

## Group Child Protection and Safeguarding Policy

**Policy Owner:** Group Health and Safety Director and Group Head of Safeguarding **Revised:** June 2022

### Rationale

At ISP, we are committed to safeguarding and promoting the welfare of children and young people and we expect all our employees and volunteers and any contractors / consultants and partner agency staff in our schools to share this commitment. In line with this, we expect them to recognise where a student is at risk of, or is actually being harmed, and to do all they can to reduce further risk or harm.

Our schools are particularly important in protecting our students; our school colleagues are in the best position to identify concerns early and to provide or recommend support for students as well as helping to prevent these concerns from escalating.

At ISP, we adhere to the following basic child protection and safeguarding principles:

- A child's welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender, or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'. ▪ All students have the same equal rights to protection, but we recognise that we need to do more for some because of their special educational needs, disability, gender or religion.

There are three main elements to our child protection policy;

**Prevention** through the creation of a positive school atmosphere and the teaching, and pastoral support offered to pupils. Our school will establish and maintain an environment where pupils feel safe and secure and are encouraged to talk, and are listened to. We will include safeguarding themes and activities in the pastoral curriculum which equip pupils with the skills they need to recognise abuse and stay safe from abuse.

**Protection** by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to child protection concerns. Students will know that there are adults within the school who they can approach if they are worried or are in difficulty.

**Support** to pupils who have faced any kind of child protection concern. We will ensure that wherever possible every effort will be made to establish effective working relationships with parents and colleagues from outside agencies. **The school recognises it is an agent of referral and not of investigation.**

### Policy Aims and Objectives

We will:

- Provide a safe and happy environment to enable students to thrive and learn.
- Outline the systems and processes we all take to ensure that students remain safe at school.
- Raise awareness to all employees of safeguarding/child protection issues and define their roles and responsibilities in reporting possible cases of abuse.
- Identify students who are suffering, or likely to suffer harm.
- Ensure effective communication between all employees on child protection/safeguarding issues.
- Set effective procedures for employees/volunteers or third-party individuals who encounter any issues in relation to child protection/safeguarding to follow.
- Be clear with all parties, including students and their parents/carers, regarding our approach to safeguarding and child protection, through the provision of clear and well communicated policies.

Safeguarding and Child protection are the responsibility of all adults and especially those working with children. The development of appropriate school procedures and the monitoring of good practice are the responsibilities of the Designated Safeguarding Lead (DSL), however, all school staff should maintain the attitude of "it could happen here". The English College takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care. It is recognised that school staff are particularly important in the safeguarding and child protection process as they have regular contact with the students in their care. They are in a position to:

- notice early signs that could indicate safeguarding or child protection concerns,
- report any attitudes or behaviours that could indicate safeguarding or child protection concerns,
- help and support students in order to attempt to prevent an escalation of events.

### DUBAI CONTEXT

In April 2012, it was reported that Dubai had "embraced a new policy to protect children against all forms of violence, abuse, exploitation and neglect and offer support and care for those in need." The policy "aims to provide protection to Emirati and expatriate children under the age 18 who live permanently or temporarily in Dubai." The Dubai Strategic Plan 2015 calls for the provision of "proper social services to meet the requirements of the local community."

In November 2012, the UAE Cabinet approved Article 42 "Wadeema's Law" to "protect children in the UAE. The law includes creating special units that intervene when children are at risk and stresses that all children have rights regardless of religion and nationality."

Article 44 of the law protects the identity of informants, witnesses and involved parties, unless given consent.

In April 2020, the UAE Cabinet announced a 24 hour hotline number for community members to report cases of neglect, abuse and violence against children through the Community Development Authority (CDA).

There are several agencies that can support a safeguarding referral. These include the Ministry of Interior, The Ministry of Education and the Community Development Authority. Currently within Dubai, all referrals should be made to the KHDA. The KHDA will then act as the agent of referral to the CDA. The CDA will no longer accept referrals directly from schools. Professional counselors, consultants, psychologists could also be considered. It is the role of The English College to ensure that any signs that could indicate safeguarding or child protection concerns are identified, reported and dealt with swiftly and sensitively.

