bullying is introduced into Form discussions, assemblies and into lessons where appropriate.

Students who have been subject to child on child abuse are encouraged to immediately report any concerns to a member of staff. Alternatively, students may seek help from the School Counsellor and/or School Doctor/Nurse. If a student makes an allegation of peer-on-peer abuse staff should follow the procedure as set out under ‘What to do if a student makes a disclosure?’

The School’s Safer Use of Technology Policy reminds students that 'sexting' i.e. sending or posting images or videos of a sexual or indecent nature, is strictly prohibited by the School and in the UAE, constitutes a criminal offence. The School will treat incidences of sexting, both sending and receiving, as a safeguarding matter. Students are advised to speak to any member of staff for advice if they are concerned about images that they have received, sent or forwarded.

A student against whom an allegation of abuse has been made may be suspended from School during the investigation and the School’s Behaviour Policy and Anti-Bullying Strategy will apply.

The School will take advice on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the student or students accused of abuse, who are all treated as being “at risk”. If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of a professional, parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult.

14. Safer Recruitment

The School takes the UK and UAE Government recommendations for the safer recruitment and employment of staff who work with children into account and obtains the International Child Protection Certificate (ICPC). The ICPC is produced by the ACRO Criminal Records Office (ACRO) in the UK in conjunction with the National Crime Agency (NCA) - Child Exploitation and Online Protection Command, the UK’s national law enforcement agency for child protection. or all staff who are UK Nationals and residents who wish to work abroad. The School also takes heed of the guidance concerning the Childcare

(Disqualification) Regulations 2009 and the Education Act 2006. If not UK based, we ensure that all staff from all countries undergo the relevant child protection checks and procedures. Any external providers for trips and ECAs will undergo license checks and police safeguarding checks to ensure due diligence.

See the 'Recruitment Policy' for more detail.

15. Secure School Premises

Visitors:

The School will take all practical steps to ensure that School premises are as secure as circumstances permit. A visitor's book is kept at Reception and all visitors are required to sign in on arrival and sign out on departure. They are accompanied whilst on School premises by a member of staff, or appropriately vetted contractors or approved volunteers. All visitors will be given a name badge with the title "Visitor" which must be clearly displayed and worn at all times whilst on the School premises.

Identification:

All staff are issued with identity badges which serve as access cards to secured sections of the School, displaying their name and photograph. The access cards must be clearly displayed and worn at all times whilst on the School premises.

16. Safer Use of Technology

The School's Policy on **Safer Use of Technology** sets out comprehensive guidance and advice to students, staff and all members of the School community. Students are taught online safety as part of a broad and balanced curriculum, which includes lessons on staying safe online as part of the taught pastoral programme, as well as 'Digital Challenges' in the Moral Education Framework. All staff members should be aware of what they post online and any social media should be private. No staff member should have students on their social media accounts, or use their private emails to contact them. The only contact with students is through school based media such as Teams and our school email.

Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

Staff may take photographs of school events or lessons but these photographs must be stored on the school's online drive and deleted from their personal electronic device within 24 hours. Staff must have

private accounts on all their social media and must never share any photographs of students on their own accounts. Images of more than one child in a learning context are more appropriate. Staff must make themselves aware of the ‘no photograph’ list detailed by the marketing team and in the staffroom.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes harm.

The School will do all it reasonably can to limit students’ exposure to the above risks when using the School’s IT systems by having in place a filtering system to safeguard students from potentially harmful and inappropriate material online without “over blocking” or imposing unreasonable restrictions as to what students can be taught through online teaching. Education on the above categories will be provided to raise student's awareness of potential online harm.

17. Training

The Designated Safeguarding Leads; Vice Principal (Pastoral Care) and the Assistant Principals, in the Senior School, the Head of the Junior School and the Deputy Heads in the Junior School will attend Level 3 Safeguarding and Child Protection training courses.

