

Policy

Policy	Student Protection (Child Protection and Safeguarding) Policy
Service Pillar	Education Child Protection - Safeguarding
Guideline Number	Policy-ED-CP-001
Effective Date	January 24
Assessment Cycle	Annual
Author Modified	Kate McMillan GH Inclusion & Safeguarding 12 th August 2023



Implementation and Exemptions

All schools are required to observe and implement this policy as a minimum expected service level.

Exemptions will only be granted for legal (contravention of local and / or federal legislation), technological, cultural, or physical reasons. Sufficient supporting documentation is required in order to obtain an exemption.

Objective and/or Scope

The purpose of the policy is to ensure that a process is in place for protecting students, and to provide staff and employees with the guidance they need in order to keep children safe in our schools, respond in cases where abuse or neglect is identified and to inform parents and guardians how we will safeguard their children whilst they are in our care.

The scope of this policy covers all Aldar Education schools, including those on a managed and operated basis.

Guidelines

1. Aldar Education fully recognises its responsibility to safeguard and promote the welfare of children. We recognise that children have a right to feel secure and cannot learn effectively unless they do so. Parents, carers and other people can harm children either by direct acts or failure to provide proper care, or both. Children may suffer neglect, emotional, physical or sexual abuse or a combination of such types of abuse. All children have a right to be protected from abuse.
2. Safeguarding and promoting the welfare and safety of children is everyone's responsibility. All adults who come into contact with children and families are responsible for and legally compelled to respond to a child at or at potential risk of abuse, neglect or maltreatment. Safeguarding and child protection underpin all relevant policies and operate with the best interests of the child as paramount. Zero tolerance of all forms of maltreatment are implemented and upheld in all actions and environments pertaining to students.
3. Whilst the schools will work openly with parents as far as possible, the school reserves the right to contact the police, or Child Protection Units in ADEK, MOE, ESE, MOI, Family Care Authority or Social Support Center without notifying parents if this is in the child's best interests.
4. Aldar Education upholds that all students have the right to be:
 - Heard and to express their voice / aspirations and participate in select decision making processes in the school or nursery, as determined by the school staff.
 - Treated with respect and dignity.
 - Treated with fairness and justice.
 - Supported by an advocate and provided with necessary support where required.
 - Safe, protected from harm and aware of what constitutes risk and harm.

