



SAFEGUARDING POLICY

POLCSG001V1



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GEMS SAFEGUARDING POLICY STATEMENT

GEMS Education is driven by a single purpose – to put a quality education within the reach of every student, maximising their endless potential for a richly fulfilling tomorrow. First of all, though, we must ensure that all our students feel – and are – completely safe.

GEMS is fully committed to safeguarding the welfare of all our students, staff, volunteers, and other stakeholders. We fully recognise our responsibility to take all steps possible to promote safe practice and to protect children from harm, abuse, and exploitation.

We acknowledge our duty to act appropriately in response to any allegations, reports, or suspicions of abuse.

Additionally, paid staff and volunteers will work together to develop a culture that positively embraces our differences and diversity and respects the rights of children and adults.

This is the introductory policy statement for the GEMS Education Safeguarding Policy, a comprehensive set of documents, processes, guidance, policies, and procedures, adopted by all our schools.

The Policy will be followed by all members of the organisation and promoted by those in positions of leadership within the individual organisations.

To fulfil their commitment to safeguard and promote the welfare of children, all GEMS Education schools must have:

- » Clear priorities for safeguarding and promoting the welfare of children explicitly stated in strategic policy documents
- » A clear commitment by senior leaders to the importance of safeguarding and promoting children's welfare
- » A clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children
- » Approaches, policies, and a culture that embrace and safeguard all children, staff, and wider stakeholders, irrespective of their faith, gender, spiritual background, or culture
- » Recruitment and human resources management procedures that take account of the need to safeguard and promote the welfare of students, including arrangements for appropriate checks on staff and volunteers
- » Procedures for dealing with allegations of abuse against members of staff and volunteers
- » Arrangements to ensure that all staff undertake appropriate training to equip them to carry out their responsibilities effectively
- » That all staff, including temporary staff and volunteers who work with children, are made aware of the establishment's arrangements for safeguarding and promoting the welfare of children and their responsibilities for that

- » Policies for safeguarding and promoting the welfare of children and procedures that are in accordance with GEMS guidance and locally agreed national legislative procedures
- » Arrangements to work effectively with other organisations to safeguard and promote the welfare of children, including arrangements for sharing information (e.g. child protection agencies, police, healthcare, mental health services and legal practices)
- » A culture of listening to, and engaging in dialogue with children – seeking children’s views in ways that are appropriate to their age and understanding, and taking account of those views in individual decisions and in the establishment or development of services
- » Appropriate whistleblowing procedures and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed
- » Senior leaders who understand the context of Federal Law no. 3 of the UAE, the guiding law for safeguarding and child protection, and any relevant country-specific legislation

Principles upon which the Safeguarding Policy Statement is based:

- » The welfare of a child will always be paramount
- » The welfare of families will be promoted
- » The rights, wishes and feelings of children and their families will be respected and listened to
- » Keeping children safe from harm requires people who work with children to share information
- » Those people in positions of responsibility within the organisation will work in accordance with the interests of children and follow the GEMS Safeguarding Policy
- » GEMS will ensure the application of this policy through clear management, governance, and quality assurance

We recognise that for these commitments to be effective, senior leaders, employees, volunteers, parents, services, and students throughout the GEMS network must play their part in the creation of a positive safeguarding culture.

Signed: Dino Varkey, Group Chief Executive Officer, GEMS Education

Date: 01.09.2021



1. STATUS OF THE DOCUMENT AND HOW TO USE IT

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

This document has been compiled from a wide range of international and best practice guidance, all of which is intended to ensure the safety of all parties. The document outlines the principles as highlighted in the UAE inspection framework

<https://www.moe.gov.ae/Ar/ImportantLinks/Inspection/PublishingImages/frameworkbooken.pdf>

whilst ensuring the rights of the child legislation found in Federal Law no. 3 of 2016 also known as Wadeema's law

https://www.khda.gov.ae/CMS/WebParts/TextEditor/Documents/Children_Law_English.pdf

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

2. ROLES AND RESPONSIBILITIES – SEE APPENDIX B:

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

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

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 **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 students understand and implement the policy to safeguard students.

