

 NEW DAWN PRIVATE SCHOOL	Integrated Management System	Document ID	5IWD.21
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	Safeguarding & Child Protection Policy		

Integrated Management System (IMS)
Safeguarding & Child Protection Policy



This Document has been prepared, reviewed and approved by:

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Revision History of the Document

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This document has been approved by the School Management System

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1. Rationale

New Dawn Private School (NDPS) is committed to safeguarding and promoting the welfare, safety, dignity and wellbeing of every student. Every child has the right to learn, develop and thrive in a safe, inclusive and supportive environment, free from abuse, neglect, exploitation, discrimination, bullying and online harm. Safeguarding is a whole-school responsibility embedded in the school's Integrated Management System (IMS), leadership, curriculum, culture and everyday practice.

The best interests of the child are the primary considerations in safeguarding decisions. The school adopts a prevention-first approach without delaying urgent protective action and will cooperate with the competent authorities in accordance with UAE legislation and Dubai regulatory requirements.

2. Purpose

This policy aims to:

- Set out the school's safeguarding commitments, non-negotiable standards and expectations for every adult and student.
- Protect students from harm, recognise additional vulnerabilities and ensure equitable access to safety and support.
- Establish a clear duty to report concerns promptly, maintain appropriate confidentiality and take protective action.
- Define governance, accountability, training, assurance and continuous improvement requirements.
- Link to the separate Safeguarding & Child Protection Procedures and controlled supporting forms.

3. Scope

Applies to the Board of Governors, Principal, DSL, Deputy DSL(s), all employees, agency and supply staff, volunteers, contracted service providers, visitors and all school activities under NDPS duty of care, including classrooms, transport, trips, extracurricular activities and school-managed online environments. Parents and students are informed of relevant rights, responsibilities and reporting routes.

4. Terms and Definitions

Term	Definition
Safeguarding	Proactive measures to protect students from harm and promote their welfare.
Child Protection	Specific action to protect a child who is experiencing or at risk of abuse, neglect or significant harm.
Designated Safeguarding Lead (DSL)	Designated Safeguarding Lead / trained Deputy Designated Safeguarding Lead.
Safeguarding Concern	A disclosure, observation, allegation or information suggesting a student may be at risk.
Child Abuse	Harmful behaviour between students, including violence, harassment, sexual harm and online abuse.
Low-level adult conduct concern	Adult conduct inconsistent with the Staff Code of Conduct that may not meet the threshold for a formal abuse allegation but still requires reporting and review.

5. Safeguarding Policy Commitments

New Dawn Private School (NDPS) is committed to providing a safe, inclusive, respectful and nurturing environment in which every learner is protected from harm and supported to thrive. Safeguarding is everyone's responsibility and is embedded in the school's culture, curriculum, leadership, pastoral provision, recruitment, supervision and partnership with families.

The school will comply with applicable UAE legislation, Ministry of Education requirements and KHDA regulations. As a British curriculum school preparing for British Schools Overseas (BSO) inspection, NDPS will also use the principles and relevant expectations of *Keeping Children Safe in Education (KCSIE) 2026*, alongside other relevant English safeguarding guidance, to inform its safeguarding practice where appropriate and consistent with UAE law.

NDPS adopts a child-centred, proactive and evidence-informed approach. All concerns must be taken seriously, recorded accurately, assessed promptly and escalated appropriately. No member of staff may delay protective action because of uncertainty, organisational hierarchy or a belief that a concern is too minor to report.

5.1 Child-Centred Rights, Inclusion and Vulnerability

Every learner will be treated with dignity, respect, fairness and without discrimination. Learners will be listened to and provided with accessible, age-appropriate and developmentally appropriate opportunities to express concerns, disclose harm and seek support.

The school recognises that some learners may face additional safeguarding risks or encounter barriers to disclosure. Particular vigilance will be maintained for:

- Learners of determination, including those with physical, sensory, communication, developmental or learning needs.
- Learners with English as an additional language, limited communication skills or difficulty understanding safeguarding information.
- Younger learners and learners who are particularly dependent on adults for care and supervision.
- Learners experiencing mental health difficulties, emotional distress, self-harm risks or significant changes in behaviour.
- Learners experiencing domestic abuse, family conflict, bereavement, separation, neglect, financial hardship or other adverse circumstances.
- Learners who are absent repeatedly, frequently late, missing from education or whose attendance patterns change unexpectedly.
- Learners vulnerable to bullying, discrimination, isolation, coercion, exploitation, harmful sexual behaviour or child-on-child abuse.
- Learners at risk of online exploitation, grooming, cyberbullying, exposure to harmful content or inappropriate contact through digital platforms.
- Learners who may be young carers or who have significant caring responsibilities at home.
- Learners whose circumstances, relationships, peer groups or community environments may expose them to additional risks.
- Learners who are reluctant to seek help because of fear, shame, language barriers, loyalty to another person or concern about the consequences of speaking out.