### **Policy Scope**

The Child Protection and Safeguarding Policy is endorsed by our Executive Committee and adopted by all levels throughout our group and school. The policy will also be applied to any partner agency with unsupervised access to children and young people and any contractors working on any ISP school site.

### **Definitions**

#### *Safeguarding*

Safeguarding and promoting the welfare of children refers to the processes of protecting students from harm, preventing the impairment of their health and development, ensuring that we seek to improve the general health and well-being of all students in our care and enabling every student to have the optimum life chances and enter adulthood successfully.

#### *Child Protection*

Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect.

Note:

If the preventative work around safeguarding issues is not appropriate or extensive enough, students identified as being a concern may move to being identified as being at risk of significant harm. Although other factors outside of the schools' control may also influence this, the purpose of the policy is to ensure that at ISP we take whatever measures are possible to avoid this from happening.

### **Principles**

This policy sets out our principles and expectations, as well as the procedures and processes, which must be adopted by all our schools and across our group as a whole. The policy also describes the steps that must be taken in meeting our commitment to safeguarding students, at both school, regional and group level.

Given our international context, we recognise and accept our responsibility to safeguard all students under the UN Convention on the Rights of the Child (1989). We recognise our

obligation to protect our students from harm and in particular, the obligation on us and our regions and schools under the following Articles of the UN convention:

- Article 3: which states that the best interests of children must be the primary concern in decision making about them.
- Article 13: which states that children have the right to get and share information as long as it is not damaging to them or another child.
- Article 14: which states that children have the right to think and believe what they want and to practise their religion.
- Article 19: which states children have the right to be protected from hurt and mistreatment, physically and mentally.
- Article 34: which states that Governments should protect children from sexual exploitation and abuse.
- Article 35: which states that Governments should take all measures to ensure that children are not abducted, sold or trafficked.
- Article 36: which states that children should be protected from any activity that takes advantage of them or could harm their welfare and development.
- Article 37: which states that no one is allowed to punish children in a cruel or harmful way.

All member states of the UN have signed up to the 1989 convention (with the exception of the United States of America) and all the UN articles can be found at the following link: <https://www.unicef.org/child-rights-convention>

The contents of this policy and all of the procedures contained within it are also in line with the following guidance;

a) DfE (KCSIE) - Keeping children Safe in Education 2024 (Statutory guidance for schools and colleges in the UK).

b) Section 11 of The Childrens' Act (2004)

### **UAE specific**

c) Federal National Council-Child Rights Law ('Wadeema's Law' ) April 2016-Federal Law No 3 of 2016 on children's rights passed

d) Federal Decree Law No. (20) of 2023 Amending Certain Provisions of Federal Decree Law No. (33) of 2021 Regarding the Regulation of Employment Relationships

### **Responsibilities**

#### *Executive Committee (ExCo) and Senior Management Team (SMT)*

Our ExCo and SMT recognise their ultimate responsibility to ensure that the group and all regions and schools understand and follow the guidance provided by this and all other safeguarding related documents.

#### *Principals / Heads of School and Senior Leadership Teams in Schools*

The Principals / Heads of School and The Whole School Leadership Team in school will:

- Ensure that the policy is implemented across their school and followed by all employees and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and the four deputies to carry out their role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum ensuring that children throughout the school are taught about keeping themselves safe, including online safety.
- Ensure the school site is secure.
- Customise this policy for their particular school.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's customised version of this policy.
- Only deploy employees who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by employees in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy.

#### *Designated Safeguarding Lead (or Deputy) in a school*

Every school will identify a named person designated as the Safeguarding Lead (DSL), to support the Principal / Head of School on each site. This means that schools with split sites may have Deputy Designated Leads on each site for safeguarding with the DSL having an overview. This person/people will: receive appropriate safeguarding training to equip them to undertake their role; be given sufficient time in the working day to undertake the role; and be able to prioritise safeguarding when necessary.