All staff, including temporary staff and other relevant members of the School community, including Governors, external providers and volunteers will be provided with induction training that includes

- this policy
- the Code of Conduct for Staff
- the role, identity, and contact details of the Designated Safeguarding Lead.

The purpose of this induction training will be to ensure that staff understand the School’s Safeguarding Policies. This will include, amongst other content, training to enable staff to identify signs of possible abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way.

All temporary staff, members of staff, students and other relevant members of the School community, including Governors and volunteers receive a copy of the Safeguarding and Child Protection Policy. All are required to sign and return a declaration confirming receipt and that they have received training, read and understood the policy to the HR department. The signed record of training received is currently retained in a central folder by the HR department and will be saved electronically.

At least every two years, the Designated Safeguarding Lead will ensure that the Principal, all staff members and the Board of Governors, including the nominated Governor, undertakes child protection training appropriate to their roles which will be updated regularly in accordance with the School's and KHDA's requirements.. This will include, amongst other content, training to enable staff to identify signs of possible abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way. Whenever such training takes place, the School will discuss and take account of any specific local requirements and the specific context of the School.

The Designated Safeguarding Lead runs child protection training sessions throughout the academic year to ensure all staff receive the requisite training. Staff also receive safeguarding and child protection updates via email and staff briefings, as required, but at least termly to provide them with relevant skills and knowledge to safeguard children effectively.

The Principal and Senior Team will monitor and evaluate with Governors the effectiveness of the safeguarding training provided to staff. The safeguarding training will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require). The safeguarding training will also be subject to critical review by the Chairman of the Governors' Personnel Committee, who has received safeguarding training, and by the full Governing Body each year as part of the Governors' annual safeguarding review.

18. Confidentiality and Information Sharing

The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and the authorities to ensure that all relevant information is shared for the purposes of child protection investigations. The School will not allow data sharing concerns to stand in the way of the need to promote the welfare and protect the safety of children.

Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Leads will need to consult with the appropriate authorities and/or the Principal before discussing details with parents.

Allegations against staff, the Principal, volunteers or Governors will be dealt with in accordance with the procedures set out in Appendix 1 below. In addition to informing the Principal (or the Chairman of Governors, in cases where an allegation relates to the Principal) the DSLs will consult, where appropriate, with the police or the appropriate authorities to agree the information that should be disclosed, and to whom.

19. Monitoring

Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School by the Designated Safeguarding Leads and a prompt report to the Governors. Where an incident involves a member of staff, the Designated Safeguarding Leads will assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses regarding child protection arrangements at any time will be remedied without delay.

The Principal and Senior Team will monitor and evaluate, with Governors, the effectiveness of the Safeguarding and Child Protection Policy on an annual basis. The Safeguarding and Child Protection Policy will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require.) The full Governing Body will annually review this policy and the implementation of its procedures, including good cooperation with local agencies, and approve the amendments to the policy, which will, in turn, be signed off by the Chairman of Governors.

This annual review will take account of evidence such as staff training in safeguarding matters, referral data, analysis of any issues and themes which have emerged in the School and how these have been handled, initiatives to educate students about safeguarding, and details of any contribution the School has made to local discussions and multiagency working on safeguarding matters.

20. Online Learning

It is important that all staff who interact with students, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to the relevant authorities. Staff will ensure any use of online learning tools and systems are approved for use within school.

Learning Environment

- ensure that the learning environment is suitable
- when taking part in a teams or zoom call, students should be in a formal setting. i.e. not their bedroom
- staff and students must wear suitable clothing, as should anyone else in the household who may come into view

Communication and Online Behaviour

- parents must sign the online consent form.
- students in PKG-G1 must be accompanied by an adult when online.
- any safeguarding concerns must be reported to the Designated Safeguarding Lead in the Senior School and the Designated Safeguarding Lead in the Junior School.