This list is not exhaustive. A learner may be vulnerable at any time, regardless of background, attainment, behaviour, family circumstances or apparent confidence.

A learner's behaviour, disability, communication difficulty, nationality, gender, religion, family circumstances or previous safeguarding history must never be used as a reason to dismiss a concern. Safeguarding decisions will be based on evidence, risk and the individual learner's circumstances.

5.2 Protection from Abuse, Neglect and Exploitation

NDPS does not tolerate abuse, neglect, exploitation, corporal punishment, humiliating or degrading treatment, intimidation, discrimination, harassment or sexual misconduct.

Safeguarding concerns may include, but are not limited to:

- Physical, emotional and sexual abuse.
- Neglect and unmet basic care needs.
- Domestic abuse and exposure to violence within the home.
- Bullying, cyberbullying, prejudice-based abuse and discriminatory behaviour.
- Child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence.
- Online grooming, sexual exploitation, coercion, blackmail and the non-consensual sharing of images.
- Criminal exploitation, trafficking or other forms of exploitation.
- Radicalisation, extremist influence or other risks requiring an appropriate safeguarding response.
- Self-harm, suicidal ideation, serious emotional distress and risks to a learner's own safety.
- Abuse or inappropriate conduct by adults working in or visiting the school.
- Risks arising during transport, educational visits, extracurricular activities or other school-related activities.

The school will respond proportionately to the nature and seriousness of each concern. Behaviour management, counselling, restorative practice and educational interventions may form part of the response, but must never replace a necessary child-protection response or referral.

Where there is an immediate risk of serious harm, staff must take urgent protective action and contact the appropriate emergency or competent authority in accordance with UAE requirements.

5.3 A Safe and Trusted Reporting Culture

All staff, contractors, volunteers and other adults working with learners have a responsibility to identify and report safeguarding concerns promptly.

A learner does not need to provide proof of abuse for a concern to be reported. Staff must report suspicions, disclosures, observations and patterns of behaviour that may indicate risk.

All staff must:

- Listen calmly and take disclosures seriously.
- Reassure the learner that speaking up is the right thing to do.
- Avoid leading questions, repeated questioning or attempting to investigate.
- Never promise secrecy or guarantee a particular outcome.
- Record the learner's words as accurately as possible and distinguish facts from professional opinion.
- Report concerns immediately through the school's approved safeguarding procedures.
- Maintain confidentiality and share information only with those who need it to protect the learner.

The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (Deputy DSL) will oversee the reporting system and ensure concerns are appropriately assessed, recorded, monitored and escalated.

Where a concern involves the DSL, it must be reported directly to the Principal or the designated alternative safeguarding contact. Where a concern involves the Principal, it must be escalated to the Board of Governors or proprietor's designated safeguarding representative. Concerns involving governors, the proprietor or other senior leaders must be escalated through an alternative route that avoids conflicts of interest.

Where internal reporting is unsafe, inappropriate or ineffective, staff must use the appropriate external reporting route. No internal procedure may prevent or delay a report to a competent authority where required.

NDPS prohibits retaliation against anyone who raises a safeguarding concern in good faith, makes a disclosure, cooperates with an investigation or reports a breach of the Staff Code of Conduct.

5.4 Child-on-Child Harm, Bullying and Online Safety

NDPS recognises that safeguarding risks may arise between learners as well as from adults. All reports of bullying, cyberbullying, harassment, physical aggression, intimidation, coercion, discriminatory abuse, sexual harassment, sexual violence and other harmful behaviour will be taken seriously.

The school will assess the safety and needs of the affected learner, the behaviour and circumstances of the learner alleged to have caused harm, and any wider risks to the school community. Responses will be proportionate, recorded and consistent with applicable law and school procedures.

The school will not automatically dismiss harmful behaviour as friendship conflict, joking, immaturity or a normal part of growing up. Repeated incidents, power imbalances, coercion and the impact on the affected learner will be considered.

Online safety applies to school devices, school networks, digital learning platforms, messaging services, photographs, images, social media and school-related online activity, including activity occurring outside school where it creates a safeguarding concern.