The **Designated Safeguarding Lead (DSL)** is a member of the school senior team who takes lead responsibility for safeguarding and child protection in the school. This responsibility may be delegated to an appropriately trained Deputy in the absence of the DSL.

3. CHILD PROTECTION PROCEDURES

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

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

- » Demonstrate that they are willing to listen to what the student has to say
- » Be prepared to listen impartially to the student, giving appropriate support, but without introducing their own opinions or judgement;
- » Be aware of documenting requirements;
- » Remember that they are working as part of a team, and must never make 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.

If a disclosure or allegation is made by any other person (parent, family member, another professional, etc.) with regard to a safeguarding or child protection issue, the same principles regarding documenting and evidence will apply. 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 Phoenix HSE incident case notes.

The DSL or Principal 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 DSL, or to other senior staff, must be followed up formally in writing, and delivered electronically through the Phoenix HSE system (see also APPENDIX I: GEMS Allegations Management Policy.)

ii) Acting on a current child protection issue:

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

The GEMS Vice President – Safeguarding and Child Protection, Sara Hedger sara.hedger@gemseducation.com is the contact point for any referral and is the person responsible for keeping the school informed of the process and outcome from GEMS perspective. If this has not been done already, a decision will be reached as to whether any immediate action is necessary to secure the student’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 student, 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 an allegation or evidence of a member of staff or a professional person working with students, then the GEMS Vice President – Safeguarding and Child Protection must be notified on the same day the allegation is raised, without delay, once the allegation is substantiated. See GEMS Management of Allegations policy: Appendix I.

Discussions with the student’s parents, or any other person who has been, or may be, implicated in the safeguarding concern must not take place without the agreement of the Vice President – Safeguarding and Child Protection and the Principal/CEO.

Where a student has made a specific statement, it may be necessary to clarify what they have said, and it is vitally important to document this information accurately together with the circumstances in which the statement was given. The relevant person in the school should meticulously document all observations, concerns, discussions and actions; inclusive of the date and time they were noted, this forms the safeguarding chronology. These records should be uploaded onto Phoenix HSE and could provide crucial information that may be needed for an external referral or in any subsequent legal proceedings. Phoenix HSE populates a chronology as part of the case management system.

4. ALLEGATIONS AGAINST ADULTS:

All GEMS schools should have appointed at least two members of the SLT to act as managers for allegations against staff. For details see Appendix I: GEMS Allegations Management Policy.

Employees with specific questions about the GEMS Allegations Management Policy or who have been subject to an allegation can access support through the school designated Allegations Manager, or if they feel this is a conflict of interest they can raise their queries with the Principal or the school HR Business Partner, who may seek further advice from the GEMS Vice President – Safeguarding and Child Protection.



5. WHISTLEBLOWING

Whistleblowing is any disclosure of information that is made in the 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: [GEMSNET Policies & Documents - Whistleblowing Policy](#)

6. COMPLAINTS PROCEDURES

Complaints whether directly made to the school or through the GEMS Speak Up 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's safeguarding/child protection procedures.

7. SAFER RECRUITMENT

It is the expectation that all schools adhere to the concepts of the policy and procedures for safer recruitment in education. GEMS will audit the compliance with its safer recruitment policy periodically via review of the individual Single Central Records.

Should senior leaders have questions about the detail of any of the GEMS safer recruitment checks these should be directed through individual school HR Business Partners. Please reference GEMS Safer Recruitment Policy for the detail relevant to your individual schools, see link below.

For specific details relating to safer recruitment in GEMS' schools we ask all employees to direct these questions through the school's HR Manager. However, the exact detail and expectations of all pre-employment checks can be found in the Safer Recruitment policy found on GEMS SharePoint [GEMSNET Policies & Documents - Safer Recruitment Policy](#). Employees will also be subject to ongoing checks through the government in the schools' locality.

8. ABUSE OF A POSITION OF TRUST

As a GEMS employee tasked with the responsibility of supervising/educating students you provide care, supervisory and educational support to students from 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. teachers, doctors, social workers, therapists etc.

You are employed in a 'position of trust' in respect of all young people connected to GEMS. All relationships developed with students 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 GEMS Safer Working Practice Guidance APPENDIX H.

