



GEMS Safeguarding Policy

Key Contacts

Principal: Ms. Lini Shivaprasad

Designated Safeguarding Lead: Ms. Geeta Manghnani (Head of Section - Kindergarten)

Deputy(ies) Safeguarding Lead:

- 1. Ms. Sujatha Balasubramanian (Vice-Principal)**
- 2. Ms. Zeya Azmi (DDSL – Grades 1 to 4) (Educational Supervisor Grades 3 & 4)**
- 3. Ms. Tulika Srivastava (DDSL – Grades 5 to 8) (Educational Supervisor Grades 7 & 8)**
- 4. Ms. Hajarah Hamdani (DDSL – Grades 9 to 12) (Head of Section - Grades 9 to 12)**
- 5. Ms. Nisha Mathew – DDSL – Head of Inclusion**



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Allegations Manager: Ms. Lini Shivaprasad (Principal)

Deputy Allegations Manager: Ms. Sujatha Balasubramanian (Vice-Principal)

Child Protection Officers:

- 1. Ms. Rose Mercy (Counsellor)**
- 2. Ms. Rachel Virgina (Counsellor)**

Detail any specific school procedure here: e.g. out of hours, in an emergency or who to contact if an allegation is made about the Principal or DSL etc.

Ms. Nargish Khambatta (Senior Vice President – GEMS Education)
Ms. Amal Jarjour (Senior Manager – Safeguarding)



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REVIEWED IN: JANUARY 2017, OCTOBER 2018, MARCH 2019, MARCH 2020, FEBRUARY 2021, April 2021, MAY 2021, MAY 2022, APRIL 2023, APRIL 2024, SEPTEMBER 2024,

CHILD SAFEGUARDING AND PROTECTION POLICY

INTRODUCTION:

Our core protection principles are:

- It is the school's responsibility to safeguard and promote the welfare of children
- Children who are and feel safe make more successful learners
- Representatives of the whole-school community of pupils, parents, staff including senior school management will be involved in policy development and review
- Policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

POLICY STATEMENT:

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

The procedures contained in this policy apply to all staff.

1. Principles

- a. The school will ensure that the welfare of children is given paramount consideration when developing and delivering all school activity
- b. All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- c. All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm in accordance with this guidance
- d. All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance in doing so
- e. The school will follow the policy outlined in the GEMS Policy Manual



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AIMS:

- To provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children
- To ensure consistent good practice across the school
- To demonstrate the school's commitment with regard to safeguarding children

2. Terminology

Safeguarding and promoting the welfare of children refers to the process of protecting children from abuse or neglect, preventing the impairment of their health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective and nurturing care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Child protection is the process of **protecting** individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect

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

Child refers to all young people who have not yet reached their 18th birthday.

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

3. Key personnel

Key personnel to carry out the implementation of Child Protection Policy in the school are:

School Principal

Ms. Lini Shivaprasad

E-mail: lini.s_gms@gemsedu.com



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Designated Safeguarding (DSL) & Head of Section - Kindergarten

Ms. Geeta Manghnani

E-mail: geeta.m_gms@gemsedu.com

Deputy(ies) Designated Safeguarding Lead (DDSL)

1. Ms. Sujatha Balasubramanian – DDSL & Vice -Principal
E-mail: sujatha.b_gms@gemsedu.com
2. Ms. Zeya Azmi – DDSL- Grades 1 to 4 & Educational Supervisor – Grades 3 & 4
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3. Ms. Tulika Srivastava – DDSL- Grades 5 to 8 & Educational Supervisor – Grades 7 & 8
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4. Ms. Hajarah Hamdani – DDSL- Grades 9 to 12 & Head of Section – Grades 9 to 12
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5. Ms. Nisha Mathew – DDSL & Head of Inclusion
E-mail: nisha.m_gms@gemsedu.com

Counsellors

Ms. Rose Mercy

E-mail: rosemercy.f_gms@gemsedu.com

Ms. Rachel Virginia

E-mail: rachel.v_gms@gemsedu.com

The Child Protection Officer Counsellors

Contact details: same as above



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4. Roles and Responsibilities

GEMS School Local Advisory Board 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 SVP Education is responsible for ensuring that all aspects of the GEMS Safeguarding Policy are delivered effectively in their respective cluster.