NDPS will provide age-appropriate education on online privacy, responsible digital communication, cyberbullying, digital footprints, inappropriate contact, image sharing, misinformation, reporting harmful content and seeking help from trusted adults.

Filtering and monitoring arrangements will be maintained in line with applicable requirements, with concerns identified through these systems referred through the school's safeguarding procedures.

5.5 Professional Boundaries, Safer Recruitment and Staff Conduct

All adults working at or on behalf of New Dawn Private School (NDPS) must comply with the Staff Code of Conduct, safeguarding procedures, confidentiality requirements and safer working practice expectations. Every adult has a responsibility to maintain professional boundaries, protect learners from harm and model respectful, appropriate behaviour at all times.

The Staff Code of Conduct must clearly define acceptable and unacceptable behaviour towards learners, including expectations relating to:

- **Professional relationships and over-familiarity:** Staff must maintain appropriate professional relationships and must not develop personal, secretive or inappropriate relationships with learners. They must not use their position to intimidate, manipulate, isolate, exploit or influence a learner for personal benefit.
- **Physical contact:** Any physical contact must be appropriate, necessary, proportionate and consistent with the learner's needs, dignity, safety and applicable school procedures. Physical intervention must only be used when permitted by the school's approved procedures and applicable requirements. Staff must not engage in unnecessary, inappropriate or sexualised physical contact.
- **One-to-one situations:** Staff must follow approved arrangements for individual meetings, tuition, pastoral support and other one-to-one interactions. Wherever practicable, interactions should take place in an appropriate, observable setting, with relevant colleagues informed and the purpose of the interaction clear. Staff must avoid unnecessary isolation, secrecy or situations that could place a learner or member of staff at risk.
- **Communication and social media:** Staff must use authorised school communication channels when communicating with learners and parents about school matters. Personal social media accounts, private messaging applications and personal contact details must not be used to establish inappropriate relationships or conduct unauthorised private communications with learners. Staff must not share inappropriate content or engage with learners online in ways that breach professional boundaries.
- **Photographs, videos and digital content:** Staff must comply with school procedures for photography, video recording, image storage, consent and the use of digital devices. Images of learners must only be captured or shared for authorised purposes using approved arrangements. Staff must not take, retain or share learner images on personal devices or accounts except where expressly permitted by an approved school procedure and applicable requirements.
- **Favouritism and fairness:** Staff must treat learners fairly and consistently. They must not show inappropriate favouritism, provide unauthorised gifts or rewards, offer preferential treatment, or create exclusive relationships that undermine professional boundaries or the wellbeing of other learners.
- **Privacy, dignity and confidentiality:** Staff must respect learners' privacy and dignity, maintain appropriate confidentiality and only access or share learner information where there is a legitimate professional purpose and appropriate authorisation.

- **Supervision and safeguarding:** Staff must follow requirements for learner supervision, movement around the school, educational visits, changing arrangements, transport and other activities. They must not leave learners unsupervised where this creates a foreseeable risk or disregard established safeguarding procedures.
- **Language and conduct:** Staff must use respectful, professional and age-appropriate language. Humiliation, threats, discriminatory remarks, inappropriate jokes, bullying, sexualised comments and any conduct that compromises a learner's dignity or safety are unacceptable.

All staff must understand that professional boundaries apply both on and off school premises, including during educational visits, extracurricular activities, school transport, online interactions and other occasions when staff act in a professional capacity.

Safer recruitment and induction

NDPS will undertake identity, qualification, reference, employment-history and background checks appropriate to each role and required by applicable UAE law and regulatory guidance before appointment. Required checks and their completion will be documented in accordance with school procedures.

Contractors, volunteers, visitors, temporary staff, agency personnel and other adults entering the school environment will be subject to appropriate screening, safeguarding briefings, access controls and supervision. Clear arrangements will be maintained for reporting and managing concerns about adults employed by external providers who have contact with learners.

All staff will receive safeguarding induction and appropriate ongoing training. They must be informed of the reporting routes for child-protection concerns, allegations against staff, low-level concerns and whistleblowing. Staff must understand that they have a personal responsibility to report concerns and must not assume that another colleague will do so on their behalf.

Duty to report concerns about colleagues

Every member of staff has a professional and safeguarding responsibility to report any concern about a colleague's behaviour that may place a learner at risk of harm or fall below the standards set out in the Staff Code of Conduct.

Staff must report concerns promptly, honestly and through the appropriate designated route. They must not ignore, conceal, privately resolve or dismiss a concern solely because the person involved is a colleague, a senior leader or someone with whom they have a close working relationship.

