

# Student Protection Policy

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## **1. Our Philosophy**

AISD provides quality international and intercultural education that prepares students for their futures in a global economy. Beyond the academic program, AISD prepares students to lead successful lives through the diversity of its community in Dubai and extra-curricular experiences that contribute to the development of the whole person.

## **2. Child protection statement**

The health, safety and well-being of all students are of paramount importance to all staff. Our children have the right to protection, regardless of age, gender, race, culture or disability. They have a right to be safe in our school.

Protecting children is everyone's responsibility at AISD and this includes reporting any act committed by a parent, guardian or any other person, to a child enrolled in our school which results in neglect, physical or emotional injury or sexual harm.

All staff have a duty of care to report any suspected or disclosed issues of child protection to the Executive Principal. If the threat is immediate or ongoing it will be reported to the appropriate local safeguarding authorities as set in place by the UAE.

## **3. Policy purpose visit**

This policy outlines the responsibilities and processes for employees, volunteers and visitors to AISD to prevent and respond to harm or risk of harm to students. This policy also clarifies responsibilities necessary for compliance with the mandatory reporting obligations under the UAE Federal Law No. 3 of 2016 concerning child rights, also known as Wadeema's Law. [Wadeema's Law](#) emphasises that all children should be provided with appropriate living standards, access to health services, education, equal opportunities in essential services and facilities without any kind of discrimination. The law protects children against all forms of negligence, exploitation, physical and psychological abuses.

#### 4. Overview

This policy applies to all employees and visitors to AISD who have regular contact with students, including such activities as escorting students on camp and trips within or outside the UAE, sporting activities and other extracurricular activities.

Any person has the right to make a report directly to the Ministry of Interior Child Protection Centre or other child protection authorities, such as the police.

#### 5. Policy Principles:

- Our school's responsibility to safeguard and promote the welfare of children is of fundamental importance.
- All children, regardless of age, gender, ability, culture, race, language or religion have equal rights to protection.
- Children who are safe and feel safe are better equipped to learn.
- This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Representatives of the whole school community of students, parents, staff, volunteers and governors will therefore be involved in reviewing, shaping and developing our school's safeguarding arrangements and child protection policy.
- 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.
- If at any point, there is a risk of immediate serious harm to a child, a referral will be made to the 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 reconsideration. Concerns should always lead to help for the child at some stage.
- Students 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.

## **6. Policy aims:**

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent best practice across our school.
- To demonstrate our school's commitment with regard to safeguarding and child protection to students, parents and other relevant stakeholders.

## **7. Child protection legislation and guidance**

The law and guidance set within the UAE is as follows:

- [UAE Federal Law No.3 of 2016 on children's rights \(Wadeema's Law\)](#)
- [Ministry of Interior Child Protection Centre](#)

## **8. Student protection involves:**

- Working to make schools safe and supportive places
- Taking action to prevent students being harmed at school
- Reporting any suspicions that a student has been harmed or may be at risk of harm
- All children have a right to be protected from harm

## **9. What is harm?**

- In the context of student protection, "harm" is defined as any significant detrimental effect on a child's physical, psychological or emotional wellbeing
- It is immaterial how harm is caused, which means that the definition of "harm" includes anything that has or will have a serious and harmful effect on a student's physical health, or how they think and feel about themselves
- Everyone who works in a school should look after the best interests of children

## 10. Best practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards students, we need agreed standards of good practice which form a code of conduct for all staff. Best practice at AISD includes:

- Treating all students with respect
- Setting a good example by conducting ourselves appropriately
- Involving students in decisions that affect them
- Encouraging positive, respectful and safe behaviour among students
- Being a good listener
- Being alert to changes in students' behaviour and signs of abuse, neglect and exploitation
- Recognising that challenging behaviour may be an indicator of abuse
- Reading and understanding the AISD Child Protection Policy, Code of Conduct and guidance documents on wider safeguarding issues, for example, bullying, behaviour, physical contact, sexual exploitation, extremism, e-safety and information-sharing
- Always asking student's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid
- Maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of derogatory language
- Being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
- Applying the use of reasonable force and physical intervention only as a last resort and in compliance with our school's [Attitudes and Behaviour Policy](#), KHDA [Code of Conduct](#), [Child Protection](#) and [Qld Government Student Protection](#).
- Referring all concerns about a student's safety and welfare to the Executive Principal (or delegate) and/or Guidance Counsellor or, if necessary, directly to the Police or Child Protection. Refer to Safeguarding Leads Poster

- Following our school's expectations with regard to communication and relationships with students, including via social media

### **11. Abuse of position of trust**

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students should be beyond reproach. Our school's [Code of Conduct](#) sets out our expectations of staff. All staff receive yearly training on the Code of Conduct and Student Protection.