The Principal/CEO is responsible for ensuring that all aspects of the GEMS Safeguarding Policy are delivered effectively in their school. The Principal/CEO ensures that staff, volunteers and children understand and implement the Policy to safeguard children.

The 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). This responsibility may be delegated to an appropriately trained Deputy in the absence of the DSL.

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

The Principal/ DSL will update any major concern, which requires external agency's involvement, to the GEMS Corporate Office for guidance and immediately action.

The Principal/CEO:

- ❖ Ensures that the GEMS Safeguarding 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 DSL and Deputies to carry out their roles effectively, including the assessment of children and attendance at any external agency discussions, training and other necessary meetings.
- ❖ Ensures that all staff receive safeguarding training in line with the GEMS Safeguarding 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 Safeguarding Policy and Whistleblowing procedures.



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- ❖ 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 allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Central Safeguarding Team on the day of the allegation and documents it as an allegation on the Guard Case Management platform.
- ❖ Appoints an Allegation Manager and Deputy who have completed GEMS safeguarding training to Level 3, is a member of the Senior Leadership Team (if not themselves) 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 SCHOOL HAS ENSURED THAT THE DESIGNATED SAFEGUARDING LEAD (DSL) AND DEPUTY SAFEGUARDING LEADS (DDSLs):

- ❖ 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 DSL may be delegated to appropriately trained deputies.
- ❖ Is/are appropriately trained through completion of the GEMS safeguarding training to Level 3, receives Level 3 DSL refresher training at two-yearly intervals and further training regularly (through attendance at the GEMS 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 in need, including those with special educational needs or other vulnerabilities.
- ❖ Has a working knowledge of relevant local law, education inspection process, and inter- agency support.



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- ❖ 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 to the local child protection agency or the Police as appropriate and seeks advice and guidance from the Central Safeguarding Team, prior to any external referral.
- ❖ 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 Education Safeguarding Policy: POLCSG001V4 and 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.
- ❖ Makes the GEMS Safeguarding and Child Protection Policy is publicly for staff and parents, e.g., on the central area, school or services website or by other means.
- ❖ Ensures parents are aware of the school's role in safeguarding and the referral process on suspected abuse.
- ❖ Ensures that the Principal/CEO and SVP - Education is aware of the 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.



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The Deputy Designated Safeguarding Lead(s)

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



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5. Good practice guidelines

To meet and maintain our responsibilities towards children, the school agrees to the following standards of good practice;

- ❖ treating all children with respect
- ❖ involving children in decision-making which affects them
- ❖ encouraging positive and safe behaviour among children
- ❖ being a good listener
- ❖ being alert to changes in child's behaviour
- ❖ recognizing that challenging behaviour may be an indicator of abuse
- ❖ reading and understanding all of the school's safeguarding and guidance documents on wider safeguarding issues, for example bullying, physical contact, e-safety plans and information-sharing
- ❖ asking the child's permission before doing anything for them which is of a physical nature, such as assisting with dressing, physical support during administering first aid
- ❖ maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualized or derogatory language
- ❖ being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and or abuse
- ❖ Maintain records as per the requirement maintaining confidentiality
- ❖ Record any concerns on Guard without undue delay and report to the DSL or the Deputy



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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 e.g. manipulation of accounting records and finances, or inappropriate use of school assets or funds
- 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 expect all senior leaders to have disseminated the company's 'Whistleblowing Policy' to all employees. The school's leadership team through the 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 Up Whistleblowing Hotline are managed by the Principal/CEO, other members of the Senior Leadership Team and Governors (where appropriate).

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

8. Abuse of trust

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

The school's Code of Ethical Practice sets out our expectations of staff (see: appendix 1).



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9. Children who may be particularly vulnerable

Some children are at increased risk of neglect and or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

Vulnerable children may be more susceptible to grooming, bullying, online harm or child-on-child abuse.

