



*Safeguarding is
everyone's responsibility
me, you, us*

GEMS STUDENT PROTECTION POLICY (ABU DHABI)

POLCSG002V2

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1. INTRODUCTION

It is every student's right to be in an educational environment that upholds, cares for, respects, and protects their dignity. This policy sets out every school's obligation to have in place student protection measures which focuses on the prevention of student maltreatment as well as the handling of any maltreatment concerns.

PURPOSE

Protect students under the supervision of schools from all acts and omissions constituting maltreatment.

Identify and support students who are at risk of harm, as enforced by the UAE Federal Decree Law No. (3) of 2016 Concerning Child Rights (Wadeema), Federal Decree Law No. (31) of 2021 Promulgating the Crimes and Penalties and its amendments, Federal Decree Law No. (51) of 2022 Concerning the Regulation of Nurseries, Federal Decree Law No. (18) of 2020 on Private Education and its amendments, and other relevant UAE laws.

Emphasise that all staff and volunteers of schools are mandated reporters of cases of alleged and/or suspected maltreatment of students inside and outside the school.

Define roles and responsibilities of Principals, staff, and parents of students in schools for responding to alleged and/or suspected cases of student maltreatment.

Ensure that all schools are responsible for the care and protection of all students in schools and coordinate actions to safeguard them.

2. STATUS OF THE DOCUMENT AND HOW TO USE IT

This document is part of a group of policies intended to keep children, staff, other adults and the wider organisation of GEMS Education safe. This document outlines specific operational arrangements for the items listed in the contents. It should be read in conjunction with the guidance contained in the appendices of this Policy and other associated company policies found in [GEMSNET - Policies & Documents Portal](#) (GEMS employee access only).

The Student Protection Policy shall be available publicly and on the school's website and disseminated annually to parents, board members, staff, and volunteers, along with a student-friendly version.

This document has been compiled from a wide range of regional, international and best practice guidance, all of which is intended to ensure the safety of all parties.

In all situations which require human judgement, a policy or procedure is there as guidance. Wherever a matter of legal responsibility is relevant to the text in this Policy, this is clearly highlighted.



3. ROLES AND RESPONSIBILITIES

GEMS Education Board/Chief of Risk and Assurance/Chief Education Officer is responsible for corporate governance and oversight of the effective delivery of the GEMS Safeguarding Strategic Plan and GEMS Student Protection Policy. The Board/CoRA/CEdO ensure that safeguarding, recruitment and managing allegations procedures take into account the advice and guidance contained in the GEMS Student Protection Policy and any regional and national legislation and guidance.

The VP - Risk, Global Lead of Safeguarding and Child Protection is responsible for the development and strengthening of all activities relating to safeguarding and child protection across GEMS Education. This includes writing and leading the overall development, implementation and monitoring of the organisational safeguarding strategy, policy and practice, providing real-time advice and guidance to country safeguarding teams on casework and embedding safeguarding across GEMS.

The Central Safeguarding Team (CST) ensure the effective management of safeguarding across GEMS schools through case management, training and development, external stakeholder management, safeguarding processes, curriculum development, student voice and participation, and parental engagement. The Central Safeguarding Team supports an allocated cluster of schools to embed the organisation's Student Protection Policy and strategic plan within the GEMS Group so that there is consistency of safeguarding practice and policy compliance across the group.

GEMS School Local Advisory Board (LAB) is responsible for monitoring and advising schools on the central responsibilities of governance. This includes arrangements for safeguarding for which an appointed, named Governor, has responsibility for contributing to the strategic discussions at LAB meetings which help determine the vision and ethos of the school and clear strategic priorities and targets for the school's safeguarding and child protection responsibilities. The LAB ensures the school's safeguarding framework of policies, procedures and practices is appropriate and ensures the school's adherence to the GEMS Student Protection Policy.

The **Executive Vice President (EVP) - Education** is responsible for ensuring that all aspects of the GEMS Student Protection Policy is delivered effectively in their respective cluster.

The **Principal/CEO** holds overall responsibility for fostering a culture of safeguarding at the school; incorporating all elements of the policy and robust safeguarding practices. The Principal ensures that staff, LAB members, volunteers and children understand and implement the policy to safeguard children.

The **Child Protection Coordinator (CPC)/Designated Safeguarding Lead (DSL)** is a member of the Senior Leadership Team who takes responsibility for safeguarding and child protection in the school or service (including online safety and understanding the filtering and monitoring systems and processes in place). The CPC/DSL ensures comprehensive, detailed and accurate safeguarding recording and case management on Guard, the GEMS Safeguarding Case Management platform, and appropriate safeguarding training for all staff, LAB members and volunteers working in school. This responsibility



may be delegated to an appropriately trained Deputy in the absence of the CPC/DSL.

The **Allegations Manager** takes responsibility for managing allegations against adults and works with the CPC/DSL and HR Manager to investigate any allegations concerning members of staff and volunteers.

All **school staff** are responsible for recording concerns on GUARD and are to inform the CPC/DSL or DCPC/DDSL immediately of any high risk concerns. All **service staff** should report all safeguarding concerns immediately to the CPC/DSL or DCPC/DDSL. All school and service staff also need to ensure that they undertake safeguarding training that is commensurate with their role within the school.

4. CHILD PROTECTION PROCEDURES

How should maltreatment concerns identified in schools be handled?

i) Dealing with a disclosure, concern or allegation:

Children in school may feel safe and secure enough to make a disclosure of past abuse, current abuse or neglect to a member of staff whom they feel they can trust. A disclosure of this kind can arise at any time and may have been anticipated by staff or equally be unexpected. In these situations, staff should:

- » Demonstrate that they are willing to listen to what the child has to say
- » Be prepared to listen impartially to the child, giving appropriate support, but without introducing their own opinions or judgement
- » Be aware of documenting requirements
- » Remember that they are working as part of a team, and must never make a promise of confidentiality
- » Record any concerns on Guard, the safeguarding case management platform, without undue delay and report to the CPC/DSL or the Deputy CPC/DSL
- » Be aware that what the child has to say may be uncomfortable or distressing to them, and make clear to them that they may seek support, help or advice for themselves if required

If a disclosure or allegation is made by any other person (parent, family member, another professional, etc.) regarding a safeguarding or child protection issue, the same principles regarding documenting and evidence will apply. Children and adults should be offered the opportunity to make a written statement, which should be signed and dated by them, and by any witness(es) to the statement. This should be uploaded to the specific concern on Guard.