5. **Purpose** of this policy is to provide staff, governors, subcontracted staff, volunteers and the wider school community with the framework needed in order to keep children safe and secure in Aldar Education. This policy also informs parents and carers how we are safeguarding their child whilst they are in our care.
6. **Legal Obligations**, as detailed in the Student Protection Policy (2022) and related UAE Child Rights Laws, require that:
 - All educational institutions comply, develop and publish a Student Protection Policy.
 - All educational institutions comply with the Handling Student Maltreatment Concerns within Educational Institutions guide, liaising with authorities relevant to the emirate in which the school is located.
 - All educational institutions ensure the policy has been communicated, understood and agreed by all within the institution, stakeholders and students.
 - The educational institution and principal are guardians of student rights to protect against being exposed to maltreatment.
 - All students have equal rights to care, protection and safety in all educational institutions.
7. **Safeguarding** and promoting the welfare of children (everyone under the age of 18 years) protects children from maltreatment, prevents impairment of children's mental and physical health or development, ensures that children grow up with safe and effective care and that action is taken to enable all children to have the best outcomes.
8. **Student Protection** policies and procedures are in place to prevent children from being abused, and to safeguard and promote the welfare of student in the following ways:
 - Providing an environment which fosters a supportive school community and culture where all feel able to share concerns about another's wellbeing,
 - Providing an ethos of care whereby class teachers, specialist teachers and support staff get to know students such that they are more readily aware of a child in need of support or 'changes' that may indicate abuse or a safeguarding concern.
 - Raise awareness of child protection and safeguarding roles and responsibilities with staff and volunteers.
 - Develop, implement and review a systematic means of monitoring and responding in our school that enable all staff and volunteers to identify and report cases, or suspected cases, of abuse or neglect.
 - Ensure that all vulnerable children are provided with appropriate support in school and that their needs are identified and responded to effectively.
 - Develop and promote effective working relationships with other agencies including police, Family Care Authority and Child Protection Units.
 - Support students who have been abused in accordance with an agreed child protection and/or safety plan.
 - Ensure the practice of safe recruitment in checking and recording the suitability of staff and volunteers to work with children.
 - Emphasise the need for good communication about safeguarding issues between all members of staff.
9. **Training** will be delivered for all Child Protection Coordinators (Advanced Safeguarding) which will equip them with the skills and expertise to deliver training to school staff in line with the Student Protection Policy and training expectations. All staff will be trained relevant to their roles and responsibilities, and sign attendance, which is maintained for records and compliance. School counsellors, child protection team members and pastoral leads will engage in ongoing training, network workshops and case conferencing to maintain skills in responding to vulnerable students. Volunteers and subcontracted staff will undertake robust induction and visitors will sign Child Protection Briefing Sheets.
10. **Vetting, Hiring and Monitoring School Staff and Volunteers** will be led by the HR teams supported by Aldar Education People and Culture team, who will ensure that robust safer recruitment measures are in place. This will be monitored in school by the Child protection Coordinator and Team and apply to all adults working in or around the school who come in contact with children. This includes robust shortlisting, criminal reference and reference checks, probing and critically examining CV's and candidates during interview, and removing staff who may pose a risk to students, preventing access and where appropriate enacting suspension or dismissal.
11. **Acceptable Adult Behaviours** are expected at all times, with all staff signing a professional and ethical code of conduct which outlines expected behaviours to protect the rights of students and create a culture of safety. Staff and volunteers are required to report any incidents (from self or others) of behavior against students. Serious allegations of sexual

misconduct by staff and volunteers will be directly reported to the police and FCA, and the staff member immediately suspended without prejudice, and removed from the school site pending investigation.

12. **Student Protection Education** is to be delivered to students to support their knowledge and ability to understand personal safety and wellbeing and what actions they can take to report any violations and seek help. Student education relating to personal safety, healthy living (physical and mental health), and child rights and responsibilities, shall be taught, using developmentally and age-appropriate concepts and language), in the classroom and in counselling sessions, and may include story books, illustrations, posters, reading content that can be discussed wither individually or within a group setting.

13. Roles and Responsibilities

13.1 School Director / Board:

The Directors and Board of Aldar Education recognise their responsibility to safeguard children. They will do this by ensuring safeguarding procedures can be followed within the learning environment. Aldar Education will therefore:

- Ensure school Principals receive Child Protection and Safer Recruitment training, and to ensure the safeguarding and protection of children is at the centre of their organisational and corporate philosophy.
- Provide adequate funding for Child Protection Coordinators/ Child Protection Team members to attend and receive Advanced Child Protection Training.
- Ensure facilities support Child Protection and Safeguarding by facilitating access to separate changing rooms and toilets for males and females, and also for younger and older students when a primary and secondary campus are on the one site.
- At all times comply with Ministry of Education, ADEK, ESE requirements for safeguarding equipment (CCTV), supervision and policy.