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

- ❖ disabled or have special educational needs
- ❖ living in a known domestic abuse situation
- ❖ affected by known parental substance misuse
- ❖ asylum seekers
- ❖ living away from home
- ❖ vulnerable to being bullied, or engaging in bullying
- ❖ living in temporary accommodation
- ❖ living transient lifestyles
- ❖ living in chaotic, neglectful and unsupportive home situations
- ❖ vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- ❖ involved directly or indirectly in child trafficking
- ❖ do not have English as a first language.
- ❖ Special consideration includes the provision of safeguarding information, resources and support services in community languages and accessible formats.

10. 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.



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11. 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

12. Attendance / Students Missing from Education

Attendance is given prime most importance and is monitored closely and action is taken where concerns are raised. The attendance policy is reviewed regularly to ensure that good attendance and punctuality is ensured.

Where a student has 3 consecutive school days of unexplained absence the school will try to reach the parents. In case of prolonged unexplained absence (more than 5 days) from school and all reasonable steps* have been taken by the school to establish the whereabouts without success, the School will make an immediate referral for advice and guidance to the Central Safeguarding Team and ensure that this is recorded 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



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13. Behaviour Management

We have a specific Behaviour Policy that is reviewed and ratified by the school SLT/LAB annually. Employees must have access to this document and be inducted in its relevance through induction and orientation. Any staff members with pastoral or supervisory support for children who present with challenging behaviour have a responsibility to work with individual SLTs to establish relevant training for themselves and the whole school staff team, seeking further advice and guidance from the GEMS Corporate Head of Inclusion where necessary.

Individual employees have a responsibility to ensure they familiarise themselves with the relevant Behaviour Policy for the school they work in. Failure to adhere to this Policy could result in disciplinary action.¹¹

14. Empowering students to keep themselves safe

We ensure that students are taught about elements of safeguarding, including online safety, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum. The Senior Leadership Team ensures that the Curriculum is relevant, and is sensitive to social, cultural and moral principles, and for all age ranges.

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

We ensure that everyone involved in a child protection issue follows the procedures laid out in this policy and any other relevant policy where appropriate. Senior leaders ensure that all suspicions and disclosures are taken seriously.

The Principal and the DSL will act as a central points of contact, offering details of helplines, counselling or other avenues of external support where necessary, seeking advice and guidance from GEMS SSC as appropriate.

16. Support for those involved in a child protection issue

Child neglect and abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- i. taking all suspicions and disclosures seriously
- ii. nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a child, a separate link person will be nominated to avoid any conflict of interest
- iii. responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety
- iv. maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies



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- v. storing records securely
- vi. offering details of help lines, counselling or other avenues of external support cooperating fully with relevant statutory agencies.



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17. Complaints procedure in respect of poor practice behaviour

Our complaints procedure will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a child, using sarcasm or humiliation as a form of control, bullying or belittling a child or discriminating against them in some way.

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

18. If you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's whistle blowing code (appendix 2) enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns of poor practice or concerns about a child's welfare brought about by the behaviour of colleagues should be reported to the Principal.

19. Staff who are the subject of an allegation (Allegation Against an Adult (AAA))

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 GEMS Corporate Head of Safeguarding and Child Protection.

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some adults do pose a serious risk to children's welfare and safety and we must act on every allegation made. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. They can raise their queries with the Principal or the school HR who may seek further advice from the GEMS Corporate Head of Safeguarding and Child Protection. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children



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are protected.

Allegations against staff should be reported to the Principal. Allegations against the Principal should be reported to the Governing body in GEMS Corporate Office.



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20. Staff Training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff will receive training during their induction. All staff, including the Principal will receive training that is updated at least every three years and the DSL will receive training updated at least every two years, including training in inter-agency procedures.

21. Safer Recruitment

Our school endeavours to ensure that we do our utmost to employ 'safe' staff. Safer recruitment means that all applicants will:

- i. complete an application form provide two referees, including at least one who can comment on the applicant's suitability to work with children. In the absence of a reference, a Risk Assessment is filled in
- ii. provide evidence of identity and qualifications
- iii. be checked through the Criminal Records Bureau as appropriate to their role
- iv. be interviewed.
- v. Single Central Records (SCR) compliance

All new members of staff will undergo an induction that includes familiarization with the school's child protection policy and identification of their own safeguarding and child protection training needs. All staff sign to confirm they have received a copy of the child protection policy (see: appendix 3).

