



Safeguarding and Child Protection Policy

WHOLE SCHOOL

Driven by our values



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SAFEGUARDING

1. SAFEGUARDING - INTRODUCTION

- 1.1. Jumeirah English Speaking School ('JESS' and/or the 'School') recognises its responsibility to safeguard and promote the welfare of the children and young people in their care. In formulating these policies and procedures, the School has taken due regard to the most recent Child Protection legislation in the UAE and the UK; and has consulted with the Dubai Community Development Authority Child Protection Department.
- 1.2. All students have the right to protection, regardless of age, gender, ethnicity, disability, sexuality or beliefs. The School recognises its legal duty to work with and in accordance with locally agreed inter-agency procedures. This responsibility is underpinned by the following aims:
 - 1.2.1. To protect children from harm (maltreatment);
 - 1.2.2. To prevent impairment of children's health and development;
 - 1.2.3. To ensure children grow up in circumstances consistent with the provision of safe and effective care;
 - 1.2.4. To take action to enable all children to have the best outcomes.

2. DEFINITION OF SAFEGUARDING AND CHILD PROTECTION

For the purpose of safeguarding and child protection at JESS a child is anyone under the age of 18 years old.

2.1. Safeguarding

- 2.1.1. Keeping Children Safe in Education 2025 defines safeguarding and promoting the welfare of children as:
 - a) providing help and support to meet the needs of children as soon as problems emerge;
 - b) protecting children from maltreatment, whether that is within or outside the home, including online;
 - c) preventing the impairment of children's mental and physical health or development;
 - d) ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
 - e) taking action to enable all children to have the best outcomes.
- 2.1.2. Safeguarding is wide in scope and takes into consideration keeping children safe in a range of activities.

2.2. Child Protection

- 2.2.1. Child Protection, however, is defined in Working Together to Safeguard Children (2018) as:

The activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

- 2.2.2. Child protection is one very important aspect of safeguarding. The term 'significant harm' was defined by *The Children Act 1989* as the threshold that justifies compulsory intervention in family life in the best interests of children, to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.
- 2.2.3. Whilst there are no absolute criteria on which to rely when judging what constitutes significant harm, the following factors are used by the **DSL** and the **DSOs** in assessing any case:
 - a) The degree and extent of physical harm;
 - b) The duration and frequency of abuse and neglect;
 - c) The extent of premeditation;
 - d) The presence and degree of threat, coercion, sadism.
- 2.2.4. Sometimes, a single traumatic event may constitute significant harm (e.g. a violent assault, suffocation or poisoning), but more often, it is the consequence of a compilation of significant events (both acute and long-standing) which interrupt, change or damage the child's physical and psychological development.
- 2.2.5. Staff should be clear that they must not make judgements or carry out investigations. The information in these procedures must be read in the context of the specific advice offered herein, in terms of how to act in cases where safeguarding and/or child protection issues are suspected.

3. LEGISLATION AND GUIDANCE

- 3.1. Legislation around child protection in the UAE is underpinned by the United Nations Convention on the Rights of the Child (UNCRC).
- 3.2. For the purpose of this Policy reference has been made to:
 - a) United Nations Convention on the Rights of the Child (UNCRC)
 - b) National Child Protection Policy in Educational Institutions in United Arab Emirates (2022)
 - c) UAE Federal Law No. (3) of 2016 regarding the Child Rights Law (Wadeema)
 - d) UAE Cabinet Resolution No. (52) of 2018 regarding implementing regulation of Federal Law No. (3) of 2016 regarding the child rights
 - e) Keeping Children Safe in Education (2024)
 - f) Working Together to Safeguard Children (2018)

4. PREVENTION

- 4.1. By ensuring all reasonable measures are taken to minimise the risk of harm to children's welfare, including:
 - 4.1.1. Appointing an overall Designated Safeguarding Lead (**DSL**), a Designated Safeguarding Officer (**DSO**), and Deputy Designated Safeguarding Officers (**DDSO**'s) in each School.
 - 4.1.2. Ensuring safer recruitment training is completed and best practice is followed as per the Safer Recruitment and Vetting Policy.
 - 4.1.3. Ensuring through training that all staff are aware of and committed to the Policy and Procedures for Safeguarding and Child Protection as required by the National Child Protection Policy in Educational Institutions in the United Arab Emirates (2022).
 - 4.1.4. Adhering to a zero-tolerance approach to abuse and ensuring staff are clear about the important role they play in preventing it.
 - 4.1.5. Adopting a supportive, open and accepting attitude towards children so that they feel valued, listened to and respected.
 - 4.1.6. Establishing a positive and secure environment, in which children can learn and develop.
 - 4.1.7. Including in the curriculum, activities and opportunities for PSHE which equip students with the skills they need to stay safe from abuse and which will help them develop realistic attitudes to the responsibilities of adult life.
 - 4.1.8. Providing pastoral support that is accessible and available to all students and ensuring that students know to whom they can talk about their concerns both within and beyond school.
 - 4.1.9. Maintaining ongoing quality assurance and robust governance of safeguarding and child protection at all times.