Where a concern involves the Designated Safeguarding Lead (DSL), the Principal or another person normally responsible for receiving concerns, staff must use the alternative reporting route set out in the school's safeguarding and whistleblowing procedures. Where the Principal is implicated, the

concern must be escalated to the Board of Governors or the proprietor's designated representative, as appropriate.

Reports must be handled sensitively, recorded factually and shared only with those who need to know. Staff who raise genuine concerns in good faith must not be subjected to retaliation or disadvantage for doing so. Deliberately concealing a safeguarding concern or discouraging another person from reporting one may itself constitute a serious breach of professional responsibilities.

5.6 Allegations Against Staff and Low-Level Safeguarding Concerns

NDPS will maintain clear, fair, confidential and timely procedures for managing allegations and concerns about adults working with or on behalf of learners. These procedures must be cross-referenced in the Staff Code of Conduct, Safer Recruitment Policy, Whistleblowing Policy and Safeguarding and Child Protection Procedures.

All concerns must be taken seriously, assessed promptly and managed in a manner that prioritises learner safety, protects the integrity of any investigation and ensures fair treatment of those involved. Staff must report concerns even where they are uncertain whether the formal allegation threshold has been met.

Allegations meeting the threshold for a formal safeguarding response

An allegation must be treated as a formal safeguarding matter where the information indicates that an adult may have:

- Harmed a learner or committed a criminal offence against or related to a learner.
- Behaved towards a learner in a way that indicates they may pose a risk of harm.
- Behaved in a way that raises serious concerns about their suitability to work with children.

The Principal will normally act as the designated case manager, unless the allegation concerns the Principal or there is a conflict of interest. Where the Principal is implicated, the matter must be referred to the Board of Governors or the proprietor's designated representative.

The school will take immediate steps to protect learners, preserve relevant evidence, document the allegation and seek guidance from the appropriate UAE competent authorities. The school will not conduct an internal investigation in a way that compromises a police or other competent-authority investigation.

Any decision regarding temporary reassignment, restricted duties, suspension or other protective measures will be risk-based, proportionate and consistent with applicable law and employment procedures. Suspension will not be automatic.

Where an allegation concerns a member of the school's leadership, the DSL or another person responsible for managing the concern, the school will ensure that an independent and appropriate person oversees the response.

The school will maintain confidentiality, avoid prejudging the outcome and provide appropriate support to the learner and the adult concerned. Records will document decisions, actions, referrals and the rationale for the response. Relevant authorities will be notified where required by applicable UAE legislation or regulatory requirements.

Low-level safeguarding concerns

A low-level concern is any concern, however small, that an adult's behaviour towards or around learners may be inconsistent with the Staff Code of Conduct or the school's professional expectations, even where it does not appear to meet the threshold for a formal allegation.

Examples may include:

- Inappropriate over-familiarity or personal relationships with learners.
- Unnecessary or unexplained one-to-one contact or failure to follow agreed visibility arrangements.
- Use of personal messaging accounts or unauthorised private communication with learners.
- Inappropriate photographs, recordings or sharing of digital content.
- Favouritism, unauthorised gifts or preferential treatment.
- Inappropriate physical contact, language, jokes or comments.
- Breaches of learner privacy, confidentiality or dignity.
- Failure to follow supervision, safeguarding or professional-boundary procedures.
- Behaviour that appears minor in isolation but may indicate a pattern of boundary violations.

All staff must report low-level concerns promptly through the designated route. The school will ensure that:

- Concerns are recorded factually, including the context, relevant information, action taken and outcome.
- Records are securely maintained, with access restricted to authorised personnel.
- Concerns are reviewed for patterns, repeated behaviour or indicators of escalating risk.
- Appropriate action is taken, which may include guidance, training, supervision, a review of working arrangements, formal management action or escalation to a formal safeguarding response.
- Concerns about contractors, agency staff or other external personnel are communicated to the relevant employer or responsible organisation where appropriate, while ensuring that the school takes any necessary immediate steps to protect learners.
- Staff are encouraged to report concerns about their own conduct where an incident could be misunderstood or may have fallen below expected standards.

- The person receiving the concern considers whether further information, consultation or referral to a competent authority is required.
- The outcome and rationale for decisions are documented and reviewed where necessary.

Low-level concerns must not be disregarded simply because they do not individually meet the threshold for a formal allegation. Where a pattern of behaviour emerges, the school must reassess the cumulative information and determine whether further safeguarding action is required.

Where uncertainty exists about whether a concern meets the threshold for a formal allegation, the Principal or designated case manager must seek appropriate external safeguarding advice rather than dismissing the concern.