### **12. Children who may be particularly vulnerable**

Some children are more vulnerable to abuse and neglect than others. 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, behaviour, disability, mental and physical health needs and family circumstances.

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

- People of Determination
- Affected by parental substance misuse, domestic abuse and violence or parental mental health needs
- Vulnerable to being bullied, or engaging in bullying behaviours
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality

This list provides examples of vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

### **13. Early help**

Our school recognises that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life. All school staff are trained to notice any concerns about children which may help to identify that they would benefit from early help.

Our school is committed to working in partnership with children, parents and other agencies to:

- Identify situations in which children and their families would benefit from early help
- Undertake an assessment of the need for early help and provide targeted early help services to address the assessed needs of a child and their family, developing an action plan that will focus on an activity to improve the child's outcomes

Our school is particularly alert to the potential need for early help for any student who:

- is a Person of Determination and has specific additional needs
- has special educational needs
- is showing signs of engaging in anti-social behaviour
- is in a family whose circumstances present challenges for the child, such as adult substance abuse, adult mental ill health or domestic abuse
- is showing early signs of abuse and or neglect

Careful consideration will be taken regarding who to involve in the 'Early Help' process. The process should involve the child and family as well as all the professionals who are working with them. However, if doing so puts the child at further risk, relevant best interests decisions should be made, in consultation with UAE inter-agencies.

Our school will keep the needs and circumstances of children receiving early help under constant review. If the child's situation does not improve and/or the child's

parents and/or the child do not consent to early help being initiated, our school will make a judgement about whether, without help, the needs of the child will escalate. If so, a referral to the Child Protection Centre may be necessary.

#### **14. Attendance**

Our school monitor's attendance closely and recognises that full attendance at school is important to the well-being of all our students and enables them to access the opportunities made available to them at school. [Student Attendance and Punctuality Policy](#)

#### **15. Children missing from education**

All children, regardless of their circumstances, are entitled to an efficient, full-time education that is suitable to their age, ability, aptitude and any special educational needs they may have.

Children missing education are at significant risk of underachieving, being victims of harm, 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 a suitable education.

Attendance, absence and exclusions are closely monitored. The Heads of School will monitor unauthorised absence and take appropriate action.

Where a student has 10 consecutive school days of unexplained absence and all reasonable steps\* have been taken by our school to establish their whereabouts without success, our school will make an immediate referral to relevant UAE authorities.

\*Reasonable steps include:

- Phone calls to all known contacts
- Letters home (including recorded delivery)
- Contact with other schools where siblings may be registered
- Possible home visits where it safe to do so

- Enquiries to friends, neighbours etc. through school contacts
- Enquiries with any other service known to be involved with the student/family
- All contacts and outcomes to be recorded on the student's file

Our school is required by UAE educational law to have an admission register and an attendance register. All students will be placed on both registers.

## **16. Helping 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 Moral Education lessons and through all aspects of school life. 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. Students are taught how to conduct themselves and how to behave in a responsible manner. Students are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyberbullying procedures. Our school continually promotes an ethos of respect for children and students are encouraged to speak to a member of staff of their choice about any worries they may have.

Discussions about risk will include talking to students about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which is widely referred to as 'sexting'.

It is recognised that a student may choose to share indecent images with another student in the context of a romantic relationship and that she or he may do so without any intention to cause harm or distress to anybody. Although technically an offence, 'sexting' of that nature is referred to as 'experimental sexting' and it is

usually not necessary or appropriate to criminalise young people in those circumstances, yet UAE law prohibits this.

However, there are clear risks associated with such behaviour. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other concerns.

When concerns are identified, staff will always speak to students and inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm.

(Please also refer to 'Youth produced sexual imagery' in section 22 below)

## **17. Support for students, families and staff involved in a child protection issue**

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

We will support students, their families, and staff by:

- Taking all suspicions and disclosures seriously
- Nominating a preferred contact who will keep all parties informed and be the central point of contact
- Where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest
- Responding sympathetically to any request from students or staff for time out to deal with distress or anxiety
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- Storing records securely
- Offering details of helplines, counselling or other avenues of external support.
  - United Arab Emirates Child Helpline: 800 700.
- Following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures

- Cooperating fully with relevant statutory agencies

## **18. Complaints procedure**

Our complaints procedure will be followed where a student or parent has a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student or discriminating against them in some way. Complaints are managed by the Heads of School and the Executive Principal.