5. PROTECTION

- 5.1. By ensuring all appropriate actions are taken to address concerns about the welfare of a child or children, working with agreed local policies and procedures in full partnership with other local external agencies, including KHDA, the Community Development Authority Child Protection Department (CDA) and, where necessary, the Police. This may include:
 - 5.1.1. Sharing information about concerns with agencies that need to know and involving children and their parents/carers appropriately.
 - 5.1.2. Monitoring children known or thought to be at risk from harm and contributing to assessments of need and support packages for those children.
 - 5.1.3. In the cases of domestic abuse, the School will refer cases to the KHDA and CDA, however, the Dubai Child Protection Centre runs a safe refuge for girls (and boys under the age of 12). The Dubai Child Protection Centre Helpline is 800-988 (24 hour 7 days a week).

6. ROLES AND RESPONSIBILITIES

- 6.1. Everyone at JESS has a duty to safeguarding children at all times. Staff must maintain an attitude of 'it could happen here' where safeguarding is concerned. When

concerned about the welfare of a student, staff must always act in the best interests of the student. Everyone has responsibility for ensuring the welfare of students at JESS.

6.2. It is important that staff show professional curiosity at all times on matters relating to safeguarding. All concerns no matter how small must be reported to the safeguarding team.

6.3. JESS Safeguarding Personnel

6.3.1. The table below highlights our safeguarding structure at JESS.

Shane O'Brien Director			
	Secondary	Ranches Primary	Jumeirah Primary
Designated Senior Lead (DSL)	Stephen Green Headteacher	Jose Diez Headteacher	Suzanne Carrigan Interim Headteacher
Designated Safeguarding Officer (DSO)	Andrew Sargeant Deputy Headteacher	Ross O'Donnell Deputy Headteacher	Carol Foster Deputy Headteacher
Deputy Designated Safeguarding Officer (DDSO)	Bryony Lynch Deputy Headteacher	Liz Morris Deputy Headteacher	Samantha O'Brien Assistant Headteacher
	David Annand Pastoral Lead KS3	Rachael Abbas Assistant Headteacher	Jason Slater Assistant Headteacher
	Emma Newton Pastoral Lead KS4	Carly Gulliver Inclusion Teacher	
	Kosta Lekanides Deputy Headteacher		
Health and Welfare Coordinators		Lamya Kamal School Doctor	Paula McCourt School Nurse
		Zahra Ali Lead School Counsellor	
Safeguarding Governor	Dr Sapna Verma (along with the Director forms the JESS Safeguarding Board)		

6.3.2. Although there is a dedicated safeguarding team as highlighted above everyone in the JESS community has a duty to safeguarding children as prescribed below.

6.4. All Staff

6.4.1. All staff will:

- Make sure they have read and understood all policies and procedures around safeguarding child protection;
- Identify and know how to contact the safeguarding team at JESS;
- Undertaken the appropriate level of training for their role;

- d) Ensure they have read and understood relevant UAE statutory guidance and legislation;
- e) Uphold professional standards at all time;
- f) Report any concerns they have in relation to a child or adult at JESS immediately.

6.4.2. Staff should know that children may not feel ready to, or know how to, tell someone that they are being abused, exploited or neglected, or they may not recognise their experience as being harmful.

6.5. Designated Safeguarding Leads

6.5.1. The Designated Safeguarding Lead (**DSL**) for Child Protection in each School is:

Name	Contact Details
Suzanne Carrigan – Interim Headteacher Jumeirah	scarrigan@jess.sch.ae
Jose Diez – Headteacher Primary	jdiez@jess.sch.ae
Stephen Green – Headteacher Secondary	sgreen@jess.sch.ae

6.5.2. It is the expectation that any referrals to external Child Protection Services will be discussed first with the relevant school's **DSL**. In the event that the **DSL** is not available, then it should be escalated to another school **DSL**. The communication of the referral may then be delegated to **DSOs** as the primary communicator. Any external referral will be brought to the attention of, and approved by, the **Director**.

6.5.3. The School, through the **DSL**, operates:

- a) To ensure that the school operates within the UAE legislative framework and recommended guidance, in accordance with locally agreed inter-agency procedures.
- b) To develop effective working relationships with other agencies and services.
- c) To decide upon the appropriate level of response to specific concerns about a child, referring to local guidance on thresholds and obtaining information on borderline cases. Responses may include discussions with parents, assessment under the Common Assessment Framework (CAF) or referral to relevant external agencies.
- d) To liaise and work with KHDA and CDA.
- e) To ensure that accurate safeguarding records relating to individual children are kept separate from the academic file with the **DSL**, marked 'Strictly Confidential' and are passed on securely should the child transfer to a new educational provider.
- f) To submit reports and ensure the school's attendance at child protection conferences.

- g) To contribute to decision making and delivery of actions planned to safeguard the child.
- h) To ensure that the school monitors effectively children about whom there are concerns.
- i) To notify external agencies of any serious incident or injury (or death), of any child while in the care of the school, and to act upon any advice from those agencies.
- j) To ensure that the members of The JESS Safeguarding Board are kept fully informed of any concerns.