The Designated Safeguarding Lead may be the Principal if appropriate, but they will be subject to the same training and processes as every other Designated Safeguarding Lead. Schools are therefore advised to give careful consideration before choosing the Principal to act as the Designated Lead for Safeguarding.

The DSL role is guided by two principles:

- The welfare of the child is always paramount.
- Confidentiality should be respected as far as is reasonably possible.

Being guided by these principles the Designated Safeguarding Lead will:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the Principal, make sure that all employees, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Have appropriate training in addition to the basic training that all other employees receive. This includes attending ISP Designated Safeguarding Lead training at least every two years and actively participating in their DSL Regional Networking meetings to ensure they stay updated on safeguarding issues.
- Collate and keep accurate and confidential records of any concerns about children, this should include ensuring robust action plans are implemented at the

- earliest opportunity which are captured in writing and are reviewed regularly.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL/ DSL Team is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All employees have the responsibility to report to the Designated Safeguarding Lead any concern they have about the safety of any child in their care. The Designated Safeguarding Lead's responsibility is to make decisions about what to do next and then to take appropriate action.

If for any reason the **Designated Safeguarding Lead** is unavailable, the **Safeguarding Officers** who have been identified will act in their absence. Additionally, it is the role of the **Designated Safeguarding Lead** to ensure all staff employed including temporary staff and volunteers within the school are aware of the school's internal procedures, to advise staff and to offer support to those requiring this.

#### **It is the role of the Safeguarding Officers (SO's) to:**

- Ensure the protection and welfare of all EC students is paramount;
- Understand the key legislation and guidance that determines our Safeguarding Policy;
- To support the DSL in providing advice, guidance and signposting for staff, parents and most importantly, children and young people;
- Provide support for staff to carry out their safeguarding duties and conduct annual training for all staff;
- To support the DSL in creating and promoting professional networks and partnerships;
- To support the DSL in ensuring that child protection procedures are followed within the school;
- To support the DSL in making appropriate, timely referrals if practicable.

*All employees (including employees of partner organisations and contractors having unsupervised contact with children)*

All employees will:

- Ensure they are familiar with and follow the policy and all other safeguarding related documents e.g., Codes of Conduct, guidance for safe working practice.
- Be subject to safer recruitment processes and checks prior to starting at the school/organisation (unless an action plan/risk assessment is in place to ensure the employee is supervised until all checks are completed, this **must** be authorised by the Group Health and Safety Director before employment begins).
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children, knowing what to do if a child tells them they are being abused, exploited, or neglected.
- Know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and children's social care in their

area. Employees should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

- Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse. Nor should a victim ever be made to feel ashamed for making a report.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL) on the school's concern form..
- Be aware of who the Designated Safeguarding Lead is in the school they are working in and how they can be contacted.
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, employees or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by ISP).
- All employees and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the ISP code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

All employees who have occasional or supervised contact with children (including employees from partner and contracted organisations) will:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- Provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these employees, (appropriate to the role and contact they will have with children), before they commence their role in any ISP school. Where these employees or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the Principal/ Designated Safeguarding Lead to assess this risk, not individual employees or partner organisations themselves.
- Where partners/contractors do not have their own safeguarding or child protection policy, the ISP application notes will be used, and partners/contractors asked to read and follow this. These requirements will be part of any contractual arrangement. • Follow the guidance laid down in this document at all times.
- Be provided with guidance on appropriate safe working practice.

### *Training and support*

ISP will ensure that:

- All employees, volunteers and partner agencies in schools are provided with appropriate general safeguarding training on joining the organisation and then undertake annual refreshers. This training will be available through ISP authorised online courses e.g., Safeguarding Essentials on the Learning Hub or in-house training (following the ISP format within the DSL resources), whichever is appropriate, as well as face-to-face events which schools should secure the budget for each year.
- All employees receive safeguarding and child protection (including online safety)



updates throughout the school year (for example, via email and e-bulletins) to provide them with relevant skills and knowledge to safeguard students effectively.