22. 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)



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23. Safer Working Practice/Moe Staff Code Of Conduct

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)

24. Site Security

Visitors to the school, including contractors, must be supervised at all times and 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 of parents/caregivers to wear the relevant school lanyard. Where possible and practical, contractors will be engaged before or after regular school hours.

25. Extended school and off-site arrangements

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. Residential trips are managed through a GEMS third party provider, Camps International, who are responsible for vetting and managing safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, the GEMS Safeguarding policy and school-specific on-site procedures apply, including the mandate to escalate any safeguarding concerns as per policy. If other organisations provide services or activities on the school site, the school will check that those organisations have appropriate procedures in place, including safer recruitment and health & safety procedures. The school must ensure that there are arrangements in place for the provider to report safeguarding concerns.

26. Photography and images

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

- i. seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- ii. seek parental consent
- iii. ensure that children are appropriately dressed



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- iv. encourage children to tell us if they are worried about any photographs that are taken of them.

27. E-Safety/ Online Safety

Most of our children will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The school's e-safety policy explains how we try to keep children safe in school. Cyber-bullying by children, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and children are not allowed to access these sites whilst in school. Some children will undoubtedly be 'chatting' on mobiles or social networking sites at home. So the school has produced a factsheet to help parents and children understand the possible risks.

Online communication between staff and children 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*)

28. Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to 12 child suicides each year.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the head teacher and the DSL will consider implementing child protection procedures

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



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- ❖ 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



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29. Record Keeping

The GEMS Guard Case Management Platform will be used as the system to record, escalate, review actions taken and evaluate outcomes of concerns. All safeguarding concerns must be entered on the Guard platform 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 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 DSL of all events, reports, decisions, actions taken and outcomes. This should be entered into the Guard platform.

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 or 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 the Guard platform using the body map but must not take any photographs of a child in these types of circumstances. The privacy of children's sensitive information is taken seriously. Therefore, safeguarding/child protection information must be stored confidentially. Any records should be uploaded onto Guard where these can be stored securely linked to individual children. Only the GEMS Corporate Head of Safeguarding and Child Protection, Central Safeguarding Team, the Principal/CEO's and DSLs in individual schools 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.

30. 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.

Upon confirmation that a child has transferred to another GEMS school, any safeguarding records held on the Guard Case Management Platform can be transferred to the new school DSL. Paper based safeguarding records should be transferred to the DSL of the receiving school. The DSL of the current



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school should also contact the 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' network, every effort should be made to contact the 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.

31. Transport Safety

The school transport operates in three emirates – Dubai, Sharjah and Ajman. Procedures and policies laid down by respective ministries are followed by the school. The school has set up a separate office with central monitoring system installed and designated staff to supervise and manage bus operations. Following practices are in place to ensure safety of children while on board:

1. All buses are equipped with GPS tracking devices. These devices enable live tracking of vehicles and students' movements on real time basis.
2. All buses are fitted with scanners. Students are issued with bar coded ID cards and the boarding/de-boarding is captured on real-time basis
3. All buses are installed with video surveillance system (CCTVs). The system provides recording on the purpose built rugged digital Video recorder
4. Leaving a child unattended inside the bus is a biggest challenge faced in the school transport system which is eliminated through the Display of No Passenger Board or sleeping Child Check Button
5. Panic buttons are in place to invite immediate attention and support during any emergencies
6. The exact location of the bus, the entry, exits of students etc. is monitored live on the state-of-art control room screen from the beginning to the end of the journey. In case of any traffic or delay, all parents are updated via SMS informing them about the delay

Following list of responsibilities, which are in line with ministry rules, are in place and practiced:

RESPONSIBILITIES OF BUS DRIVERS:

- Perform daily inspection of buses before driving including lights, tires, body, and seats, and make a report of any defects to the operator.
- Ensure that no students are left on board at the final destination point and display the "No Students On Board" sign at the rear of the bus.
- Do not allow students to stand in the bus during the journey and inform the operator of any violation by students.