The Allegations Manager or Deputy Allegations Manager must be notified immediately of any allegation or disclosure that calls into question the competence or suitability of another professional person (whether or not they are an employee of GEMS Education). Such information must be treated as being strictly confidential. Verbal notifications of this kind that are made to the Allegations Manager

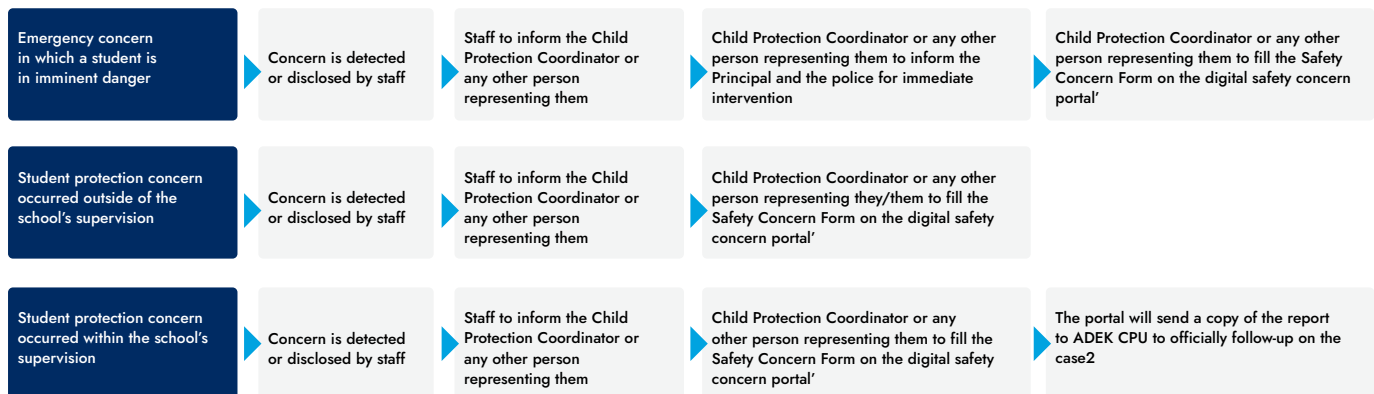


or Deputy Allegations Manager must also be reported electronically through the Guard safeguarding case management platform. The Allegations Manager must notify HR for all allegations as per the Employee Disciplinary Policy.

ii) Acting on a current child protection issue - Safety concern referrals in Abu Dhabi schools:

If there is a cause for concern about a child, safeguarding and child protection procedures will be followed as outlined in this Policy. The CPC/DSL or a named Deputy CPC/DSL, or another person acting on his or her behalf, will take the lead role in any safeguarding or child protection issue.

Referral Process



The Central Safeguarding Team will support the CPC/DSL with any external referral. If this has not been done already, a decision will be reached as to whether any immediate action is necessary to secure the child's safety and welfare, and on any subsequent investigation or action to be taken.

GEMS schools should hold at least two contact numbers for each child, and if it is deemed appropriate, (i.e. if there is not an allegation against one of those contacts) these people will be contacted in the event of any safeguarding concern or incident at school, without undue delay.

If a child protection concern, allegation or incident relates to a member of staff or a person working with children, the Central Safeguarding Team must be notified without delay of any high-risk allegations.

Where a child has made a specific statement, it may be necessary to clarify what they have said, and it is important to document this information accurately together with the circumstances in which the statement was given. The relevant person in the school or service should meticulously document all observations, concerns, discussions and actions; inclusive of the date and time they were noted to form the safeguarding chronology. These records must be uploaded to Guard and provide important information that may be required for external referrals or subsequent court proceedings. Guard populates a chronology as part of the safeguarding case management platform.

5. ALLEGATIONS AGAINST ADULTS:



All GEMS schools and services will have appointed an Allegations Manager and Deputy who have completed Level 3 Safeguarding Training, to act as managers for allegations against staff. All staff should be made aware of their identity and how to share concerns about the behaviour of adults working with children.

Employees who have been subject to an allegation can access support through the school HR Manager, or if they feel this is a conflict of interest, they can raise their queries with the Principal or the HR Business Partner who may seek further advice from the VP - Risk, Global Lead of Safeguarding and Child Protection.

6. WHISTLEBLOWING

Whistleblowing is any disclosure of information that is made in the company and/or public interest and, in the reasonable belief of the individual that relates to suspected wrongdoing or dangers at work. This could be happening at the present time, have taken place in the past or is likely to happen in the future. This may include:

- » a criminal offence
- » a miscarriage of justice
- » an act creating risk to health and safety
- » an act causing damage to the environment
- » a breach of any other legal obligation
- » a concern relating to the safeguarding of children or adults
- » the deliberate concealment of any of the above matters

GEMS expects all senior leaders to have disseminated the company's 'Whistleblowing Policy' to all employees. The Senior Leadership Team through the CPC/DSL must have allocated a proportion of induction or orientation to highlighting the key principles of whistleblowing.

See [GEMS Whistleblowing Policy](#) (GEMS employee access only).

7. COMPLAINTS PROCEDURES

Complaints whether directly made to the school or through the GEMS Speak Safe Whistleblowing Hotline should be managed in accordance with the GEMS Complaints Policy.

Complaints which include a safeguarding/child protection concern must be recorded on the Guard platform with all safeguarding procedures being followed.

8. SAFER RECRUITMENT

Vetting, hiring and monitoring of staff, volunteers and invited visitors

It is the expectation that all schools and services comply with the requirements of the Policy and



procedures for safer recruitment. GEMS Risk Management function will monitor compliance against the GEMS Safer Recruitment Policy on an ongoing basis including, but not limited to, the school's Single Central Records (SCR). In addition, schools will be subject to periodic audit of their safer recruitment practices and management of SCR.