- Relevant documents are made available in a range of relevant languages.
- Employees and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up to date knowledge and that they access appropriate additional and specialist training (approved by the Group H&S Director). This will be refreshed every two years.
- All employees and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate employees are trained in safe recruitment. This safer recruitment training must be renewed every five years.
- Training for new starters must be complete before any new starter can have unsupervised contact with students.
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counsellors or external agency input. All ISP schools will hold information in relation to local, regional, or national bodies that may be able to offer direct support in these circumstances.

ISP recognise our duty of care to our employees and where employees have been involved in reporting and responding to abuse, we recognise that this can be very difficult to deal with in isolation. ISP will therefore be in a position to offer or broker appropriate external support or counselling for any employee affected by a safeguarding issue. ISP schools will keep a list of

organisations (such as law firms, hospitals, and counsellors, which can be made available to employees on request).

*Please remember unless you are specifically asked to do so, never carry out an investigation about any suspected abuse. This can be highly specialist work and could interfere with a criminal investigation if this were required and appropriate under local laws.*

The Governing Body and school leadership team are responsible for ensuring that the school follows safer recruitment processes explained in the Safer Recruitment Policy.

The role of the Nominated Governor for Safeguarding and Child Protection is to ensure that the school has an effective policy, that the Guidelines are complied with and to support the school in this aspect.

Governors must not be given details relating to individual child protection cases or situations to ensure confidentiality is not breached.

The DSL and the Principal provide an annual report for the governing body detailing any changes to the policy and procedures; training undertaken by all staff and governors, statistics around cases and other relevant issues.



**Designated Safeguarding Lead (DSL)**

Gemma Marar

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**Safeguarding Officers**

Deputy: Carmella Jodrell

Secondary: Thomas Gregory, Asha Wadhwani & Nicola Hamer,

Primary: Andrew Stenhouse, Mat Budd

**Nominated Governor For Safeguarding**

Kam Bhamra (Regional Managing Director for ISP)

**Forms of abuse**

There are a significant number of ways that students may be exposed to risk and danger. All require a response. Abuse is defined as any form of maltreatment of a child. This can manifest itself as direct harm to a child, or by a failure to take action to protect a child who is at risk of, or already suffering harm.

The more commonly referred to types of abuse are:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, or otherwise causing harm to a child.
- Emotional abuse: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, or valued only in so far as they meet the needs of another person.
- Sexual Abuse: involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This form of abuse can involve direct contact activities but also non-contact activities over social media or the internet.
- Neglect: This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development.

While the above are the broad four main areas of potential abuse, abuse itself can take many forms involving one or more of these areas. Organisational and school employees need to be aware of what to look for and what actions to take when concerned about any of these issues (or any other concerns).

**Specific Safeguarding Issues**

There are specific safeguarding issues that can put children at risk of harm (listed below), all areas will be covered in ISP initial training courses and must be included in annual refresher training or during a safeguarding training programme delivered throughout the school year. This helps to ensure all employees are aware of the signs and indicators of these specific issues to enable early intervention support to be put in place within schools or referrals

made to specialist outside agencies.

### *Peer on Peer abuse*

We recognise that children are capable of abusing their peers. Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. This type of peer-on-peer behaviour will not be tolerated. It can happen both inside and outside of school and online. Peer on Peer abuse is most likely to include, but may not be limited to:

- abuse in intimate personal relationships between peers;
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi nudes images and/or videos (sexting); 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;
- upskirting, 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; and 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.

### *Sexual violence and sexual harassment*

This can occur between two children of any age and sex, from primary through to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All employees must maintain an attitude of 'it could happen here'.

Any report of peer-on-peer abuse should be taken seriously it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

All employees should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### *Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)*

Both CSE and CCE are forms of abuse that occur where an individual or group takes

advantage of an imbalance in 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 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.

