

JPS Child Protection and Safeguarding Policy

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An ever-evolving experience for ever-evolving learners

At GEMS Jumeirah Primary School, we believe that everyone can achieve highly with equitable access to the right opportunities and support. As a World Class High Performance Learning school, we recognise and embrace the uniqueness of every child. We create an inclusive, nurturing environment, prioritising the psychological wellbeing of all, allowing children to feel happy, safe and confident. Children at JPS know that anything is possible for them and they aspire to be the best versions of themselves.

We meet the diverse needs of all children and their families to facilitate the best possible individual experience to ensure our learners excel beyond their potential flight path. Our bespoke, innovate curriculum is carefully designed and continually reviewed to:

- Guide learners in developing their values, behaviours and learner competencies to prepare them for success in an ever-evolving world
- Challenge learners and help them to discover their passions, talents and interests
- Provide leadership opportunities for all learners, allowing them to influence the direction of travel for key aspects of school

We are a diverse learning community, passionate about inspiring a love for learning in our children, staff and families. Our inclusive actions and behaviours are led by our core values of Kindness, Empathy, Respect, Hard Work and Resilience. This is clear through our acts of philanthropy and environmental sustainability. The JPS family is proud to lead the way in contributing positively to our local and wider community.

1. Policy Statement and Principles

At Jumeirah Primary School, we recognise our moral and statutory responsibility and are fully committed to safeguarding the wellbeing of all our children, staff, volunteers and other stakeholders. We endeavour to provide an environment where all children feel safe, respected and happy and where they have a strong sense of belonging so they can learn in a relaxed and secure atmosphere.

We recognise our responsibility to take all steps possible to promote safe practice and to protect children from harm, abuse and exploitation of any form. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The purpose of this Child Protection and Safeguarding policy is to raise awareness of safeguarding issues and ensure all staff are clear about procedures and actions necessary, with regard to any child protection concerns. These safeguarding procedures apply to all children within our care.

It is our collective duty to act appropriately in response to any allegations, reports or suspicions of abuse. Additionally, staff and volunteers are tasked with working together to develop a culture that wholly embraces our differences and diversity, and which respects and upholds the rights of children and adults.

The school's child protection and safeguarding arrangements are in accordance with GEMS guidance and locally agreed national legislative procedures and are inspected by KHDA under the judgements for the protection, care, guidance and support of children and leadership and management.

The Policy will be followed by all members of GEMS Jumeirah Primary School and is available on the school website.

Policy Principles:

- The welfare of the 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
- Keeping children safe from harm requires people who work with children to share information
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in school
- All staff members will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child
- If, at any point, there is a risk of immediate serious harm to a child, a referral will be made to relevant statutory body and public services. Anybody can make a referral. If the child's situation does not appear to be improving, any staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some stage
- Pupils and staff involved in child protection issues will receive appropriate support

This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review.

Policy Aims:

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities
- To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners

Terminology

Child includes everyone under the age of 18.

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

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

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

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

2. Safeguarding Legislation and Guidance

Without exception, JPS adopts the relevant law governing the jurisdiction of the operating locality of the school. 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.

This document outlines the principles as highlighted in the UAE inspection framework 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 requiring human judgement, a policy or procedure is there as guidance. Wherever a matter of legal responsibility is relevant to the text in this policy, this is clearly highlighted.

3. Roles and Responsibilities - Appendix B

Key JPS Personnel:

Designated Safeguarding Lead (DSL) – Emma Hurst, Deputy Principal

Email: e.hurst_jps@gemsedu.com

Tel: +971 4 394 3500 Ext: 211

Deputy Designated Safeguarding Lead (DDSL) – Rachel Higgins, Principal/CEO

Email: rachel.h_jps@gemsedu.com

Tel: +971 4 394 3500 Ext: 212

Deputy Designated Safeguarding Lead (DDSL) – Louise Usher, Vice Principal

Email: l.usher_jps@gemsedu.com

Tel: +971 4 394 3500 Ext: 236

Deputy Designated Safeguarding Lead (DDSL) – Olivia Gavin, School Councilor

Email: o.gavin_jps@gemsedu.com

Tel: +971 4 394 3500 Ext: 217

Designated LAB for Safeguarding – Jan Steel

Email: j.steel_wis@Gemsedu.com

4. Child Protection and Safeguarding Procedures

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

Children 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 child has to say
- Be prepared to listen impartially to the child, giving appropriate support, but without introducing their own opinions or judgement
- Be aware of documenting requirements
- Remember that they are working as part of a team and must never make an unconditional promise of confidentiality to a child
- Report any concerns to the Designated Safeguarding Lead, in person or via the appropriate recording channels, without undue delay
- Be aware that what the child has to say may be uncomfortable or distressing to them

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

The 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 Guard 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 child, then the Safeguarding and Child Protection 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 Senior Manager – Safeguarding in the Central Safeguarding Team is the initial 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 child's safety and welfare, and on any subsequent investigation or action to be taken.