Complaints from staff are dealt with under our school's complaints and disciplinary and grievance procedures. Complaints which escalate into a child protection concern will automatically be managed under our school's child protection procedures.

## **19. Allegations against staff**

When an allegation is made against a member of staff, set procedures are followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, our school will provide support and a named contact for the member of staff.

As stated above, all allegations against staff will be reported immediately to the Executive Principal.

Staff, parents and Board members are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations concerning staff who no longer work at our school or historical allegations will be reported to the police.

In accordance with AISD Policy, our school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

## **20. Staff training**

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

All staff, volunteers and visitors to AISD receive an explanation during their induction/registration which includes:

- Student Protection policy
- KHDA Code of Conduct policy
- Staff Code of Conduct policy

All of the above will be explained before a new member of staff, volunteer or visitor has direct contact with children in school. Our school's [Student Protection Policy](#) and [Code of Conduct](#) will be sent with the letter confirming an appointment with a written requirement that the individual reads the two policies in advance of starting work at our school. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.

All staff will receive appropriate and regularly updated safeguarding and child protection training and updates as required (at least annually) during student free days and regular discussions at staff meetings, to provide them with the prerequisite skills and knowledge to safeguard children effectively in line with UAE guidance and any requirements of AISD.

## **21. Safer recruitment**

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

Safer recruitment means that all applicants will:

- Have their CV reviewed to check for employment history and explain any gaps in that history
- Upon request, 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
- Be interviewed by a panel of at least two school leaders, if shortlisted
- Police check (as per KHDA requirements)
- Teaching staff are KHDA approved

AISD will also:

- 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
- Verify the preferred candidate's mental and physical fitness to carry out their work responsibilities
- 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. i.e Blue card checks for Australian citizens
- Ensure that applicants for teaching posts are not subject to a prohibition order issued by the country of origin
- For teachers - Proof of teachers registration from Australian state staff member, on hiring

All new members of staff, volunteers and visitors will undergo an induction that includes familiarisation with our school's [Student Protection Policy](#) and [Staff Code of Conduct Policy](#).

All staff are required to sign to confirm they have received a copy of the [Student Protection Policy](#) and [Staff Code of Conduct Policy](#) and understand its contents.

Our school obtains written confirmation from supply agencies and third party organisations that they have satisfactorily undertaken all appropriate checks in

respect of individuals they provide to work in our school that our school would have undertaken if they were employing the individual directly.

Our school maintains a single central record of recruitment checks undertaken and ensures that the record is maintained.

Volunteers and visitors will undergo checks commensurate with their work in our school and contact with students. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.

Our 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.

## **22. Site security**

Visitors to our 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 observe our school's safeguarding and health and safety regulations to ensure children in school are kept safe.

Travelling independently:

Students aged 11 and above may leave the school premises without a parent/guardian or authorised adult when written parental consent has been formally provided. Without this consent, students will not be permitted to exit the campus unaccompanied. Consent remains valid unless revoked in writing. Parents/guardians who choose to allow ongoing independent travel must submit a signed Independent Travel Consent Form for each child. They thereby acknowledge that AIS Dubai is not responsible for the student's safety once they have left school premises and confirm that they accept full responsibility for each of their child's journey home. Parents/guardians must ensure their child understands safe travel expectations.

Regardless of age or independent dismissal status, all students must be signed out by a parent/guardian if leaving school during the school day. Students arriving to school late must complete the official late sign-in procedure before going to class. Students approved for independent travel must leave the school campus promptly and follow safe travel practices, and conduct themselves responsibly while

travelling home. They must also adhere to all school expectations related to behaviour and safety.

### **23. Behaviour management**

Our behaviour guidelines are set out in our [Attitudes and Behaviour Policy](#) for students.

### **24. Record keeping**

AISD maintains safeguardings (including early help) and child protection records by:

- Keeping a clear detailed electronic record of concern in the iSams about children (noting the date, event and action taken), even where there is no need to refer the matter to relevant agencies immediately.
- Ensuring child protection records are maintained independently from the students' accessible school record. Such records will only be accessible to the Executive Principal and school leaders who need to be aware.
- Including in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded.