13.2 Whole Staff Responsibilities

Aldar Education recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse, and to respond in the event of a disclosure. Student protection is the responsibility of everyone, everyone has a role to play, therefore all staff have a duty and responsibility to:

- Have a child-centred approach by considering at all times what is in the best interest of the child.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried about any problems.
- Include opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from abuse.
- Follow the procedures set out by the Ministry of Education, UAE Educational Regulators (ADEK/KHDA/ESE) and take account of guidance issued by the Ministry of Interior and Early Childhood Authority.
- Be aware of and understand the types and indicators of abuse and neglect so that they are able to identify children who may be in need of help or protection or who are suffering, or likely to suffer, significant harm.
- Be able to reassure victims that they are being taken seriously and that will be supported and know what to do if they suspect of student discloses or alleges abuse, or neglect.
- Treat all disclosures with the strictest confidence.
- Ensure that parents understand the responsibility placed on the school and its staff for student protection.
- Notify the Family Care Authority, Ministry of Education, ESE/KHDA/ADEK where required, any cases of any cases of alleged or suspected child abuse.
- Inform parents of any concerns, and provide them with opportunities to change the situation, where this does not place the child at greater risk.
- Ensure that there is a senior Child Protection Coordinator (CPC), and Child Protection Team (CPT), including the school counsellor and, wherever possible, someone who holds a current pastoral role in the school.
- Ensure that all records pertaining to CP concerns are treated with the highest level of confidentiality and maintained in a secure location and format, on CPCMS where in place.

13.3 Principal, Child Protection Coordinator and Child Protection Team Responsibilities

In addition to the roles and responsibilities outlined above, they will:

- Complete Advanced CP training to support their role (CPC must hold Advanced level training, CP team members have 12 months to complete once joining the team).
- Ensure that the school staff are fully aware of and understand their responsibilities and obligations under this policy.
- Ensure that whole school training occurs annually so that every member of staff and volunteers can fulfil their student protection responsibilities effectively and to comply with the policy, including where in place, the use of CPOMS as a central database for Child Protection monitoring and concerns.
- Ensure every member of staff and all volunteers know the name of the designated person CPC, their role and how to contact them.
- Ensure CPC & CPT are clearly named, and contact details provided in school Student Protection policies and communications within the school.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, and responsibility for referring any concerns to the designated person CPC.
- Keep written records of child protection concerns that are kept securely and separately from the main student file and use these records to assess the likelihood of risk.
- Ensure that copies of child protection records and/or records of concern are transferred accordingly when a child leaves the school.
- Ensure that where a student transfers to a new Aldar Education school, their information is transferred to the new school, directly to the Child Protection Coordinator.
- Ensure that where external companies provide services, that staff (including but not exclusive to: music services, bus drivers/ monitors, cleaners, maintenance, security, canteen staff) provide evidence of having received Child Protection training – or access it through the school. They will be required to sign a Subcontractor Briefing Sheet.
- For staff that experience a disclosure, ensure they receive any necessary debriefing or counselling support.

Selection of Child Protection Coordinators and Child Protection Team

Child Protection Coordinators and members of the Child Protection Team are selected from the School Senior Leadership Team, by the school principal and /or Heads of School. They are experienced pastoral leads within schools and have a range of expertise they may bring to the role. The role of Child Protection Coordinator is not interviewed for per se, it is a position a person with demonstrated experience and demeanour, professionalism, capacity and interest in leading Child Protection who is invited to fulfil. As a responsibility allocated to SLT alongside leadership positions in school, there is no additional mandated stipend for fulfilling the role. The roles and responsibilities are outlined in the position description. The school counsellor should be a member of the Child Protection Team.

13.4 Responsibilities of Adults within School Communities

All adults are required to be aware of and alert to the signs of abuse and neglect. If an adult identifies that a child may be in an abusive situation or being neglected, they should record their concerns and report them to the CPC as soon as possible. If a child discloses allegations of abuse to an adult, they will follow the procedures attached to this policy and report immediately to the CPC. If the disclosure is an allegation against a member of staff, they will immediately report to the CPC and Principal.