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- Ensure the availability of first aid supplies and fire extinguishers in the bus.
- Before starting a journey, ensure that entrances, exits and aisles of the bus, including emergency exits, are not obstructed in any way.
- Prepare the bus so that it is ready to receive passengers. This includes cleaning and ensuring the temperature inside the bus is between 24-21 degrees Celsius.
- Do not exceed the maximum speed limit, and should not exceed 80 km/h at any time regardless of posted speed limit.
- Use the stop arm and warning lights when students are crossing the road.
- Do not allow any student to depart from the bus except at the stop designated for that student unless having written instruction from the school.
- Maintain professional appearance and wear assigned uniform while on duty.
- Present school bus driver permit to authorized inspectors upon request.
- Refrain from eating, drinking and using the telephone while the bus is moving.
- Do not smoke or allow others to smoke on the bus.

RESPONSIBILITIES OF BUS ATTENDANTS:

- Ensure that all students are seated while the bus is moving and are using seat belts where they are provided. No student is to be seated in the center seat of the rear row.
- Ensure that no students are left on board at the final destination.
- Ensure students under 11 years of age returning home are dropped off with a guardian. In case the guardian is not available, inform the school that the student is being returned to the school after the remaining students are dropped off.
- Ensure students behave and look after their safety during the journey. Report any incidents to the school transport coordinator.
- Ensure doorways, aisles and emergency exits are clear of any obstructions during the journey.
- Assist students with crossing the streets.
- Assist in evacuating the bus in case of emergency.
- Use car seats for students below four years of age in accordance with the manufacturer's instructions.
- Refrain from eating, drinking and using the telephone while students are on the bus.

Participate in educating students about traffic safety and how to use the bus, and supervise any entertainment program on the bus.



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RESPONSIBILITIES OF PARENTS AND GUARDIANS:

- Designate a person to receive the student from the bus at the scheduled time and place if the student is under 10 years of age.
- Provide the school with necessary and up-to-date contact information.
- Pick up students from school if they are returned there due to unavailability of person to receive them at the designated bus stop.
- Pay the cost of any damage to buses caused by their children.
- Report to the school any violation related to school bus cleanliness or any misbehavior of drivers, escorts or students.
- Educate their children regarding safety during the school bus journey, especially while waiting for the bus, boarding and disembarking, and instruct them to do the following:
 - Reach the assigned bus stop on or before the specified time;
 - Behave in a way that avoids endangering themselves or others during the journey;
 - Remain on the bus until reaching the school or other designated destination;
 - Remain seated during the journey and use seat belts when provided;
 - Refrain from misbehavior, causing noise or trouble; and
 - Report to the school administration any violation related to school bus cleanliness or any misbehavior of drivers, escorts or students.

32. Child Protection Procedures

Recognizing abuse

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

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives/scissors 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 Designated Safeguarding Lead (or Deputy 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



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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 to those who do not want to receive such content.

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

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age – or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.



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Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure 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'.

Safeguarding issues and risk of harm

All staff should have an awareness of the safeguarding issues that can put children at risk of harm. Behaviours linked to drug-taking and/or alcohol misuse, missing education and consensual and nonconsensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

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);



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- ❖ 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 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 DSL. Staff will not look at, take photos of or print any images.

The 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 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 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.



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Indicators of abuse and what you might see

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 these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

A child who is being abused and/or neglected may:

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

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns – you do not need 'absolute proof' that the child is at risk.



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THE IMPACT OF ABUSE:

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their

reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

TAKING ACTION:

i) Dealing with a disclosure or allegation by a student or another

person: Key points to remember for taking action are:

- ❖ Demonstrate that they are willing to listen to what the child has to say
- ❖ in an emergency take the action necessary to help the child
- ❖ listen impartially to the student, giving appropriate support, but without introducing their own opinions or judgement
- ❖ Record any concerns on Guard, the safeguarding case management platform without undue delay and report to the DSL or the Deputy DSL or the Principal
- ❖ 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
- ❖ complete a record of concern
- ❖ Remember that they are working as part of a team, and must never make an unconditional promise of confidentiality to a student;
- ❖ Report any concerns on Phoenix HSE without undue delay. If further clarification or support is needed, then also to the DSL or the Deputy/SLT member in their absence.
- ❖ » Be aware that what the student 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
- ❖ seek support for yourself if you are distressed.