Low-level concerns must not be treated as insignificant simply because an individual incident appears minor. A pattern of concerns may indicate a wider safeguarding risk.

5.7 Protective Environments, Supervision and Emergency Preparedness

NDPS will maintain appropriate arrangements for site security, visitor management, learner supervision, safe transport, educational visits, extracurricular activities, health and safety and emergency response.

Safeguarding responsibilities extend to all school-organised activities, off-site visits, transport arrangements, digital learning and other circumstances in which the school has a safeguarding responsibility.

The school will maintain risk assessments and operational procedures covering relevant hazards, including unauthorised access, missing learners, medical emergencies, fire, evacuation, lockdown, transport incidents, serious behavioural incidents and other foreseeable emergencies.

British preparedness and emergency readiness

In support of its British school identity and BSO inspection readiness, NDPS will promote a culture of preparedness, responsibility and calm decision-making. British preparedness in this policy means the practical application of recognised British school safeguarding and emergency-readiness principles, adapted to the UAE regulatory context; it does not replace UAE civil defence, police, emergency management or Ministry of Education requirements.

The school will:

- Maintain clear emergency plans and communicate relevant responsibilities to staff.
- Conduct appropriate drills and exercises in accordance with UAE requirements.
- Ensure staff understand reporting routes, emergency contacts, evacuation procedures and arrangements for learners who require additional assistance.

- Provide age-appropriate education on personal safety, emergency awareness, help-seeking and responsible responses to risk.
- Review incidents, drills and identified weaknesses and implement documented corrective actions.
- Ensure safeguarding arrangements are considered when planning trips, transport, external activities and changes to the school environment.

Learners of determination and those requiring additional support will be considered explicitly in emergency planning and risk assessments.

5.8 Early Help, Support and Recovery

NDPS recognises that safeguarding intervention should take place as early as possible to prevent concerns from escalating and to improve outcomes for learners.

Early help means identifying emerging difficulties and coordinating appropriate support as soon as a need becomes apparent. This may include concerns relating to attendance, emotional wellbeing, behaviour, family circumstances, online safety, peer relationships, health, inclusion or unmet educational and pastoral needs.

Where appropriate, the school will coordinate support through the DSL, counsellor, inclusion team, nurse, teachers, pastoral leaders, parents and relevant external professionals.

Support may include:

- Early identification and documented assessment of need.
- A learner support plan with clear actions, responsibilities and review dates.
- Regular monitoring of attendance, behaviour, wellbeing and engagement.
- Counselling or pastoral support within the school's competence.
- Reasonable adjustments and additional inclusion support.
- Parent engagement where safe and appropriate.
- Referral to competent authorities or specialist services where the learner's needs exceed the school's capacity.

The school will distinguish between early help and formal child-protection action. Counselling, pastoral support, internal meetings or parent consultations must not delay a referral where a learner may be at risk of significant harm or requires urgent protection.

Where a learner has experienced harm or a significant safeguarding incident, NDPS will consider ongoing support, safety planning, appropriate reintegration and monitoring of risk.

5.9 Attendance, Children Missing Education and Unexplained Absence

NDPS recognises that absence from education, repeated unexplained absence, persistent lateness and unexpected changes in attendance may indicate safeguarding concerns. Attendance will therefore be monitored as both an educational priority and a safeguarding responsibility.

The school will:

- Record attendance accurately and investigate unexplained absence promptly.
- Follow up repeated or prolonged absence using the school's approved attendance procedures.
- Make reasonable attempts to contact parents or carers and verify a learner's whereabouts when necessary.
- Consider whether absence may indicate neglect, abuse, exploitation, bullying, mental health difficulties, family disruption or another safeguarding risk.
- Escalate concerns to the DSL where absence patterns, failed contact or other information suggest that a learner may be unsafe.
- Maintain records of contact attempts, decisions, actions and outcomes.
- Follow applicable UAE requirements for attendance, withdrawal, transfer, enrolment and notification to relevant authorities.

Where a learner cannot be located, the school cannot establish their safety, or there are indicators of immediate risk, staff must escalate the matter urgently through the DSL and appropriate competent authorities.

The school will maintain appropriate procedures for learners who leave NDPS, transfer to another school or cease attending. Reasonable steps will be taken to confirm the learner's destination and ensure that relevant records are transferred securely to the appropriate receiving school or authority, in accordance with applicable requirements.

The UK concept of *children missing education* will inform NDPS practice as a useful safeguarding reference. It will be applied in a manner appropriate to the UAE education system and will not be treated as a replacement for UAE enrolment, transfer or attendance procedures.