It is important that all members of staff, including visiting staff both paid and unpaid, should be aware and alert to possible outward signs of abuse or neglect, understanding the categories of abuse: emotional abuse, physical abuse, sexual abuse and neglect. Exploitation and peer to peer abuse including bullying should also be monitored. These signs may include one or more of the following:

- An injury that is not typical of the bumps and scrapes associated with everyday activities.
- An injury that is not consistent with any explanation given.
- Frequent injuries even when apparently reasonable explanations are given.
- Sudden changes in behaviour, performance or attitude.
- Anxiety or low self-esteem.
- Knowledge of sexual matters beyond what would normally be expected, or sexual behaviour that is unusually explicit or inappropriate to the student's age.
- Disclosure of an experience in which the student may have been significantly harmed.
- Evidence of neglect of nutrition, affection, cleanliness and education.

- Evidence of access to materials or content deemed dangerous or inappropriate.

All teaching staff including specialist/music/swimming teachers, learning support staff, and administration staff receive annual training on the signs and symptoms of abuse and neglect, and the reporting procedures within Aldar Education. All contracted staff including cleaners, security, canteen, nursing and bus drivers and nannies are expected to have completed annual training provided by their employer, with evidence provided (as is required in the contract). Additional training may be provided by the school CPC and they will sign a Subcontractor Briefing Sheet.

13.5 Responsibilities of Parents / Legal Guardians

- Cooperate with the school, principal and staff, answer all enquiries about the student's behaviour and academic performance, and respond to their feedback and guidance/
- Attend all scheduled parent meetings with the school.
- Communicate any concern, observations or changes in their child's behaviour to the school and principal.
- Support the school in ensuring safe online practices are in place during homework and distance learning.

14 Types of abuse and neglect

14.1 What is 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 another child or children.

14.2 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.

14.3 Emotional Abuse

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

14.4 Sexual Abuse

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

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

14.5 Neglect

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

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

15 Providing Early Help requires that schools should respond as soon as early signs or indicators of problems emerge. All staff should be prepared to identify children who may need early intervention and refer to CPC or CPT as early as possible, via CPOMS where in place. In this way the mental health and wellbeing of a child is supported and achieved by:

15.1 Prevention Creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities and ethos.

15.2 Identification Recognising emerging issues as early and accurately as possible.

15.3 Early support Helping students access evidence based early support and interventions.

15.4 Access to specialist services Working effectively with parents and external agencies to provide swift access or referrals to specialist support and treatment.

15.5 Vulnerable students All staff are to be aware of the importance of being alert to the potential need for early assistance for a child who:

- is disabled and has special educational needs.
- is showing signs of engaging in anti-social behaviour, including illegal or risk taking.
- is frequently missing/goes missing from care or from home.
- is at risk of trafficking or exploitation.
- is at risk of being radicalised or exploited.
- is misusing drugs or alcohol themselves, or self harming.
- is in a family circumstance that presents challenges for the child, such as substance abuse, adult mental health problems and domestic or family violence.
- is showing early signs of abuse and/or neglect.

16 Case Management

CPT should refer to Service Guidelines which relate to the case type and context of disclosure or concern to guide the management of individual cases. Child Protection Team must meet on a scheduled and regular basis to review cases and families/student that may be vulnerable or at risk and establish safety or support plans. Reporting to authorities will be undertaken by the CPC and following a case review (the reporting decision making rubric and the reporting flow chart support in establishing the most appropriate course of action and timing).

Professional judgement and case review with CPT is necessary to ensure that decisions are made in the best interests of the child. At all times CPOMS (or case notes where CPOMS not in place) are updated with all details of contact with families, authorities, actions taken, and relevant documentation saved on the student file and maintained confidentially). The principal should be updated on the actions taken in regard to cases, and where appropriate or timely responses to reports made to authorities are not actioned, the CPC should escalate to the AE HQ Group Head of Safeguarding.

Case Recording on CPOMS must be comprehensive, robust and communicated in a factual manner. Incidents must be closed in a timely manner in line with the Case Recording on CPOMS Service Guideline. Incidents should not ordinarily remain open for longer than a term, however in the event that the CPT establishes the incident should remain open (for

example where FCA response is pending, significant risk relating to the specific incident or emerging contextual factors arise) the Case closure template should be completed and uploaded onto the system with a clear indication of the rationale to maintain the incident as active.

