SAFEGUARDING GEMS

Safeguarding is everyone's responsibility

me, you, us

GEMS EDUCATION

جيمس مدرستنا الثانوية الإنجليزية، دبي
GEMS Our Own English High School, Dubai

POLCSG001V601082026 Safeguarding Policy *(w.e.f. 31st August 2026)*

Key Contacts:

Principal: Dr. Sheeba Jojo

Designated Safeguarding Lead: Ms. Sreeja Nair

Deputy Designated Safeguarding Lead: Ms. Jayasree Jayachandran

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GEMS SAFEGUARDING POLICY

POLCSG001V6

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1. STATUS OF THE DOCUMENT AND HOW TO USE IT

This document is part of a group of policies intended to keep children, staff, other adults and the wider organisation of GEMS Education safe. This document outlines specific operational arrangements for the items listed in the contents. It should be read in conjunction with the guidance contained in the appendices of this policy and other associated company policies found in ***GEMSNET - Policies & Documents Portal*** *(GEMS employee access only)*.

This document has been compiled from a wide range of regional, international and best practice guidance, all of which is intended to ensure the safety of all parties.

The document outlines the principles as highlighted in Federal Law no. 3 of 2016, also known as Child Rights (Wadeema's) Law, and other related UAE policies and guidance; including but not limited to the UAE inspection framework and the ***Ministry of Education Child Protection Policy for Private Education Institutions***.

In all situations which require human judgement, a policy or procedure is there as guidance. Wherever a matter of legal responsibility is relevant to the text in this policy, this is highlighted.

2. SAFEGUARDING DEFINITION & CULTURE STATEMENT

Safeguarding is defined as protecting children from risk, harm, abuse and neglect, promoting their wellbeing and ensuring they grow up in a safe and supportive environment.

Safeguarding is everyone's responsibility. All staff should maintain an attitude of "it could happen here," recognising that children can be vulnerable to harm, abuse and neglect in any setting.

3. ROLES AND RESPONSIBILITIES

GEMS Education Board/Chief of Risk and Assurance/Chief Education Officer hold responsibility for corporate governance and oversight of the effective delivery of the GEMS Safeguarding Strategic Plan and GEMS Safeguarding Policy. The Board/CoRA/CEdO ensure that safeguarding, recruitment and managing allegations procedures take into account the advice and guidance contained in the GEMS Safeguarding Policy and any regional and national legislation and guidance.

The Vice President (VP) – Risk, Global Lead for Safeguarding and Child Protection holds responsibility for providing strategic leadership and direction to ensure the effective management and prevention of safeguarding risks across the organisation. Working in alignment with regulatory requirements and best practice, the VP drives a proactive, risk-based approach, ensuring that robust controls, oversight mechanisms and assurance processes are in place. Central to this role is the identification, mitigation and prevention of risks that may impact students, staff and the organisation. The VP also champions a strong safeguarding culture across all operations, supporting the organisation to meet its legal, ethical and reputational responsibilities.

The Head–Safeguarding Operations holds responsibility for the day-to-day oversight of operations within the GEMS Central Safeguarding Team, with oversight of case management, external referrals and ensuring the application of appropriate policy and procedure. The Head-Safeguarding Operations

gives advice and guidance on safeguarding casework, policy and procedure, escalating concerns carrying high risk to the VP-Risk, Global Lead of Safeguarding and Child Protection.

The Central Safeguarding Team (CST) ensure the effective management of safeguarding across GEMS schools and services through case management, training and development, external stakeholder management, safeguarding processes, curriculum development, student voice and participation, and parental engagement. The Central Safeguarding Team supports allocated groups of schools and services to embed the GEMS Safeguarding Policy and strategic plan, ensuring consistency of safeguarding practice and policy compliance across the group.

GEMS School Local Advisory Board (LAB) holds responsibility for monitoring and advising schools on the central responsibilities of governance. This includes arrangements for safeguarding for which an appointed, named Governor, has responsibility for contributing to the strategic discussions at LAB meetings which help determine the vision and ethos of the school and clear strategic priorities and targets for the school's safeguarding and child protection responsibilities. The LAB ensures the school's adherence to the GEMS Safeguarding Policy, including, but not limited to, IT filtering and monitoring.

The Executive Vice President (EVP) Education is responsible for ensuring all aspects of the GEMS Safeguarding Policy are delivered effectively in their respective cluster.

The Principal/CEO holds overall responsibility for safeguarding in school. The Principal/CEO fosters a culture of safeguarding and ensures the effective implementation of the GEMS Safeguarding Policy. The Principal/CEO holds responsibility for ensuring the school has a resourced and trained safeguarding team and that the DSL is provided with sufficient time, training, resources and authority to carry out their safeguarding responsibilities effectively. The Principal/CEO ensures that staff, LAB members, volunteers and children understand and implement the policy to safeguard children.

The Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team who takes operational responsibility for safeguarding and child protection in the school or service. DSLs ensure all safeguarding concerns are recorded on GUARD and are comprehensive and thorough. DSLs are also responsible for ensuring that all staff, LAB members and volunteers are trained in line with expected standards. This responsibility may be delegated to an appropriately trained DDSL in the absence of the DSL.

The Allegations Manager takes responsibility for managing allegations against adults and works with the DSL and HR Manager to investigate any allegations concerning members of staff and volunteers. This responsibility may be delegated to an appropriately trained Deputy Allegations Manager in the absence of the Allegations Manager.