### **25. Confidentiality and information sharing**

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

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the Executive Principal.

It is reasonable for staff to discuss day-to-day concerns about students with colleagues in order to ensure that children's general needs are met in school. However, staff should report all child protection and safeguarding concerns to the Executive Principal. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff are aware that they cannot promise a child/parent to keep secrets.

Every effort will be made to prevent unauthorised access to sensitive information.

## **26. Extended school and off-site arrangements**

All extended and off site activities are subject to a [risk assessment](#) to satisfy health and safety and safeguarding requirements. When our students attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

Outside agencies who hire our facilities have their own processes and procedures and as independent organisations from the AISD, the organiser and parents take full responsibility for child protection matters.

## **27. Photography and images**

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

To protect students AISD:

- Seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)

- Use only the student's first name with an image
- Ensure students are appropriately dressed
- Encourage students to tell us if they are worried about any photographs that are taken of them
- Refer to parent media permission before any distribution

## **28. Online safety**

Children and young people commonly use electronic equipment, including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, WhatsApp, Snapchat and Instagram.

Social networking sites are the more obvious sources of inappropriate and harmful behaviour and students are not allowed to access these sites in school. Many students own or have access to mobile devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

Students at AISD sign our [Internet Access and Acceptable Use Agreement](#) prior to accessing the internet at school. This utilised in conjunction with our [Student Network Firewall Policy](#) and [E-Safety Policy](#) to ensure our students are educated and protected while online.

## **29. Child protection procedures**

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

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

There are four categories of abuse:

### **1. Physical abuse**

Physical abuse is the deliberate physical injury to a child which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

## **2. Emotional abuse**

Emotional abuse is the persistent emotional maltreatment or rejection of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may include:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- age or developmentally inappropriate expectations being imposed on children.
- interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- seeing or hearing the ill-treatment of another.
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

## **3. Sexual abuse and exploitation**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical, including penetrative or non-penetrative acts.

## **4. Online child sexual exploitation and abuse (OCSE).**

OCSE are acts where the perpetrator does not come into physical contact with a child, such as in the case of possession, distribution or consumption of child sexual abuse material.

## **5. Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment
- unresponsive to a child's basic emotional needs.

## **6. 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 Executive Principal.

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 HPE
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdraw
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. Each small piece of information will help the Executive Principal 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.

## **7. 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:

1. Teacher identifies concern and documents reason for referral
2. Teacher reports immediately to Executive Principal

3. Executive Principal can then investigate the case and communicate with the Head of Primary, as appropriate
4. Do not start your own investigation
5. Share information on a need-to-know basis only. Do not discuss the issue with colleagues, friends or family
6. Seek support for yourself if you are distressed or need to debrief

## **8. 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 okay or if they can help in any way.

Staff should report these concerns to the Executive Principal as per any other concern about a child's welfare.

## **9. 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 well-being, the staff member will need to let the student know that they should 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 jump in 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 know how hard this would 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 should 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 yourself or another named person, e.g. the Executive Principal will come to see them before the end of the day
- Report verbally to the Executive Principal
- Write up their conversation as soon as possible
- Seek support if they feel distressed or need to debrief

## **10. Notifying parents**

AISD will normally seek to discuss any concerns about a student with their parents. This will be handled sensitively and the Executive Principal will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if our school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from relevant UAE agencies.

## **11. Making a referral to the Child Protection Centre**

The Guidance Counselor will make a referral to UAE 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.

## **30. Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures as outlined in our school's [Living in Harmony Policy](#).

## **31. Children with sexually harmful or inappropriate behaviour**

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use our school's anti-bullying procedures where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures.

In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

Abusive behaviour by one child towards another will not be tolerated, minimised or dismissed as 'banter' or 'part of growing up'.

When dealing with abuse of students by other students, staff will be mindful of the potential for prejudice-based bullying; racist, disability, homophobic and transphobic abuse; gender-based violence and teenage relationship abuse. Whilst mindful of the particular vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.

Members of staff who become concerned about a student's sexualised behaviour, including any known online sexualised behaviour, should record their concerns and report them to the Executive Principal as soon as possible, as with any other concerns.

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

Any instances of sexual harm caused by one student to another and any situation where there are concerns about power imbalance, coercion or force will be discussed with UAE agencies, and potentially the police.