5.10 Parents, External Agencies and Information Sharing

NDPS values constructive partnerships with parents and carers and will involve them in safeguarding matters where doing so is safe, appropriate and consistent with the learner's welfare.

The school may need to seek advice, share information or make a referral to a competent authority without first informing parents if advance contact could increase risk, compromise an investigation or impede protective action.

Information will be shared lawfully, proportionately and on a need-to-know basis. Staff must not assume that confidentiality or data protection requirements prevent the sharing of information necessary to protect a learner.

The DSL will coordinate safeguarding referrals and liaison with relevant authorities, including the police, health services, child-protection bodies, education regulators and other appropriate agencies.

All significant decisions, information-sharing actions, referrals and the reasons for those decisions will be documented.

5.11 Confidentiality, Information Security and Records

Safeguarding records will be accurate, timely, factual and securely maintained. They will be subject to appropriate access controls and handled separately from general behaviour, routine counselling and other educational records where necessary to preserve confidentiality and safeguarding integrity.

Records should distinguish between direct observations, a learner's own words, information provided by others, professional assessment and allegations that have not been established.

The school will maintain appropriate records of:

- Safeguarding concerns and disclosures.
- Risk assessments and protective measures.
- Referrals, external advice and information-sharing decisions.
- Learner support plans and review outcomes.
- Allegations against staff and low-level concerns.
- Training, safer recruitment and compliance checks.
- Incidents, actions taken and subsequent learning.

Records will be retained, transferred and disposed of in accordance with applicable UAE law, regulatory requirements and the school's approved records-management schedule. Access will be limited to authorised personnel with a legitimate safeguarding or governance need.

5.12 Preventive Education, British Values and British Preparedness

NDPS will provide age-appropriate safeguarding education that helps learners understand personal safety, respectful relationships, boundaries, online risks, trusted adults, help-seeking, anti-bullying and emotional wellbeing.

The school will explicitly promote the **Fundamental British Values** of:

- **Democracy:** enabling learners to express views, participate in appropriate decision-making and understand that concerns can be raised safely.

- **The rule of law:** helping learners understand the importance of rules, lawful behaviour, personal responsibility and protection from harm.
- **Individual liberty:** developing learners' understanding of personal safety, appropriate choices, boundaries and how to seek help without fear.
- **Mutual respect and tolerance of different faiths and beliefs:** promoting inclusion, respect, understanding, freedom from discrimination and the rejection of bullying, prejudice and abuse.

These values will be promoted in a manner consistent with UAE law, the school's inclusive ethos and respect for the UAE's culture, identity, religion and national values. NDPS will not tolerate the use of British Values to justify discrimination, hostility or disrespect towards any learner or family.

British preparedness will be reflected in learners' understanding of personal responsibility, risk awareness, emergency procedures, online safety, safe decision-making and the importance of reporting concerns to trusted adults. Staff will reinforce these principles through the curriculum, pastoral provision, assemblies, age-appropriate discussions and practical safety procedures.

Preventive education will also address safeguarding risks that may arise in person, online, in the community, during transport and through peer relationships.

Learners and parents will be informed of the school's safeguarding reporting routes and the ways in which they can raise concerns. Feedback will be provided where appropriate, subject to confidentiality and the protection of those involved.

5.13 Training, Competence and Professional Development

All staff, including those who do not work directly with learners, will receive safeguarding induction and training appropriate to their roles and responsibilities. Staff will be informed of the school's safeguarding arrangements, reporting routes, Staff Code of Conduct, procedures for allegations and low-level concerns, whistleblowing arrangements and relevant emergency procedures.

Training will cover recognition of abuse and neglect, child-on-child abuse, online safety, attendance-related safeguarding, early help, vulnerable groups, professional boundaries, information sharing and the importance of acting promptly.

The DSL and Deputy DSL will maintain enhanced training appropriate to their responsibilities, including safeguarding case management, risk assessment, referral procedures, information sharing and liaison with competent authorities.

The school will monitor training completion, acknowledgements, updates and staff understanding through its training matrix, audits, supervision and professional development arrangements.

Where appropriate, NDPS will use KCSIE 2026 and related English safeguarding guidance to inform staff training and BSO preparation, while maintaining compliance with UAE requirements.

5.14 Accountability, Monitoring and Continuous Improvement

Safeguarding arrangements will be monitored through regular review and documented assurance. The Board of Governors and school leaders will consider anonymised safeguarding trends, attendance patterns, incident reports, case-file quality, staff training, recruitment checks, site safety, stakeholder feedback and the effectiveness of protective actions.

