

Safeguarding Policy 2024/25

Kent College Dubai



KENT COLLEGE
DUBAI

Approved by
Principal:

Tim Hollis

Date: August 2024

Approved by
KCDBoard
Representative :

Date:

Last reviewed on:

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Next review due by:

August 2025

KCD Authorised Stamp

I acknowledge that I have read, understood and accepted ownership of this policy document and at the next formal review, the below signatories will replace those named above.

Tim Hollis, Principal, Kent College Dubai

Safeguarding and Child Protection Policy

Introduction

Circulation

This policy is applicable to all pupils in the school and is addressed to all teaching and non-teaching staff, including school medical and nursing staff, volunteers or other people working in the school and will be given to parents and pupils on request. It is also available on the school's website.

Positive Ethos

In line with the UAE "National Child Protection Policy", the policy objectives are;

Protecting and enhancing children's welfare is the collective responsibility of everyone; every person who deals with children and their family has a role to play. To effectively honour this responsibility, every person dealing with a child must ensure that the welfare, wellbeing and best interests of the child operate as the primary and guiding focus of all dealings with the child. The school asserts its complete commitment to ensure the welfare, safety and respect for all children, and that a positive, enjoyable and safe educational environment is created for every child without discrimination on grounds of ethnicity, gender, origin, religious doctrine, social standing or disability. This Policy seeks to achieve the following objectives:

- 1. Ensure implementation of mechanisms and measures of child protection in educational institutions pursuant to the applicable legislations in the State and the international conventions in place.*
- 2. Determine the roles and responsibilities of all personnel working for the educational institutions, and all stakeholders including parents, individuals, agencies, partners, and the relevant service providers.*
- 3. Create a safe and supportive school environment to protect the child against occurrences that can threaten the child's survival and wellbeing in terms of physical, mental, intellectual, educational or moral health.*
- 4. Enable the child to exercise his/her rights, particularly educational rights and the right for protection pursuant to the provisions set out in the applicable legislations and the provisions of Federal Law No. (3) of 2016, 4 its implementing regulation and the international conventions ratified by the country.*
- 5. Create a safe and confidential information reporting and complaints system for cases of potential or suspected child abuse or compromising of the child's rights within an educational institution, the services and utilities provided by the educational institution, the transportation of children to and from the educational institutions, and any extracurricular activities organized by the educational institution or Ministry.*
- 6. Provide the child social and psychological protection, and support and care after cases of child abuse.*
- 7. Enhance child welfare in all aspects.*
- 8. Foster and model positive behavior and the building of positive social school relationships.*
- 9. Promote the principle of tolerance among all members of the school community.*
- 10. Improve the competency of education professionals working in the field of child protection and bullying prevention.*
- 11. Foster child protection partnerships.*
- 12. Coordinate with the relevant bodies to safeguard the rights of all children in educational institutions.*

We believe that all children have the right to be safe in society. Therefore, we recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of children by creating a positive school atmosphere; through our teaching and learning, pastoral support and care for both pupils and school staff; through establishing strong, positive relationships with parents which allow us to work in partnership; and through providing appropriate training for school staff.

We want all our children to achieve their full potential through providing a safe and caring environment in which they can thrive and develop into confident, healthy and well-balanced individuals.

We are committed to establishing and maintaining an ethos where children and parents feel secure in being able to talk confidently to school staff about any concerns or fears they may have, knowing that they will be taken seriously and handled with sensitivity.

Every pupil should feel safe and protected from any form of abuse. We recognise that the safety and protection of pupils is the responsibility of all school staff and volunteers, and we acknowledge that children can be abused physically, emotionally, sexually or by neglect. It is our duty to report **any** concerns that we have of child abuse, as the health, safety and protection of all children is paramount.

Every member of staff recognises that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability or abuse in today's society. We recognise, therefore, that the duty to prevent children from being drawn into terrorism is an aspect of safeguarding.

We believe that on a practical day-to-day basis, safeguarding also encompasses issues such as: pupils' Health and Safety; the medical needs of children; providing first aid; school security; staff recruitment; visitors to the school; off site visits; and also e-safety, bullying, drugs and substance misuse, physical contact with pupils and their restraint etc.

We will ensure that the curriculum deals with safeguarding through activities and opportunities in tutor periods, other curriculum subjects and assemblies, equipping pupils with the necessary skills and awareness to stay safe from abuse and to know who to turn to for help.

Compliance

Kent College Dubai understands its statutory duty to safeguard and promote the welfare of children. This policy considers best practice in the UK using the [Keeping Children Safe in Education 2023](#) document as a guide and UAE legislation; "National Child Protection Policy in Educational Institutions in United Arab Emirates". The school is also an active member of the BSID Safeguarding Group, sharing best practice across Dubai.

The Aims of this Policy

- To have in place procedures to ensure that we meet our responsibilities for safeguarding and promoting the welfare of children and protecting them from abuse.
- To ensure that all school staff are aware of what action to take when dealing with any child protection issue.
- To work with other schools and agencies to share good practice in order to improve this policy.