6.6. Designated Safeguarding Officers

- 6.6.1. There is also a Designated Senior Officer (**DSO**) who takes responsibility for child protection matters in each school within JESS. In the event of the absence of any **DSO** another **DSO** within the organisation will be empowered to deal with matters in the relevant school.
- 6.6.2. All referrals and paperwork will be held by the **DSO** or designated **DDSO** for each school.
- 6.6.3. The **DSOs** at JESS are:

Name	Contact Details
Carol Foster - Deputy Headteacher Jumeirah	cfoster@jess.sch.ae
Ross O'Donnell - Deputy Headteacher Primary	rodonnell@jess.sch.ae
Andrew Sargeant - Deputy Headteacher Secondary	asargeant@jess.sch.ae

6.7. Deputy Designated Safeguarding Officers

- 6.7.1. In addition to the **DSO** there are trained **DDSOs** at JESS who actively support the role of the **DSL** and **DSOs**.
- 6.7.2. In the event the **DSOs** were not available the **DDSOs** have the knowledge and understanding of safeguarding at JESS to act accordingly.
- 6.7.3. The **DDSOs** are trained to an advanced safeguarding level and support on wider safeguarding embedding at JESS.
- 6.7.4. The **DDSOs** at JESS are:

Jumeirah	Contact Details
Suzanna Carrigan - Deputy Headteacher	scarrigan@jess.sch.ae
Samantha O'Brien - Assistant Headteacher	samobrien@jess.sch.ae
Jason Slater - Assistant Headteacher	jslater@jess.sch.ae

Primary	Contact Details
Liz Morris - Deputy Headteacher	lmorris@jess.sch.ae
Rachael Abbas - Assistant Headteacher	rabbas@jess.sch.ae
Carly Gulliver - Inclusion Teacher	cgulliver@jess.sch.ae
Secondary	Contact Details
Bryony Lynch - Deputy Headteacher (KS3)	blynch@jess.sch.ae
David Annand - Pastoral Lead (KS3)	dannand@jess.sch.ae
Emma Newton - Pastoral Lead (KS4)	enewton@jess.sch.ae
Kosta Lekanides – Deputy Headteacher (KS5)	kleanides@jess.sch.ae

6.8. The Director

6.8.1. The **Director** will provide appropriate support and challenge to the **DSL**. The **Director** will ensure that the **DSL** is effective in their role in keeping children at JESS safe.

6.8.2. The **Director** will, but not limited to:

- a) provide the **DSL** with the appropriate level of time and funding in order to support them in fulfilling their role;
- b) offer day-to-day support and guidance as required;
- c) oversee the embedding of safeguarding culture into JESS by ensuring all staff are trained and aware of policy and procedure;
- d) ensure the appropriate level of cover is provide in the absence of the **DSL**;
- e) encourage the promotion of student voice in safeguarding;
- f) work with the governing body to ensure safeguarding is communicated appropriately and in a timely manner;
- g) liaise with the relevant authorities on all matter relating to the safety and wellbeing of students at JESS;
- h) ensure recruitment procedures are followed and maintained;
- i) contribute to the wider quality assurance and strategy of safeguarding.

6.9. Governance of Safeguarding

6.9.1. The JESS Safeguarding Board shall consist of:

- a) The **Director**
- b) The Board Member Responsible for Safeguarding, and in their absence due to conflict, the Deputy Safeguarding Board Member.

- 6.9.2. The Board of Governors appoints a designated Board Member Responsible for Safeguarding to take specific responsibility for this area but recognises that the Safeguarding duties remain the responsibility of the whole Board of Governors.
- 6.9.3. The Board Members Responsible for Safeguarding are:

Name	Contact Details
Dr Sapna Verma – Safeguarding Board Member	sverma@jess.sch.ae
Alison Dawson – Deputy Safeguarding Board Member	adawson@jess.sch.ae

- 6.9.4. The Board of Governors will undertake annual safeguarding and child protection training contextual for safeguarding governance which will include safer recruitment. Safeguarding will be captured at every Board and Committee meeting through minutes and reports.
- 6.9.5. The role of the Safeguarding Board Members include, but is not limited to:
- Ensuring that the School has Policies and Procedures for Safeguarding and Child Protection, known to all staff and governors, which are in accordance with inter-agency procedures and that these are made available to all parents.
 - Working with the **DSLs** and the JESS Safeguarding Board to carry out an annual review and audit to judge the efficiency with which the procedures have been implemented and to ensure that any deficiencies are remedied immediately.
- 6.9.6. The Board of Governors reviews its Safeguarding Policy and Child Protection Procedures annually but will review sooner if practice or statutory changes requires so.
- 6.9.7. The Board of Governors actively discusses the procedures and their implementation regularly at their meetings.

7. TRAINING AND SUPPORT

- 7.1. The School, through the **DSL** undertakes:
- 7.1.1. To ensure that all **DSOs** and the **DDSOs** receive Designated Safeguarding Leader Training and refresher training at two yearly intervals. This training is in child-protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children.
 - 7.1.2. To ensure that **all staff who work with children** receive appropriate safeguarding and child protection training to equip them to carry out their responsibilities for safeguarding children effectively and that this is kept up to date by annual refresher training.
 - 7.1.3. To ensure that new staff receive a safeguarding children induction prior to working with children.
 - 7.1.4. To ensure that temporary staff and volunteers are made aware of the school's arrangements for safeguarding children prior to working with children, including

provision of this document, the code of conduct for staff, the name and contact details of the **DSLs** and **DSOs**.