9. SAFE WORKING PRACTICE/STAFF CODE OF CONDUCT

GEMS Safer Working Practice Guidance is attached as Appendix H. This provides practical guidance to all adults on which behaviours potentially constitute safe practice and what behaviours should be avoided. The document seeks to ensure that the responsibilities of senior leaders of educational settings towards students 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.

10. STAFF TRAINING

There is an expectation that minimum training is in place for the delegations in all GEMS Schools and any associated service including the School Support Centre:

The minimum expectation for a Designated Safeguarding Lead in a GEMS school or service is that they have undertaken the GEMS-specific DSL Level 3 training every 2 years and receive regular practice updates throughout the year through the GEMS Designated Safeguarding Lead Forums, which are mandatory to attend. For full details of training required see the GEMS Safeguarding Training Matrix - Appendix D.



11. EMPOWERING STUDENTS TO KEEP THEMSELVES SAFE

GEMS Education ensures 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.' Where they exist, this is supported by the school inspection frameworks and legislative frameworks in the various countries in which GEMS operates. GEMS expects senior leadership teams to ensure a curriculum that is relevant, and is sensitive to social, cultural and moral principles, exists in all schools and for all age ranges.

Any area of the curriculum which explores aspects of safeguarding that could be perceived as 'culturally sensitive' should be married with relevant departmental advice from the GEMS Vice President – Safeguarding and Child Protection as well as the regulator and relevant content specialists. The relevant VP Education/Cluster Lead should be informed before content is implemented into the curriculum.

12. STUDENTS WHO MAY BE PARTICULARLY VULNERABLE

All schools in the GEMS network must be clear that there is sometimes a need to provide additional support to students that have SEN, Disabilities, mental health conditions, or are disadvantaged in other ways. This applies to all of our students, and may present in a number of ways, including:

Communication difficulties – students may need support to articulate their feelings and/or report concerns. The safeguarding information or procedures may need to be presented in an accessible way to provide additional opportunities outside of the usual verbal communication. They may also need further adaption and opportunities to share concerns in ways other than verbally.

Presenting behaviours (mood, self-injury, behaviour that challenges) may be a way of communicating harm or impact of abuse. Staff must be aware of the need to look beyond the behaviour to the possible root cause and explore this with the student at an appropriate time.

These students may be more vulnerable to grooming, bullying or peer-to-peer abuse. Schools should regularly raise awareness with staff about early identification and response to these issues.

13. ATTENDANCE/STUDENTS MISSING FROM EDUCATION

GEMS Education recognises that regular attendance and punctuality at school is important to the well-being and safety of all of our students and enables them to access the opportunities made available to them at school. Attendance is monitored closely and action is taken where concerns are raised; whether learning is online, blended or physically in school. Every school must have an attendance policy that is reviewed regularly by the school leaders, and Governors should monitor the impact of the policy in securing good attendance and punctuality.

Where a student has 10 consecutive school days of unexplained absence 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 GEMS Vice President – Safeguarding and Child Protection and ensure this is recorded on the Phoenix HSE online reporting system.

*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.

14. BEHAVIOUR MANAGEMENT

Every school in the GEMS network must have a specific Behaviour Management Policy that is reviewed and ratified by the school SLT/Governors annually. Employees must have access to this document through a common ICT drive and be inducted in its relevance through annual induction and orientation. Any staff members with pastoral or supervisory support for students 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.

GEMS does not recognise restrictive physical intervention as a means to manage behaviour under any circumstances. Individual employees have a responsibility to ensure they familiarise themselves with the relevant Behaviour Management Policy for the school they work in. Failure to adhere to this policy could result in disciplinary action.

15. ONLINE SAFETY

Online communication between staff and students should not happen other than for the purposes of coordinating an aspect of education. All communications should be made on school devices through GEMS approved mail servers. All communications should be available on request to the SLT team of the specific school. For further information, please see [GEMSNET Policies & Documents - Safer Working Practice Guidance](#), [Guidance for Remote Learning](#) and the [GEMS Employee Acceptable Use Policy](#).