Our policy and our commitment at Kent College is to take all reasonable measures to safeguard and promote the welfare of each pupil in our care and:

- to ensure that we establish and maintain procedures for safer recruitment in checking the suitability of staff and volunteers to work with children and young people and developing sound working relationships with parents and support agencies;

- to protect each pupil from any form of abuse, whether from an adult or another pupil;
- to be alert to signs of abuse both in the school and from outside;
- to deal appropriately with every complaint or suspicion of abuse, radicalisation or extremism;
- to design and operate procedures which promote this policy and which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- to support children who have been abused in accordance with his/her agreed child protection plan;
- to ensure that where abuse is suspected by another child, then child protection procedures will be applied to both children;
- to be alert to the medical needs of children with medical conditions;
- to operate robust and sensible health & safety procedures;
- to follow updated advice from both the DHA and the Dubai government on all areas related to COVID-19
- to take all practicable steps to ensure that school premises are as secure as circumstances permit;
- to operate clear and supportive policies on drugs, alcohol and substance misuse;
- to consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our schools or in our local area, including assessing the risk of radicalisation and extremism, and the procedures to follow if concerns arise;
- to inform the Designated Safeguarding Lead (DSL) of any allegations of abuse by any member of the school staff whether they took place on the school premises or elsewhere and of the action taken in respect of these allegations ; and to also inform the DSL of any person connected to the school who is considered to be unsuitable to work with children.
- work with agreed local policies and procedures in full partnership with other local external agencies including KHDA, the Child Welfare Centre and, where necessary, the Police. This may include:
 - Sharing information about concerns with agencies that need to know and involve children and their parents / carers appropriately.
 - Monitoring children known or thought to be at risk from harm and contributing to assessments of need and support packages for those children.

In the cases of domestic abuse, the Dubai Foundation for Women and Children runs a safe refuge for girls (and boys under the age of 12). The Dubai Child Welfare Centre Helpline is 800-998 (24 hour 7 days a week).

Responsibilities for Policy and Procedures

The Designated Safeguarding Lead

In line with Keeping Children Safe in Education 2024 the School has appointed two senior members of staff (Designated Safeguarding Lead) to be responsible for matters relating to child protection and welfare. In the absence of one DSL from school, the other DSL will undertake the role in their absence.

The Designated Safeguarding Lead for the Senior School is Kimberley Gore, who can be contacted on kgore@kentcollege.sch.ae

The Designated Safeguarding Lead for the Junior School is Cassie Crisp who can be contacted on ccrisp@kentcollege.sch.ae

The following staff members make up the “Team around a child” group who meet on a biweekly basis to discuss current cases and to support the school counsellor with her current caseload.

Andrew Spencer (DDSL) - aspencer@kentcollege.sch.ae

Lisa Reilly (DDSL) - lreilly@kentcollege.sch.ae

Emily Partridge - epartridge@kentcollege.sch.ae

The Designated Safeguarding Leads and the 'Team around the child' work together to:

- ensure the implementation of this policy and co-ordinate the child protection and wellbeing procedures in the school
- ensure that the school operates within the UAE legislative framework and recommended guidance, in accordance with locally agreed inter-agency procedures
- develop effective working relationships with agencies and services, including a liaison officer associated with the Dubai Police Service
- be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection, and act as a source of advice within the school
- advise and act upon all cases of suspected or actual problems associated with child protection (including radicalisation) reported to him/her
- provide support for any child at risk
- ensure everyone connected with the school is aware of this policy
- familiarise school staff with the policy and procedures and ensure they have read the required documentation as outlined in Keeping Children Safe in Education 2022 who state:

“It is essential that everybody working in a school or college understands their safeguarding responsibilities. Governing bodies and proprietors should ensure that those staff who work directly with children read at least Part one of this guidance. Governing bodies and proprietors, working with their senior leadership teams and especially their designated safeguarding lead, should ensure that those staff who do not work directly with children read either Part one or Annex A (a condensed version of Part one) of this guidance.”

- Ensure staff read the required following documentation as part of their induction:
 - Safeguarding policy
 - Part 1 including Annex A of KCSIE 2024 (all staff who work directly with children)
 - Annex A of KCSIE 2024 (staff not working directly with children)
 - Behaviour Policy
 - Anti-bullying policy
- ensure that pupils are made aware of:
 - basic safeguarding procedures in school such as visitors signing in and wearing visitor badges;
 - how to keep themselves safe in various situations - Anti Bullying policy and Online
 - opportunities in forums such as the School Council to review the Anti-bullying Policy and the School Rules, and to raise safeguarding concerns.
- ensure all incidents are recorded, reported and kept confidential, and monitor the keeping, confidentiality and storage of records in relation to child protection and pass such records on securely should the child transfer to a new educational provider (all incidents are reported using the school's online system - CPOMS);
- make and record all child protection referrals using CPOMS;

- keep a confidential Child Protection Register of all those pupils known to be at risk (via CPOMS);
- work closely with the Principal and the nominated governors and keep the Principal informed of all actions unless the Principal is the subject of a complaint;
- be trained in child protection policy and procedures, and renew training;
- keep up to date with all new guidance on safeguarding children;
- keep all school staff up to date with any changes to procedures
- maintain an ongoing training programme for all School employees, including induction
- organise appropriate training for school staff and governors
- organise appropriate training for all volunteers wishing to work in the school
- hold a copy of the KHDA Safeguarding procedures, be familiar with relevant legislation in the UAE and follow the BSID Code of Practice.
- annually review the policy with all necessary parties.

In order to establish strong, positive partnerships with parents, the DSLs and 'The team around a child' will also:

- liaise with the admissions departments to ensure that the school holds, where possible, more than 1 contact number for all pupils
- ensure that parents have access to this policy
- respect parents' and children's need for privacy and handle all concerns with sensitivity and confidentiality (as appropriate)
- respect families from different backgrounds and cultures as long as it does not put the child at risk;

If the DSL is unavailable or is himself/herself the subject of a complaint, his/her duties will be carried out by the Deputy DSL or Principal, or further staff who have received appropriate training. If the DSL is absent for any reason, it must be made clear to all staff how to contact the other DSL or Deputy. The Deputy DSL will undertake appropriate training and will attend refresher training at two-year intervals.