- 7.1.5. To ensure sufficient resources and time are allocated to enable the **DSOs** and other staff to discharge their responsibilities, including taking part in strategy discussion and other inter-agency meetings, and contributing to the assessment of children.
- 7.1.6. To ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice regarding safeguarding children, and to treat such concerns sensitively and effectively in a timely manner in accordance with the school's Whistle Blowing Policy.
- 7.1.7. To hold, and to be conversant with the School's Child Protection procedures.
- 7.1.8. To maintain an up-to-date central database (Online Single Central Register) detailing dates of training for all JESS staff, the level of training received and the dates of when refresher training is required.
- 7.2. The School will appoint a Safeguarding Trainer (Level 3 trained) for both the Jumeirah and Arabian Ranches campuses, so that there can be effective and timely training of new staff and refresher training of existing staff (when required).
- 7.3. The below table indicate the JESS training schedule for safeguarding and child protection:

Role	Level of Training	Frequency of Refresher Training
DSL	Designated Safeguarding Leadership Training	Every 2 Years
DSO	Designated Safeguarding Leadership Training	Every 2 Years
DDSO	Designated Safeguarding Leadership Training	Every 2 Years
All JESS Employees	Safeguarding Training (Internal and Online)	Annually
All adults who have regular (> 3 times in month) contact with children	Safeguarding Training (Internal and Online)	Annually
Contractors working at JESS (e.g. Swimming and Sports Coaches)	Safeguarding Training (Internal and Online)	Annually
Regular outside Users who hire JESS to run activities involving Children	Safeguarding Training (Internal and Online)	Annually
Board Member(s) Responsible for Safeguarding (Dr Sapna Verma) Deputy Safeguarding Board Member (Alison Dawson)	Designated Safeguarding Leadership Training	Every 2 years
The Director	Designated Safeguarding Leadership Training	Every 2 Years
The Board of Governors	Safeguarding Training (Internal and Online)	Annually

8. SIGNS AND SYMPTOMS OF ABUSE AND NEGLECT

- 8.1. Abuse and neglect are forms of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. The definition of child abuse is wide and covers all forms of cruelty that children may endure in their lives.
- 8.2. Children may be abused in a family or an institutional or community setting; by those known to them, or more rarely, by a stranger. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

8.3. Types of Child Abuse

The following definitions have been taken directly from the National Child Protection Policy in Educational Institutions in United Arab Emirates (2022):

- 8.3.1. **Physical abuse** means causing physical harm or injury to the child or failing to or being unwilling to prevent physical harm to the child.
- 8.3.2. **Sexual abuse** means forcing, attracting or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It includes the practices that do not involve any physical contact, such as engaging children in watching or producing pornographic material, watching sexual intercourses or encouraging the children to act in a sexually inappropriate way.
- 8.3.3. **Psychological abuse** means dealing abusively with the child's psychological state, causing severe and or permanent harm and thus affecting the child's psychological growth and development.
- 8.3.4. **Neglect** means the failure of parents or caregivers to take the necessary measures to protect the child's life, and to provide physical, psychological, mental and moral safety against danger, and or to protect the rights of the child.

It is important to note that JESS consider affluent neglect within the definition of neglect as above.

8.4. Signs and Symptoms

- 8.4.1. Staff should remember that these symptoms are 'possible' signs and do not automatically mean that abuse has or is taking place; there may be other explanations. In most cases it will be appropriate for staff to discuss observations with the Head of Year to help to decide whether it should be referred to the Designated Senior Person (The Headteacher of the relevant school).

8.4.2. Physical Abuse

Staff should be aware of the following signs that may indicate abuse. Possible physical signs may include:

- a) unexplained or repeated injuries;
- b) bruises in odd places (non-bony areas);
- c) marks of slapping, biting, gripping etc;
- d) cuts in odd places / evidence of deliberate self-harm;

- e) poor hygiene;
- f) marked weight fluctuations.

If an injury is considered to be of such severity that the child requires immediate medical treatment (i.e. Emergency Department) that help should be sought in accordance with local procedures and the parents (as appropriate) informed at once.

8.4.3. Behavioural Signs

Possible behavioural signs may include:

- a) any comments children make which give cause for concern;
- b) concerns about domestic violence;
- c) a marked change in behaviour;
- d) eating disorders;
- e) excessively affectionate or sexual behaviour;
- f) emotional isolation;
- g) school refusal and significant school absence;
- h) an inability to sleep;
- i) theft;
- j) (new) habits such as thumb-sucking;
- k) 'frozen watchfulness';
- l) any deterioration in a child's general wellbeing;
- m) reluctance to participate in P.E. games or swimming.

9. REPORTING PROCEDURES

9.1. Concerns

9.1.1. Staff who notice injuries that appear to be non-accidental, a significant change in a student's behaviour, or who are told anything significant related to child protection by another student, must report their concerns immediately to the relevant **DSL** or **DSO**.