- students must contact subject teachers or form tutors with any concerns. They can communicate directly through email or Teams groups
- only use School email addresses to contact teachers or students, within school hours
- for concerns unrelated to a specific subject, contact your Head of House, Head of First School or Head of Lower School.
- Teams/Zoom Meetings should only be initiated by members of staff. Students cannot set up Teams account for themselves.
- only the channel function can be used on Teams, not the chat function.
- all live webinars will be recorded for safeguarding purposes.
- usual standards of behaviour are expected in accordance with the Behaviour Policy, Safer Use of Technology Policy and Student Code of Conduct.

APPENDIX 1

Allegations of abuse against members of staff, the Principal, Governors, contractors, volunteers or students who work with children

Any allegation against a member of staff (or any volunteers, contractors or students who work with children), or the Principal, or a Governor must be reported straight away, in accordance with the procedures set out below.

The School has procedures for dealing with allegations that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures will be used where the member of staff, volunteer, student, the Principal or Governor has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children.

Any allegations not meeting these criteria will be dealt with in accordance with UK and UAE best practice. All such allegations must be dealt with as a priority, without delay.

The School has a culture of safety and of raising concerns, encouraging transparency and accountability. Induction and whole school training in safeguarding includes guidance to staff on the raising and handling of concerns and the support available in such cases.

Reporting allegations against members of staff, the Principal, Governors, contractors, volunteers, or students who work with children

Where an allegation or complaint is made against any member of staff (other than the Principal), a Designated Safeguarding Lead, a Governor, contractor or students who work with children, the matter must be reported immediately to the Principal (or in the Principal's absence, the Chair of Governors). Where appropriate to do so, the Principal will liaise with a Designated Safeguarding Lead, the Chair of Governors, or the Vice-Chair in their absence.

Where an allegation is made against the Principal, the matter must be reported immediately to the Chair of Governors, or the Vice-Chair in their absence, without notifying the Principal first. Staff will be able to access the Governors' details on the shared folder. Parents can write to the Chair of Governors or the Vice-Chair, they can request the email address from the Designated Safeguarding Lead.

The Principal or Chair of Governors (or Vice-Chair), as appropriate, will report the matter to the relevant authorities and will act in accordance with any strategy formulated by the relevant agencies.

If it is not possible to report to the Principal or Chair of Governors in the circumstances set out above, a report

should be made immediately to one of the Designated Safeguarding Leads. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Principal or, where appropriate, the Chair of Governors.

Further action:

The School has a duty of care towards its employees and as such, it will ensure that effective support is provided or anyone facing an allegation.

Suspension:

The School will carefully consider whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- there is cause to suspect a child or other children at the School is or are at risk of significant harm or
- the allegation is so serious that it might be grounds for dismissal.

All alternatives to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School.

The School will give due weight to the views and Laws of the UAE, the UK's 'Keeping Children Safe in Education and Working Together to Safeguard Children' guidelines when making a decision about suspension. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided.

Ceasing to use staff:

If the School ceases to use the services of a member of staff (including the Principal), or a Governor, volunteer, contractor or student who works with children, because he or she is unsuitable to work with children, a settlement/ compromise agreement will not be used and a referral to the Disclosure and Barring Service (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: International: +44 151 676 9390) will be made. Separate referral will also be made as soon as possible to the Teaching Regulation Agency in cases of serious professional misconduct of teachers.

Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

Resignation:

If a member of staff, (including the Principal) or a Governor, volunteer, contractor or student, tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the local authority and the Disclosure and Barring Service.

Ceasing to use a person's services includes:

Dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

Where a teacher (including the Principal) has been dismissed, or would have been dismissed had he/she not resigned, in circumstances where the threshold for a DBS referral have not been met, separate consideration will be given to whether the matter should be referred to the Teaching Regulation Agency. This will include matters where there has been unacceptable professional conduct, conduct which may bring the teaching profession into disrepute, conviction at any time of a relevant offence or where a prohibition order may otherwise be appropriate.