All school staff are responsible for recording concerns on GUARD and are to inform the DSL/DDSL immediately of any high-risk concerns. **All service staff** should report all safeguarding concerns immediately to the DSL/DDSL. All school and service staff also need to ensure that they undertake safeguarding training that is commensurate with their role within the school.

4. CHILD PROTECTION PROCEDURES

i) Dealing with a disclosure, concern or allegation:

Children in school may feel safe and secure enough to make a disclosure of past abuse, current abuse or neglect to a member of staff who they feel they can trust. A disclosure of this kind can arise at any time and may have been anticipated by staff or equally be unexpected. In these situations, staff should:

- Listen to what the child has to say.
- Be prepared to listen impartially to the child, giving appropriate support, without introducing judgement or opinion.
- Never promise confidentiality: all children should be made aware of staff responsibility to refer all safeguarding concerns to a specialised safeguarding team.
- Record all safeguarding concerns promptly, concisely and clearly on GUARD. Where possible, document the child's voice and the language used in the disclosure.
- Where a concern requires an urgent safeguarding response, report to the DSL or Deputy DSL immediately.

If a disclosure or allegation is made by any other person regarding a safeguarding or child protection issue, the same procedures apply. All concerns must be recorded on GUARD, with any additional evidence or documentation uploaded to the concern recording.

The Allegations Manager must be notified immediately of any allegation or disclosure that calls into question the competence or suitability of another professional. Any allegation where an adult who is working (paid or unpaid) on school premises has behaved in a way that has, or may have, put a child at risk of harm, should be recorded on GUARD as an Allegation Against an Adult. The Allegations Manager must notify HR of all allegations as per the Employee Disciplinary Policy.

Safeguarding disclosures may present challenges for staff. Staff should seek appropriate support where required.

ii) Acting on a current child protection issue:

The DSL, or Deputy DSL(s), will lead on all safeguarding casework and investigations.

The Central Safeguarding Team support DSLs in advising on casework, are the initial contact point for external referrals and will guide on GEMS policies and procedures.

GEMS schools should hold at least two contact numbers for each child, and if it is deemed appropriate, these people will be contacted in the event of any safeguarding concern or incident at school, without undue delay.

The Central Safeguarding Team must be notified without delay of any high-risk concerns.

All safeguarding investigations and child protection procedures must be clearly and comprehensively documented on GUARD with all supporting evidence attached. This should include, but not be limited to, child's voice, written or verbally recorded statements, observations, concerns, discussions, meetings

and actions; corresponding risk assessments and Team Around the Child (TAC) functions, meetings and minutes. All details should include dates, times and personnel. These records provide important information that may be required for external referrals or subsequent court proceedings.

All safeguarding actions will take into account the wishes and feelings of the child, in line with their age, stage, understanding and best interests.

5. ALLEGATIONS AGAINST ADULTS

GEMS Education promotes an open and transparent safeguarding culture in which concerns about adults are addressed promptly and appropriately. All GEMS schools and services will have appointed an Allegations Manager and Deputy who have valid GEMS Level 3 Safeguarding Training, to act as managers for allegations against staff. All staff should be made aware of their identity and how to share concerns about the behaviour of adults working with children.

Employees who have been subject to an allegation can access support through the school HR Manager, or if they feel there is a conflict of interest, they can raise their queries with the Principal/CEO or the HR Business Partner who may seek further advice from the VP-Risk, Global Lead of Safeguarding and Child Protection.

6. WHISTLEBLOWING

Whistleblowing is a disclosure of information that is made in the company and/or public interest and, in the reasonable belief of the individual that relates to suspected wrongdoing or dangers at work. This could be happening at the present time, have taken place in the past or is likely to happen in the future. This may include:

- Unethical conduct or corruption.
- Conflicts of interest or abuse of authority.
- Misuse of position or power.
- Inappropriate relationships.
- Fraud or policy violations.
- Breaches of ethics, compliance, or integrity standards.
- Unsafe working conditions or practices.
- Fire or emergency hazards.
- Workplace accidents, injuries, or near misses.
- Health risks or wellbeing concerns (including mental health).
- Non-compliance with safety regulations or failure to report incidents.
- A concern relating to the safeguarding of children or vulnerable adults.
- Unauthorized access or cyber security threats.
- Data privacy breaches.
- Misuse of GEMS systems or confidential information.

- Sharing of insider or restricted information.
- Any issue raised by parents, customers, or external stakeholders concerning GEMS operations or conduct.
- Any other issue that does not align with GEMS' values or ethical standards.

GEMS expect all senior leaders to have disseminated the GEMS Speak Up (Whistleblowing) Policy to all employees. The Senior Leadership Team, through the DSL, must have allocated a proportion of induction or orientation to highlighting the key principles of whistleblowing.

See ***GEMS Speak Up (Whistleblowing) Policy***.

7. COMPLAINTS PROCEDURES

Complaints which include a safeguarding concern must be recorded on the GUARD platform with all safeguarding procedures followed.

8. SAFER RECRUITMENT

All schools and services must comply with safer recruitment policies and procedures. GEMS Risk Management function will monitor compliance against the GEMS Safer Recruitment Policy on an ongoing basis including, but not limited to, the Single Central Record (SCR). Schools and services will be subject to periodic audit of their safer recruitment practices and management of SCR.