9.1.2. **These concerns must be recorded on Wellbeing Manager (iSAMS).**

9.2. Disclosures

9.2.1. If a child discloses that he or she has been abused in some way, the member of staff/volunteer should:

- a) Listen to what is being said without displaying shock or disbelief;
- b) Accept what is being said;
- c) Allow the child to talk freely;

- d) Reassure the child, but not make promises which it might not be possible to keep;
- e) Not promise confidentiality – it might be necessary to refer to the relevant **DSL** or the **DSO**.
- f) Reassure that what has happened is not the child's fault;
- g) Reiterate the point that it was the right thing to tell;
- h) Only ask questions when necessary for the purpose of clarification;
- i) Not criticise the alleged perpetrator;
- j) Explain what has to be done next and who has to be told;
- k) Document the information on Wellbeing Manager and pass this to the relevant **DSL** or **DSO** without delay. Where the disclosure implicates a member of staff, the staff concerns form must be completed and handed to the **DSL** and staff should adhere to the staff concerns section of this policy.

9.2.2. School staff who do not hold a position of Safeguarding responsibility are not to investigate concerns nor decide whether or not a child has been abused. Their duty is to recognize a concern and pass it on to the **DSL** or **DSO** who are responsible for fact finding or information gathering.

9.2.3. See summary sheet for staff in Appendix 2: Guidance on how to report to a child wanting to talk about abuse.

9.3. **Written Records**

9.3.1. The member of staff or visitor to School (e.g. parent, guest, contractor) to whom a disclosure has been made or who has a concern should:

- a) Record the details of the disclosure verbatim in the words of the child (not summarised) on Wellbeing Manager (in iSAMS) at the earliest opportunity, even if this means delaying other elements of their role in school.
- b) Record the date, time, place and any noticeable words or non-verbal behaviour used/demonstrated by the child.
- c) Where necessary draw a diagram to indicate the position of any injuries and hand this in with the form or upload to documents in Wellbeing Manager.
- d) Record verbatim statements and observations rather than personal interpretations or assumptions.
- e) For external hires, a digital forms is available in addition to the Child Protection Record of Concern Form and this will be emailed to them as part of their safeguarding training and induction.

9.3.2. **All records need to be logged promptly and provisional notes must be destroyed securely.**

9.4. Tiered System at JESS

- 9.4.1. Safeguarding concerns will be allocated to a tier in the JESS Safeguarding Tiering System (refer to Appendix 1). These tiers are moderated and reviewed termly by the JESS Safeguarding Board and **DSOs**.
- 9.4.2. **DSO** and **DDSO**'s will work with relevant people to attempt to examine and improve the situation with relevant parties (e.g. counsellor, pastoral leads, family). It is hoped that at this level an outcome will be achieved within school.
- 9.4.3. Serious cases that are categorized as Tier 1 (or have been escalated to Tier 1 because progress or an outcome has not been achieved) will be taken by the **DSL** to the **Director**. Next steps will be approved or agreed at that level. This may result in further work within the school to achieve an outcome, or if deemed necessary the consideration of liaison with or referral to external agencies and referral to the JESS Safeguarding Board.
- 9.4.4. **If, at any point, there is a risk of immediate serious harm to a child the case will be immediately escalated to Tier 1.**
- 9.4.5. According to Article (42) from Federal Law No. (3) of 2016 concerning Child Rights Law 'Wadeema' – Every person shall report to the child protection specialist or child protection units in case of threat to the child's safety or his physical, psychological, moral or mental status. Reporting shall be obligatory by teachers, physicians, specialists and social workers or whoever assigned for child protection, care or education.
- 9.4.6. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

9.5. Tiers Three and Two Action

- 9.5.1. The **DSO** or **DDSO** will:
 - a) Meet with the child, following the guidance on questioning students.
 - b) Take steps to protect the informing student as appropriate. Ensure that the student is aware that confidentiality cannot be guaranteed but that the matter will be disclosed only to people who need to know, and the child will know who these people are. If the allegation involves abuse by other students, it is likely that the students against whom the allegation has been made will need to be told.
 - c) Meet with any students against whom an allegation has been made and follow the interview protocols as outlined above to develop an understanding of what has happened and to provide information to support these students too, in terms of further actions and involvement of others.
 - d) If the allegation is against a parent/adult and the child may be considered at risk of immediate harm the **DSO** will discuss next steps with the **DSL** to decide whether the concern will be elevated to Tier 1 status.
 - e) The **DSO** in consultation with the **DDSO** will decide who else needs to be made aware of the allegation (e.g. parents, students, counsellor).
 - f) If appropriate, the **DSO** in consultation with the **DDSO** may seek a medical examination or treatment for the student with the Health Office.

- g) The **DSO** and/or **DDSO** will work as a team around the child with other key staff/students/parents/counsellors to work towards a positive outcome.
- h) All records and notes will be filed securely by the **DSO** or **DDSO** who has this responsibility within each school. If a new case it will be allocated a Tier on the school system.