Staff should note that just because child-on-child abuse is not being reported that does not mean it is not happening. In 2019, the NSPCC reported a 29% increase in children seeking help from Childline due to child-on-child sexual abuse in the UK. In 2021 an Estyn report 'We Don't Tell Our Teachers' found that 61% of female and 29% of male pupils reported having personal experience of child-on-child harassment and 82% of females and 71% of males reported seeing others experience it. It is essential that EC staff are vigilant and report any behaviour that could be perceived as child-on-child abuse; downplaying behaviours or dismissing behaviour and excusing it as "just having a laugh", "part of growing up", "boys will be boys" or "banter" is unacceptable and can lead to a culture of unacceptable behaviours being normalised and an unsafe environment for our students.

### Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Behaviours that fall into the categories of inappropriate, problematic, abusive or violent are referred to as harmful sexual behaviour (HSB). HSB can occur online or in face-to-face contexts or in a combination of the two. When considering whether a behaviour is a HSB, the ages and stages of development of the children should be considered. HSBs are considered to be more harmful if one child is much older than the other, particularly if there is more than two years' difference or if one child is pre-pubescent and the other is not. It is important to note that a younger child can still abuse an older child, especially if they have more power such as the older child has SEND or is smaller in stature.

### Sexting

Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages.

Sexting may also be referred to by students as trading nudes, dirties or pic for pic. There are many reasons why a student may want to send a naked or semi-naked picture, video, or message to someone else:

- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent or has groomed the child to gain their trust. ▪ Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.

Students often do not realise that in creating and sending these images they are potentially

committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting. Employees must report any incident of sexting to the DSL on the school concern form.

## Mental Health

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. School employees, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that employees are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

If an employee has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by capturing the concern on the school's concern form and speaking to the Designated Safeguarding Lead or a deputy.

## Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously.

The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving, or having relationship problems with family or friends. The feelings that these issues bring up can include low self-esteem, low confidence, loneliness, sadness, anger, numbness, and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

There are some common themes that may help employees identify concerns including:

- Physical indicators such as cuts, bruises, burns, bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal.

If an employee suspects that a student is self-harming this must be referred to the Designated Safeguarding Lead who will consider the next steps. It is likely that this will require discussion with the student involved and their Parents/Carer's to agree a course of action or referral to an organisation that may be able to support the student.

Anyone can self harm but those more at risk of self harm are:

- females
- young people
- people with other emotional and mental health issues
- people who have experienced abuse
- people who have been bereaved by suicide

## Suicidal ideation

Suicidal ideation is when a person has thoughts about suicide. They may think about death, think about what it would be like to suicide or have an intention to suicide. They may or may not have thought about how they would suicide; people who have thought about how they would suicide are generally more at risk than those who have not. Suicidal ideation may exist by itself or it may be a symptom of another disorder, such as depression or anxiety. Suicide has historically been seen as a crime in most countries and therefore people have used the phrase "committing suicide". This is unhelpful - criminalising suicide does not prevent it from happening. Consequently, the term "suiciding" should be used instead of "committing suicide".

## Radicalisation and Extremism

Children can be vulnerable to extremist ideology and radicalisation. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, employees should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

ISP values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions within the law of The UAE. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

## *Female Genital Mutilation (FGM)*

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with through the procedures set out in this document i.e., concerns and signs of FGM must be reported to the DSL.

FGM is potentially damaging to children both emotionally and in terms of health issues and is in breach of a number of articles under the UN convention on the rights of the child. It is illegal in 26 countries across Africa and the Middle East, as well as in 33 other countries including the United States of America and the UK. We recognise that this is cultural practice in some countries and not always seen as abusive. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the student's best interests.

## *Forced marriages (FM)*

A Forced marriage (FM) is a marriage conducted without the valid consent of one or both

parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g., threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g., if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

In 2013, the first United Nations Human Rights Council also adopted a resolution against child and forced marriages. This resolution recognises child, early, and forced marriage as involving violations of human rights which "prevents individuals from living their lives free from all forms of violence and has adverse consequences on the enjoyment of human rights, such as the right to education."

As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests. However, the school procedures must be followed in the same way as for any other safeguarding or child protection matter.

### **Children missing from education**

All employees should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Employees should be aware of their school's attendance policy and unauthorised absence and children missing from education procedures.

### *Domestic Abuse*

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'.