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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 Allegation Manager or Deputy Allegation 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 Allegation Manager or Deputy Allegation 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:

If, after discussion with a DSL, there is still cause for concern about a child, safeguarding and child protection procedures will be followed. The DSL or a named Deputy DSL, or another person acting on his or her behalf, will take the lead role in any safeguarding or child protection issue.

The Central Safeguarding Team is the initial contact point for any external referral and is responsible for keeping the school or service informed of the process from GEMS. 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 emergency contact numbers for each child, usually both parents, 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 GEMS Corporate Head of Safeguarding and Child Protection must be notified without delay of any high-level and/or substantiated 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 may 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.

IF YOU SUSPECT A CHILD IS AT RISK OF HARM:

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have



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noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Start recording these early concerns. If, following your conversation, you remain concerned, you should discuss your concerns with the designated person.

IF A CHILD DISCLOSES INFORMATION TO YOU:

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen



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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.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

MANAGING DISCLOSURES

When engaging with children who already have, or maybe 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 often that they 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 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 DSL.



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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.

DURING YOUR CONVERSATION WITH THE CHILD:

- ❖ Allow them to speak freely.
- ❖ Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.
- ❖ 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’.
- ❖ Do not be afraid of silences – remember how hard this must be for the child.
- ❖ 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.
- ❖ At an appropriate time tell the child that in order to help them you must pass the information on.
- ❖ Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- ❖ Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- ❖ Tell the child what will happen next. The child may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- ❖ Report verbally to the designated person.
- ❖ Write up your conversation as soon as possible on the record of concern form and hand it to the designated person.
- ❖ Seek support if you feel distressed.



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NOTIFYING PARENTS:

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

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from the child protection officer in GEMS corporate office.

REFERRAL TO CHILDREN'S SOCIAL CARE:

The DSL will consult the child protection officer in the GEMS corporate office in case a child require referral to children's social care.

CHILDREN WITH SEXUALLY HARMFUL BEHAVIOUR:

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

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

CONFIDENTIALITY AND SHARING INFORMATION:

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

Staff should only discuss concerns with the designated person, Principal or concerned person in GEMS Corporate Office (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored. The Information is:



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- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights secure.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort should be made to prevent unauthorized access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the Principal.

The Child Protection Records does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Key service contacts:

Child abuse helpline: 800 700



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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 the 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 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 the United Arab Emirates](#)

APPENDIX 1

CODE OF ETHICAL PRACTICE FOR SCHOOL STAFF:

All school staff are valued members of the school community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for our children.

All school staff should:

- place the safety and welfare of children above all other considerations
- treat all members of the school community, including children, parents, colleagues and governors with consideration and respect
- adhere to the principles and procedures contained in the policies in our safeguarding portfolio and in teaching and learning policies
- treat each child as an individual and make adjustments to meet individual need
- demonstrate a clear understanding of and commitment to non-discriminatory practice
- recognize the power imbalances between children and staff, and different levels of seniority of staff and ensure that power and authority are never misused
- understand that school staff are in a position of trust and that sexual relationships with a child, even over the age of 16, may be an offence
- be alert to, and report appropriately, any behaviour that may indicate that a child is at risk of harm
- encourage all children to reach their full potential



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- never condone inappropriate behaviour by children or staff
- take responsibility for their own continuing professional development
- refrain from any action that would bring the school into disrepute
- value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice.

Staff name _____

Signature _____

Date _____



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APPENDIX 2

Whistle blowing code for issues relating to children and young people

PURPOSE OF THE CODE:

The school adheres to the whistleblowing policy and procedures that enable staff to raise concerns relating to:

- a criminal offence
- a miscarriage of justice
- illegality
- health and safety
- environmental or property damage
- unauthorized use of public funds
- a breach of any other legal obligation
- a concern relating to the safeguarding of children or adults
- concealing or attempting to cover up any of the above.

This code provides additional information to help staff to understand the role of whistle blowing in the context of poor practice and unacceptable conduct and attitudes towards children.

When to use the code

The whistle blowing procedures and this code may be used by anyone employed by the school in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a child is inappropriate.

Inappropriate conduct includes, but is not confined to:

- bullying or humiliation
- contravening health and safety guidelines
- serious breaches of the school's code of ethical practice
- professional practice that falls short of normally accepted standards
- compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention.