9.6. Tier One Action

- 9.6.1. The **DSL** will decide in consultation with the **DSO** upon the next steps, this could include, but is not limited to:
 - a) implementing and communicating an immediate vulnerable student risk assessment.
 - b) Identifying internal support from the school or home and school working in partnership.
 - c) Ensuring referral to external agencies for support or advice. The **DSL** will report any referral to the Board member with responsibility for safeguarding.
- 9.6.2. Further developments in Tier 1 cases that require ongoing significant decision making will be discussed with the **Safeguarding Governor** or the **Director**.
- 9.6.3. The JESS Safeguarding Team (**DSL**, **DSOs**, **Safeguarding Governor** and **Counsellor**) meet at least once a term, twice in longer terms, to review cases, trends and developments.
- 9.6.4. The **DSL** will ensure that all tiered cases have a pastoral flag indicating this on the student's file. This will indicate to teaching staff that the child may be vulnerable or in need of additional care and support. Staff are aware to check with the **DSO/DSL** before contacting home when a child has a pastoral flag.

9.7. Out of Hours Reporting

- 9.7.1. The **DSL** or the **DSOs** should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of JESS hours.
- 9.7.2. If in exceptional circumstances the **DSL** and **DSOs** are unavailable, staff must not delay taking action. Staff should speak to the **DDSOs** immediately.
- 9.7.3. There is also an email address safeguarding@jess.sch.ae that anyone can report to at anytime. This inbox is available to the three DSL's who monitor this daily.

10. REFERRING

- 10.1. JESS will always refer serious safeguarding or child protection concerns they may have as required to do so by UAE legislation.
- 10.2. In the first instance reporting must be made to the following authorities:
 - 10.2.1. A criminal act must be reported to Dubai Police (Al Barsha Police Station).
 - 10.2.2. Suspicion of a sexual offence must be reported to the Dubai Police (Al Barsha Police Station) and the victim must be present when reporting.
 - 10.2.3. Serious school related matters must be reported to the KHDA. The KHDA will subsequently inform the CDA.

10.3. Other useful numbers/contacts are:

10.3.1. CDA Child Protection Department – Hotline is 800 988 or email: child@cda.gov.ae

10.3.2. Dubai Foundation for Women and Children – Hotline – 800 111

10.3.3. Al Barsha Police Station – Tel: 04 609 6299 or 999

10.4. Everyone at JESS has a duty to report a safeguarding or child protection concern as prescribed by UAE Legislation. The School, under inter-agency procedures, will report complaints that raise Child Protection issues.

11. ALLEGATIONS AGAINST STAFF AND VOLUNTEERS

11.1. JESS will follow its Managing Allegations Policy when dealing with any concern about an adult.

11.2. National laws in the UAE govern any legal action taken in cases of child abuse. However, staff should know that upon allegation they may also be prosecuted in their country of origin or residence.

11.3. For example:

11.3.1. In the case of employees from the UK, the School will also report to the Disclosure and Barring Service (DBS) and where applicable the Teaching Regulation Agency (TRA) within one month of their leaving employment, any person (whether employed, contracted, volunteer or student) whose services are no longer used because he/she is considered unsuitable to work with children.

11.3.2. In the case of employees from other countries, the School will inform their relevant safeguarding authorities and teaching professional bodies.

12. CHILD-ON CHILD ABUSE

12.1. Staff have an an important role to play in preventing peer on peer abuse and when staff believe a child may be at risk from it, they must report the incident as per the reporting process outlined in this Policy.

12.2. All staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports.

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

12.3.1. bullying (including cyberbullying, prejudice-based and discriminatory bullying);

12.3.2. abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');

12.3.3. physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;

12.3.4. sexual violence, such as rape, assault by penetration and sexual assault;

12.3.5. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;

12.3.6. coercing someone to engage in sexual activity;

12.3.7. sharing of indecent images and or videos;

- 12.3.8. 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
- 12.3.9. 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).
- 12.4. JESS takes a whole-school approach to child-on-child abuse and understands that it can only be countered effectively through all staff working together, and also with students, parents and other stakeholders.
- 12.5. JESS has a zero-tolerance approach to child-on-child abuse. Sexual violence or sexual harassment will not be passed off as 'banter', 'having a laugh,' or as 'part of growing up.'
- 12.6. All staff should be clear that child-on-child abuse should always be viewed as a serious safeguarding concern and should be reported immediately to the **DSO** or **DDSO**. Students who have been victims of harmful sexual behaviour or any other forms of child-on-child abuse may find the experience stressful and distressing.
- 12.7. Even if there are no reports in school, it does not mean it is not happening, it may be the case that it is just not being reported. If staff have any concerns regarding child-on-child abuse they should speak to their DSL, DSO or DDSO.
- 12.8. In the case of abuse by a student, or group of students, the key indicators that may identify abuse (as opposed to bullying or adolescent misbehaviour, to be handled within the school's normal discipline framework) are:
 - 12.8.1. the frequency, nature and severity of the incident(s); whether or not the victim was coerced by physical force, fear, or by a student or group of students significantly older than them, or having power or authority over them;
 - 12.8.2. whether or not the incident involved a potentially criminal act;
 - 12.8.3. whether or not the same incident (or injury) would have been regarded as assault or otherwise actionable) had it occurred to a member of staff or other adult.
- 12.9. JESS recognises their duty to minimise the risk of child-on-child abuse. This duty is met via the School's Behaviour Policy and explicit expectations about standards on behaviour both in and out of school emphasising the JESS core value of Respect.
- 12.10. JESS recognises that the initial response to a report from a student is incredibly important, and the importance of all victims being reassured that they are being taken seriously. It is our direct duty to protect, support and reassure the victim in any allegation of child-on-child abuse. JESS will assess the risks and needs of the victim, the perpetrator, and other students. This also includes a careful consideration of whether the victim and perpetrator/s should be separated when in classes and activities depending on the nature of the allegation.