NDPS will use its Integrated Management System (IMS) Plan–Do–Check–Act (PDCA) cycle to identify risks, implement improvements, evaluate impact and ensure that corrective and preventive actions are completed.

Reviews will consider whether:

- Concerns are reported and escalated promptly.
- Learners know how to seek help and feel safe doing so.
- Vulnerable learners receive appropriate support.
- Attendance and unexplained absence are monitored effectively.
- Staff follow the Code of Conduct and professional boundaries.
- Allegations and low-level concerns are managed consistently.
- Emergency procedures and supervision arrangements are effective.
- British Values and British preparedness are reflected in the school's safeguarding culture.
- Required actions from audits, incidents and external reviews are completed and evaluated.

Individual case confidentiality will be maintained throughout monitoring and governance reporting. Serious incidents or significant changes in risk will be escalated promptly and will not wait for the annual policy review.

6. Responsibilities

Board of Governors and Proprietor

The Board of Governors and proprietor will:

- Approve and oversee the implementation of the Safeguarding and Child Protection Policy.
- Ensure that appropriate safeguarding leadership, staffing, training and resources are in place.
- Review safeguarding assurance reports, anonymised trends, audit findings and significant improvement actions.
- Ensure that clear alternative reporting routes exist for concerns involving senior leaders, the DSL or the Principal.
- Hold the Principal accountable for effective implementation and ensure that safeguarding failures are addressed.

Principal

The Principal is accountable for the effective implementation of the policy and will:

- Promote a culture in which safeguarding is prioritised and concerns are reported without delay.
- Ensure that the DSL and Deputy DSL have appropriate authority, time, training and resources.
- Ensure that staff understand and follow safeguarding procedures.
- Oversee formal allegations against staff unless the Principal is implicated or has a conflict of interest.
- Ensure that appropriate external referrals and notifications are made.
- Monitor compliance with safeguarding, attendance, recruitment, training and emergency procedures.

Designated Safeguarding Lead (DSL)

The DSL will:

- Lead and coordinate the school's safeguarding arrangements.
- Receive, assess, record and monitor safeguarding concerns.
- Make or coordinate referrals to competent authorities and seek external advice where required.
- Advise staff on risk, early help, protective action and information sharing.
- Maintain secure safeguarding records and oversee appropriate case reviews.
- Monitor vulnerable learners, unexplained absence and emerging safeguarding patterns.
- Ensure that safeguarding training, procedures and reporting arrangements remain effective.
- Support the review of allegations against staff and low-level concerns in accordance with the designated procedures.
- Provide anonymised safeguarding reports to school leaders and governors.

Deputy Designated Safeguarding Lead (Deputy DSL)

The Deputy DSL will support the DSL, undertake delegated safeguarding responsibilities and act in the DSL's absence. Staff must know how to access the Deputy DSL and the alternative escalation arrangements.

Senior Leadership, Teachers and Pastoral Staff

All leaders, teachers and pastoral staff will:

- Maintain a safe, respectful and inclusive learning environment.
- Recognise and report safeguarding concerns promptly.
- Record concerns accurately and follow the approved procedures.
- Monitor learner wellbeing, behaviour, attendance and engagement.

- Support safeguarding plans and reasonable adjustments where appropriate.
- Promote British Values, personal safety and age-appropriate preparedness.
- Maintain professional boundaries and protect confidential information.

Counsellor, Medical and Inclusion Staff

These staff will provide support within their professional competence, communicate relevant safeguarding concerns to the DSL and ensure that counselling, medical or inclusion interventions do not delay necessary protective action.

HR, Operations, Transport and Contracted Services

These teams will implement relevant safer recruitment checks, induction arrangements, visitor controls, supervision, site security, transport safety, contractor oversight and incident reporting procedures.

All adults working on behalf of NDPS must follow the safeguarding requirements relevant to their roles.

Parents and Carers

Parents and carers are encouraged to work in partnership with NDPS, share relevant information that may affect learner safety and use the school's reporting channels to raise concerns. The school will balance partnership with parents against its responsibility to protect learners and comply with applicable law.

Learners

Learners will be encouraged to treat others respectfully, follow safety expectations, report concerns to trusted adults and seek help when they or another learner may be at risk. They will receive age-appropriate information about their rights, responsibilities and safeguarding support.

7. Accountability and Escalation

The Board of Governors and proprietor retain governance oversight. The Principal is accountable for implementation. The DSL leads professional safeguarding coordination. Every adult working with or around learners remains personally responsible for recognising and reporting concerns.