The Principal

The Principal will ensure that all staff (including temporary teachers and volunteers):

- Are aware of child protection policies, and that procedures adopted by the governing body are fully implemented and followed;
- Can access sufficient resources and time to enable them to discharge their responsibilities under this policy;
- Understand the procedures for safeguarding children and feel able to raise concerns about poor or unsafe practice, and will ensure that such concerns are addressed sensitively and effectively in a timely manner in accordance with the school's Whistleblowing Policy;
- As part of their induction, the new staff are given a written statement about the school's policy and procedures, and the name and contact details of the relevant DSL when they start work;
- Appropriate police and Prohibition checks were undertaken before new staff were appointed;
- Should the designated Board member responsible for Child Protection and Safeguarding need to be replaced by another, the school must ensure the protocol for training the next designated person monitoring Child Protection and Safeguarding is in place

The Principal will also:

- work closely with the DSLs;
- provide adequate resources for the DSL to undertake his/her role;
- ensure safeguarding checks are undertaken for everyone working with children in the school. When recruiting new staff this will include the requirement for production of the appropriate certificate (International Child Protection Certificate [ICPC], Police Record Clearance Certificate based on the country of the potential employee – linked to the ICMEC list);
- ensure that all new staff undertake training in child protection procedures as part their induction programme;
- monitor the effectiveness of this policy;
- report annually to the governing body on the effectiveness of the policy;
- work closely with the Registrar to ensure that there is communication about Child Protection concerns between schools when pupils transfer from another school to KCD.

School Staff & Volunteers

School staff and volunteers should:

- treat children's welfare as paramount;
- understand their role and responsibilities to safeguard and promote the welfare of children;
- be familiar with the school's procedures and protocols for safeguarding and promoting the welfare of children;
- know who to contact to express concerns about a child's welfare;
- know when and how to refer any suspected case of harm or abuse to the DSL or deputy DSL trained staff (or know how to access and implement the procedures independently if necessary);
- know when and how to refer any suspected case of harm or abuse to other outside agencies;
- undertake appropriate training including refresher training at two-yearly intervals (to identify signs of harm and abuse, including indicators of vulnerability to radicalisation and on how to respond to a child)
- be aware of the impact and effects of abuse and neglect on children;
- be alert at all times to the indicators of abuse or neglect and the risks which individual abusers or potential abusers may pose to children;
- work cooperatively with the parents, unless this is inconsistent with the need to ensure the child's safety;
- recognise when a parent or carer has problems which may affect their capacity to provide effective or appropriate care, or which may mean they pose a risk of harm to a child;
- share and help to analyse information so that an informed assessment can be made of the child's needs and circumstances;
- contribute as necessary at all stages of the Child Protection process;
- contribute to regular review of the outcomes for the child, against specific shared objectives;
- be committed to full cooperation with all other agencies in the interests of safeguarding children;
- ensure that they always conduct themselves correctly and do not put themselves at risk;

Parents

Parents are:

- asked to provide the school with the travel movements (in line with KHDA and DHA requirements) prior to their child starting at Kent College;
- asked to work in partnership with the School to establish excellent home-school relationships by sharing all information which will help to promote the welfare of their child;
- aware that we have a responsibility for the welfare of all our pupils;
- aware that we have a duty to investigate and act appropriately if we have any concerns about a child;
- aware they will be informed of our actions, depending upon the circumstances and outcome of the investigation.

Pupils

Pupils must be made aware of:

- who the designated safeguard leads are within the school and who the 'Team around a child' department are;
- basic safeguarding procedures in school such as visitors signing in and wearing visitor badges;
- how to keep themselves safe in various situations (including online/internet safety and responding to bullying);
- every year the school will ask the views of all pupils by issuing a digital "wellbeing" questionnaire and asking age-appropriate questions such as:
 - Do they feel safe in school?
 - Are they aware of basic safeguarding procedures in school?
 - Are pupils aware of how to keep themselves safe?
 - Do they know who to go to if they are concerned about their own safety or that of others?
 - Are they aware of e-safety?
 - Do they know how to keep themselves safe outside school?
 - Do they know how to keep themselves safe when using the internet?

SEND and Children with Additional Vulnerabilities

- People of Determination and children with SEND needs can be more vulnerable to exploitation and abuse and should have enhanced access to support systems.
- They may be more isolated from their peers and may find it difficult to express concern
- No concern should be overlooked or passed off as a symptom of SEN or disability; including (not an exhaustive list)
 - Communication;
 - Toileting;
 - Understanding right and wrong;
 - Physical Build;
 - Unusual or over-physical attachments to staff members or peers;
- Staff must be hyper-vigilant to the needs and concerns of these children who are among the most vulnerable
- Additional barriers can exist in identifying neglect and harm for some groups of students.

Procedures and Guidance for Reporting Concerns

In line with the UAE National Child Protection Policy, will follow the rules and provisions of "Information Reporting in Educational Institutions":

- The Ministry or the competent authority shall be notified of any suspected critical abuse or one to which the student is exposed in, around or in the utilities of the educational institution campus, the transportation buses or camps and internal and external activities organized by an educational institution or the Ministry according to the applicable legislations and laws. In addition, registers shall be kept of all cases of reported abuse in educational institutions;

- The relevant bodies shall take the necessary measures to safeguard and protect children against substance abuse, including: using, contributing to producing, trading or trafficking narcotic, intoxicating and stimulant substances, or all types of psychotropic substances;

- The school health system shall be supported to carry out its role in prevention, treatment and health counselling;

- Any information provided in suspected cases of abuse is reported in complete confidence. The informant's identity may not be disclosed against his/her will, and the identity of all the parties of the incident and witnesses shall not be disclosed in 6 child abuse cases, when using the information in analyses, media reports, and no personally identifying material or information may be published;

- The leadership team of the educational institution shall cooperate with the approved child protection specialists and shall facilitate tasks they are entrusted to carry out inside the educational institution, without any obstacle or hindrance that could result in delay in taking the necessary measures for reported cases or their follow-up.