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

If a child protection concern, allegation or incident relates to a member of staff or a person working with children, then the Senior Manager – Safeguarding in the Central Safeguarding Team 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 child'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 Senior Manager – Safeguarding and Child Protection and the Principal/CEO.

Where a child 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 must be uploaded to Guard and may provide important information that may be required for external referrals or subsequent court proceedings. Guard populates a chronology as part of the case management system.

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.

5. Allegations Against Adults

JPS has two members of the SLT (allegations manager and deputy) to act as managers for allegations against staff. When an allegation is made against a member of staff, set procedures must be followed – 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 Senior Manager – Safeguarding.

6. 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

See GEMS Whistleblowing policy for further details: [GEMS Whistleblowing Policy](#)

7. Complaints Procedure

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.

8. Safer Recruitment

Our school ensures that we do our utmost to employ 'safe' staff and allow 'safe' volunteers to work with children.

Safer recruitment means that all applicants will:

- Complete an application form which includes their employment history and explains any gaps in that history
- Provide two referees, including at least one who can comment on the applicant's suitability to work with children
- Provide evidence of identity and qualifications
- If offered employment, will be subject to vetting and barring checks relevant to their country of origin
- If offered employment, provide evidence of their right to work in the UAE

The school will also:

- Ensure that every job description and person specification for roles in school includes a description of the role holder's responsibility for safeguarding
- Ask at least one question at interview for every role in school about the candidate's attitude to safeguarding and motivation for working with children
- Obtain references for all shortlisted candidates, including internal candidates
- Carry out additional or alternative checks for applicants who have lived or worked outside the UAE
- Ensure that applicants for teaching posts are not subject to a prohibition order issued by the country of origin
- Ensure at least one member of each recruitment panel will have attended safer recruitment training.

All new members of staff and volunteers will undergo an induction that includes familiarisation with the school's Safeguarding Policy and Staff Behaviour Policy (Code of Conduct).

All relevant staff (teachers, teaching assistants, other classroom-based staff, members of the senior leadership team and all those who work in before or after school care for children under eight) are made aware of the disqualification and disqualification by association legislation.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

The school maintains a Single Central Record (SCR) of recruitment checks undertaken and ensures that the record is maintained. GEMS will periodically audit compliance with its safer recruitment policy via review of the individual SCR.

The exact detail and expectations of all pre-employment checks can be found in the Safer Recruitment policy can be found on GEMS SharePoint [GEMS Safer Recruitment Policy](#).

Volunteers

Volunteers are asked to sign in at reception and complete the JPS Safeguarding Level1 training as well as sign the JPS safeguarding code of conduct.

Contractors

The school checks the identity of all contractors working on site and requests police checks where appropriate. Contractors who have not undergone checks will not be allowed to work unsupervised or in regulated activity.

9. Abuse of Position of Trust – Appendix H

As a GEMS employee tasked with the responsibility of supervising/educating children you provide care, supervisory and educational support to children 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. school staff, volunteers, medical staff, therapists, coaches, drivers, services staff, etc.

You are employed in a 'position of trust' in respect of all young people connected to JPS. All relationships developed with children will be as agents of GEMS Education 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.

10. Safe Working Practice/Staff Code of Conduct – Appendix H

All adults who come into contact with children have a duty of care to safeguard and promote their welfare.

This means that an individual must take all reasonable steps to ensure the safety of any child involved in any activity, or interaction for which that individual is responsible. Any person in charge of, or working with, children in any capacity must, both legally and morally, provide a duty of care. For full guidance, please see: [GEMS Safer Working Practice Guidance](#)

11. Staff Training – Appendix D

The minimum expectation for a Designated Safeguarding Lead in a GEMS school 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.

12. Empowering Children to Keep Themselves Safe

The UAE School Inspection Framework stipulates governing bodies and proprietors to ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum.'

Children are taught to understand and manage risk through our wellbeing assemblies, e-safety, conceptual learning curriculum and the UAE Moral Education curriculum. Our approach is designed to help children to think about risks they may encounter and, with the support of staff, work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children are encouraged to speak to a member of staff of their choosing about any worries they may have.