In deciding the most appropriate response, relevant considerations will include:

- The nature and extent of the inappropriate/abusive behaviours. In respect of sexual abuse, it is necessary to distinguish between normal childhood sexual development and experimentation and sexually inappropriate or aggressive behaviour
- The context of the abusive behaviours
- The student's development, family and social circumstances

- The need for services, specifically focusing on the student's harmful behaviour as well as other significant needs
- The risks to self and others, including other children in our school, household, extended family, peer group and wider social network.

our school is committed to participating in plans both to provide students who are at risk from other children and those students who may present a risk to other children with appropriate services to address any concerns and wherever possible, to facilitate ongoing access to education in school for all children concerned, subject to appropriate risk assessments and risk management plans.

### **32. Youth produced sexual imagery ('sexting')**

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.

All incidents of YPSI should be reported to the Executive Principal 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 Executive Principal. 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 Executive Principal which the member of staff may not be aware of.

If staff become concerned about a YPSI issue in relation to a device in the possession of a student (e.g. mobile phone, tablet, laptop), the member of staff will secure the device (i.e. it should be confiscated).

Staff will not look at or print any indecent images. The confiscated device will be passed immediately to the Executive Principal (see 'Viewing the imagery' below).

The Executive Principal will discuss the concerns with appropriate staff and speak to students involved, as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the student at risk of harm.

If at any point in the process there is concern that a student has been harmed or is at risk of harm, a referral will be made to UAE agencies and police.

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 a student (possibly by an adult pretending to be a student 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 which are unusual for the student's developmental stage, or are violent
- Sharing of indecent images places a student at immediate risk of harm, for example the student is presenting as suicidal or self-harming

The Executive Principal 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 our 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 students involved learn from the incident in order to keep themselves safe in the future.

In the latter instance, the Executive Principal will usually consult with the police to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

### **1. Viewing the Imagery**

Adults should not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible, the Executive Principal'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 Executive Principal's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a student.

If a decision is made to view imagery, the Executive Principal 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 student or parent in making a report
- Is unavoidable because a student 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 Executive Principal will:

- Never copy, print or share the imagery - this is illegal
- Discuss the decision with the Executive Principal and Head of Primary
- Ensure viewing is undertaken by the Executive Principal

- Ensure viewing takes place with another member of staff present in the room, ideally the Executive Principal. The other staff member does not need to view the images
- Wherever possible ensure viewing takes place on school grounds, ideally in the office of the Executive Principal or Head of Primary.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the student in the imagery
- Record the viewing of the imagery in the student's profile on iSams, including who was present, why the image was viewed and any subsequent actions.

## **2. Deletion of Images**

If our 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.

## **33. Sexual exploitation of children**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or group of children or young people. Victims can be boys or girls. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to the trafficking of children.

All staff are made aware of the indicators of sexual exploitation of children and all concerns are reported immediately to the Executive Principal. The Executive Principal will consider the need to make a referral to UAE agencies, and the police. Parents will be consulted and notified as above.

## **34. Anti-Vaping Safeguarding Summary (AIS Dubai)**

AIS Dubai is committed to safeguarding the health, wellbeing, and safety of all students. Vaping is strictly prohibited on school premises, school transport, and during all school-related activities, as it poses significant health and safety risks.

### **Prevention and Awareness**

Vaping prevention is integrated into the curriculum, wellbeing sessions, and safeguarding programmes. Students are supported to understand the physical and emotional risks of vaping and the social influences that may affect their choices.

### **Reporting and Intervention**

Staff are trained to identify early signs of vaping. Students and staff can report concerns confidentially through safeguarding channels. All incidents are managed following the school's safeguarding procedures, using a graduated response model and involving parents where appropriate.

### **Support and Compliance**

Referral pathways to wellbeing, counselling, and medical support are in place. Vaping-related incidents are recorded, monitored termly, and reported to KHDA when required. The school maintains a proactive and preventative approach to ensure a safe, healthy, and supportive learning environment for all students.

## **35. Staff reporting**

Staff should ordinarily follow the reporting procedures outlined in this policy. However, any staff member can refer their concerns directly to UAE Authorities , or the police if:

- The situation is an emergency and the Executive Principal or Head of Primary is unavailable
- They are convinced that a direct report is the only way to ensure the student's safety, or
- For any other reason they make a judgement that a direct referral is in the best interests of the child.