Staff, volunteers, and invited visitors shall be properly vetted and screened prior to working in or accessing any locations where students are present. This includes criminal record checks from countries from which the applicant is being hired.

The Principal must take full responsibility and accountability for all persons working in schools and ensure their suitability and compliance with all student protection and safeguarding requirements. This includes preventing any person from working with students if they pose a risk to students' safety and wellbeing.

The Principal shall ensure continuous monitoring of all staff and immediately report alleged inappropriate conduct or suspected actions that may result in harm or risk of harm to a student.

Staff members found guilty of serious misconduct shall have their appointment letters revoked, following a written investigation as per the ADEK School Employment Policy, the Cabinet Decision No. (52) of 2018 regarding the Executive Regulations of Federal Law No. (3) of 2016 regarding Child Rights (Wadeema) and Federal Decree Law No. (33) of 2021 Concerning Regulating Labour Relations and its amendments.

For specific details relating to GEMS Safer Recruitment we ask all employees to direct questions through the school or service HR Manager or HR Business Partner. However, the exact detail and expectations of all pre-employment checks can be found in the GEMS Safer Recruitment Policy found on GEMS SharePoint [GEMSNET Policies & Documents - Safer Recruitment Policy](#) (GEMS employee access only).

Employees will also be subject to ongoing checks through government entities in the school's locality.

9. POSITION OF TRUST

GEMS employees or volunteers providing care, supervisory and educational support to children are always in a 'position of trust.' The position of trust carries with it certain expectations and responsibilities. Breaches of these expectations and responsibilities are likely to lead to disciplinary action and possible dismissal.

'Positions of trust' exist in professions where the professional is in a position of authority or status over a child or vulnerable person, e.g. school staff, volunteers, medical staff, therapists, coaches, drivers, services staff etc.

You are employed in a 'position of trust' in respect of all children connected to GEMS. All relationships developed with children will be as agents of the company and as such, no personal relationships will be permitted outside the remit of the service.



This means that adults should always maintain appropriate professional boundaries and avoid behaviours which might be misinterpreted by others. They should report and document any incident with this potential. See [GEMSNET Policies & Documents - Safer Working Practice Guidance](#) (GEMS employee access only).

10. SAFER WORKING PRACTICE/MOE STAFF CODE OF CONDUCT

Acceptable adult behaviours

GEMS Safer Working Practice Guidance provides practical guidance to all adults on which behaviours constitute safe practice and which behaviours should be avoided. The document seeks to ensure that the responsibilities of senior leaders of educational settings towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. This guidance supplements the UAE Ministry of Education Code of Conduct for Education Professionals in General Education. See [GEMSNET Policies & Documents - Safer Working Practice Guidance](#) (GEMS employee access only).

Staff and volunteers shall respect and protect the rights of all students and take no actions that may put the student at risk of maltreatment.

Staff and volunteers shall not undertake any inappropriate behaviours' needed towards the student and/or in the presence of the student.

Staff and volunteers shall report any incidents of inappropriate behaviours' needed against students.

Serious allegations of sexual misconduct by staff, volunteers, and/or invited visitors shall be directly reported to the Police and FCA and the concerned staff/volunteer/invited visitor shall be immediately removed from the school's premises.

11. STAFF TRAINING

There is an expectation that safeguarding training is in place for staff in all GEMS schools and any associated services, including the School Support Centre. Training must include an understanding of safeguarding expectations, applicable roles and responsibilities, including online safety and the school's arrangements for filtering and monitoring.

The minimum expectation for a Child Protection Coordinator/Designated Safeguarding Lead in a GEMS school or service is that they have undertaken the GEMS-specific CPC/DSL Level 3 training every 2 years and any training as mandated by ADEK, receive regular practice updates throughout the year through the GEMS Child Protection Coordinator/Designated Safeguarding Lead Forums, which are mandatory to attend. [For full details of training required see the GEMS safeguarding training matrix - APPENDIX D.](#)



12. EMPOWERING CHILDREN TO KEEP THEMSELVES SAFE

Student protection learning resources

GEMS Education ensures that children are taught about elements of safeguarding; including online safety, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum.' Where they exist, this is supported by the school inspection frameworks and legislative frameworks in the various countries in which GEMS operates. GEMS expects senior leadership teams to ensure a curriculum that is relevant, and is sensitive to social, cultural and moral principles, exists in all schools and for all age ranges.

Any area of the curriculum which explores aspects of safeguarding that could be perceived as 'culturally sensitive' should be aligned with relevant departmental advice from the VP - Risk, Global Lead of Safeguarding and Child Protection as well as ADEK and relevant content specialists. The relevant EVP - Education must be informed before content is implemented into the curriculum.

13. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

All schools in the GEMS Group must be clear that there is sometimes a need to provide additional support to vulnerable children. Children may be vulnerable due to a wide range of factors including but not limited to; communication difficulties, SEND, adversity and trauma.

Vulnerable children may be more susceptible to grooming, bullying, online harm or child-on-child abuse. Schools should regularly raise awareness with staff and parent / carers about early identification and how to respond to these issues.

14. INTIMATE CARE

When providing intimate care, schools must follow the GEMS Intimate Care Policy including the provision of a risk assessment and risk reduction plan. This plan should be created in conjunction with the child's parents and key school staff. See [APPENDIX E: INTIMATE CARE AND TOILETING GUIDANCE STATEMENT.](#)

15. SUICIDE IDEATION/SUICIDE ATTEMPT

When dealing with disclosures of suicide ideation or suicide attempt, schools must follow the GEMS Care Protocol including the implementation of a risk assessment and risk management plan. This should be created in conjunction with the child (where appropriate), the child's parents and key school staff. See [APPENDIX F: CARE PROTOCOL.](#)

16. ATTENDANCE/CHILDREN MISSING FROM EDUCATION

GEMS Education recognises that regular attendance and punctuality at school is important to the well-being and safety of all children and enables them to access the opportunities made available to them at school. Attendance must be monitored closely, and action taken where concerns are raised; whether



learning is online, blended or physically in school. Every school must have an Attendance Policy that is reviewed regularly by the school leaders, and LAB members should monitor the impact of the Policy in securing good attendance and punctuality.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. It is important the school's response to persistently absent pupils and children missing education, supports identifying abuse; and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

Where a child has 5 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 record the concern on the Guard platform.