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

13. Children Who May be Particularly Vulnerable

At JPS, we recognise that there is sometimes a need to provide additional support to vulnerable children. Several factors may contribute to that increased vulnerability, including prejudice and discrimination, isolation, social exclusion, communication issues, a reluctance on the part of some adults to accept that abuse can occur, as well as an individual child's personality, age, behaviour, disability, mental and physical health needs and family circumstances.

They are considered vulnerable as they may not know that what is happening to them is abuse, they have additional communication needs (they may be non-verbal,) they need intimate care or are isolated from others or are dependent on adults/others for care.

This may apply to any of our children, and may present in a number of ways, including:

- Communication difficulties – children may not have the vocabulary to articulate their needs or feelings and are unable therefore to share concerns. It is important that staff observe children for possible signs of concern.
- Information regarding empowerment and how these children share information may need to be presented in an accessible way to provide opportunities outside of the usual verbal communication. They may also need further adaption and opportunities to share concerns in a non-verbal format.
- Presenting behaviours (mood, self-injury, challenging behaviour) 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 child at an appropriate time.
- These children may be more vulnerable to grooming, bullying, online harms or child-on-

child abuse. Schools should regularly raise awareness with staff about early identification and how to respond to these issues.

14. Attendance/Children Missing from Education

JPS recognise that full attendance at school is important to the well-being and safety of all children and enables them to access the opportunities made available to them at school. Attendance must be monitored closely and action taken where concerns are raised. Our Attendance policy is set out in a separate document and is reviewed regularly by our SLT.

Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Effective information sharing between parents, schools and authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education.

Where a pupil has 5 consecutive school days of unexplained absence and all reasonable steps* have been taken to establish their whereabouts without success, the school will make an immediate referral for advice and guidance to the relevant Senior Manager – Safeguarding and ensure that this is recorded on the Guard platform.

*Reasonable steps 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

The school is required by UAE educational law to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers.

15. Behaviour Management

Our Behaviour Policy is set out in a separate document, saved on PDrive, and is reviewed regularly by the SLT. This policy is transparent to staff, parents and pupils. Failure of staff to adhere to the Behaviour Policy could result in disciplinary action.

16. Online Safety

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

For full guidance, please see: [GEMS Safer Working Practice Guidance](#)

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 Decree Law No. 34 of 2021 on Combatting Rumors and Cybercrimes

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern will always be the welfare and protection of the children involved. Children who share sexual imagery of themselves or their peers are breaking the law. However, GEMS believes it is important to avoid criminalising children unnecessarily. Therefore, JPS will 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 child has been harmed or is at risk of harm, the DSL will contact the relevant Senior Manager – Safeguarding for further advice and guidance.

17. Bullying

JPS has a policy that addresses anti-bullying. This is part of a wider group of linked policies including behaviour, online safety, complaints etc. The policy is regularly reviewed, and JPS children are involved in its creation, implementation and review.

See also Appendix C: Child Protection Procedures – Child-on-child abuse.

It is the responsibility of:

- GEMS Corporate Governance to ensure 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
- Children to abide by the policy.

18. Engaging with Children

When engaging with children who already have, or may be about to, make a disclosure of abuse, staff should be aware that the child may need to make a formal statement to external agencies and the police 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 child 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 child’s must be avoided. Similarly, staff must not pass any opinions, or express their own feelings about what the child 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 child may need more time and more than one opportunity to speak before they feel safe to fully voice all their concerns.
- The child may wish to retract a statement they have made earlier, or contradict a statement they have already made, or even refuse to speak at all. In these circumstances, it is not appropriate for staff to put any pressure on them, but their reactions and comments should be accurately documented, with times and dates.

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

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

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

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

19. Support for Children, 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 the relevant Senior Manager - Safeguarding as appropriate.

20. 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 children in school are kept safe, including expectations of parents/caregivers to wear the relevant school lanyard.

The Principal/MSO 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.

21. Extended School and Off-site Visits

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

When JPS children attend off-site activities, including day or residential visits and work-related activities, the Principal is responsible for ensuring that effective safeguarding and child protection arrangements are in place. Residential trips are managed through a GEMS third

party provider, Camps International, who are responsible for vetting and managing safety and safeguarding requirements.

Where extended school activities are provided by and managed by the school, the GEMS Safeguarding policy and school-specific on-site procedures apply, including the mandate to escalate any safeguarding concerns as per policy. If other organisations provide services or activities on the school site, the school will check that those organisations have appropriate procedures in place, including safer recruitment and health & safety procedures.

22. Record Keeping

The GEMS Guard Safeguarding Platform is used as the system to report, document, escalate, review and evaluate outcomes of cases, in conjunction with the school safeguarding dashboard. All safeguarding concerns are entered on the Guard platform and staff are trained in how to raise concerns on the Guard system.