In any of those circumstances staff may make direct child protection referrals and share information without being subject to censure or disciplinary action. However, staff should inform the Executive Principal at the earliest opportunity that they have done so unless in their judgement doing so would increase the risk of harm to the child.

**1. Staff should report to the Executive Principal any harm to a student that is caused by:**

- someone working at our school
- another student
- someone from the student's family, a friend or a stranger
- the student self-harming

**2. If you see harm occurring at school:**

Help the student who has been harmed by:

1. Instructing other students to move away
2. Involving another staff member as soon as possible
3. Tell the Heads of School immediately about what you have seen
4. Write down what you saw and give the information to the Heads of School

**3. If you suspect a student has been harmed at school or outside of school:**

1. Tell the Heads of School immediately about your suspicion.
2. Write down what you suspect and give the information to the Heads of School

**4. If a student tells you that they have been harmed at school or outside of school:**

1. Listen carefully.
2. Reassure the student that they have done the right thing by telling you.
3. If the allegation does not relate to the Executive Principal or Heads of School:
  - Tell the student they should tell the Executive Principal/Heads of School what they have told you
  - Tell the Executive Principal/Heads of School immediately about what the student told you
  - Write down what the student told you and give the information to the Executive Principal/Heads of School

If the allegation relates to the Executive Principal/Heads of School, or if you suspect the Executive Principal/Heads of School is responsible for causing harm to a student they should report the matter to the Board Representative in our school.

The main thing to remember is, if there is suspicion a student might have been harmed or might be at risk tell the Executive Principal/Heads of School straight away. If the Executive Principal isn't available, advise Heads of School.

## 36. Definitions

Term	Definition
<b>Children</b>	A person under 18 years of age.
<b>Employee</b>	For the purposes of this procedure the definition of an employee is 'a person engaged to carry out work at AISD for financial reward'.
<b>Harm</b>	For the purposes of this procedure the definition of harm is: Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.
<b>Official misconduct</b>	As described in our school's Code of Conduct that could, if proved, be a disciplinary breach providing reasonable grounds for terminating the person's services.
<b>Parent/carer acting protectively</b>	A parent/carer who supports the best interests of their child/student by: <ul data-bbox="724 1245 1422 1547" style="list-style-type: none"><li>● providing support to the child/student when there are concerns of self-harm or risk of self-harm</li><li>● engaging with school personnel to support the child/student at school, and</li><li>● seeking medical or mental health care or referral to counselling services as required</li></ul>
<b>Reasonably suspects</b>	Suspects on grounds that are reasonable in the circumstances.

<p><b>Relevant information</b></p>	<p>Relevant information means, in respect of giving information to the Child Protection Department in the Ministry of the Interior information that the Executive Principal of AISD reasonably believes may:</p> <ul style="list-style-type: none"> <li>(i) help an authorized officer to investigate an allegation of harm or risk of harm to a child or assess a child's need for protection or in respect of giving information to another service provider (a prescribed entity or another person providing a service to children or families or a recognised entity) information the Executive Principal of AISD reasonably believes may help the service provider to: <ul style="list-style-type: none"> <li>(i) assess or respond to the health, educational or care needs of a child in need of protection</li> <li>(ii) otherwise make plans or decisions relating to, or provide services to, a child in need of protection or the child's family.</li> </ul> </li> </ul>
<p><b>School staff member</b></p>	<p>Employed by AISD and normally performs their daily duties within our school, whether on a temporary, permanent or contract basis.</p>
<p><b>School visitor</b></p>	<p>Any person who visits our school on a one off or regular basis to provide services to our school. This includes any volunteers assisting in our school canteen, classrooms or on school excursions or presenters of one-off programs.</p>
<p><b>Self-harm</b></p>	<p>Harm that requires immediate medical or psychological intervention. Self-harm includes self- inflicted injuries, or other self-inflicted physical or psychological damage.</p> <ul style="list-style-type: none"> <li>(i) Self-inflicted injuries. Child has recent injuries and either the child admits inflicting injuries or the pattern of injuries appears self-inflicted.</li> <li>(ii) Other self-inflicted physical or psychological damage. Child's behaviour has caused or is likely to cause serious physical or psychological damage to self. Serious damage</li> </ul>

	requires immediate medical or psychological evaluation or intensive treatment.
<b>Sexual conduct</b>	Any behaviour that might reasonably be interpreted as being designed or intended to arouse or gratify sexual desires.