### *Modern Slavery*

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

### *Fabricated and Induced illness*

In fabricated illness the perpetrator (usually a parent or carer) does not directly harm the child but reports to doctors a clinical story which is eventually established to be fabricated. Whereas with induced illness the perpetrator inflicts direct (hands on) harm to the child. This can range from trivial injuries such as pricking the child to add blood to urine, through



to suffocation. All schools must have a robust attendance policy to aid the monitoring of child illnesses. When a parent reports that a child has an illness which requires a health plan the school must work in collaboration with the medical practitioner treating the child.

**Note:**

*The above is not an exhaustive list of all the potential forms of abuse which employees may have to deal with on occasions. For information, please see "Keeping Children Safe in Education" 2021. This is a UK publication, but the types of abuse discussed are valid and can apply to any country around the world. All employees are required to read and acknowledge receipt of Part 1 of the document.*

## **Preventative measures and linked policies for safeguarding children**

### *E-safety*

The English College also has an additional Digital Safeguarding Policy due to the level of importance we place on this. Due to the growth in electronic media in everyday life and an ever-developing variety of devices create additional risks for children. Risks and dangers of being online include:

- Inappropriate content.
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or running up debts.
- Cyber Bullying.

Cyber bullying is an increasingly common form of bullying behaviour and is most often related to social networks and mobile phones.

ISP believes the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. Each school's curriculum includes appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies, and language they need to take appropriate action.

### *Mobile phone and Camera Images for Social Media and Marketing*

Please refer to the Digital Device Policy 2025-26.

### *Anti-Bullying*

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Employees at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve either face-to-face or the misuse of social media or technology. Each school should have its own policy and approach to restorative practices and all our schools will demonstrate a commitment to help resolve specific issues. The English College also has an Anti-Bullying Policy for your reference.

### *Children with Special Educational Needs or Disabilities*

All employees should recognise that children with Special Educational Needs and Disabilities can mean additional safeguarding challenges. Depending on the nature of a



child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it is easy to assume that a child's mood, behaviour, or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted on by behaviours such as bullying but they may not show any outward signs. Communication difficulties can make it very difficult for a child to indicate what's happening and, therefore, may make it very difficult to overcome any such barrier. Employees should be extra vigilant and report all concerns, avoiding making assumptions about the causes of any injury or behaviour. ISP has a separate Special Needs Policy Statement.

### *Physical Intervention/restraint*

Please note, The English College has an additional policy named Physical Handling Policy for additional guidance. As there may be times when adults in schools, in the course of their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation. UK government guidance has been issued in relation to the use of reasonable force and can be used as best practice advice.

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>.

The Principal / Head of School should require any adult involved in any such incident to report the matter to him/her as soon as possible. The employee is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified where possible.

Where intervention has been required a senior employee should be asked to debrief the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept, and the student checked for any injuries.

Parents/carers should always be informed when an intervention has been necessary.

### *Safer Recruitment and Selection*

We will do all we can to ensure that all those working with children in our regions and schools and across our whole group are suitable people. In order to do this, all employees who will work in an unsupervised capacity with children or young people will be recruited using safer recruitment procedures. (See ISP's safer recruitment policy and background checks policy).

Safer Recruitment involves scrutinising applicants through the interview process and application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks.

At least one member of every interview panel at both the organisational and school level, who are interviewing for a post or posts that may have unsupervised contact with children, will have undertaken safer recruitment training. All schools will keep a central record of all the recruitment checks undertaken on all employees. This record will include details for each employee or volunteer of:

- Police background checks carried out ensuring the date completed, and number of the check is recorded.

- The relevant references received with dates obtained and details of who has checked that they comply to ISP Safer Recruitment policy.
- Details of the safeguarding training carried out with the date of completion.

Where information is disclosed as part of the criminal records checking process, whether this is information about cautions, convictions or soft information, any disclosure will lead to a risk assessment being completed prior to appointment. This risk assessment will be signed off by the Principal, Group Health and Safety Director, Regional HR Manager and Regional managing Director.