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REASONS FOR BLOWING THE WHISTLE:

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that children are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects children, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Whistle blowing can also support the member of staff who is the subject of the concern. Their conduct may result from inexperience or lack of training that can be addressed by the school, or they may be under stress and be relieved when their conduct is questioned.

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 e.g. manipulation of accounting records and finances, or inappropriate use of school assets or funds
- 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

BARRIERS TO WHISTLE BLOWING:

You may worry that you have insufficient evidence to raise a concern that you will set in train an unstoppable chain of events, that there will be adverse repercussions for your career, that you may suffer harassment or victimization, or that your suspicion or concern might be totally misplaced.

These concerns are entirely understandable but you can be reassured that whistle blowing procedures addresses these issues.

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an investigation, you are required to provide a witness statement or attend a court hearing.

You can, if you prefer, raise your concern anonymously. The school would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.



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The school will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistleblowing. Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

REPORTING PROCEDURE:

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

- You may raise your concern verbally or in writing. You should report your concern directly to the head teacher.
- If the head teacher is the subject of your concern, speak to the chair of governors.
- A friend, colleague or union representative may accompany you to the meeting if you wish.
- Ensure the head or chair informs you of their proposed action and sets a date for a second meeting.
- Timescales will depend on the complexity of the initial inquiry but the case should not be allowed to stall and you should receive initial feedback within 10 working days. The timescale for subsequent feedback should then be agreed.
- Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.
- Process and outcome

The head teacher or chair will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred.

Members of the school community, including governors, may be asked to provide information or advice.

- External advice, for example, from legal or human resources or children's services may be sought.
- A written record of the conduct, established facts and outcome of the inquiry will be kept.
- The whistleblower will be kept informed of the progress of the inquiry.
- The outcome of the inquiry will be one of the following:
- No poor practice or wrongdoing is established and the case is closed



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- The concern has some substance and the subject of the concern will receive advice and support from the head teacher to improve practice
- Poor practice or wrongdoing is established and disciplinary proceedings are initiated
- The concern is more serious and an investigation is initiated. This investigation may involve the local authority's legal team, children's social care or the police.

If, at any stage in the process, there is reason to believe that a child is at risk of significant harm, children's social care will be immediately involved.

**CHILD SAFEGUARDING AND
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APPENDIX 3:

Confirmation of receipt of safeguarding children and child protection policy

Name:

Date of joining school:

Post:

Date of induction:

Name and designation of staff member responsible for induction:

I confirm that I have received and read the school child protection policy.
I have been made aware of my duty to safeguard and promote children’s welfare. The
procedure for reporting concerns about a child has been explained to me.

Signature: _____

Name: _____

Date: _____

Please sign and return this form to the designated senior person:



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APPENDIX 4:

Photographic Consent Form (Under 18s)

At the **GMS** we take the issue of child safety very seriously, and this includes the use of images of pupils. The images of minors in **GMS publications** and on **school website** can be motivating for the minors involved, and provide a good opportunity to promote the work of the school. However, the school has a duty of care towards minors, which means that minors must remain unidentifiable, reducing the risk of inappropriate contact, if images are used in this way.

We ask that parents/legal guardians consent to the school taking and using photographs and images of their children.

Please complete, sign and return this form to **[named person]** at the school.

I consent to photographs and digital images of the child named below, appearing in **publications produced by or the website of the school**. I understand that the images will be used only for school purposes. I also acknowledge that the images may also be used in and distributed by other media, such as CD or DVD, as part of the promotional activities of the school.

Name of child:

Name of Parent/Guardian:

Address:

Phone: _____

Email: _____

Signature: _____

Date: _____



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APPENDIX 5 :

School Welfare Concern Form

Use this form to record any concern about a child's welfare and give it to the designated person for child protection:

If you suspect the child may be suffering abuse or neglect, or you have received a disclosure of abuse from a child, or you have heard about an allegation of abuse, you must complete the child protection record of concern form instead, and hand it to the designated person.

Child's full name

Date of this record

Why are you concerned about this child?

What have you observed and when?

What have you heard and when?



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What have you been told and when?