Unsubstantiated, false or malicious allegations:

Where an allegation by a student is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's Behaviour Policy.

Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

Whether or not the person making the allegation is a student or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

Allegations against a teacher who is no longer teaching and/or allegations of historical abuse should be reported to the Designated Safeguarding Lead who will take them forward in accordance with the guidance contained in the UK Keeping Children Safe in Education.

Record Keeping:

Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal pension age or for a period of 10 years from the date of the allegation if this is longer. Allegations proven to be false, unsubstantiated, or malicious, will not be referred to in any employer reference. Allegations found to be malicious will be removed from personnel records.

APPENDIX 2

Responsibilities of the Governing Body in the Management of Safeguarding

The Governing Body will ensure that it and, as appropriate, the School's Senior Team and all staff will use as a guideline, principles of best practice as outlined in Part two of the UK Keeping Children Safe in Education, as well as any KHDA or UAE regulations, including ensuring that:

- there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
- there is an effective Safeguarding and Child Protection policy and procedures in place, together with a Code of Conduct for Staff, and Anti-Bullying Policy which amongst other things includes acceptable use of technologies, staff/student relationships and communications including the use of social media, and that these are provided to all staff (including, as and where necessary), to temporary staff and volunteers, based on a proportional risk based approach on induction
- Designated Safeguarding Leads are appointed from the Senior Team and have the appropriate authority and the time, funding, training, resources and support to fulfil the role and responsibilities
- the Governing Body has nominated one of its members (as agreed by the Board) as the 'Nominated Child Protection Governor' for the School to have oversight of child protection matters, including monitoring of the School's legal duty to refer persons to the Disclosure and Barring Service; liaise with the local authority and/or partner agencies on issues of child protection; and instigate and oversee the annual review of this policy
- the School has procedures for dealing with allegations of abuse made against members of staff (including the Principal), Governors, other members of the School community, volunteers and students who work with children
- the School also has procedures in place to handle allegations against other children
- the School operates an effective training strategy that ensures all staff, and relevant members of the School community, including the Principal, receive safeguarding and child protection training
- an annual review of safeguarding is instigated, carried out and approved and that the minutes of Governing Body meetings record in detail the relevant discussion and actions taken in carrying out and approving their annual review of safeguarding
- appropriate safeguarding responses are in place to deal with students who go missing from the School (see Missing Student Policy), in particular any students who go missing on repeat occasions to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future
- any serious incident that has resulted or could result in a significant loss of funds or a significant risk to the School's property, work, beneficiaries or reputation is reported to the School Senior Team or Board

of Governors, including any suspicions, allegations or incidents of abuse or mistreatment of vulnerable beneficiaries.

APPENDIX 3

Responsibilities of the Principal in the Management of Safeguarding

The Principal will ensure that the Safeguarding and Child Protection policy and procedures adopted by the Governing Body are implemented and followed by all staff.

- allocate sufficient time and resources to enable the Designated Safeguarding Leads and deputies to carry out their roles effectively
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively
- ensure that children's safety and welfare is addressed through the curriculum;
- receives the required safeguarding and child protection training and training in order to understand safer recruitment procedures and processes, and be able to apply them as a member of an appointment panel and to deal with allegations made against members of staff and volunteers.

APPENDIX 4

Safeguarding Referral Form– Report of a Concern

Please complete by hand. Once completed pass reporting form in person to the Designated Safeguarding Lead – **Mrs. Emma Dawson**

Name of referrer:		Role of referrer:	
Student Full Name:		Date and time:	
Date of birth:		Grade / Class:	
		House:	
Details of concern:	<p><i>(Include details of what was said, by whom, where, when and details of the disclosure or concern. Use body map if appropriate on reverse of sheet)</i></p>		
How did you find out about this concern? Circle one or more or make notes	<p><i>Observation Disclosure Reported by another student</i> <i>Parent concern</i></p>		
Have you completed a report on CPOMS?			Yes No
Signed:	Date:		