13. ONLINE SAFETY

- 13.1. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place online as well as face to face.

- 13.2. JESS ensures that there is robust online filtering and monitoring place which is overseen by the **DSL** and reviewed at a governance level. Any concerns raised are dealt with by the **DSL**.
- 13.3. JESS has the following systems in place for online filtering and device management:
- Firewall (for Main Internet filtering and security)
 - Staff filtering and monitoring uses [Sophos Firewall: Synchronized Next-Gen Firewall](#)
 - Student filtering and monitoring uses the [Qoria](#) safeguarding solution
 - JAMF (mobile device management for Apple devices, Primary schools) [Jamf Apple Device Management. Mac iPad iPhone TV Apple MDM](#)
 - Classroom Cloud (MDM for windows devices, Secondary School) <https://classroom.cloud/>
 - Microsoft Intune (End point Manager, Secondary School) <https://www.microsoft.com/en-us/security/business/microsoft-intune>
- 13.4. We have different policies set up for WEB and Application filtering and separate policies in place for staff and students.
- 13.5. Web Filtering: URL within each category will be automatically updated by Sophos and we can add custom URLs as well.
- 13.6. By application Filter we can block or allow different types of Apps like games, chat, proxy, VPN etc. Apart from this Sophos has features such as DoS prevention, IPS (Intrusion prevention system), Site to Site VPN, VPN for end users etc.
- 13.7. **Four Areas of Risk for Online Safety**
- JESS recognises the four areas of risk when considering online safety:
- 13.7.1. **content:** exposure to illegal inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, misandry, self-harm, suicide, anti-Semitism and extremism.
- 13.7.2. **contact:** being subjected to harmful online interaction with other users: for example: child-to-child pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- 13.7.3. **conduct:** personal behaviour that increases the likelihood of, or causes, harm; for example making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography sharing other explicit images and online bullying).
- 13.7.4. **commerce:** risks such as online gambling, inappropriate advertising, 'phishing' and or financial scams.
- 13.8. Both staff and students receive online safety awareness training appropriate to their age and role. For further information please refer to the JESS E-safety Policy.

14. SUPPORTING CHILDREN

14.1. The School recognises that:

- 14.1.1. A child who is abused or witnesses abuse may find it difficult to develop and maintain a sense of self-worth.
- 14.1.2. A child in these circumstances may feel helpless and humiliated and may feel self-blame.
- 14.1.3. The school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 14.1.4. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to aggression or withdrawal.

14.2. The School will support all students by:

- 14.2.1. Encouraging self-esteem and self-confidence whilst not condoning aggression or bullying.
- 14.2.2. Promoting a caring, safe and positive environment within the School.
- 14.2.3. Liaising and working closely together with all other support agencies involved in the safeguarding of children.
- 14.2.4. Notifying the relevant external agencies as soon as there is a significant concern.
- 14.2.5. Providing continuing support to a student, about whom there have been concerns, who leaves the School (other than at the end of Y13) by ensuring that appropriate information is forwarded under confidential cover to the student's new school.

14.3. **Increased Vulnerabilities**

- 14.3.1. Staff must be vigilant to the needs and concerns of these children who are among the most vulnerable.
- 14.3.2. Additional barriers can exist in identifying neglect and harm for some groups of students. For example, but not limited to:
 - a) People of Determination and children with SEND needs can be more vulnerable to exploitation and abuse and should have enhanced access to support systems.
 - b) They may be more isolated from their peers and may find it difficult to express concern.
 - c) No concern should be overlooked or passed off as a symptom of SEN or disability; including (not an exhaustive list):
 - Communication;
 - Toileting;
 - Understanding right and wrong;
 - Physical build;
 - Unusual or over-physical attachments to staff members or peers;

14.4. **Mental Health and Wellbeing**

- 14.4.1. Promoting positive mental health is the responsibility of the whole community and we recognise that schools play a key part in this. All staff are aware that

mental health problems can, in some cases, be an indicator that a student 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 issue. However, staff are well placed to observe students day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

- 14.4.2. Our School wants to develop the emotional wellbeing and resilience of all students and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resiliency.
- 14.4.3. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counterbalance and promote further growth of resilience. It is vital that we work in partnership with parents to support the well-being of our students. Parents should share any concerns about the well-being of their child with school, so appropriate support and interventions can be identified and implemented.
- 14.4.4. The School has access to a range of advice to help in identifying students who may be in need of additional mental health support.