The GEMS Safer Recruitment Policies for schools and services can be found on GEMSnet *(GEMS employee access only)* and any questions or specialist guidance can be sought through the school or service HR Manager or HR Business Partner.

Employees may also be subject to ongoing checks through government entities in the school's locality.

9. POSITION OF TRUST

'Positions of trust' exist in professions where the professional is in a position of authority or status over a child or vulnerable person, e.g. school staff, volunteers, medical staff, therapists, coaches, drivers, services staff etc.

GEMS Education employees and volunteers who provide care, supervision, education and/or support to children are always in a 'position of trust'. This 'position of trust' carries with it professional conduct expectations and responsibilities. Breaches of these expectations and responsibilities are likely to lead to disciplinary action and possible dismissal.

All GEMS Education employees hold a 'position of trust' for all children connected with GEMS Education. All relationships developed with children will be as agents of the company and as such, no personal relationships will be permitted outside the remit of the service.

This means that adults should always maintain appropriate professional boundaries and avoid behaviours which might be misinterpreted by others. They should report and document any incident with this potential.

10. SAFER WORKING PRACTICE/MOE STAFF CODE OF CONDUCT

GEMS Safer Working Practice Guidance provides practical guidance to all adults on which behaviours constitute safe practice and which behaviours should be avoided. The document seeks to ensure that the responsibilities of senior leaders of educational settings towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. This guidance supplements the UAE Ministry of Education Code of Conduct for Education Professionals in General Education.

See ***GEMSNET Policies & Documents–Safer Working Practice Guidance*** *(GEMS employee access only)*.

11. STAFF TRAINING

There is an expectation that safeguarding training is in place for staff in all GEMS schools and any associated services, including the School Support Centre. Training must include an understanding of safeguarding expectations, applicable roles and responsibilities, including online safety and the school's arrangements for filtering and monitoring.

The minimum expectation for a Designated Safeguarding Lead in a GEMS school or service is that they have undertaken the GEMS Level 3 Safeguarding Training every 2 years and receive regular practice updates throughout the year through the GEMS safeguarding forums and conferences, which are mandatory to attend.

For full details of training required see Appendix F: GEMS Education Training, Policy Acknowledgement & Procedure Matrix

12. EMPOWERING CHILDREN TO KEEP THEMSELVES SAFE

Schools in the GEMS Education Group ensure children are taught about safeguarding as part of a broad and balanced curriculum. Children are taught how to keep themselves safe physically, whilst online, and how to share concerns. This is supported by school inspection frameworks and legislative frameworks in the various localities in which GEMS operate.

13. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

All schools in the GEMS Group must be clear that there is sometimes a need to provide additional support to vulnerable children. Children may be vulnerable due to a wide range of factors including but not limited to; communication difficulties, SEND, adversity and trauma.

Vulnerable children may be more susceptible to grooming, bullying, online harm or child-on-child abuse. Schools should regularly raise awareness with staff and parent/carers about early identification and how to respond to these issues.

14. EARLY IDENTIFICATION AND INTERVENTION

All schools recognise the importance of early identification and intervention to prevent escalation of safeguarding concerns.

Staff must be alert to changes in children's behaviour, attendance, mental health and/or presentation. All concerns which raise safeguarding concern must be recorded on GUARD for the school safeguarding team to coordinate early support as deemed appropriate and proportional.

15. INTIMATE CARE

When providing intimate care, schools must follow the GEMS Intimate Care Policy including the provision of a risk assessment and risk reduction plan. This plan should be created in conjunction with the Corporate Head of Inclusion, school Head of Inclusion, the child (where appropriate), the child's parents and key school staff.

16. SUICIDE IDEATION/SUICIDE ATTEMPT

Concerns relating to suicide ideation or suicide attempt must follow the GEMS Care Protocol including the implementation of a risk assessment and safety management plan. This should be created in conjunction with the child (where appropriate), the child's parents and key school staff.

See APPENDIX G: CARE PROTOCOL.

17. ATTENDANCE/CHILDREN MISSING FROM EDUCATION

GEMS Education recognises that regular attendance and punctuality at school is important for the wellbeing and safety of all children. Attendance must be monitored closely and action taken where concerns are raised; whether learning is online, blended or physically in school. Every school must have an attendance policy that is reviewed regularly by school leaders, and LAB members should monitor the impact of the policy in securing good attendance and punctuality.

Children absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign of safeguarding issues. The school's attendance policy should outline the school's responsibilities and procedures for responding to attendance concerns and persistent absenteeism in alignment with the GEMS Safeguarding Policy.

GEMS Education recognises 5 days of unexplained absence as missing from education. Where a child has 5 consecutive school days of unexplained absence and all reasonable steps have been taken by the school to establish their whereabouts without success, the school will record the concern on the GUARD platform.

Schools must ensure they follow the requirements of regulators for reporting non-attendance.

18. ONLINE SAFETY

All schools are encouraged to designate a Digital DDSL who will support the DSL to oversee online safety systems, procedures, education, training and compliance.