# SAFEGUARDING LEADS

If you are worried about a student, report your concerns and speak to the appropriate safeguarding lead ASAP. Please share your concerns on the same day, before you leave school.



**Karen McCord**  
Executive Principal



**Surj Wright**  
Head of Teaching and Learning



**Linda Elder**  
Head of Primary



**Sanobia Palkhiwala**  
Director of Early Learning



**Najwa Albhaisi**  
Compliance Coordinator

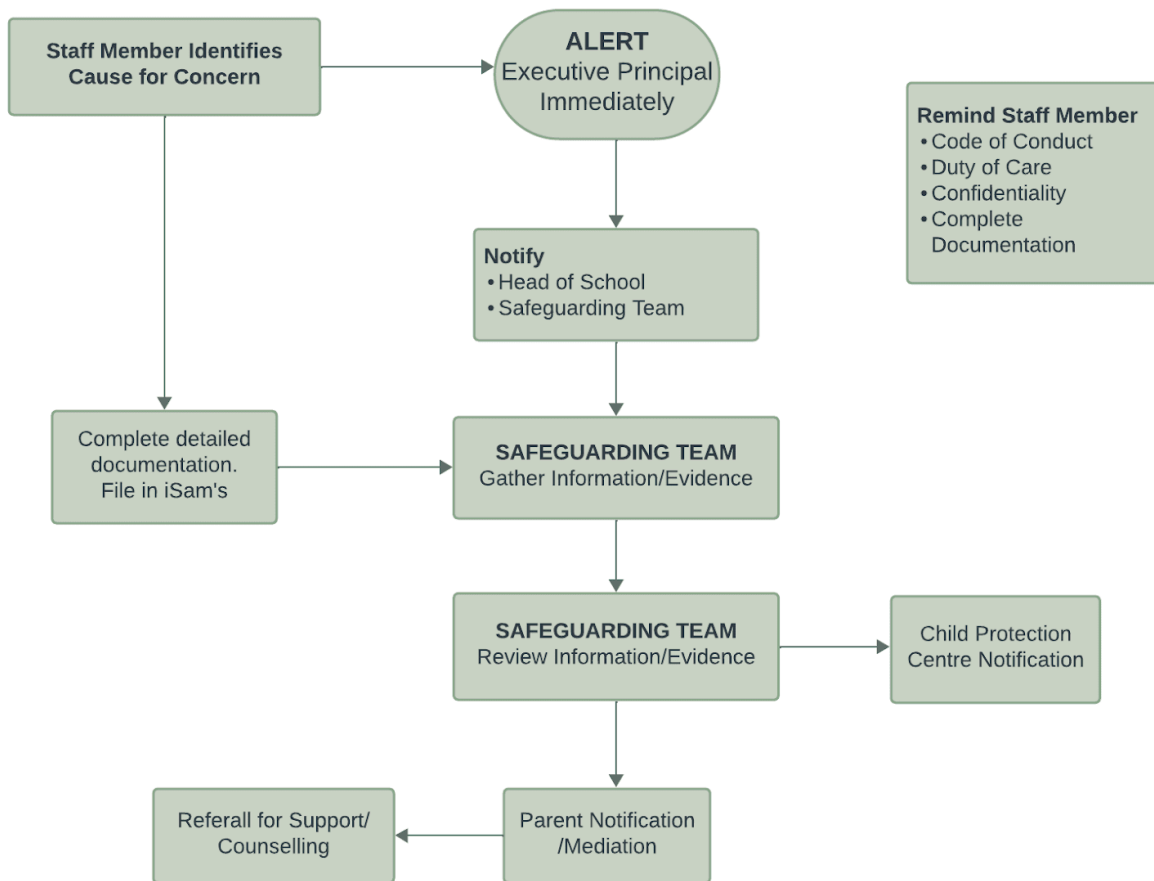


**Horia Razban**  
Wellbeing Mentor

AIS Dubai is fully committed to safeguarding all children and young people. We take all reasonable steps to promote safe practices and protect against harm, abuse, and exploitation. We recognize our duty to respond appropriately to any concerns or allegations.

## Appendix II

### Safeguarding Flowchart



AIS Dubai is fully committed to safeguarding the welfare of all children and young people. We recognize our responsibility to take all reasonable steps to remote safe practice and to protect children from harm, abuse and exploitation. AIS Dubai acknowledges our duty to act appropriately in response to any allegations, reports or suspicion of abuse.