Youth Produced Sexual Imagery (Sexting/sending nudes) See Appendix C – Child Protection Procedures for detailed information

Relevant legislation:

- » Law No. (26) of 2015 on the Organization of Dubai Data Publication and Sharing
- » Federal Law No. 5 of 2012 on Combatting Cybercrimes.

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved. Students who share sexual imagery of themselves or their peers are breaking the law. However, GEMS believes it is important to avoid criminalising young people unnecessarily. The school will therefore work in partnership with parents and external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to YPSI is more or less serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, of which the member of staff may not be aware.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, the DSL will contact the GEMS Vice President – Safeguarding and Child Protection for further advice and guidance and then a referral will be made to the relevant agency.

16. BULLYING

Every school in the GEMS network must have a policy that addresses anti-bullying. This may be part of a wider group of linked policies including behaviour, online safety, complaints etc. This should be regularly reviewed and students should be involved in its creation, implementation and review. See also Appendix C: Child Protection Procedures – Peer on peer abuse.

It is the responsibility of:

- » GEMS Corporate Governance to ensure schools have effective anti-bullying policies in place
- » The Principal/CEO to communicate the anti-bullying policy to the school community, to ensure that disciplinary measures are applied fairly, consistently and reasonably, and that there is an effective route for concerns to be raised without delay
- » LAB Governors to take a lead role in monitoring the impact of this policy and reviewing it regularly
- » All staff, including: governors, 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
- » Students to abide by the policy.

17. ENGAGING WITH STUDENTS

When engaging with students who already have, or may be about to, make a disclosure of abuse, staff should be aware that the student may need to make a formal statement to external agencies and the police in the near future.

However, the reality is often that they will choose to disclose initially to a member of staff they feel that they can trust, and who will 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 student concerned, and maximises the likelihood that the information they provide is accurate and complete. Where the discussion takes place should be somewhere so 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 student's' must be avoided. Similarly, staff must not pass any opinions, or express their own feelings about what the student is telling them. It is acceptable for staff to reassure them that it is safe for them to tell staff, but it must be made 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 student may need more time and more than one opportunity to speak before they feel safe to fully voice all of their concerns.
- » The student 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 Phoenix HSE 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 student 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 student 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 student that they need to seek help from someone else. A more experienced member of staff may be able to help, or alternatively the student may wish to speak to the DSL.

However, if nobody else is available, and the student insists on talking, 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 student must be carefully documented using the student's own words where possible.



18. SUPPORT FOR STUDENTS, FAMILIES AND STAFF INVOLVED IN A CHILD PROTECTION ISSUE

Child abuse is devastating for the child and can result in distress and anxiety for staff and parents/caregivers who become involved.

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

The DSL will act as a central point of contact, offering details of helplines, counselling or other avenues of external support where necessary, seeking advice and guidance from GEMS Vice President – Safeguarding and Child Protection as appropriate.

19. SITE SECURITY

Visitors to the school, including contractors, 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 students in school are kept safe, including expectations of parents/caregivers to wear the relevant school lanyard.

The Principal/Manager of School Operations will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. Where possible and practical, contractors will be engaged before or after regular school hours.

20. EXTENDED SCHOOL AND OFF-SITE VISITS

All extended and off site activities are subject to a risk assessment and must satisfy health and safety and safeguarding requirements. All schools should enter their requests in the Phoenix School Trips platform and follow the guidance, approvals and requirements contained in the platform and any specific additional requirements from the regulator.

When GEMS students attend off-site activities, including day and residential visits and work related activities, the school is responsible for checking 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.

21. SAFEGUARDING/CHILD PROTECTION LEGISLATION AND GUIDANCE

- » Federal Law No. 3 of 2016 on child 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
- » The Cooperation Council for the Arab States of the Gulf Secretariat-General GCC Human Rights Declaration - reiterating rights of children and the protection of children within the GCC (see Articles 3, 14, 18, 19 and 23).
- » Ministerial Decision No. 368/2014 On the Implementing Regulation of Federal Law No 1/2012 on Children of Unknown Kinship
- » Federal Decree Law No. 10/2019 On the Protection From Domestic Violence - covers correction of behaviors harmful to the family, woman and child within the UAE
- » Federal Decree Law No. 15 of 2020 Amending Certain Provisions of Federal Law No. 3 of 1987
- » Law No. (26) of 2015 on the Organisation of Dubai Data Publication and Sharing
- » Federal Law No. 5 of 2012 on Combatting Cybercrimes.