Online Safety Policy

All schools must have an online safety policy, regularly reviewed. This policy must:

- Include clear guidance on appropriate filtering and monitoring systems for all school devices and networks to protect children from harmful or inappropriate content. Filtering and monitoring systems must be reviewed at least annually, and that review must explicitly consider AI tool use.
- Set out clear expectations and boundaries around the use of mobile and smart technology.
- Address the risks of online abuse, including child-on-child abuse, sharing of images, and cyberbullying. The full range of online risks categorised as:

  Content: exposure to illegal or harmful material such as pornography, racism, misogyny, self-harm, suicide, radicalisation, extremism, violent content, harmful AI-generated content, misinformation, disinformation and conspiracy theories.

  Contact: harmful interactions with adults, peers or AI tools, including peer pressure, targeted advertising or grooming.

  Conduct: harmful online behaviours such as the consensual and non-consensual producing or sharing of explicit images, online bullying, self-generated intimate images or child sexual abuse images and/or videos including those generated using AI. This also includes harassment, online coercion and accessing or distributing pornography.

  Commerce: risks linked to online gambling, phishing, financial scams or exploitation, and inappropriate advertising.

- Address the potential risks associated with artificial intelligence, including exposure to AI-generated harmful content or misuse:

  Deepfakes and AI-generated images: which can be used to groom, blackmail and coerce children.

  Cognitive offloading: the risk that pupils defer their thinking to AI rather than developing their own knowledge and skills. This can reduce the likelihood of seeking help from human sources and create conditions where important disclosures are missed.

  Emotional attachment to AI chatbots: some tools are designed to actively encourage emotional connections between humans and technology. For vulnerable children, this can substitute human relationships and bypass trusted adult contact that sits at the heart of effective safeguarding. AI Chatbots can also present a safeguarding risk if they provide inaccurate, inappropriate or harmful advice, especially when they discourage young people from seeking help from trusted adults.

  Misuse of AI tools: by students to create child sexual abuse material (CSAM/AI-CSAM); to create new content that they then use to bully, sexually harass or blackmail their peers; or to create content that misinforms their peers. Any incident involving CSAM/AI-CSAM should be treated with the same level of care, urgency and safeguarding response as any other incidence involving child sexual abuse material. The DSL and members of staff should never download, copy, print, share, store or save content of this nature.

Self-generated intimate images

All incidents of self-generated intimate images and/or videos, including those generated using AI, will be dealt with as safeguarding concerns. All safeguarding concerns should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to self-generated intimate images and/or videos, including those generated using AI, is more or less serious enough to warrant a report to the DSL.

Online Communication

Online communication between staff and children should not happen other than for the purposes of coordinating an aspect of education. All communications should be made on school devices through GEMS approved communication channels. All communications should be available on request to the SLT team of the specific school or service.

For further information, please see ***GEMSNET Policies & Documents–Safer Working Practice Guidance.*** *(GEMS employee access only)*.

Relevant legislation:

- Federal Decree-Law No. 26 of 2025 — Child Digital Safety Law (CDS Law).
- Federal Law No. 45 of 2021 — Personal Data Protection Law (PDPL).
- Law No. (26) of 2015 on the Organization of Dubai Data Publication and Sharing.
- Federal Decree Law No. 34 of 2021 on Combatting Rumors and Cybercrimes.
- UAE Cabinet Resolution No. 106 of 2026 - Regulating Children's Access to Social Media Platforms.

19. BULLYING

Across GEMS schools, bullying prevention and early response are supported through the Stand Up, Speak Out Framework. GEMS schools are expected to provide clear and accessible routes for students to speak up safely and any concern of bullying must be recorded on GUARD.

20. DRUGS. ALCOHOL AND SUBSTANCE MISUSE

GEMS Education adopts a zero-tolerance approach to drugs, alcohol and substance misuse in accordance with UAE legislation and regulatory expectations.

A preventative approach is taken through student education and parent engagement to raise awareness, reduce risk and promote safe and responsible behaviours.

Please see ***GEMSNET Policies & Documents – Drugs and Alcohol Prevention & Management Policy.*** *(GEMS employee access only)*.

21. SUPPORT FOR CHILDREN, FAMILIES AND STAFF INVOLVED IN A CHILD PROTECTION CONCERN

Safeguarding concerns can result in distress for the child and anxiety for staff and parents/caregivers who become involved.

GEMS expects senior leaders to ensure that everyone involved in a child protection issue follows the procedures laid out in this policy and any other relevant policy. Senior leaders will ensure that all suspicions and disclosures are taken seriously.

The DSL will act as a central point of contact; offering details of helplines, counselling or other avenues of external support and where necessary, seeking advice and guidance from the Central Safeguarding Team, as appropriate.

22. SITE SECURITY

Visitors to the school, including contractors, must be appropriately supervised. They must sign in and have a displayed identity badge/lanyard to confirm they have permission to be on site. All visitors are expected to follow the school's safeguarding and health and safety regulations. Where possible and practical, contractors will be engaged before or after regular school hours. All schools must ensure that they follow the Access Control, Managing Patrolling at Schools Policies, and the Safecor Security Handbook, at all times.

23. EXTENDED SCHOOL AND OFF-SITE VISITS

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

When GEMS children attend off-site activities, including day or residential visits and work-related activities, the Principal/CEO is responsible for ensuring that effective safeguarding and child protection arrangements are in place. The Principal/CEO must ensure that the school has followed procedures as outlined in the ***GEMS Offsite Educational Trips and Visits Policy*** *(GEMS employee access only)*.