### **Allegations against employees and volunteers**

Please note, The English College has an additional policy named Whistleblowing Policy and a Low Level Concerns policy for additional guidance. An allegation can be made against an employee or volunteer at any point. It is important that any such allegations are treated seriously, and appropriate procedures followed.

An allegation is different to a complaint and can be defined as follows:

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal offense against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.

In the event of an allegation being made against an employee (or a volunteer helper), it will always be investigated by the Principal / Head of School unless a criminal act has been committed, in which case the matter should be referred to the local authorities where appropriate. In all cases (criminal or not) the Principal and Group Head of Safeguarding must be informed as soon as possible and certainly within 48 hours. In the case of the allegation being against the Principal or school SLT, the Divisional CEO, Divisional CFO, Regional Managing Director, Group Director of Health & Safety, the Group Head of Safeguarding and the Group Head of People Operations should be informed.

No action to investigate the concern should be taken before consultation with the Group Head of Safeguarding, and agreement reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are needed, then the employee may be suspended. Suspension is a neutral act, and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the Group Head of Safeguarding before acting and will comply with national and locally agreed guidance on these matters. Each school is expected to have researched and mapped the local arrangements and guidance for dealing with allegations.

The Group Head of Safeguarding will update and keep the Group Director of Health & Safety informed of any developments. In cases of allegations against a Principal or school SLT member, it is expected that the Divisional CEO will also update the Group CEO, CFO and Chief Learning and Innovation Officer.

Employees will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the code of conduct for employees and volunteers and the guidance for safe working practice, this includes school Intimate Care policies.

### *Whistleblowing*

We recognise that we cannot expect children to raise concerns in an environment where adults fail to do so. All employees and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are considered to be a protected disclosure and, even if proven to be unfounded, no action will be taken against the whistle-blower.

Malicious whistleblowing, however, will be seen as a potential disciplinary matter. ISP has a separate Whistleblowing Policy which must be referred to and fully referenced in the event of such an incident.

## **Procedures**

### *Adults concerned about a Student*

If an employee suspects that any student in their care may be a victim of abuse or is at risk of abuse or other form of harm, they should not try to investigate, and instead should inform the Designated Safeguarding Lead (DSL) about their concerns as soon as possible.

Employees must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm. In many cases a student will not make a direct disclosure, but employees will be concerned because of a physical or emotional indicator. In these circumstances employees should still use the record of concern form and the body map (if appropriate), to make a report to the Designated Safeguarding Lead.

Where any student makes any form of direct disclosure, the guidelines under the heading 'Dealing with Disclosure' below should be followed.

### *Disclosure, Reporting and Further Action*

If a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Employees should always give this as a health warning before meeting with the child.

The following guidance is based on five key practices for all employees:

#### *Receive*

Where possible, always stop and listen to a child who wishes to speak in confidence. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say, "I can't stop now but come and see me in my office at...". Where possible during any disclosure try to listen, allow silences, and try not to show shock or disbelief.

#### *Reassure*

Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.

#### *React*

React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as... "is there anything else you need to tell me?".

Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.

### *Record*

Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date, and place as well (see the record of concern form).

### *Report*

Where a child makes any disclosure, or where you have concerns for any reason, it is very important that the procedures outlined in this document are followed. A full written/typed account of the concern (ideally using the record of concern form) should be passed to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed body map.

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal / Head of School in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then consider and where necessary, consult on the information available. It is the role of the Designated Safeguarding Lead to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

ISP recognises the diverse and complex local contexts our schools operate in. Therefore, the following principles are taken into account when following the framework and procedure for disclosure, reporting and further action:

As International Schools we:

- often reside in cities and countries that offer little external support.
- recognise the limitations in the areas of child protection.
- need to assess the quality and skills of counsellors and other support staff in dealing with children who have suffered harm or self-harm, in order to determine the boundaries of their work.
- need to act in accordance with local legislation as well as the principles and practices outlined in this policy.