Without exception, GEMS will adopt the relevant law governing the jurisdiction of the operating locality of the school. We understand that in different regions of the Emirates, and in the different countries in which we operate, subtlety of legal interpretation may exist. Throughout our safeguarding policies, we have broadly accepted the principles and ethos of UK safeguarding legislation, as we believe this to be some of the most robust legislation internationally. Keeping Children Safe in Education commissioned and developed by the Department for Education England and Wales, is debatably the most robust educational safeguarding resource in circulation.



22. RECORD KEEPING

Following an initial concern being raised on Phoenix HSE, it is essential that any subsequent discussions with students or others are accurately documented as soon as possible, and if written, are clearly signed and dated. Any such 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 student 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.

The written information should then be uploaded into the Phoenix HSE system by attaching a PDF of the original disclosure documentation. The original information should always be filed and stored securely with the DSL.

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 and notifications made. This should be entered into the Phoenix HSE online reporting/case management platform.

On some occasions, it may be deemed necessary to obtain photographic evidence of suspected injuries to a student. School staff (including medical staff) must not photograph students. This evidence will be obtained by the police or 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 Phoenix HSE platform using the body map but must not take any photographs of a student in these types of circumstances.

The need for these types of documents to be confidential is taken very seriously. Any written records of such discussions and any documents concerning safeguarding and child protection issues are kept in confidential files in each student's folder (separate from any general student folder) and/or on the GEMS Phoenix HSE online reporting system. Only the GEMS Vice President - Safeguarding and Child Protection, the Principal/CEO's and DSL's in individual schools should and will have access to these files. These same end users will also make decisions about with whom they are to be shared.

The GEMS Phoenix HSE Safeguarding Platform should be used as the primary system to report, document, escalate, review and evaluate outcomes of cases, in conjunction with the school safeguarding dashboard.

23. CONFIDENTIALITY AND INFORMATION SHARING

Throughout any investigation of a student welfare 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.



Appendix E contains a link to the standard format for requesting or sharing relevant information between GEMS schools to ensure an effective transfer for any vulnerable student. It is also good practice to ensure that the DSL of the current school also contacts the DSL/Principal in the receiving school by telephone to provide a full picture of the student(s). The Phoenix HSE platform transfers all case notes for students with historic and current safeguarding case work to the new GEMS school.

When students transfer to a school outside of the GEMS' network, every effort should be made to contact the DSL/Principal by telephone regarding any vulnerable students and share appropriate information in the best interest of the child. In addition, the same Transfer of Information form can be used see Appendix E. Further advice and guidance can be sought from the GEMS Vice President – Safeguarding and Child Protection.





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 students. 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 students.





APPENDIX B: ROLES AND RESPONSIBILITIES

The Governing Body (GEMS Education) ensures that schools:

- » Appoint a Designated Safeguarding Lead who is a member of the senior team and who has undertaken GEMS DSL training at level 3, in addition to GEMS Level 1 Safeguarding Basic Awareness training.
- » Ensures that the DSL role is explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- » Have Safeguarding and Child Protection policy and procedures, including a staff code of conduct, that are consistent with GEMS, and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.
- » Have procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the Principal/CEO and allegations against other students.
- » Follow safer recruitment procedures that include statutory checks on the suitability of staff to work with students and disqualification by professional association regulations
- » Develop an induction strategy that ensures all staff, including the Principal/CEO, and volunteers receive information about the school's safeguarding arrangements, Safer Working Practice (Code of Conduct) and the role of the DSL, on induction and before they start work at the school.
- » Develop a training strategy that ensures all staff and volunteers receive appropriate and regularly updated safeguarding and child protection training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard students effectively in line with any requirements of GEMS. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties below, these include mandatory attendance at GEMS Designated Safeguarding Lead Forums.
- » Contribute to inter-agency working.
- » Teach students about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum.
- » It is the responsibility of the GEMS Education governing body to ensure that all school's safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of GEMS Education, the country of operation and any national legislation/guidance.