If a pupil informs a member of staff that they or another young person are being abused, the staff member should follow the procedure outlined in this flow diagram [KCD Reporting flowchart](#)

Staff should:

- show the pupil that they have heard what the pupil is saying, and that they take their allegations seriously;
- encourage the pupil to talk, but not prompt, jump to conclusions or ask leading questions;
- not interrupt when the pupil is recalling significant events and not make the pupil repeat their account;
- explain what actions they will then take, in a way that is appropriate to the age and understanding of the pupil;
- not promise to keep what they have been told a secret or confidential, as they have a responsibility to disclose information to those who need to know: reporting concerns is not a betrayal of trust;
- report their concerns to their line manager or (if appropriate) the DSL or deputy DSL if a DSL is not available;
- report the incident, using CPOMS, as soon as they can, and no later than 24 hours, what they have been told, using the exact words if possible;
- not confront the alleged abuser;
- do not worry that they may be mistaken, they will always be taken seriously by the DSL. It is better to have discussed it with somebody with the experience and responsibility to make an assessment;
- when reporting the incident on CPOMS ensure that the correct date, time, place and people who were present at the discussion are included

In the event of the concern occurring during a time of school closure, staff should immediately contact the DSLs and report the incident using CPOMS (ensuring they include the "school closure") tag.

A failure to act may lead to a more serious outcome.

Guidelines for dealing with a report of abuse:

- If the pupil is in danger or needs medical attention, make sure the relevant emergency service is informed;
- If in a group situation, arrange to meet the pupil individually at the earliest possible convenience;
- Reassure the pupil that he or she is not to blame;
- Accept what they say – it is not your role to investigate or make judgments;
- Stay calm and do not rush into any action that may be inappropriate;
- Reassure them that they are doing the right thing in telling someone and tell them what you are going to do to help;
- Do **not** allow your shock or distaste to show;
- Do **not** speculate or make assumptions;
- Do **not** make negative comments about the alleged abuser;
- Do **not** delay emergency action to protect a young person;
- Do **not** investigate or question that young person;
- Do **not** ask the pupil to remove or adjust clothing if bruises are observed.

You must not investigate any allegations yourself; to do so could create serious problems at later stages of any proceedings.

If a member of staff has concerns about, or suspects that a child may be a victim of abuse they should:

- Make a record in an accurate, concise and clear form;
- Immediately inform the DSL by “tagging” them into the CPOMS incident form (as soon as practical, provided the child is not at immediate risk of danger).

If a parent makes a disclosure to school, the Designated Safeguarding Lead:

- should meet with the parent and record all relevant details;
- will assure the parent that the school will take the matter seriously;
- will explain that he/she may have to take advice from other agencies about the disclosure;
- will contact the parent when a decision has been taken and how to proceed.

Guidance and procedures for Recording Information

ALL concerns about child protection (including those relating to suspected radicalisation) must be reported using CPOMS:

- If a disclosure is made by a child, and the adult has written notes, they should upload these when completing the CPOMS incident form.
- The CPOMS incident form should include the accurate date, time and place of the conversation and the essence of what was said and done by whom and in whose presence.
- Record any observed injuries or bruises using the body map function if applicable.
- In the event of a concern occurring during a time of school closure, staff should ensure they include the “School closure” tag in their incident report on CPOMS.

Reporting to the Designated Safeguard Lead

If staff members are unsure, they should always speak to the DSL. In exceptional circumstances, such as in an emergency, where there is a risk of immediate serious harm to a child or a genuine concern that appropriate action has not been taken, staff members can speak directly to outside agencies such as:

- KHDA - +971-4-3640000
- Dubai Foundation for Women and Children
 - Helpline: 800111
 - SMS: 5111
- Ministry of Interior Child protection hotline (116 6111)
- EWAA Shelter for Women and Children on hotline - 8007283
- Child protection centre in Sharjah on toll-free helpline number - 800 700.
- Hemaya Foundation for Children and Women - Ajman on hotline - 800himaya (800446292)
- Aman Centre for Women and Children through RAK Police – 07-2356666
- 24 hours Dubai child protection hotline - 800 988

The DSL in consultation with the Principal will usually decide whether to make a referral to KHDA, but it is important to note that any staff member should follow up their concerns and if in doubt should press the DSL for reconsideration. Concerns should always lead to help for the child at some point, if the staff member feels that the DSL has not been acted upon appropriately and according to the “Safeguarding Policy”, they should raise their concern with the Principal.

Action by the Designated Safeguarding Lead

The DSL will:

- Discuss the concern with the Principal to decide if the risk requires an immediate referral
- Meet with the child, following the guidance on questioning pupils
- Take steps to protect the informing pupil as appropriate. Ensure that the pupil is aware that confidentiality cannot be guaranteed but that the matter will be disclosed only to people who need to know, and the child will know who these people are. If the allegation involves abuse by other pupils, it is likely that the pupils against whom the allegation has been made will need to be told
- Meet with any pupils against whom an allegation has been made and follow the interview protocols as outlined above to develop an understanding of what has happened and to provide information to support these pupils too, in terms of further actions and involvement of others
- Ensure the parents of any of the pupils involved are aware of the allegation
- Refer the matter to the relevant external agencies for all the children involved, as appropriate
- Ensure that a reference is made on the child’s main school file using the incident form, and that there is a record on the School Child Protection file.