The GEMS Safeguarding Policy and school-specific on-site procedures apply to all trips, including the mandate to escalate any safeguarding concerns as per the policy. If other organisations provide services or activities on the school site, the school will ensure that there is an appropriately trained safeguarding lead and check the organisations have appropriate procedures in place, including safer recruitment and health & safety procedures. The school must ensure that there are arrangements in place for the provider to report safeguarding concerns.

24. SAFEGUARDING/CHILD PROTECTION LEGISLATION AND GUIDANCE

GEMS will adopt the relevant law, legislation and guidance governing the jurisdiction of the operating locality of the school. We understand that in different regions of the Emirates, and in the different countries in which GEMS operate, subtlety of legal interpretation may exist.

25. RECORD KEEPING

GUARD should be used as the system to record, escalate, review actions taken and evaluate outcomes of concerns. All safeguarding concerns must be entered on GUARD and staff must be trained in how to raise concerns.

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

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

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

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

On some occasions, it may be deemed necessary to obtain photographic evidence of suspected injuries to a child. School staff (including medical staff) must not photograph children. This evidence will be obtained by the Police, external medical professionals or child protection services.

School staff may document details in writing of any visible injuries or illustrate the position and extent of the injuries on GUARD using the body map but must not take any photographs of a child.

Service staff will report all child safeguarding concerns to the school DSL, for the school to record on the GUARD platform. Service staff will record any allegations raised against adults in their service on their own GUARD platform.

26. CONFIDENTIALITY AND INFORMATION SHARING

All safeguarding data is recorded confidentially on GUARD. Effective safeguarding requires appropriate information sharing. Safeguarding information is only shared lawfully, proportionately and in the best interests of a child. Concerns about sharing information must not prevent action being taken to protect a child.

Upon confirmation that a child has transferred to another GEMS school, any safeguarding records held on the GUARD platform can be transferred to the new school DSL. Paper based safeguarding records should be transferred to the DSL of the receiving school. The DSL of the current school should also contact the DSL or Principal/CEO in the receiving school by telephone to provide a full picture of the child(ren).

When children transfer to a school outside of the GEMS Group, every effort should be made to contact the DSL or Principal/CEO by telephone regarding any vulnerable child and share appropriate information in the best interest of the child. Further advice and guidance can be sought from the Central Safeguarding Team.

27. SAFEGUARDING DATA MONITORING

GEMS Education monitors safeguarding data to identify patterns, risks, emerging and declining trends and opportunities for proactive safeguarding and further development. This may include analysis of timings and categories of concern, repeated concerns, concerns based on demographics, alongside any additional identifiable categorisations. Data findings inform training, policy development and preventative strategies.

APPENDIX A: UAE GOVERNMENT SAFEGUARDING MANDATE FOR EDUCATORS

The following information can be used in a school/service's literature/website to inform parents of the expectations of school staff regarding UAE child protection legislation:

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

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

National Child Protection Policy in Educational Institutions in United Arab Emirates

APPENDIX B: GOVERNMENT OF SHARJAH SOCIAL SERVICES DEPARTMENT: TEACHER'S GUIDE SERIES 2025; EARLY DETECTION OF CHILD ABUSE AND VIOLENT CASES

Please refer to this document for government guidance issued in Sharjah to support early identification of safeguarding and child protection concerns.

Guidance issued directly to schools in Sharjah.

APPENDIX C: SAFEGUARDING POLICY [P.19] IN RAS AL KHAIMAH DEPARTMENT OF KNOWLEDGE: SCHOOL HEALTH AND SAFETY POLICY

School-Health-and-Safety-Policy_RAK-DOK.pdf

Please refer to this document for further guidance to support safeguarding practice in schools located in the emirate of Ras al Khaimah.

APPENDIX D: ROLES AND RESPONSIBILITIES

The Governing Body (GEMS Education) ensures that schools:

- Have safeguarding, recruitment and managing allegations procedures that take into account the procedures and practice of GEMS Education, the country of operation and any national legislation/ guidance.
- Appoint a Designated Safeguarding Lead who is a member of the Senior Leadership Team and who holds a valid GEMS Level 3 Safeguarding Training Certificate, in addition to GEMSU Basic Awareness Training and GEMS Level 1 Training.
- Are compliant with the GEMS Safeguarding Policy and procedures.
- Ensure the GEMS Safeguarding Policy is publicly available on the school's website.
- Have procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the Principal/CEO and allegations against other children.
- Follow safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification by professional association regulations.
- Develop an induction strategy that ensures all staff, including the Principal/CEO, and volunteers receive training on safeguarding arrangements, Safer Working Practice and the role of the DSL, on induction and before they start work at the school or service.
- Develop a training strategy that ensures all staff and volunteers receive appropriate and regularly updated safeguarding and child protection training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively in line with any requirements of GEMS. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties below, these include mandatory attendance at GEMS safeguarding forums and conferences.
- Contribute to inter-agency working when necessary.
- Teach children about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.

The Principal/CEO:

- Holds overall responsibility for fostering a culture of safeguarding at the school; incorporating all elements of the policy and robust safeguarding practices.
- Ensures the GEMS Safeguarding Policy and procedures are understood and implemented by all staff including how to identify, raise, record and escalate concerns effectively.
- Allocates sufficient time, training, support and resources, including cover arrangements, when necessary, to enable the DSL and Deputies to carry out their roles effectively, including attendance at any external agency discussions, training and other necessary meetings.