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

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

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

As soon as a child protection issue or concern has been raised, a timely and accurate record must be made by the DSL of all events, reports, decisions, actions taken and outcomes. This should be entered into the Guard platform.

On some occasions, it may be deemed necessary to obtain photographic evidence of suspected injuries to a child. School staff (including medical staff) must not photograph children. This evidence will be obtained by the police or external medical professionals or child protection services. School staff may document details in writing of any visible injuries or illustrate the position and extent of the injuries on the Guard platform using the body map but must not take any photographs of a child in these types of circumstances.

The privacy of children's sensitive information is taken seriously. Therefore, safeguarding/child protection information must be stored confidentially. Any records should be uploaded onto Guard where these can be stored securely linked to individual children.

Only the GEMS Senior Safeguarding Managers, the Principal/CEOs and DSLs in individual schools should and will have access to all safeguarding files. These same end users will also make decisions about with whom they are to be shared.

23. Confidentiality and Information Sharing

Whilst gathering information following a child 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.

All staff must be aware that they cannot promise a child/parent to keep secrets. Child protection information shall be:

- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than necessary
- Processed in accordance with the data subject's rights
- Secure

Transferring Information Between Schools

The standard format for requesting or sharing relevant information between GEMS schools is used to ensure an effective transfer for any vulnerable child - [GEMSNET Policies & Documents Portal \(Safeguarding - Transfer of Information template\)](#)

Upon confirmation that a child has transferred to another GEMS school, any safeguarding records should be transferred to the DSL of the receiving school. The DSL of the current school should also contact the DSL/Principal in the receiving school by telephone to provide a full picture of the child(ren).

When children transfer to a school outside of the GEMS network, every effort will be made to contact the DSL/Principal by telephone regarding any vulnerable children and share appropriate information in the best interest of the child. Further advice and guidance can be sought from the relevant GEMS Senior Manager - Safeguarding.

Appendix A: UAE GOVERNMENT SAFEGUARDING MANDATE FOR EDUCATORS

'Under UAE governmental guidance, schools must make arrangements to safeguard and promote the welfare of children. Parents/carers should know that the law requires all school staff to pass on information, which gives rise to a concern about a child's welfare, including risk from neglect, physical, emotional or sexual abuse. Staff will seek, in general, to discuss any concerns with the parent/carer and discuss the need to make a referral to UAE agencies if that is considered necessary, however, this discussion will only take place where such discussions will not place the child at increased risk of significant harm or cause undue delay.

The school will seek advice from UAE agencies when they have reasonable cause to suspect a child may be suffering or likely to suffer significant harm. Occasionally, concerns are passed on which are later found to be unproven. Parents/carers will appreciate that the school's Designated Safeguarding Lead carries out their responsibilities in accordance with the law and acts in the best interests of all children.

Appendix B: ROLES AND RESPONSIBILITIES

The Governing Body (GEMS) ensures that the school:

- 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 children.
- Follow safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification by professional association regulations
- Develop an induction strategy that ensures all staff, including the Principal/CEO, and volunteers receive 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 children 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 children 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 governing body (GEMS) nominates a member (normally an executive) to be responsible

for liaising with the Government Authority, and other agencies in the event of an allegation being made against the Principal.

The Principal:

- 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 children 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 children 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 children 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 Guard 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 children and taking account of their wishes and feelings.
- Is alert to the specific needs of children in need, including those with special educational needs or other vulnerabilities.
- Has a working knowledge of relevant local law, education inspection process, and inter-agency support.
- Keeps detailed records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from the child'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

children, 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 Leads (DDSL):

Are appropriately trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

JPS Local Advisory Board:

The LAB is responsible for monitoring and advising schools on the central responsibilities of governance. This includes arrangements for safeguarding for which an appointed, named Governor has responsibility for contributing to the strategic discussions at LAB meetings, which help determine the vision and ethos of the school and clear strategic priorities and targets for the school's safeguarding and child protection responsibilities.

Appendix C: CHILD PROTECTION PROCEDURES

Definitions taken from Keeping Children Safe in Education, Department for Education, (2022)

Recognising abuse

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

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 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 Child-on-Child 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

wellbeing, development, and ability to learn.

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.

Abuse

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in 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 child-on-child abuse is any form of child-on-child abuse with a digital element, for example 'sexting', online abuse, coercion and exploitation, peer on peer grooming, threatening language delivered via online means, the distribution of sexualised 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 child (e.g. mobile phone, tablet, digital camera), the member of staff will support the child to take the device immediately to the DSL. Staff will not look at or print any indecent images.