*Reasonable steps may include:

- » Telephone calls to all known contacts (local/international)
- » Emails to parents/guardians
- » Contact with other schools where siblings may be registered.
- » Enquiries to friends, neighbours etc. through school contacts.

17. ONLINE SAFETY

All schools must have an Online Safety Policy. This policy must include clear guidance on appropriate filtering and monitoring systems for all school devices and networks to protect children from harmful or inappropriate content. It should also address the risks of online abuse, including child-on-child abuse, sharing of images, and cyberbullying. In light of evolving technologies, the policy must also address the potential risks associated with artificial intelligence, including exposure to AI-generated harmful content or misuse. In addition, the policy must set out clear expectations and boundaries around the use of mobile and smart technology. The policy should address the full range of online risks, categorised as:

Content: exposure to illegal or harmful material such as pornography, racism, misogyny, self-harm, suicide, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.

Contact: harmful interactions with others, including peer pressure, targeted advertising, or grooming.

Conduct: harmful online behaviours such as the consensual and non-consensual sharing of explicit images, online bullying, and accessing or distributing pornography.

Commerce: risks linked to online gambling, phishing, financial scams, and inappropriate advertising.

Online communication between staff and students should not happen other than for the purposes of coordinating an aspect of education. All communications should be made on school devices through



GEMS approved mail servers. All communications should be available on request to the SLT team of the specific school or service. For further information, please see [GEMSNET Policies & Documents - Safer Working Practice Guidance](#). (GEMS employee access only).

See [Youth Produced Sexual Imagery APPENDIX C – Child Protection Procedures](#) for detailed information.

RELEVANT LEGISLATION:

- » Law No. (26) of 2015 on the Organization of Dubai Data Publication and Sharing
- » Federal Decree Law No. 34 of 2021 on Combatting Rumors and Cybercrimes

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. When dealing with concerns of YPSI, the school or service will work in partnership with parents and external agencies to respond proportionately to the circumstances.

All incidents of YPSI should be reported to the CPC/DSL as with all other safeguarding issues and concerns. If, at any point in the process, there is concern that a child has been harmed or is at risk of harm, the CPC/DSL will contact the Central Safeguarding Team for further advice.

18. BULLYING

Every school in the GEMS Group must have an Anti-Bullying Policy. This should be regularly reviewed, and GEMS children should be involved in its creation, implementation and review. See also [APPENDIX C: Child Protection Procedures – Child-on-Child Abuse](#).

It is the responsibility of:

- » GEMS Corporate Governance to ensure each school has an effective Anti-Bullying Policy in place
- » The Principal/CEO to communicate the Anti-Bullying Policy to the school community to ensure that disciplinary measures are applied fairly, consistently and reasonably and that there is an effective route for concerns to be raised without delay
- » LAB Members to take a lead role in monitoring the impact of this Policy and reviewing it regularly
- » All staff, including: LAB, senior leadership, teaching and non-teaching staff, to support, uphold and implement this Policy accordingly
- » Parents/carers to support their children and work in partnership with the school
- » Children to abide by the Policy

19. MANAGING DISCLOSURES

When engaging with children who already have, or may be about to, make a disclosure of abuse,



staff should be aware that the child may need to make a formal statement to external agencies and the Police.

The reality is that children will choose to disclose initially to a member of staff they feel they can trust, who may listen to them sympathetically. Therefore, the following points should be kept in mind:

- » Any discussion should be carried out in a way that minimises distress to the child concerned and maximises the likelihood that the information they provide is accurate and complete. The discussion should take place somewhere that they feel safe, they are assured of privacy, and they are not distracted or interrupted.
- » Asking 'leading questions', or 'putting your own words as the child's must be avoided. Similarly, staff must not pass any opinions, or express their own feelings about what the child is telling them. Staff must make clear that anything they say will have to be passed on to the CPC/DSL and possibly other people who work in child protection so that we can keep them safe.
- » Be aware that the child may need more time and more than one opportunity to speak before they feel safe to fully voice all their concerns.
- » The child may wish to retract a statement they have made earlier, or contradict a statement they have already made, or even refuse to speak at all. In these circumstances, it is not appropriate for staff to put any pressure on them, but their reactions and comments should be accurately documented, with times and dates.

It is important that in addition to a factual written statement of the disclosure, any member of staff who has been involved, or who was present at the time, should make a written record of the circumstances in which the disclosure came about, this should be directly entered, or the document uploaded directly onto Guard as part of the case management documentation.

It is important that all staff are aware of their own ability to deal with any safeguarding situation or issue. If a member of staff finds themselves in a situation where a child feels sufficiently comfortable to disclose information of a sensitive nature, the member of staff must consider very carefully how confident they feel about continuing to engage the child in this discussion.

If the member of staff/volunteer feels that they need support from a more experienced staff member, they should carefully explain to the child that they need to seek help from someone else. A more experienced member of staff may be able to help, or alternatively the child may wish to speak directly to the CPC/DSL.

However, if nobody else is available, and the child wishes to disclose, then the member of staff should continue to listen carefully, so that they do not feel that they are being rejected or ignored. As soon as possible, any disclosure made, or information given by the child must be carefully documented using the child's own words.



20. SUPPORT FOR CHILDREN, FAMILIES AND STAFF INVOLVED IN A CHILD PROTECTION CONCERN

Safeguarding concerns can result in distress for the child and anxiety for staff and parents/caregivers who become involved.

GEMS expects senior leaders to ensure that everyone involved in a child protection issue follows the procedures laid out in this Policy and any other relevant policy. Senior leaders will ensure that all suspicions and disclosures are taken seriously.

The CPC/DSL will act as a central point of contact; offering details of helplines, counselling or other avenues of external support and where necessary, seeking advice and guidance from the Central Safeguarding Team, as appropriate.