- Ensures all staff receive safeguarding training in line with the GEMS Safeguarding Policy before they commence working in school or service.
- Ensures all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the GEMS Safeguarding Policy and Whistleblowing procedures.
- Ensures children are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.
- Refers all high-risk allegations that a child has been harmed by, or that children may be at risk of harm, from a member of staff or volunteer to the Central Safeguarding Team on the day of the allegation and documents it as an allegation on GUARD.
- Appoints an Allegations Manager and Deputy, who have completed GEMS Level 3 Safeguarding Training, to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.
- Ensures safeguarding is a standing agenda item in Safeguarding Team, SLT, LAB, and pastoral meetings including regular updates on the impact of training and compliance with the policy.
- Ensures safeguarding patterns and trends are monitored through Power BI.

The Designated Safeguarding Lead (DSL):

- Is a senior member of staff from the school or service's Leadership Team. The DSL must have the status and authority within the school to carry out the duties of the post, including committing resources, supporting and directing other staff.
- Takes lead responsibility for safeguarding and child protection in the school (including online safety and understanding the filtering and monitoring systems and processes in place), the overall responsibility of which cannot be delegated. However, the day-to-day activities of the DSL may be delegated to appropriately trained deputies.
- Holds valid GEMS Level 3 Safeguarding Training Certification, which is refreshed every two years; attends all GEMS safeguarding forums and conferences and engages in additional training to update their knowledge and skills relevant to their role.
- Acts as a source of support and expertise to the school or service community.
- Encourages a culture of listening to children and taking account of their wishes and feelings.
- Is alert to the specific needs of children, including those with special educational needs or other vulnerabilities.
- Has a working knowledge of relevant local law, education inspection process, external and inter-agency support.
- Keeps detailed, accurate records of all concerns using the GUARD platform detailing discussions,

decisions made including the rationale for those decisions and outcomes. This should include instances where referrals were or were not made to an external agency.

- Refers cases of suspected abuse to the local child protection agency or the Police as appropriate and seeks advice and guidance from the Central Safeguarding Team, prior to any external referral.
- Attends and/or contributes to any external child protection meetings and chairs regular safeguarding meetings within the school or service.
- Develops effective links with relevant statutory and voluntary agencies.
- Ensures that all staff sign to indicate that they have read and understood the GEMS Safeguarding Policy.
- Has a working knowledge of relevant national safeguarding guidance.
- Ensures that the school or services safeguarding procedures are regularly reviewed, in collaboration with the whole school or service community of children, parents, staff, volunteers and LAB Members.
- Liaises with the Principal/CEO and the Central Safeguarding Team on child protection concerns.
- Keeps a record of staff attendance at school/service-based safeguarding training, which is signed and dated by individual staff members.
- Ensures the GEMS Safeguarding Policy is publicly available for staff and parents, e.g., on the central area, school or services website or by other means.
- Ensures parents are aware of the school's role in safeguarding and the referral process of suspected abuse.
- Ensures the Principal/CEO and EVP—Education are aware of the DSL responsibility, under relevant law and GEMS Safeguarding Policy, to keep them informed of any relevant safeguarding and child protection issues.
- Ensures safeguarding patterns and trends are monitored through Power BI and that data-driven strategies are in place to support proactive safeguarding practice.

The Deputy Designated Safeguarding Lead(s):

- Is/are appropriately trained to the same level as the DSL and, in the absence of the DSL, carries out those functions as necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the deputy will assume all the functions above, with approval of the Principal/CEO and the Head – Safeguarding Operations.

APPENDIX E: CHILD PROTECTION PROCEDURES

Recognising abuse

To ensure GEMS children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse is covered in all GEMS safeguarding training, commensurate with the level of training.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a child home alone, or leaving knives or matches within reach of an unattended child. Abuse may take place in person or online, and can be committed by adults, both male and female, or other children.

Abuse, neglect and exploitation

Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All staff should be aware of indicators of abuse, neglect and exploitation so they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or Deputy DSL).

All should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In some instances, abuse will occur concurrently via online channels and in daily life. Children can also abuse their peers online, this can take of the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

Definitions of abuse, neglect and exploitation

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children can be abused in any setting, by those known to them, or, less commonly, by stranger. Abuse can take place in person, and or wholly, or partly online; technology can also be used to facilitate offline abuse. Children can be abused by an adult, adults, a child, or children.

Physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse (including psychological abuse): The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

Emotional abuse may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: Involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape) or rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and all staff should be aware of it and procedures for dealing with it.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Affluent neglect refers to a form of unmet need experienced by children and young people who may appear materially well provided for, yet lack consistent emotional availability, appropriate supervision, or meaningful engagement from caregivers. It is characterised by limited attention to a child's developmental, emotional or relational needs.

Domestic Abuse: Domestic abuse is typically defined as behaviour occurring between two or more individuals in a close personal or family relationship—such as current or former partners, relatives or people who share a child. Domestic abuse can encompass a wide range of behaviours, might be a single incident or a pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of domestic abuse at home and/or suffer domestic abuse in their own relationships. All of which can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or the increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. On occasion, this is sometimes referred to as 'sextortion'.