### **Local Safeguarding Agencies/Advice**

The school recognises its responsibility under Article 42 of Federal Law number 3, that *"Every person shall notify the child protection specialist or child protection units in case of anything that threatens the child's physical, psychological, moral or mental integrity or health. The notification shall be mandatory for the educators, physicians, social specialists or others entrusted with the protection, care or education of the child."*

The DSL or safeguarding officers will refer any safeguarding or child protection concerns that threaten the student's physical, psychological, moral or mental integrity or health to

the relevant authorities. This will be determined by the type of concern, but can be referred to the Ministry of Education, the Ministry of Interior or the Community Development Authority. Referrals can also be made directly to the police.

Accurate records of disclosures made will be maintained on MyConcern and followed up by the referrer.

For any safeguarding or child protection concern that involves potential legal consequences, for example the behaviour is deemed illegal in the UAE, a referral will always be made to both the KHDA and the police.

When a referral is made to an outside agency, it will be made by the DSL, using the outside agency referral form [Outside agency referral form 2023 - Google Docs](#)

The school recognises its responsibility to ensure that the student receives ongoing support within school, even after a referral to an external agency has been made.

## **Record Keeping and Confidentiality**

### *Record Keeping*

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept together securely and separately from the child's general school records. The information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it should not be shared more widely than that.

- Child protection records must be recorded on MyConcern, all staff have access to making a referral on MyConcern and have been trained on the matter each year. Files and documents must also be uploaded onto MyConcern.
- MyConcern files can be fully accessed by the DSL and WSLT.
- Records of any child disclosure should be clear and factual
- Child protection records are separate to a child's general files.
- If an employee raises a concern about the welfare or well-being of a child – this should be recorded on MyConcern .
- If information is forwarded to the school by a previous school attended by the child this must be recorded on MyConcern.
- If the school is alerted by another agency of child protection concerns about that child this must be recorded on MyConcern.
- Employees should make a typed account of any concern they have regarding the welfare or well-being of a child, using the schools platform MyConcern. This record should be submitted as soon as possible to the Designated Safeguarding Lead. Concerns, which initially seem trivial, may turn out to be vital pieces of information later. So, it is important to give as much detail as possible. A concern raised may not progress further than a conversation with the Designated Safeguarding Lead but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from a file for any reason, a note is required by MyConcern indicating who, why and when.
- The platform used is compliant with the following pieces of information being included

- a) A record of the child's details: name, date of birth / age or year group,
- b) Date and time of the event/concern.
- c) The nature of the concern raised.
- d) The action taken and by whom: Name and position of the person making the record.

In the case of disclosure, remember the record you make should include:

- As full an account as possible of what the child said (in their own words).
- An account of the questions put to the child.
- Time and place of disclosure.
- Who was present at the time of the disclosure.
- The demeanour of the child, where the child was taken and where returned to at the end of the disclosure.

### *Confidentiality*

Schools should regard all information relating to individual Safeguarding/child protection issues as confidential and should treat it accordingly. Information should be passed on to appropriate persons only at the discretion of the Principal/Designated Safeguarding Lead and this should always be based on the need to know.

All records relating to child protection should be secured appropriately.

### **Auditing, Reporting and Review**

Elements of safeguarding practice in schools will be audited during the Group Safeguarding Teams visits it will also be included in the annual safety audit and will also be reviewed when visited by Group Health and Safety.

This policy will be reviewed on a regular basis and at least every 2 years by the Group Head of Safeguarding, Group Health and Safety Director, Group Head of People Operations and ExCo.

### **Responding to a Safeguarding Referral at EC**

When responding to a safeguarding referral about a child, EC staff will follow our responding to a referral at EC flowchart.

## **APPENDICES** (Relevant links to other policies or documents)

[Responding to a referral at EC flowchart.](#)

[Digital Device Policy](#)

## **POLICY REVIEW HISTORY:**

This policy will be monitored, evaluated and reviewed by the Senior Leadership Team, approved by the Principal

Historical Record				
Revision No.	Date	Brief Description of Change	Approved by:	Next Review:
0	16.08.2024	New Policy	WSLT	June 2025
1	9.06.25	Name changes and added flow chart	WSLT	June 2026
2				
3				



## Appendix

### Flowchart