21. SITE SECURITY

Visitors to the school, including contractors, must be appropriately supervised. They 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 follow the school's safeguarding and health and safety regulations to ensure children in school are kept safe, including expectations to wear the relevant school lanyard. Where possible and practical, contractors will be engaged before or after regular school hours. All schools must ensure that they follow the Access Control, Managing Patrolling at Schools Policies, and the Safecor Security Handbook at all times.

22. EXTENDED SCHOOL AND OFF-SITE VISITS

All extended and off-site activities are subject to a risk assessment and must satisfy health and safety and safeguarding requirements.

When GEMS children attend off-site activities, including day or residential visits and work-related activities, the Principal is responsible for ensuring that effective safeguarding and child protection arrangements are in place. The Principal must ensure that the school has followed procedures as outlined in the [GEMS Offsite Educational Trips and Visits Policy](#) (*GEMS employee access only*).

The GEMS Student Protection Policy and school-specific on-site procedures apply to all trips, including the mandate to escalate any safeguarding concerns as per the Policy. If other organisations provide services or activities on the school site, the school will ensure that there is an appropriately trained safeguarding lead and check the organisations have appropriate procedures in place, including safer recruitment and health & safety procedures. The school must ensure that there are arrangements in place for the provider to report safeguarding concerns.

23. SAFEGUARDING/CHILD PROTECTION LEGISLATION AND GUIDANCE



Without exception, GEMS will adopt the relevant law governing the jurisdiction of the operating locality of the school. We understand that in different regions of the Emirates, and in the different countries in which GEMS operate, subtlety of legal interpretation may exist. Throughout our policies, we have broadly accepted the principles and ethos of UK safeguarding legislation.

24. RECORD KEEPING

The Guard safeguarding case management platform should be used as the system to record, escalate, review actions taken and evaluate outcomes of concerns. All safeguarding concerns must be entered on Guard and staff must be trained in how to raise concerns.

Following an initial concern being raised, it is essential that any subsequent discussions with children or others are accurately documented on Guard as soon as possible.

Any written information should be clearly signed and dated then be uploaded onto the Guard platform by attaching a PDF of the original documentation. The original information should always be filed and stored securely with the CPC/DSL.

Any records may be required as part of a subsequent investigation, and they could be used as evidence in court if there is a criminal prosecution. Consequently, it is vital that all written records are accurate and factual. Any allegations or statements made by a child or by any other person should be documented verbatim (documenting the exact words used) wherever possible. The person, who made the allegation or statement, and any witness who was present, should countersign any written record.

As soon as a child protection issue or concern has been raised, a timely and accurate record must be made by the CPC/DSL of all events, reports, decisions, actions taken and outcomes. This should be entered into Guard and reported in-line with ADEK requirements.

On some occasions, it may be deemed necessary to obtain photographic evidence of suspected injuries to a child. School staff (including medical staff) must not photograph children. This evidence will be obtained by the Police, external medical professionals or child protection services.

School staff may document details in writing of any visible injuries or illustrate the position and extent of the injuries on Guard using the body map but must not take any photographs of a child.

Service staff will report all child safeguarding concerns to the school CPC/DSL, for the school to record on the Guard case management platform. Service staff will record any allegations raised against adults in their service on their own Guard platform.

Only the VP - Risk, Global Lead of Safeguarding and Child Protection, Central Safeguarding Team, Chief of Risk and Assurance, Chief Education Officer, EVP - Education, the Principal/CEOs and CPC/DSLs in individual schools and services should and will have access to all safeguarding files. These same end users will also make decisions about with whom they are to be shared.

25. DATA CONFIDENTIALITY AND INFORMATION SHARING



Whilst gathering information following a child safeguarding concern, the appropriate information sharing guidance must be followed. When working with confidential, personal information of a very sensitive nature, staff should be aware, at all times, of the GEMS current guidance on information sharing in the best interest of a child and data protection. See above for how records are kept confidentially.

Case reports and student data are strictly confidential. The identities of the student subject to alleged and/or suspected maltreatment, the alleged/suspected perpetrator, and the person reporting the alleged/suspected case shall be kept confidential by all parties involved in the case.

The data shall be shared only with authorized individuals from the ADEK CPU and the FCA, within investigative teams, and the Abu Dhabi Judicial Department.

Authorized individuals are strictly prohibited from discussing active or closed cases with the media, any third parties or other staff, and/or unauthorized ADEK staff, with the exception of investigative and judicial authorities and within the legal responsibilities.

Upon confirmation that a child has transferred to another GEMS school, any safeguarding records held on the Guard safeguarding case management platform can be transferred to the new school CPC/DSL. Paper based safeguarding records should be transferred to the CPC/DSL of the receiving school. The CPC/DSL of the current school should also contact the CPC/DSL/Principal in the receiving school by telephone to provide a full picture of the child(ren).

When children transfer to a school outside of the GEMS Group, every effort should be made to contact the CPC/DSL/Principal by telephone regarding any vulnerable child and share appropriate information in the best interest of the child. Further advice and guidance can be sought from the Central Safeguarding Team.

APPENDIX A: UAE GOVERNMENT SAFEGUARDING MANDATE FOR EDUCATORS

The following information can be used in a school/service's literature/website to inform parents of the expectations of school staff regarding UAE child protection legislation: '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, however, this discussion will only take place where such discussions 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 unproven. Parents/carers will appreciate that the school's Child Protection Coordinator/Designated Safeguarding Lead carries out their responsibilities in accordance with the



law and acts in the best interests of all children.

[National Child Protection Policy in Educational Institutions in United Arab Emirates](#)

Please refer to recent policy legislation for Abu Dhabi: ADEK Student Protection Policy.