The DSL will discuss the concerns with appropriate staff and speak to any child involved as appropriate. Parents/carers will be informed at an early stage and involved in the process after

the DSL has discussed the issue with the Principal and the relevant Senior Manager – Safeguarding.

If, at any point in the process, there is concern that a child has been harmed or is at risk of harm, a referral will be made to the relevant external agency, after speaking to the 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 children. These include possible adult involvement or criminal or abusive behaviour by children such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a child who is pictured.

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

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

Examples of aggravated incidents include:

- Evidence of adult involvement in acquiring, creating or disseminating indecent images of children (possibly by an adult pretending to be a child known to the victim)
- Evidence of coercing, intimidating, bullying, threatening and/or extortion of children by one or more other child to create and share indecent images of themselves
- Pressure applied to a number of children (e.g. all female children in a class or year group) to create and share indecent images of themselves
- Pressurising a child 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 children to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)
- What is known about the imagery suggests the content depicts sexual acts
- Sharing of indecent images places a young person is 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 children 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 child-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 local laws, safeguarding best practice and never taken in isolation. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child or has the potential to be viewed as a criminal activity in country in which the school operates. Any decision should be initially discussed with the Principal and GEMS Senior Manager – Safeguarding and if a decision is made to view imagery, they will be satisfied that viewing:

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

- Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the child or parent in making a report
- Is unavoidable because a child has presented an image directly to a staff member or the imagery has been found on a 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
- 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 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 child in the imagery
- Document the viewing of the imagery on the Guard safeguarding platform, including who was present, why the image was viewed and any subsequent actions and outcomes.

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. Where the device is not owned by the school, advice should be sought from the relevant Senior Manager - Safeguarding.

Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'.

It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

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

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless regarding their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy to withdrawn;
- challenge authority;
- become disinterested in their schoolwork;

- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; and/or
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development.
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted
- with the child's family

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

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

Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood, and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Taking Action

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".

GEMS Guard Online Safeguarding Platform

All staff have access to the GEMS Guard safeguarding platform and concerns relating to any aspect of a child's welfare, safeguarding and protection must be logged there.

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

For any incident categorised as serious as per the Guard safeguarding severity category (Appendix F), the GEMS Senior Manager – Safeguarding should be informed by the DSL/Principal within 1 hour of the incident being identified at school level.

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 Guard, staff should never leave site with an undisclosed concern.
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Seek support for yourself if you are distressed or need to debrief

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

There will be occasions when staff may suspect that a child may be at risk but have no 'real' evidence. The child's behaviour may have changed, 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 child the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. It is fine for staff to ask the child if they are OK or if they can help in any way.

Staff should report these concerns to the DSL and log on Guard as per any other concern about a child's welfare, it might be part of a wider picture. Concerns which do not meet the threshold for child protection intervention will be managed through the safeguarding/welfare process.

If a child discloses to a member of staff or volunteer

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

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

During their conversations with children, staff will:

- Allow them to speak freely
- Remain calm and not overreact – the child may stop talking if they feel they are upsetting their listener
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- Not be afraid of silences – staff must remember how hard this must be for the child and should not attempt to force a child to disclose
- **Under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child's mother think about all this (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. when did this happen, where did this happen?)
- **Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused**
- Avoid reprimanding the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong
- Tell the child what will happen next
- Let them know that someone (either you or another named person, e.g. the DSL) will come to see them before the end of the day
- Enter the concern on the Guard platform as soon as possible including full details of the conversation(s).
- Report verbally to the DSL
- Seek support if they feel distressed or need to debrief

Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will contact 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 relevant Senior Manager – Safeguarding.

Making a referral to an external agency

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

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

GEMS Central Safeguarding Team

Decisions related to safeguarding and child protection are made in the best interest of the child. Therefore, decisions regarding strategy and actions will not be made in isolation by individuals but in collaboration with the Senior Manager – Safeguarding.

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 GEMS Safeguarding 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 including those 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 onsite.
- 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 always supervise.
- 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 the MSO and the Designated Safeguarding Lead for on-site training prior to starting.

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: GUARD ESCALATION ROUTES

[Guard 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 who 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

[GEMS Safer Working Practice Guidance](#)

Appendix I: GEMS ALLEGATIONS MANAGEMENT POLICY

[GEMS Allegations Management Policy](#)

Appendix J: GEMS SAFER RECRUITMENT POLICY

[GEMS Safer Recruitment Policy](#)

Appendix K: GUARD REPORTING GUIDANCE

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

Reviewed by:

Designated Safeguarding Lead:

Emma Hurst, Deputy Principal

Date:

September 2022

Principal:

Rachel Higgins

Date:

September 2023

Nominated LAB:

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