The Principal/CEO:

- » Ensures that the GEMS Safeguarding Policy and procedures are understood and implemented by all staff including how to identify, raise 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 students and attendance at any external agency discussions and other necessary meetings.
- » 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 whistleblowing procedures and allegations management policy.
- » Ensures that students are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum.
- » Refers all allegations that a child has been harmed by or that students may be at risk of harm from a member of staff or volunteer to the GEMS Vice President – Safeguarding and Child Protection on the day of the allegation and documents it as an allegation on the Phoenix HSE Online Safeguarding platform.
- » Appoints 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 in line with the GEMS allegations management policy.

The Designated Safeguarding Lead (DSL):

- » Is a senior member of staff from the school's leadership team and therefore has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff.
- » Takes lead responsibility for safeguarding and child protection in the school, which will not be delegated. The activities of the DSL may be delegated to appropriately trained deputies in their absence.
- » Is appropriately trained, receives refresher training at two-yearly intervals and regularly (through attendance at the GEMS Designated Safeguarding Lead Forums) 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 community.
- » Encourages a culture of listening to students and taking account of their wishes and feelings.
- » Is alert to the specific needs of students 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.

- » Keeps detailed records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from, the student's general file. This may be in electronic format.
- » Refers cases of suspected abuse to the local Child Protection Services or the Police as appropriate.
- » Attends and/or contributes to any external child protection meetings and chairs regular school Safeguarding Committee meetings.
- » Co-ordinates the school's contribution to any meetings with external agencies, attending and actively participating in all relevant discussions
- » 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: POLCSG001V1 and Safer Working Practice guidance (Code of Conduct).
- » Has a working knowledge of relevant national safeguarding guidance.
- » Ensures that the Safeguarding and Child Protection policy and procedures are regularly reviewed and updated annually, in collaboration with the whole school community of students, parents, staff, volunteers and LAB Governors.
- » Liaises with, and keeps informed, the Principal/CEO (where the DSL role is not carried out by the Principal/CEO), GEMS Vice President – Safeguarding and Child Protection for any Child Protection issues.
- » Keeps a record of staff attendance at school-based Safeguarding/Child Protection training, which is signed by individual staff members.
- » Makes the Safeguarding and Child Protection policy available publicly for staff, e.g. on the central area, school's website or by other means.
- » Ensures parents are aware of the school's role in safeguarding and that referrals about suspected abuse and neglect may be made (see Appendix A.) In addition, the GEMS Safeguarding and Child Protection statement signed by the GEMS Education Group CEO, should be freely available as a link or PDF document on the school website for easy access for parents and is annually updated.
- » Ensures that the Principal/CEO is aware of the DSL responsibility under relevant law and GEMS expectations and keeps them informed of any relevant safeguarding and child protection issues.

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 students. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.



APPENDIX C: CHILD PROTECTION PROCEDURES

Definitions taken from *Keeping Children Safe in Education*, Department for Education, (2021)

Recognising abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. This is covered in GEMS Level 1 Basic Awareness face to face and online training.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler. Abuse may be committed by adult men or women and by other students

Abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators of abuse and neglect 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).

All should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will occur concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Definitions of abuse and neglect

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

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or 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.

The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and their school's policies and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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, deliberating missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

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.

Peer on peer abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). All staff should be clear as to the school's policy and procedures with regard to peer on peer 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.

Peer on peer abuse is most likely to include, but may not be limited to:

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



Youth Produced Sexual Imagery (Sexting)

If staff become concerned about a YPSI issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, digital camera), the member of staff will support the student to take the device immediately to the DSL. Staff will not look at or print any indecent images.

The DSL will discuss the concerns with appropriate staff and speak to any students 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 GEMS Vice President – Safeguarding and Child Protection.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made to the relevant external agency, after speaking to the GEMS Vice President – Safeguarding and Child Protection.

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 young people. These include possible adult involvement or criminal or abusive behaviour by young people 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 young person who is pictured.