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical.
- Harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of child sexual abuse imagery and self-generated intimate images and/or videos, including those generated using AI.
- Up-skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- Online child-on-child abuse is any form of child-on-child abuse with a digital element, for example 'sexting', online abuse, deepfakes / AI-generated intimate or child sexual abuse imagery, cyberbullying, coercion and exploitation, peer on peer grooming, threatening language delivered via online means, the distribution of sexualized or violent, online content and harassment.

Suicide Ideation/Attempt:

In the event that a student discloses suicide attempt or suicide ideation staff must ensure that the student is supervised and safe while the DSL is informed immediately and the Care Protocol initiated.

Self-generated intimate images and/or videos, including those generated using AI

If staff become concerned that a child may be in possession of self-generated intimate images, or other child sexual abuse imagery and/or videos, including those generated using AI, on a device (e.g. mobile phone, tablet, digital camera), they must act in line with GEMS safeguarding procedures. The member of staff will support the child and take the device immediately to the Designated Safeguarding

Lead (DSL). Staff must not view, copy, share, print, or otherwise handle any images.

The DSL will discuss the concerns with appropriate staff and speak to any child involved as appropriate. Parents/carers will be informed at an early stage and involved in the process, after the DSL has discussed the issue with the Principal/CEO and the Central Safeguarding Team.

If there is concern that a child has been harmed or is at risk of harm, a referral will be made to the relevant external agency, after speaking to the Central Safeguarding Team.

The DSL will make a judgement about whether the incident involving self-generated intimate images and/or videos, including those generated using AI, is experimental or aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by children with or without the use of AI. These include possible adult involvement or criminal or abusive behaviour by children such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a child who is pictured.

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

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

Examples of aggravated incidents include:

- Evidence of adult involvement in acquiring, creating or disseminating indecent images of children (possibly by an adult pretending to be a child known to the victim).
- Evidence of coercing, intimidating, bullying, threatening and/or extortion of children by one or more other child to create and share indecent images of themselves.
- Pressurising a child or children to create and share indecent images of themselves who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves.
- Dissemination of indecent images of children (child sexual abuse imagery), including those produced with AI, to others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation).
- What is known about the imagery suggests the content depicts sexual acts.
- Sharing of indecent images places a child at immediate risk of harm, for example the child is presenting as suicidal or self-harming.

As a rule, adults should not view self-generated intimate images or child sexual abuse images and/or videos, including those generated using AI. Wherever possible, the DSL's response to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on local laws, safeguarding best practice and never taken in isolation. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child or has the potential to be viewed as a criminal activity in the country in which the school operates.

Any decision should be initially discussed with the Principal/CEO and Central Safeguarding Team and if a decision is made to view imagery, they will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the child involved).
- Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the child or parent in making a report.
- Is unavoidable because a child has presented an image directly to a staff member or the imagery has been found on a GEMS-owned device.

If it is necessary to view the imagery, the DSL will:

- Never copy, take a photo of, print or share the imagery.
- Ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the Principal/CEO.
- Ensure viewing takes place with another member of staff present in the room, ideally the Principal/CEO, another DSL, or a member of the leadership team. The other staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school premises, ideally in the Principal/CEO or DSL's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the child in the imagery.
- Document the viewing of the imagery on GUARD, including who was present, why the image was viewed and any subsequent actions and outcomes.

If images do not meet the criteria for other agency involvement, consideration be given to deleting imagery from devices and online services in collaboration with the Central Safeguarding Team to limit any further sharing of the imagery, this will be in consultation with parents.

Any viewing of imagery on CCTV, should follow GEMS CCTV and Surveillance Policy and local regulations.

Indicators of abuse

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

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

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused. A child who is being abused or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries.
- Show signs of pain or discomfort.
- Keep arms and legs covered, even in warm weather.
- Be concerned about changing for PE or swimming.
- Look unkempt and uncared for.
- Change their eating habits.
- Have difficulty in making or sustaining friendships.
- Appear fearful.
- Be reckless regarding their own or other's safety.
- Self-harm.
- Frequently miss school or arrive late.
- Show signs of not wanting to go home.
- Display a change in behaviour – from quiet to aggressive, or happy to withdrawn.
- Challenge authority.
- Become disinterested in their schoolwork.
- Be constantly tired or preoccupied.
- Be wary of physical contact.
- Be involved in, or particularly knowledgeable about drugs or alcohol.
- Display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development.
- Acquire gifts such as money or a mobile phone from new 'friends' or adults.

Individual indicators should be viewed as part of a comprehensive safeguarding picture and all information will help the DSL respond. It is very important that staff report all safeguarding concerns, however minor or insignificant they may think they are, they do not need certainty that the child is at risk.

Any safeguarding concern, may be part of a bigger picture for that child which if known, could give context to a situation and help to protect them.

Taking Action

Any child, in any family, in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

GUARD

All staff have access to the GUARD platform and concerns relating to any aspect of safeguarding and child protection must be recorded ***here*** *(GEMS employee access only)*.

Where there is concern about the immediate welfare of a child, the DSL should also contact the Central Safeguarding Team for advice and guidance immediately. Any potential external agency involvement with statutory, and public bodies, including the Police/social services/regulatory bodies, must be notified to the Central Safeguarding Team.

The Central Safeguarding Team and the relevant EVP-Education should be informed immediately of any concern categorised as high risk or hospitalisation/fatality by the DSL or Principal/CEO.