Have you spoken to the child? Yes No

What did they say? Use the child's own words

Have you spoken to anyone else about your concern? Yes No

Who?

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Is this the first time you have been concerned about this child? Yes No

Further details

Date and time you handed this form to the designated person

Class

Class teacher

Your name and designation

Signature _____



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APPENDIX 6:

Record of concern: _____ School

Child's details

Full name

Address

Telephone

Date of birth

Gender: Male Female

Is the child looked-after by the local authority or are there any other legal family arrangements?
(for example, a residence order)

When was the child first admitted to this school?

Ethnicity and culture

Religion

Does the child have any disability or special educational need? Yes No

Please specify

Preferred language of child

Is any type of language support required to converse with the child? Yes No



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Please specify

Does the child know this form has been completed?
If not, why not?

Yes No

If yes, what did the child say?

Details of those with parental responsibility
Name(s)
Address

Telephone

Relationship to child

Ethnicity, culture and religion of those with parental responsibility if known

Preferred language of those with parental responsibility



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Is any type of language support required?

Do those with parental responsibility have any disability or special need?

How does this disability or special need affect the child?

Details of any siblings

Does the child regularly spend time with other carers, for example, after-school or holiday carers, or at a short break service?

Why are you concerned about this child?



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Please provide a description of any incidents/conversations and the dates they occurred. You must make clear what is fact and what is opinion or hearsay. You must not ask the child leading questions or try to investigate the concern yourself

What have you observed and when?
(This relates to anything you have personally witnessed)

What have you been told and when?
(Write here anything you have been told by the child or any other person. Be clear about who has said what)

What have you heard and when?
(This may be third-party information that is relevant but as yet unsubstantiated)



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If an allegation has been made, give any details you have about the alleged abuser

Date and time of this record

Your details

Full name

Position

Do those with parental responsibility know this form has been completed?

Yes No



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If not, why not?

If yes, what did they say?

NOTE: Those with parental responsibility should not be contacted by anyone in the school if this could place the child at risk. Speak to the designated person first

Does the child have any visible injury, or have they told you they have been injured?

- Yes No

If yes, has medical advice been sought?

Has any action already been taken in relation to this concern? (for example, child taken out of class, first aid)

Name and position of the person this record was handed to:



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Date and time the above person received this record

If this record has been handed to anyone other than the designated person, please explain why

If you have used additional sheets to complete this record of concern, please staple them to this form and write the number of additional sheets here _____

Hand this form to the designated person before you go home. If the designated person is unavailable, hand it to their deputy, the head teacher or your line manager.

NB: If you do not have certain information, such as the child or family's ethnicity, do not delay handing in the form.

APPENDIX 7: FURTHER READING:

- 1989: UN Convention on the Rights of the Child
- 1989: The Children's Act
- 1999: Working together to safeguard children
- 2000: Framework for the Assessment of children in Need and their families
- 2000: National care standards
- 2002: Education Act
- 2003: Every child matters
- 2003: What to do if you're worried a child is being abused
- 2004: Safeguarding Children in Education
- 2005: Guidance for safe Working practice for the protection of Children and Staff in Educational Settings.
- 2006: Working Together to Safeguard Children



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- 2007: Safeguard Children and Safer Recruitment in Education

APPENDIX 8: Relevant UAE Safeguarding legislation and guidance

- Federal Law No. 3 of 2016 on students' rights (Wadeema's Law)
- Cabinet Resolution No. (52) of 2018 Governing the Executive Regulations of Federal Law No. (3) of 2016 on Child Rights Law (Wadeema)
- Department for Health, School Health Guidelines for Private Schools 2011
- The UAE School Inspection Framework 2016
- . • Executive Council Resolution No. (2) of 2017 Regulating Private Schools in the Emirate of Dubai
- Abu Dhabi Education Council Private Schools Policy and Guidance Manual 2014
- Abu Dhabi Education Council Organising Regulations of Private Schools in the Emirate of Abu Dhabi The Chairman of the Executive Council Resolution No. (26) of 2013
- Law No. (26) of 2015 on the Organisation of Dubai Data Publication and Sharing
- Federal Law No. 5 of 2012 on Combatting Cybercrimes.

Policy to be reviewed in September 2025