A confidential list of pupils who are a cause for concern will be kept by the DSL, with a risk rating applied to the concern:

High

- A pupil whose safety the school cannot guarantee in school or outside of school without constant supervision. The possibility of abuse could be immediate or ongoing, and the pupil has a high risk of harm. Examples may include; severely depressed individuals who have a history of self-harm and, in extreme cases, suicide.

OR

- A pupil who is safe within the school environment but whose safety cannot be guaranteed at home. These cases will probably involve emotional neglect, physical abuse, grooming or sexual abuse. These cases will be referred to the MOI and or the police for further advice on the course of action to be taken.

*All high-risk cases will have a child protection plan which will be added to CPOMS and reviewed by DSL.

Medium

- A pupil who has severe mental health concerns and has an immediate or ongoing possibility of self-harm. These cases may involve feelings of suicide, and pupils will be accessing outside agencies or psychologists.

OR

- Continued abuse from parent / peer. This is an escalation from a low-risk case; where parents have met the appropriate DSL about a past disclosure, but there have been further incidents. The case may also revolve around severe physical or emotional abuse from a parent, family member, or peer.

Low

- A pupil who has mental health concerns: current or historical. These cases will have been flagged as a cause for concern (neglect etc). The appropriate DSL will monitor, and the pupil will have been referred to the school counsellor. Low risk cases may also include a form of physical abuse from parents, which involves hitting or slapping for discipline reasons. The DSL will investigate these cases and refer parents to “Wadeema’s Law”.

The DSL, under inter-agency procedures, will report complaints that raise Child Protection issues. The Head of Child Protection in Dubai and the relevant member of the special police must be informed.

Involvement of parents or carers

The school will discuss any concerns about a child’s welfare with the family and, where possible, seek their agreement to make a referral to local Services. However, this will not be done where it would put the child at risk. The child’s views should be considered in deciding whether to inform the family, particularly where the pupil is sufficiently mature to make informed judgements about the issues.

Where there are doubts or concerns about involving the family, the DSL will clarify with the Principal and/or external agencies whether and how the family should be told about the referral.

We will ensure that support mechanisms are in place for any child that is at risk to build their self-esteem and confidence. School staff and volunteer helpers who feel distressed because of being involved with a case or incident will receive support and counselling.

If children are not safe to go home, then DFWAC will be called. They will send the necessary support staff to talk to the child. The initial intervention will be done by the school in line with the Safeguarding Policy, and the DFWAC or the Police will be contacted if they suspect a child is being abused.

Counselling

The welfare of pupils is the school's overriding consideration, and a pupil should feel confident in approaching any member of staff for help or advice about their work, activities or relationships.

The school counsellor - Emily Partridge epartridge@kentcollege.ae is available should pupils need to be referred. Parents and pupils may also seek counselling from outside agencies if they need to.

Appropriate people who will listen to any concerns are:

- **Team around a child**
- **School counsellor**
- **Form Tutor**
- **Another teacher**
- **The Deputy Heads**
- **The Principal**
- **Head of Year**
- **The Health Centre**
- **The Dubai Child Protection Centre Helpline: 800-988 (24 hour 7 days a week)**
- **Dubai Foundation for Women and Children: 800-111 (24 hour 7 days a week)**
- **Schoolchildren can use the hotline number 80051115 to communicate directly with the Ministry of Education regarding any issue that may affect their learning process. Education specialists supervise the hotline.**

Confidentiality and Security of Information

It is imperative that confidentiality is observed at all times as the protection, health and well-being of the child are paramount. However, the duty of confidentiality is not absolute, and may be breached where this is in the best interests of the child and in the wider public interest.

School staff have a professional responsibility to share information with other professionals who are investigating a case.

A child, when confiding information to a member of staff must be made aware that for the child's own sake this information cannot be kept secret. All child protection records are regarded as confidential.

Preserving Evidence

All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, and computers), must be safeguarded and preserved and where necessary uploaded to CPOMS.

Training

All staff receive appropriate safeguarding and child protection training which is regularly updated.

- on induction to the school
- at appropriate times throughout the academic year

In addition, all staff receive safeguarding and child protection updates (the school safeguarding section of the information site, via email and staff meetings). The school ensures that all school staff have equal access to relevant training. A record will be kept of all staff training.

Dealing with Allegations against school staff, school volunteers, the Principal or another pupil

Allegations against Staff

The School has procedures to deal with allegations against staff (and volunteers who work with children) 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. An allegation about a staff member should be reported to the Principal.

Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure:

- The safety and welfare of the pupil or pupils concerned; and
- The need for a full and fair investigation.

Initial investigation

- The DSL will discuss the allegation with the Principal immediately.
- The purpose of this initial discussion is for the DSL to consider the nature, content and context of the allegation and agree a course of action. The DSL may need to provide or obtain additional information which may be relevant, such as previous history, whether the child or their family have made similar allegations and the individual's current contact with children.
- If the allegation is against the Principal, the Safeguarding representative on the Executive Board, would take on the Principal's role in this procedure.

Further Investigation

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken regarding the individual facing the allegation or concern. In such a scenario, this decision and a justification for it should be recorded by the DSL and the Principal, and agreement reached as to what information should be put in writing to the member of staff concerned (and by whom). The DSL should then consider with the Principal what action should follow in respect of the member of staff and those who made the initial allegation.