APPENDIX B: ROLES AND RESPONSIBILITIES

The Governing Body (GEMS Education) ensures that schools:

- » Have safeguarding, recruitment and managing allegations procedures that take into account the procedures and practice of GEMS Education, the country of operation and any national legislation/guidance.
- » Appoint a Child Protection Coordinator/Designated Safeguarding Lead who is a member of the Senior Leadership Team and who must have undertaken GEMS CPC/DSL Level 3 training and any training mandated by ADEK in addition to GEMSU Basic Awareness training and GEMS Level 1 Training.
- » Ensure that the CPC/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.
- » Are compliant with the GEMS Student Protection Policy and procedures.
- » Ensure that the GEMS Student Protection Policy is made available publicly on the school's website.
- » Have procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the Principal/CEO and allegations against other children.
- » Follow safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification by professional association regulations.
- » Develop an induction strategy that ensures all staff, including the Principal/CEO, and volunteers receive training on safeguarding arrangements, Safer Working Practice and the role of the CPC/DSL, on induction and before they start work at the school or service.
- » Develop a training strategy that ensures all staff 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 CPC/DSL receives refresher training and regular updates as defined under the CPC/DSL's duties below, these include mandatory attendance at GEMS Child Protection Coordinator/Designated Safeguarding Lead Forums.
- » Contribute to inter-agency working when necessary.



- » Teach children about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.

The Principal/CEO:

- » Comply with the provisions of this policy.
- » Publish and post this policy to protect students from maltreatment.
- » Ensure that procedures to prevent situations that could lead to the maltreatment of students are in place and understood by all staff.
- » Ensure the oversight of students at all times while under the supervision of the school.
- » Ensure that there is priority emphasis within the school on the protection of the students and for taking immediate actions when there is suspicion of cases of student maltreatment.
- » Ensure that students know how, where, and to whom to safely report their concerns about alleged and/or suspected maltreatment without fear of retribution or punishment.
- » Ensure that staff, volunteers, and students are aware of how, where, and to whom they can safely report their concerns about the potential exposure of any student to alleged and/or suspected maltreatment without fear of retribution or punishment.
- » Include the views and recommendations from students and parents regarding safety and protection reporting within the school.
- » Immediately report any case of alleged and/or suspected maltreatment of students as stated by this policy.
- » Ensure that all staff and volunteers targeted for student protection training fully attend and participate in all training sessions and sign off on safeguarding training and student protection training.
- » Conduct orientation sessions for parents upon student registration or enrollment and at the start of every school year to promote this policy and to inform them of their roles and responsibilities, and their rights and duties.
- » Maintain students' records in compliance with the ADEK School Records Policy and ensure confidentiality of open and closed cases in accordance with the guidelines.
- » Immediately suspend any staff who is suspected of an offense involving student maltreatment on a temporary basis until the suspicion is adjudicated.
- » Ensure that students have a safe and confidential opportunity to report any concerns they may have in regarding their rights to safety and wellbeing.
- » Ensure the vetting, hiring, and monitoring of all staff, volunteers, and invited visitors according to this



policy and relevant safeguarding measures.

- » Holds overall responsibility for fostering a culture of safeguarding at the school; incorporating all elements of the policy and robust safeguarding practices.
- » Ensures that the GEMS Student Protection Policy and procedures are understood and implemented by all staff including how to identify, raise, record and escalate concerns effectively.
- » Allocates sufficient time, training, support and resources, including cover arrangements, when necessary, to enable the CPC/DSL and Deputies to carry out their roles effectively, including attendance at any external agency discussions, training and other necessary meetings.
- » Ensures that all staff receive safeguarding training in line with the GEMS Student Protection Policy before they commence working in school or service.
- » 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 GEMS Student Protection Policy and Whistleblowing procedures.
- » Ensures that children are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.
- » Refers all high-risk allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer as per ADEK requirements and, to the Central Safeguarding Team on the day of the allegation and documents it as an allegation on the Guard Case Management platform.
- » Appoints an Allegations Manager and Deputy, who have completed GEMS safeguarding training to Level 3, 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.
- » Ensure that safeguarding is a standing agenda item in Safeguarding Team, SLT, LAB, and pastoral meetings including regular updates on the impact of training and compliance with the Policy.
- » Ensures safeguarding patterns and trends are monitored through PowerBI.

The Child Protection Coordinator (CPC)/Designated Safeguarding Lead (DSL):

- » Is a senior member of staff from the school or service's leadership team. The CPC/DSL must have the status and authority within the school to carry out the duties of the post, including committing resources, supporting and directing other staff.
- » Takes lead responsibility for safeguarding and child protection in the school (including online safety and understanding the filtering and monitoring systems and processes in place), the overall



responsibility of which cannot be delegated. However, the day-to-day activities of the CPC/DSL may be delegated to appropriately trained deputies.

- » Is appropriately trained through completion of the GEMS safeguarding training to Level 3 and any training mandated by ADEK, receives Level 3 CPC/DSL refresher training at two-yearly intervals and further training regularly (through attendance at the GEMS Child Protection Coordinator/ Designated Safeguarding Lead Forums) and 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 or service community.
- » Encourages a culture of listening to children and taking account of their wishes and feelings.
- » Is alert to the specific needs of children, including those with special educational needs or other vulnerabilities.
- » Has a working knowledge of relevant local law, education inspection process, and inter-agency support.
- » Keeps detailed, accurate records of all concerns using the Guard platform detailing discussions, decisions made including the rationale for those decisions and outcomes. This should include instances where referrals were or were not made to an external agency.
- » Refers cases of suspected abuse as per ADEK requirements and to the Police as appropriate and seeks advice and guidance from the Central Safeguarding Team.
- » Attends and/or contributes to any external child protection meetings and chairs regular safeguarding meetings within the school or service.
- » Develops effective links with relevant statutory and voluntary agencies.
- » Ensures that all staff sign to indicate that they have read and understood the GEMS Student Protection Policy and GEMS Safer Working Practice Guidance.
- » Has a working knowledge of relevant national safeguarding guidance.
- » Ensures that the school or services safeguarding, and child protection procedures are regularly reviewed, in collaboration with the whole school or service community of children, parents, staff, volunteers and LAB Members.
- » Liaises with, the Principal/CEO and the Central Safeguarding Team for any child protection concerns.
- » Keeps a record of staff attendance at school/service-based safeguarding/child protection training, which is signed by individual staff members.



- » Ensures the GEMS Student Protection Policy is publicly available for staff and parents.
- » Ensures parents are aware of the school's role in safeguarding and the referral process on suspected abuse.
- » Ensures that the Principal/CEO and EVP - Education is aware of the CPC/DSL responsibility under relevant law, GEMS expectations and keeps them informed of any relevant safeguarding and child protection issues.
- » Ensures safeguarding patterns and trends are monitored through PowerBI and that data-driven strategies are in place where needed.