15. WIDER STAFF SAFEGUARDING AWARENESS

15.1. Staff Safety

- 15.1.1. Staff are expected to fulfil many roles in and out of the classroom and will work with large and small groups of students. In addition, the teacher may often find themselves in loco parentis (in the place of the parent).
- 15.1.2. The law is weighted in favour of the child, applying a burden on staff to safeguard children's welfare and providing for the child's protection rather than protecting the adult. Because of the requirement for schools and agencies to share information about allegations, there is little anonymity once an allegation has been made, even if it turns out to be false in the end.
- 15.1.3. The burden of evidence is to disprove rather than prove the allegation. Given the risk of false alarms and even deliberate hoaxes on the part of students, staff are advised to think carefully about the setting and nature of their varied relationships with their students so as not to lay themselves open to undue suspicion or accusation.
- 15.1.4. Coping with concerns about the possible abuse of a child can be very stressful for all involved, however the first responsibility is to the child. The member of staff/volunteer should therefore, consider seeking support for him/herself and discuss this with the relevant **DSO** in school. The School's **Lead Counsellor** is also available to staff.

15.2. Pastoral Role

- 15.2.1. Pastoral interaction between teachers and students is an intrinsic part of the School's educational provision, however, the following points are worth bearing in mind:
 - a) If engaging with students in a non-public setting, it is prudent to meet with at least two students at any one time. This also applies to social gatherings.
 - b) Inappropriate physical contact must be avoided. The following is a (non-exhaustive) list of examples of appropriate physical contact and 'non-abusive' actions:

- Applying restraint to prevent a student self-harming or harming another person
- Removing, with reasonable force, potentially dangerous items from a student's possession, or a student from a dangerous location
- Upon obtaining permission from the student, an instrumental teacher may at times need to aid the student in the playing of an instrument
- Shepherding students, for example with a hand on back or shoulder
- Comforting, for example with a hand on shoulder, back or arm; and
- Securing attention by tapping a student's shoulder
- It is always unacceptable to harm a student.

15.3. Activities, Visits and Supervision

- 15.3.1. Staff are expected to adhere to the Trips Policy with regard to supervision, security and safety.
- 15.3.2. Staff should ensure that if they are in charge of any school activity or facilities where safety regulations and precautions are required, these are clearly published and the attention of students is drawn to them from time to time. Any accidents or other untoward incidents should always be recorded, signed and dated and a written record sent to the Health Office.
- 15.3.3. It is important not to place students of the same or differing age groups in situations which might make bullying, intimidation or other student-to-student abuse more likely and, where such situations might arise, it is important that proper adult supervision be arranged. Senior students, assisting the supervision of junior ones, should also be aware of this precaution.

15.4. Staff Code of Conduct

All JESS staff are provided with the Code of Conduct. It contains clear guidance concerning staff actions and conduct in order to ensure students and staff are not at risk of harm, or of allegation of harm to a student. It sets out the behaviour expected from all members of staff.

15.5. Acceptable Use of IT

- 15.5.1. Staff are expected to follow the ICT Acceptable Usage Policy and be fully aware of the Online Safety Policy. In particular, they should not share personal contact details with a current student or befriend current students online or via other social media. This includes former JESS students who have moved to other schools.
- 15.5.2. Staff should not have any inappropriate contact with school graduates online or via social media.

15.6. Medicines

Under no circumstances should staff other than of the Health Office staff advise on the taking of medicines, or their increased/decreased use. This is fully documented in the Administration of Medical Policies.

15.7. Site Safety

Safeguarding includes keeping children safe whilst on school premises. Staff must report in writing any health and safety or security concerns to the facilities manager and DSL immediately.

APPENDIX 1: DEFINITION OF SAFEGUARDING TIERS

Tier 1	Serious case which has been referred to an outside agency and/or student/family are receiving support from an external source. Weekly or fortnightly monitoring is in place by the school and we are actively working with the family.
Tier 2	Serious concern which requires consistent monitoring in school.
Tier 3	Low/Mid-level ongoing concern, monitored when required by the School.
For future reference (not official category)	Case was historic (we can downgrade students 1 tier per year) or case is new and not deemed significant enough to be categorized as Tier 3. This could be due to lack of information at the time of categorizing. All information stays on the student's file.

APPENDIX 2: GUIDANCE ON HOW TO RESPOND TO A CHILD WANTING TO TALK ABOUT ABUSE:

GENERAL POINTS	DON'T SAY
• Show acceptance of what the child says (however unlikely the story may sound) • Keep calm • Look at the child directly • Be honest • Tell the child you will need to let someone else know – don't promise confidentiality. • A useful distinction to make when explaining this to students is between privacy and confidentiality: <u>you cannot promise to keep a conversation private but confidentiality means only informing the people who need to know in order to help the student</u> • Even when a child has broken a rule, they are not to blame for the abuse • Be aware that the child may have been threatened or bribed not to tell • Never push for information. If the child decides not to tell you after all, then accept that and let them know that you are always ready to listen • Never ask leading questions and try to record what the child says verbatim	• Why didn't you tell anyone before? • I can't believe it! • Are you sure this is true? • Why? How? When? Who? Where? • Never make false promises • Never make statements such as 'I am shocked, don't tell anyone else.'
Helpful things you may say or show	Concluding
• I understand what you are saying • Thank you for telling me • It's not your fault • I will help you	• Again, reassure the child that they were right to tell you and show acceptance • Let the child know what you are going to do next and that you will let them know what happens • Contact the appropriate senior member of staff or agency • Consider your own feelings and seek pastoral support if needed