Where further investigation is deemed necessary, the DSL should inform the member of staff about the allegation as soon as possible after consulting the Principal, providing as much information as permissible. If a strategy discussion is needed however, or external agencies need to be involved, this will not happen until those agencies have agreed what information can be disclosed to the person.

In some cases, further enquiries will be needed to inform the decision about how to proceed. If so, the Principal will discuss with the DSL how and by whom the investigation will be undertaken. In straightforward cases the investigation should normally be undertaken by a senior member of the school. However, the nature or complexity of the allegation may require an independent investigator.

Communications with parents

Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or external agencies need to be involved, the Principal will not do so until those agencies have agreed what information can be disclosed to the parents. They will also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

Suspension

The Principal will consider carefully whether the circumstances of a case warrant the member of staff being suspended from contact with children at the school until the allegation or concern is resolved. Suspension is not the default position – an individual will only be suspended if there is no reasonable alternative, such as moving to another area of the School or removing them from specific types of duties which have contact with children.

Where it has been deemed appropriate to suspend the person, written confirmation will be sent within one working day, giving the reasons for the suspension. The person will be informed at that point who their named contact is within the School organisation and provided with their contact details. The suspended staff member is not permitted to contact any other member of staff other than their nominated contact.

If the allegation is not demonstrably false or unfounded, and there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened in accordance with the procedures of local external agencies.

If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take account of the fact that teachers and other school staff are entitled to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour.

When it becomes clear that an investigation by the police or other external agencies is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the Principal will discuss the next steps with the DSL. The Executive Board will be kept informed. In these circumstances the decisions made depend on the nature and circumstances of the allegation and the evidence and information available and could range from taking no further action to disciplinary action up to and including summary dismissal.

Timescales

The School recognises that it is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. All allegations will be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases will depend on a variety of factors including the nature, seriousness and complexity of the allegation, but it is expected that the case should be resolved in one to three months. In truly exceptional cases this may take up to twelve months.

For those cases where it is clear immediately that the allegation is unfounded or malicious then it is expected that they should be resolved within one week.

Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the School as the employer to deal with, although if there are concerns about child protection, the DSL should discuss action with the Principal.

In such cases, if the nature of the allegation does not require formal disciplinary action, the Principal will initiate appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Confidentiality

When an allegation is made the School will make every effort to maintain confidentiality and guard against inappropriate publicity while investigations are carried out (in accordance with the School's Data Protection Policy).

The School will take advice from external agencies to agree the following:

- Who needs to know and, importantly, exactly what information can be shared
- How to manage speculation, leaks and gossip
- What if any information can be reasonably given to the wider community to reduce speculation; and how to manage press interest, if and when it should arise.

Resignations, dismissal, ceasing to provide services, settlement agreements and references

National laws in the U.A.E. govern any legal action taken in cases of child abuse. However, staff should know that upon allegation they may also be prosecuted in their country of origin or residence. For example:

- In the case of employees from the UK, the School will report to the Disclosure and Barring Service (DBS) within one month of their leaving employment, any person (whether employed, contracted, volunteer or pupil) whose services are no longer used because he/she is considered unsuitable to work with children.
- In the case of employees from other countries, the school will inform their relevant safeguarding authorities and teaching professional bodies.

If a member of staff tenders his/her resignation, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with these procedures.

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; not continuing with the employment of a probationer, 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 training, or volunteering.

Every effort will be made to reach a conclusion in all cases where allegations relating to the safety or welfare of children are concerned.

Wherever possible the member of staff will be given the opportunity to answer and make representations regarding the allegation. However, the investigative processes outlined above will continue in cases where this does not happen for whatever reason.

A 'compromise agreement', by which a person agrees to resign if the school agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, generally should not be used in these cases. No such agreement will prevent a thorough police investigation or override the statutory duty to make a referral to the Disclosure and Barring Service (DBS) / KHDA, where appropriate.

Cases in which an allegation was proven to be unsubstantiated, unfounded or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in any reference.

Record keeping

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, will be kept on a member of staff's confidential personnel file, and a copy provided to the person concerned.

The purpose of this record is to enable accurate information to be given in response to any future request for a reference, where appropriate. (It could provide clarification in cases where future DBS Disclosures reveal information from the police about an allegation that did not result in a criminal conviction, and it could help to prevent unnecessary re-investigation if an allegation re-surfaces after a period of time.)

The record will be retained on the School Child Protection file for a period of 10 years from the date of leaving the employment of the school.

Action on conclusion of a case

When any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In these circumstances the Board Member Responsible for Safeguarding will discuss with the Principal whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or the local authority social care services can inform that decision. The options will depend on the circumstances of the case and the consideration will need to take account of the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

If the allegation is substantiated and the person is dismissed or the school ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the Principal should make a referral to the KHDA for consideration of inclusion on the barred lists.

In the case of employees from the UK, there is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) a child or if a person otherwise poses a risk of harm to a child. In such circumstances, the duty to refer an individual to the DBS arises where an employer has removed the individual from relevant work with children or the person has chosen to cease relevant work in circumstances where they would have been removed had they not done so.

In the case of employees from other countries, the School will inform their relevant safeguarding authorities and teaching professional bodies on the basis of the paragraphs above.

In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, the School will consider how best to facilitate this, bearing in mind that most people will benefit from some help and support to return to work after a very stressful experience.

Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The School will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the School.

Learning lessons

At the conclusion of a case in which an allegation is substantiated the SLT will review the circumstances of the case to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Allegations against Pupils

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the School's policy on behaviour, discipline and sanctions will apply. *(See Behaviour Policy & Anti-bullying Policy)*

Monitoring the Effectiveness of the Policy

The DSLs will monitor the operation of this policy and its procedures and make an annual report to the Governing Body.