The Deputy Child Protection Coordinator(s)/Designated Safeguarding Lead(s)

- » Is/are appropriately trained to the same level as the CPC/DSL and, in the absence of the CPC/DSL, carries out those functions as necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the CPC/DSL, the deputy will assume all the functions above, with approval of the Principal and the VP - Risk, Global Lead of Safeguarding and Child Protection.

Staff and volunteers shall:

- » Report immediately an alleged and/or suspected case of student maltreatment upon discovery.
- » Care for students at all times while under the school's supervision.
- » Understand this policy to address alleged and/or suspected student maltreatment cases.
- » Attend and participate in mandated student protection and safeguarding training.

Parents shall:

- » Cooperate with the Principal and staff, answer all inquiries related to the student's behavior, academic performance, and respond to their feedback and guidance.
- » Attend all scheduled parent meetings with the school.
- » Communicate any concerns, observations, or changes in the student's behavior to the Principal, board members, and/or to the concerned staff.
- » Support the school in ensuring safe online practices during distance learning and home work.

APPENDIX C: CHILD PROTECTION PROCEDURES

Recognising abuse

To ensure that GEMS children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. This is covered in all levels of GEMS safeguarding training.



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 child home alone, or leaving knives or matches within reach of an unattended child. Abuse may be committed by adult men or women and by other children.

Abuse, neglect and exploitation

Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the Child Protection Coordinator/Designated Safeguarding Lead (or Deputy CPC/DSL).

All should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will occur concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

Definitions of abuse, neglect and exploitation

Abuse: 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.

Physical abuse: 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.

Emotional abuse (including psychological 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), 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: involves forcing or enticing a child to take part in sexual activities, not necessarily involving 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 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.

The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and all staff should be aware of it and procedures for dealing with it.

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, for example, 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 failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Domestic Abuse: Domestic abuse can encompass a wide range of behaviours, maybe a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of domestic abuse at home and/or suffer domestic abuse in their own relationships. All of which can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or the increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. On occasion, this is sometimes referred to as 'sextortion'.

Child on Child Abuse: All staff should be aware that children can abuse other children (referred to as child-on-child abuse). All staff should be clear as to the school's policy and procedures regarding child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Child-on-child abuse is most likely to include, but may not be limited to:



- » bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- » abuse in personal relationships between peers;
- » physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- » sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- » sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- » causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- » consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery – See YPSI section below);
- » up-skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- » initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- » Online child-on-child abuse is any form of child-on-child abuse with a digital element, for example 'sexting', online abuse, coercion and exploitation, peer on peer grooming, threatening language delivered via online means, the distribution of sexualized online content and harassment.

Suicide Ideation/Attempt: In the event that a student discloses suicide attempt or suicide ideation staff must ensure that the student is supervised and safe while the CPC/DSL is informed immediately so that they can initiate the Care Protocol.

Youth Produced Sexual Imagery "Sexting" (YPSI): If staff become concerned about a YPSI issue in relation to a device in the possession of a child (e.g. mobile phone, tablet, digital camera), the member of staff will support the child to take the device immediately to the CPC/DSL. Staff will not look at, take photos of or print any images.

The CPC/DSL will discuss the concerns with appropriate staff and speak to any child involved as



appropriate. Parents/carers will be informed at an early stage and involved in the process after the CPC/DSL has discussed the issue with the Principal and the Central Safeguarding Team.

If, at any point in the process, there is concern that a child has been harmed or is at risk of harm, a referral will be made to the relevant external agency, after speaking to the Central Safeguarding Team. The CPC/DSL will make a judgement about whether a reported YPSI incident is experimental or aggravated.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by children. These include possible adult involvement or criminal or abusive behaviour by children 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 child 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
- » 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 children (possibly by an adult pretending to be a child known to the victim)
- » Evidence of coercing, intimidating, bullying, threatening and/or extortion of children by one or more other child to create and share indecent images of themselves
- » Pressurising a child or children to create and share indecent images of themselves
- » Dissemination of indecent images of children 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
- » Sharing of indecent images places a child at immediate risk of harm, for example the child is presenting as suicidal or self-harming

As a rule, adults should not view child produced sexual imagery. Wherever possible, the CPC/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 local laws, safeguarding best practice and never taken in isolation. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child or has the potential to be viewed as a criminal activity in the country in which the school operates. Any decision should be initially discussed with the Principal and Central Safeguarding Team and if a decision is made to view imagery, they 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 child involved)
- » Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the child or parent in making a report
- » Is unavoidable because a child has presented an image directly to a staff member or the imagery has been found on a GEMS-owned device

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

- » Never copy, take a photo of, print or share the imagery
- » Ensure viewing is undertaken by the CPC/DSL or Deputy CPC/DSL with delegated authority from the Principal
- » Ensure viewing takes place with another member of staff present in the room, ideally the Principal another CPC/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 premises, ideally in the Principal or CPC/DSL's office
- » Ensure wherever possible that images are viewed by a staff member of the same sex as the child in the imagery
- » Document the viewing of the imagery on the Guard safeguarding platform, including who was present, why the image was viewed and any subsequent actions and outcomes.

If images do not meet the criteria for other agency involvement, consideration be given to deleting imagery from devices and online services in collaboration with the Central Safeguarding Team to limit any further sharing of the imagery, this will be in consultation with parents.

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 behavioural indicators of abuse and report any concerns to the Child Protection Coordinator/ 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 regarding 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 behaviour – from quiet to aggressive, or happy to withdrawn;
- » challenge authority;
- » become disinterested in their schoolwork;
- » 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 behaviour 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 CPC/DSL to decide how to proceed.

It is very important that staff report all their concerns, however minor or insignificant they may think they are – they do not need ‘absolute proof’ that the child is at risk. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Any concern, may be part of a bigger picture for that child which if known, could give context to a situation and help to protect them.