Review of what response is necessary will facilitate consideration of whether:

- » There are any offences that warrant a police investigation
- » Child protection procedures need to be invoked
- » Parents/carers require support in order to safeguard their children
- » Any of the perpetrators and/or victims require additional support.

Examples of aggravated incidents include:

- » Evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim)
- » Evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves
- » Pressure applied to a number of students (e.g. all female students in a class or year group) to create and share indecent images of themselves
- » Pressurising a student who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- » Dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)

- » What is known about the imagery suggests the content depicts sexual acts
- » Sharing of indecent images places a young person at immediate risk of harm, for example the young person is presenting as suicidal or self-harming

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident, or whether the school is able to contain the situation in partnership with all parents of the students involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

Viewing the Imagery – As a rule, adults should **not** view youth produced sexual imagery. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a student or has the potential to be viewed as a criminal activity in country in which the school operates

If a decision is made to view imagery, the DSL will be satisfied that viewing:

Is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)

Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report

Is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network

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

Never copy, print or share the imagery; this is illegal

Discuss the decision with the Principal and GEMS Vice President – Safeguarding and Child Protection.

Ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the Principal

Ensure viewing takes place with another member of staff present in the room, ideally the Principal another DSL or a member of the senior leadership team. The other staff member does not need to view the images

Wherever possible ensure viewing takes place on school or college premises, ideally in the Principal or DSL's office

Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery

Document the viewing of the imagery in the student's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated.

Deletion of Images - if the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery, this will be in consultation with parents.

Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as students may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

- » A child who is being abused or neglected may:
- » have bruises, bleeding, burns, fractures or other injuries;
- » show signs of pain or discomfort;
- » keep arms and legs covered, even in warm weather;
- » be concerned about changing for PE or swimming;
- » look unkempt and uncared for;
- » change their eating habits;
- » have difficulty in making or sustaining friendships;
- » appear fearful;
- » be reckless 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 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; and/or
- » display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development.
- » acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk. Any concern, may be part of a bigger picture for that student which if known, could give context to a situation and help to protect them.

GEMS Phoenix HSE Online Safeguarding Platform

All staff have access to the GEMS Phoenix HSE safeguarding platform and concerns relating to any aspect of a child's welfare, safeguarding and protection must be logged in here – [Walkthrough - Logging a Safeguarding concern on Phoenix HSE](#)

Where there is concern about the immediate welfare of child, the DSL should also contact GEMS Vice President – Safeguarding and Child Protection for advice and guidance immediately. Any inter-agency involvement with statutory, and public bodies, including the Police/Social Services/regulatory bodies, must be notified to the GEMS Vice President – Safeguarding and Child Protection.

For any incident categorised as serious as per the Phoenix HSE safeguarding severity category (Appendix F), the Vice President – Safeguarding and Child Protection should be informed by DSL/Principal within 1 hour of the incident being identified at school level.

Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many students 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 students, 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

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".

Key points for staff to remember when taking action are:

- » In an emergency take the action necessary to help the child
- » Report your concern to the DSL as quickly as possible and report on Phoenix HSE – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day – staff should never leave site with an undisclosed concern.
- » Do not start your own investigation
- » Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- » Seek support for yourself if you are distressed or need to debrief

If a member of staff or volunteer is concerned about a student's welfare

There will be occasions when staff may suspect that a student may be at risk but have no 'real' evidence. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. It is fine for staff to ask the student if they are OK or if they can help in any way.

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

Concerns which do not meet the threshold for child protection intervention will be managed through the Safeguarding/welfare process.

If a student discloses to a member of staff or volunteer

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the student know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement. If they tell the student immediately the student may think that they do not want to listen but if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with students, staff will:

- » Allow them to speak freely
- » Remain calm and not overreact – the student may stop talking if they feel they are upsetting their listener
- » Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'

- » Not be afraid of silences – staff must remember how hard this must be for the student
- » **Under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the student’s mother think about all this (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. when did this happen, where did this happen?)
- » At an appropriate time tell the student that in order to help them, the member of staff must pass the information on
- » **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 things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong
- » Tell the student what will happen next
- » Let them know that someone (either you or another named person, e.g. the DSL) will come to see them before the end of the day
- » Report verbally to the DSL
- » Write up their conversation as soon as possible and upload to Phoenix HSE
- » Seek support if they feel distressed or need to debrief

Notifying parents

The school will normally seek to discuss any concerns about a student 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, advice will be sought first from the Principal/GEMS Vice President – Safeguarding and Child Protection.