Annually (or when the need arises) the effectiveness of this policy will be reviewed by the DSLs, the Principal and the nominated governors and any necessary recommendations for improvement will be made to the Governors.

Filtering and Monitoring of IT standards

The school will follow the Department for Education's (UK) filtering and monitoring standards which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems: *This will come under the Principal, DSL and the ICT operating officer.*
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet the schools safeguarding needs: *A termly report will be produced which will allow the Principal and DSL to assess the effectiveness of the school's filtering.*

Issue No	Date
0	10.1.17 - PAL
1	1.8.17
2	14/8/17 - CSA
3	6/12/18- APA
4	3/9/19 -APA
5	6/9/20 - APA
6	24/5/21 - APA
7	16/8/21 APA
8	18/8/22 - ASP & 27/9/22 - ASP
9	10/07/23 - ASP
10	6/8/24 - ASP

Appendix

Appendix i Important Contacts

Important Telephone Numbers & Email Contacts	
External	
Social Services Advice & Referrals	01492 575111
The Dubai Child Protection Centre Helpline:	800-988
Ministry of Education direct hotline	800 51115
American Centre for Psychiatry and Neurology	www.americancenteruae.com
Dubai Foundation for Women and Children	04-6060300
Ministry of interior Child protection hotline	1166111
Camali Clinic – Contact is Karen Fountain	http://www.camalclinic.com/about-us/
ICPC	https://www.acro.police.uk/home.aspx

Appendix ii Types and Indicators of Abuse

Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online.

Some forms of Abuse

Physical Abuse	
Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. It is not accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them. Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness (FII).	
Physical indicators	Behavioural indicators
<ul style="list-style-type: none"> • Bite marks • Bruises in places difficult to bruise • Burns • Untreated injuries • Scratches 	<ul style="list-style-type: none"> • Self-mutilation tendencies • Chronic runaway • Aggressive or withdrawn • Fear of returning home • Undue fear of adults • Fearful watchfulness

Emotional Abuse

Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child.

It is sometimes called psychological abuse and can seriously damage a child's emotional health and development. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. Children who are emotionally abused are usually suffering another type of abuse or neglect at the same time – but this is not always the case.

Physical indicators	Behavioural indicators
<ul style="list-style-type: none">• Speech disorders• Wetting or soiling• Signs of mutilation• Frequent vomiting	<ul style="list-style-type: none">• Rocking, thumb sucking• Fear of change• Chronic runaway• Poor peer relationships• Attention seeking behaviour

Neglect

Neglect can have a very damaging impact on a child's life. Child neglect has four main areas: **Physical** — lack of basic needs like food, clothes etc. **Educational** — lack of support in learning. **Emotional** — ignoring the child, failing to encourage, isolation or rejection. **Medical** — failure to give health care including dental health.

Physical indicators	Behavioural indicators
<ul style="list-style-type: none">• Constant hunger• Exposed to danger, lack of supervision• Inadequate, inappropriate clothing• Poor hygiene• Untreated illnesses• Tiredness	<ul style="list-style-type: none">• Listlessness• Lack of peer relationships• Low self esteem• Compulsive stealing or begging

Sexual Abuse

A child is sexually abused when they are forced or persuaded to take part in sexual activities.

This does not have to be physical contact, and it can happen online. Sometimes the child will not understand that what is happening to them is abuse. They may not even understand that it is wrong.

Physical indicators	Behavioural indicators
<ul style="list-style-type: none">• Soreness / bleeding in genital area• Itching in genital area• Stained or bloody underwear• Stomach pains or headaches• Pain on urination• Difficulty in walking or sitting• Bruises on inner thighs or buttocks• Anorexia or Bulimia• Substance or drug abuse	<ul style="list-style-type: none">• Chronic depression• Inappropriate language or sexual knowledge for age group• Sexual advances towards adults or other children• Low self-esteem• Fear of darkness• Wariness about being approached by anyone

Child on Child abuse

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.

All staff must understand that even if there are no reports of peer-on-peer abuse, it does not mean it is not happening, it may be the case that it is just not being reported.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Addressing all types of behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

All cases/incidents of peer-on-peer abuse should be reported on CPOMS in the same manner that any incidents are reported, but staff should ensure they use the “Peer on Peer abuse” category. Staff should use the narrative box to expand and explain what form the abuse took.

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 intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi-nudes' images and/or videos;
- 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;
- upskirting, 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).

Bullying

Everyone has the right to learn, free from the fear of bullying, whatever form that bullying may take. Bullying can be: **physical** like hitting or kicking; **taking belongings**; **sexual harassment**; **name-calling**; **insulting**; **spreading rumours**. **Cyber-bullying** is on the increase and includes: texting; social media comments or sending malicious emails. It is important that schools have a culture where everyone is safe and included and that they step in quickly to stop bullying.

Physical indicators	Behavioural indicators
<ul style="list-style-type: none"> • Sleep disorders • Wetting the bed • Physical evidence of fighting • Constant complaining of feeling ill or being sick, especially in the morning • Loose bowel movements 	<ul style="list-style-type: none"> • Unwillingness to mix with peers • Preferring isolation • Fear of attending school • Absence from school

Child Sexual Exploitation

Children do not volunteer to be sexually exploited and can't consent to their own abuse. They are forced or coerced. CSE includes:

- the exchange of sexual activity for payment
- the production of indecent images
- grooming
- trafficking.

Raising awareness with children and young people is an important part of educating them to stay safe and speak up.