GEMS Guard Safeguarding Case Management Platform

All staff have access to the GEMS Guard platform and concerns relating to any aspect of safeguarding and child protection must be logged [here](#) (*GEMS employee access only*).

Where there is concern about the immediate welfare of a child, the CPC/DSL should also contact the Central Safeguarding Team for advice and guidance immediately. Any potential external agency involvement with statutory, and public bodies, including the Police/Social Services/regulatory bodies, must be notified to the Central Safeguarding Team.

For any concern categorised as high risk or a hospitalization/fatality as a result of abuse, the Central Safeguarding Team and the relevant EVP - Education should be informed by the CPC/DSL/Principal immediately.

Key points for staff to remember when taking action are:

- » In an emergency take the action necessary to help the child
- » Report your concern to the CPC/DSL as quickly as possible and report on Guard, staff should never leave site with an undisclosed concern.
- » 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 child's welfare

There will be occasions when staff may suspect that a child may be at risk but have no ‘real’ evidence. The child's behaviour may have changed, 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 child 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 child if they are OK or if they can help in any way.

Staff should report these concerns to the CPC/DSL and log on Guard as per any other concern about a child's welfare, it might be part of a wider picture.

Concerns which do not meet the threshold for safeguarding intervention will be managed through the school's pastoral and wellbeing process.

If a child 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 child talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the child know that they must pass the information on – staff are not allowed to keep secrets. Children may reconsider their disclosure at this point and should not be forced to disclose.

During their conversations with children, staff will:

- » Allow them to speak freely
- » Remain calm and not overreact – the child 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 child and should not attempt to force a child to disclose
- » Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child'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?)
- » Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- » Avoid reprimanding 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 child what will happen next



- » Let them know that someone (either you or another named person, e.g. the CPC/DSL) will come to see them before the end of the day
- » Record the concern on the Guard platform as soon as possible including full details of the conversation(s)
- » Report verbally to the CPC/DSL
- » Seek support if they feel distressed or need to debrief

Notifying parents

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

However, if the school believes that notifying parents could expose the child to significant risk of harm advice will be sought first from the Central Safeguarding Team.

Making a referral to an external agency

The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless doing so would increase the risk to the child or create undue delay. Advice and guidance must be sought from the Central Safeguarding Team.

The CPC/DSL will make a referral to the relevant agencies, as per ADEK requirements and the Police, if it is believed that a child is suffering or is at risk of suffering harm.

GEMS Central Safeguarding Team

Decisions related to safeguarding and child protection are made in the best interest of the child. Therefore, decisions regarding strategy and actions will not be made in isolation by individuals but in collaboration with the VP - Risk, Global Lead of Safeguarding and Child Protection and the Central Safeguarding Team.

APPENDIX D: GEMS EDUCATION SAFEGUARDING TRAINING MATRIX

CPC/DSL, DCPC/DDSLs, EVP - Education, Principals, Allegations Manager and Deputy Allegations Manager:

- » Mandatory GEMS Level 3 - Child Protection Coordinator/Designated Safeguarding Lead training and any training mandated by ADEK.
- » Every 2 years

Key school staff:



» GEMS Level 2 - Enhanced Understanding of Safeguarding. Schools/services may elect to train key school/service staff such as pastoral team members, counsellors or Heads of Year.

» Every 3 years

All GEMS School/Service Staff:

Annually

- » GEMSU Online Basic Awareness safeguarding training.
- » Face to face Level 1 safeguarding training for all school staff including volunteers and LAB members on or before their first working day. Where the first working day falls within a school holiday, staff must receive safeguarding training before students return to school site. A training register must be completed and maintained to ensure total attendance.
- » Signed acknowledgement that attendees have understood and will comply with GEMS Student Protection Policy.
- » GEMSU Safer Recruitment online training for staff involved in recruitment and interviewing.

Termly

- » Safeguarding training/updates (subject-specific according to school context) face to face where possible by the CPC/DSL.

Site Users including SSC Staff, External Providers/Services/Therapists:

Annually

- » School provides Level 1 face to face safeguarding training, with a register signed, before external providers, including therapists, begin work onsite.
- » All SSC staff undertake GEMSU Online basic awareness with assessment through GEMSU Learning Management System.
- » Training register completed to ensure total attendance.

Termly

- » Safeguarding training/updates face to face where possible by the CPC/DSL.
- » Where contractors are on site without safeguarding training e.g. emergency works etc. MSO Department or Security Team must provide appropriate supervision.
- » Commitment by all that any necessary work will be arranged whilst children are not on site if possible.

Volunteers and LAB Members:



- » Any new starters receive face to face Level 1 training on or before their first working day. Where the first working day falls within a school holiday, staff must receive safeguarding training before students return to school site. A training register must be completed and maintained to ensure total attendance.

Annually

- » Face to face Level 1 safeguarding training annually with register and policy documents signed.
- » As with all working/volunteering in schools – good conduct certificates must be provided in line with GEMS Safer Recruitment Policy.
- » Confidentiality agreement and code of conduct/expectation document signed before volunteer commences.

APPENDIX E: INTIMATE CARE AND TOILETING GUIDANCE STATEMENT

This guidance statement is designed to promote best practice and to safeguard children and practitioners. It applies to everyone involved in the intimate care routines of children. The guidance should be read in conjunction with the settings' policies as below:

- » Child protection and safeguarding guidance
- » Staff code of conduct and guidance on safer working practices
- » Health and safety guidance and procedures
- » Inclusion guidance
- » Whistle-blowing guidance
- » Safer recruitment practices guidance

It is the expectation of GEMS that any child who requires support with intimate care is provided with a risk assessment and risk reduction plan (a plan to reduce instances of the requirement for intimate care.) This should be created in conjunction with the child's parent, the child where appropriate and the setting.

APPENDIX F: CARE PROTOCOL

This guidance outlines the procedures that school must follow for any student who has attempted suicide or has had, or continues to have, suicide ideation. The school endeavors to support the child, their family and the school community in cases of attempted, or ideation, of suicide. The processes, delivered through a Care Protocol, are in place to facilitate support and to encourage all parties and professional bodies to work collaboratively in the best interests of the child. If you would like to see a copy of this guidance, please refer to your school or service DSL.