Service Guidelines should be referred to in cases of Peer-to-Peer Abuse, Vaping, Deliberate Self Harm, Suicidal Ideation, Custody Issues, Staff Misconduct, Misconduct on Busses, Safer Recruitment for CPT etc.

17 Data Confidentiality

Case reports and student data are strictly confidential, including the identity of the student subject to alleged abuse and or suspected maltreatment. All staff must maintain privacy and confidentiality of the students, subject to alleged abuse or neglect, the alleged perpetrator and the person reporting the case.

Data should only be shared with authorized individuals in the Ministry of Interior, Family Care Authority, or Education regulator Child Protection Units and/or the police. All requests should be in writing and stamped by the relevant authority, and transferred or accessed in a manner ensuring the safety and security of the data.

All individuals are strictly prohibited from discussing active and or closed cases with the media, any third parties or other staff with the exception of investigative or judicial authorities as part of their legal responsibilities.

18 Our policy is informed by:

- United Arab Emirates Federal Penal Code (3) of 1987 on Child's rights
In relation to child abuse and neglect the above states that, "a person who fails to report a criminal offense is liable to prosecution". Additional details are provided in the following articles from Penal Code (3) of 1987: Physical Abuse: 336, 337, 338, 339, 340, 341, 342 & 343. Sexual Abuse: 354, 356, 358, 363, 364 & 362 Emotional Abuse: 351, 352, 372, 373 & 374 Neglect: 348, 349 & 350.
- Dama Al-Aman ADEK Student Protection Policy and Maltreatment Guide (2022 pending release)
- ADEK Child Protection Circular October 2016 and Unified Child Protection Policy 2016
- 'Keeping Children Safe in Education' – statutory guidance for schools and colleges (UK Dept for Education, September 2022)
- United Nations Convention on the Rights of the Child (1989)

19 Definitions

- **Child** is any resident of the UAE under 18 years of age.
- **Student** is any person under 18 years of age who is enrolled in an educational institution (school or nursery).
- **Child Protection Coordinator** is an appointed member of staff at the school who is professional relevant trained and equipped with the skills to act upon child protection concerns that arise within the school and is the key contact for staff and authorities where a concern is identified. They are also the people who makes reports to FCA/MOI/MOE/ECE/ADEK and leads the Child Protection Team meetings.
- **Child Protection Unit** is an organizational unit at MOE ESE and ADEK that develop and implement student protection mechanisms and measures in educational settings.
- **Mandated reporter** is a person that is required by law to report student concerns of maltreatment to relevant authorities.
- **CPOMS** is a safeguarding platform that helps schools maintain records of incidents of harm and abuse so that they can act proactively to prevent future occurrences and identify trends and patterns of abuse allowing earlier intervention and support to vulnerable students.
- **Safeguarding** is what we do to prevent harm, across all dimensions of safety and welfare.
- **Child Protection** is when we respond to harm, actual or potential, disclosed or suspected.
- **Neglect** is the failure to protect from danger, or extreme failure to carry out aspects of care resulting in impairment of a child or vulnerable person's health or development.
- **Abuse** is a violation of an individual's human rights or civil rights.
- **Emotional Abuse** has a severe effect upon the emotional or behavioural development of a child or vulnerable person and is caused by persistent or severe emotional ill-treatment or rejection.

- **Physical Abuse** is physical injury to a child or vulnerable person or failure to prevent physical injury or suffering.
- **Sexual Abuse** is actual or likely sexual exploitation of a child, adolescent, or vulnerable person.

Responsibility

School Principal	Implementation & Review
School Child Protection Coordinator	Implementation & Review
School Staff	Implementation
HQ Safeguarding & Child Protection	Development, Implementation, Compliance & Review