Physical indicators	Behavioural indicators
<ul style="list-style-type: none"> • Child going missing for periods of time or regularly returning home late • Skipping school or being disruptive in class • Appearing with unexplained gifts or possessions that cannot be accounted for • Experiencing health problems that may indicate a sexually transmitted infection • Using drugs and/or alcohol • Showing signs of unexplained physical harm, such as bruising and cigarette burns 	<ul style="list-style-type: none"> • Having mood swings and changes in temperament • Displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone ("sexting")

Historical Abuse: There may be occasions when a pupil or adult discloses abuse which occurred in the past. This 'historical abuse' must be treated in exactly the same way as any other disclosure or suspicion of current child abuse; the abuser may still represent a risk to children.

Appendix iii Self-Harm Protocol

The following principles underpin this protocol:

- Duty of care is, as always, paramount.
- The child or young person is central to the whole process and should be given appropriate priority by all involved.
- All school colleagues will adhere to a consistent response to and understanding of self harm.
- The emotional wellbeing and mental health of the child and young person must be supported, and harm minimised.
- The child or young person will be supported to access service(s) which will assist the child or young person with opportunities and strategies for hope and recovery from the effects of self-harming and the risk of future harm minimised.

Some self- harm behaviours:

- Scratching or picking skin
- Cutting body
- Tying something around body
- Inserting things into body scouring/scrubbing body excessively
- Hitting, punching self
- Pulling out hair
- Over/under-eating
- Excessive drinking of alcohol
- Taking non-prescription drugs or over/under- use of prescription drugs
- Burning or scalding body (physically or chemically)
- Hitting walls with head
- Taking an overdose
- Self-strangulation
- Risky behaviours such as running into the road
- Episodes of drug abuse
- Risky sexual behaviour
- Swallowing objects
- Self-tattooing

As most self-harm is privately or secretly carried out it can be hard to notice that a young person is self-harming but some signs to look out for are:

- Changes in clothing to cover parts of the body, e.g. wearing long sleeved tops
- Reluctance to participate in previously enjoyed physical activities, particularly those that involve wearing shorts or swimsuits, for example
- Changes in eating and/or sleeping habits
- Changes in consumption of drugs/alcohol
- Changes in levels of activity or mood
- Increasing isolation from friends/family

Risk

There is a need to initiate a prompt assessment of the level of risk self-harm presents. Unless the student is in obvious emotional crisis, kind and calm attention to assuring that all physical wounds are treated should precede additional conversation with the student about the non-physical aspects of self-harm. Questions of value in assessing severity might include:

- Where on your body do you typically self-harm?
- What do you typically use to self-harm?
- What do you do to care for the wounds?
- Have you ever hurt yourself more severely than you intended?
- Have your wounds ever become infected?
- Have you ever seen a doctor because you were worried about a wound?

Collecting basic information is also important in determining the need for engagement of outside resources. Questions might include aiming to assess:

- history
- frequency
- types of method use
- triggers
- psychological purpose
- disclosure
- help seeking and support
- past history and current presence of suicidal ideation and/or behaviours.

Advice on managing a disclosure can be found here: <http://www.sec-ed.co.uk/best-practice/selfharm-what-not-to-do/>

In general students are likely to fall into 1 of 2 risk categories:

Low risk students - Students with little history of self-harm, a generally manageable amount of stress, and at least some positive coping skills and some external support.

Higher risk students - Students with more complicated profiles – those who report frequent or long-standing self-harm practices; who use high lethality methods, and/or who are experiencing chronic internal and external stress with few positive supports or coping skills.

Information Sharing

This is concise guidance for sharing recorded information about children or young people who harm themselves or are perceived to be at risk of self-harm including suicide.

1. Purpose of Sharing Information

The purpose of sharing information is to ensure young people in need and in particular young people who harm themselves or are perceived to be at risk of self-harm including suicide are given the help and support they are entitled to.

2. What will be shared?

Information shared will be no more than is necessary. All information will be handled with respect and care. Unrecorded observations, which may not at first seem significant, will be freely shared on a need-to-know basis within statutory agencies and between professionals in the interests of the child. Information should be recorded if it is significant.

3. Consent

The school will record the competent child's consent to share recorded information. Fresh consent should be sought if the existing consent does not cover the proposed sharing or there has been a break in involvement. The child should be told what information may be shared and why it would be shared and the consequences of sharing.

4. Sharing without Consent

Informed consent should be sought from the competent child to share recorded information unless;

- The situation is urgent and there is not time to seek consent; or
- Seeking consent is likely to cause serious harm to someone or prejudice the prevention, detection of serious crime.

If consent to sharing recorded information is refused by the competent child, or can/should not be sought from the child, information should still be shared in the following circumstances;

- There is reason to believe that not sharing is likely to result in serious harm to the child or someone else or is likely to prejudice the prevention or detection of serious crime; and
- The risk is sufficiently great to outweigh the harm or prejudice to anyone that may be caused by the sharing;
- There is a pressing need to share the information.

5. When is a child "competent" to give consent?

Anyone under the age of 18 is a child. A judgement must be made as to whether a particular child in a particular situation is competent to consent or refuse consent to sharing information. Consideration should include the child's chronological age, mental and emotional maturity, intelligence, vulnerability and comprehension of the issues. A child at serious risk of self-harm may lack emotional understanding and comprehension (Fraser guidelines could be used). NSPCC Fact sheet on Fraser guidelines.

6. Families

Partners should keep parents informed and involve them in the information sharing decision even if a child is competent or over 16. However, if a competent child wants to limit the information given to his parents or does not want them to know it at all; the child's wishes should be respected, unless the conditions for sharing without consent apply. Where a child is not competent, a parent with parental responsibility should give consent unless the circumstances for sharing without consent apply.