No member of staff may use an internal reporting hierarchy to delay emergency action or prevent a report to a competent authority where required.

Where a concern is not addressed appropriately, the individual raising it must escalate it through the alternative safeguarding route or the school's whistleblowing procedure.

All significant safeguarding decisions must be recorded, including the information considered, action taken, referrals made, advice received and reasons for any decision not to refer.

8. Policy Review and Approval

The DSL and Principal will review this policy at least annually and sooner following changes in UAE legislation, Ministry of Education or KHDA requirements, relevant BSO standards, safeguarding guidance, significant incidents, audit findings or material changes to school operations.

The review will consider the effectiveness of reporting routes, staff training, vulnerable learner support, attendance monitoring, allegations and low-level concerns procedures, British Values education, emergency preparedness and the school's arrangements for working with external agencies.

Substantive revisions will be submitted to the Board of Governors or authorised proprietor representative for approval.

The policy's approval date, effective date, version number and next review date will be entered in the controlled document register once approval has been formally granted. The approved policy will be communicated to staff and relevant stakeholders.

9. Related Procedures, Forms and Documents

This policy must be read alongside the separately controlled Safeguarding and Child Protection Procedures and the following related policies, procedures and records:

- Staff Code of Conduct, including professional boundaries and low-level concerns.
- Allegations Against Staff Procedure.
- Low-Level Safeguarding Concerns Procedure.
- Safer Recruitment Policy and recruitment-check records.
- Whistleblowing Policy.
- Online Safety and Acceptable Use Policy.
- Behaviour Policy.
- Anti-Bullying Policy.
- Attendance and Punctuality Policy.
- Children Missing Education / Unexplained Absence Procedure.
- Inclusion and Special Educational Needs Policy.
- Medical and First Aid Procedures.
- Health and Safety Policy.
- Educational Visits and Transport Safety Procedures.
- Emergency Preparedness and Evacuation Procedures.
- Data Protection, Confidentiality and Records Management Policy.
- Complaints Policy.

- British Values and Preventive Education arrangements, where maintained separately.
- Staff Safeguarding Training Matrix.

Existing form references are retained pending validation against the controlled document register:

- F001 – Concern Reporting.
- F002 – Disclosure.
- F003 – Body Map.
- F004 – Referral.
- F005 – Risk Assessment.
- F006 – Student Support Plan.
- F007 – Safeguarding Action Plan.
- F008 – Incident Register.
- F009 – Training Record.
- F010 – Visitor Declaration.
- F011 – Annual Audit Checklist.

The DSL will ensure that all forms and associated procedures remain current, accessible to authorised staff and consistent with this policy.

10. References and Regulatory Framework

NDPS will apply this policy in accordance with applicable UAE legislation, regulatory requirements and recognised safeguarding practice.

UAE legislation and regulatory requirements

- UAE Federal Law No. 3 of 2016 concerning Child Rights (Wadeema's Law), together with applicable implementing regulations and amendments.
- UAE National Child Protection Policy in Educational Institutions (2022), together with current Ministry of Education requirements and guidance.
- Dubai Executive Council Resolution No. 2 of 2017 and applicable student safety and protection requirements.
- Current KHDA requirements, guidance and regulatory expectations relevant to safeguarding, student welfare, attendance and school operations.
- Applicable UAE legislation and regulatory requirements relating to personal data, confidentiality, employment, health and safety, emergency management and child protection.

British Schools Overseas and English safeguarding guidance

- *Keeping Children Safe in Education 2026* (Department for Education, England), including Part One: Information for All School and College Staff and the relevant sections concerning

allegations against staff, low-level concerns, safer recruitment, online safety, early help and children absent from education.

- *Working Together to Safeguard Children*, current applicable edition, as a reference for early help, multi-agency working, information sharing and child-protection practice.
- *British Schools Overseas: Standards for Schools*, Department for Education, including the applicable standards for safeguarding, welfare, leadership and management.
- Relevant Department for Education guidance on children missing education, information sharing, online safety and safer recruitment, where applicable and consistent with UAE requirements.
- United Nations Convention on the Rights of the Child, as a recognised international framework for children's rights, applied consistently with UAE law.

The DSL and Principal will review relevant publications and regulatory updates and ensure that changes requiring action are reflected in the school's policy, procedures, staff training and compliance arrangements.

Regulatory interpretation: KCSIE is statutory guidance for schools and colleges in England; it is not, by itself, UAE legislation. NDPS uses the relevant principles and expectations as a BSO safeguarding reference while meeting its obligations under UAE law and the requirements of the competent UAE authorities.