Making a referral to an external agency

The DSL will make a referral to the relevant agencies, and the police, if it is believed that a student is suffering or is at risk of suffering harm

The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay. Advice and guidance may be sought from the GEMS Vice President – Safeguarding and Child Protection.



APPENDIX D: GEMS EDUCATION SAFEGUARDING TRAINING MATRIX

Staff with DSL responsibility:

Every 2 years

Mandatory for Designated Safeguarding Lead (DSL) and Deputy DSL – GEMS Level 3 Designated Safeguarding Lead training. Schools may also elect to train pastoral team members, counsellors or other key staff in GEMS Level 3 DSL training, including the members of the Safeguarding Committee, SLT etc.

Annually – All staff

- » Face to face Level 1 Basic Awareness safeguarding training for all staff including LAB members.
- » Training register completed and maintained to ensure total attendance.
- » Signed acknowledgement that attendees have understood and will comply with Safeguarding and Child Protection Policy, Code of Conduct, Health & Safety, Acceptable Use.
- » Online Level 1 Safeguarding Basic Awareness course with successful completion of the assessment through GEMSU Learning Management System.
- » GEMSU Safer recruitment online training for staff involved in recruitment and interviewing.

Termly

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



Induction

- » Any new starters during the year receive face to face and online training (GEMSU) on or before their first working day.

Site Users including SSC/Outside providers/Services/Therapists/ESM Cover Teachers

- » All new starters who start outside of the usual induction window at the start of a term receive face to face safeguarding training and additionally, if a GEMS employee, GEMSU online training in Level 1 Basic Awareness, on or before their first working day (irrespective of when they start during the year.)

Annually

- » School provides safeguarding training with a register signed before outside providers/SSC staff including therapists begin work on site.
- » All SSC staff undertake online Safeguarding training with assessment through GEMSU Learning Management System.
- » ESM and all other Services provide Face to face Level 1 Basic Awareness safeguarding training for all staff.
- » ESM provide additional subject-specific safeguarding training e.g. swimming, gymnastics to relevant providers.
- » Training register completed to ensure total attendance.

Termly

- » Safeguarding updates face to face by the DSL for services/ESM/contractors.
- » Where contractors are on site without safeguarding training e.g. emergency works etc. MSO Department or Security Team must supervise at all times.
- » Commitment by all that any necessary work will be arranged whilst children are not on site if possible.
- » Undertaking by all, that new staff from agencies on site is highlighted to MSO and Designated Safeguarding Lead for on-site training prior to starting.

Parents/Volunteers

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

Monitoring of training

- » Safeguarding should be a standing agenda item in SLT, LAB, HSE and pastoral meetings including regular updates on the impact of training and compliance with policy.



APPENDIX E: GEMS TRANSFER OF INFORMATION TEMPLATE

[GEMSNET Policies & Documents Portal \(Safeguarding - Transfer of Information template\)](#)

APPENDIX F: PHOENIX HSE ESCALATION ROUTES

[GEMSNET Policies & Documents - HSE Escalation Routes](#)

APPENDIX G: INTIMATE CARE AND TOILETING GUIDANCE STATEMENT

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

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

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

APPENDIX H: GEMS SAFER WORKING PRACTICE GUIDANCE

[GEMSNET Policies & Documents - Safer Working Practice Guidance](#)

APPENDIX I: GEMS ALLEGATIONS MANAGEMENT POLICY

[GEMSNET Policies & Documents - Allegations Management Policy](#)

APPENDIX J: GEMS SAFER RECRUITMENT POLICY

[GEMSNET Policies & Documents - Safer Recruitment Policy](#)

APPENDIX K: PHOENIX HSE REPORTING GUIDANCE

[GEMSNET Policies & Documents - Walkthrough - Logging a Safeguarding concern on Phoenix HSE](#)