Key points for staff to remember when taking action are:

- In an emergency take the action necessary to help the child.
- Report your concern to the DSL as quickly as possible and record on GUARD, staff should never leave site with an unreported or unrecorded concern.
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
- Seek support for yourself from the school safeguarding team if you are distressed or need to debrief.

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

There will be occasions when staff may suspect that a child may be at risk but have no evidence. Staff should give the child the opportunity to talk. It is appropriate for staff to ask a child if they are OK or if they can help.

Staff should report these concerns to the DSL and record on GUARD as per any other concern about a child's welfare.

Concerns which do not meet the threshold for safeguarding intervention may be managed through the school's pastoral and wellbeing procedures.

If a child discloses to a member of staff or volunteer

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

If a child shares a concern, or makes a disclosure, which indicates there is a safeguarding risk to themselves, or someone else, the staff member must inform the child of their professional responsibility to share the information with the DSL; staff must not promise confidentiality. Children may reconsider their disclosure at this point and should not be forced to disclose.

During their conversations with children, staff will:

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

Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL/DDSL will contact the parent in the event of a concern, suspicion, or disclosure.

However, if the school believes that notifying parents could expose the child to significant risk of harm, advice should be sought first from the Central Safeguarding Team.

Making a referral to an external agency

The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless doing so would increase the risk to the child or create undue delay. Advice and guidance must be sought from the Central Safeguarding Team.

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

GEMS Central Safeguarding Team

Decisions related to safeguarding and child protection are made in the best interest of the child. Therefore, decisions regarding case management will not be made in isolation by individuals but in collaboration with the Central Safeguarding Team.

APPENDIX F: GEMS EDUCATION SAFEGUARDING TRAINING, POLICY ACKNOWLEDGEMENT & PROCEDURE MATRIX

Safeguarding Training

PERSONNEL	TRAINING LEVEL	MODE	FREQUENCY
DSL, DDSLs, Principal/CEO, EVP-Education, Allegations Manager and Deputy Allegations Managers	**Mandatory** – GEMS Level 3 Safeguarding Training	Face to face	Every 2 years
Key staff who assist the school/service safeguarding team in TACs ie. Heads of Year, other pastoral leaders, Counsellors, front of house teams	**Advisory** – GEMS Level 2 Safeguarding Training	Face to face	Every 3 years
All GEMS Education school/ service staff	**Mandatory** – GEMS U Basic Awareness Safeguarding Training	Online	Annually
	Mandatory – GEMS Level 1 Safeguarding Training (Signed and dated training records must be maintained)	Face to face	On or before the first working day* & Refreshed annually
	Advisory – Safeguarding Training Updates bespoke to the school/service	Face to face or online	Termly

PERSONNEL	TRAINING LEVEL	MODE	FREQUENCY
External providers working with children ie. non-GEMS services and therapists	**Mandatory** – GEMS Level 1 Safeguarding Training (Signed and dated training records must be maintained)	Face to face	On or before the first working day* & Refreshed annually
Volunteers and LAB Members	**Mandatory** – GEMS Level 1 Safeguarding Training for Volunteers and LAB Members (Signed and dated training records must be maintained)	Face to face	On or before the first operational day
GEMS Education staff based at SSC	**Mandatory** – GEMS Level 1 Safeguarding Training (Signed and dated training records must be maintained)	Face to face	On induction
	Mandatory – GEMS U Basic Awareness Safeguarding Training	Online	Annually
External providers who do not work with directly children ie. site maintenance contractors and visitors to school site	**No training requirements. Operations should be organised for when students are offsite. If this is not possible, they must be appropriately supervised whilst students are onsite.**		

*Where the first working day falls within a school holiday, safeguarding training must be delivered before students return to the school site.

Safer Recruitment Training

PERSONNEL	TRAINING LEVEL	MODE	FREQUENCY
GEMS Education school/ service staff	***Mandatory*** *– GEMS U Safer Recruitment Training for 1 member of every recruitment panel* ***Advisory*** *– GEMS U Safer Recruitment Training for additional staff members supporting staff recruitment*	*Online*	*Annually*

Mandatory Policy Acknowledgement & Additional Procedures

PERSONNEL	POLICY/PROCEDURE	FREQUENCY
All GEMS Staff (school/service)	GEMS Safeguarding Policy	Signed and dated annually
	GEMS Code of Conduct	Signed and dated on or before first date of employment
	GEMS Safer Recruitment Procedures	As directed by GEMS HR
Volunteers/LAB Members	GEMS Safeguarding Policy	Signed and dated annually
	Good Conduct Certificates	On or before first date of operation
	Confidentiality Agreement	On or before first date of operation

PERSONNEL	POLICY/PROCEDURE	FREQUENCY
External providers working with students, ie. non-GEMS services and therapists	GEMS Safeguarding Policy	Signed and dated annually
	GEMS Procurement & GEMS Safer Recruitment Procedures	As directed by GEMS Procurement and GEMS HR
External providers who do not work directly with children	GEMS Procurement & GEMS Safer Recruitment Procedures	As directed by GEMS Procurement and GEMS HR

APPENDIX G: CARE PROTOCOL

This guidance outlines the procedures that school must follow for any student who has attempted suicide or is ideating suicide. The school endeavours to support the child, their family and the school community in cases of attempted, or ideation, of suicide. The processes, delivered through a Care Protocol, are in place to facilitate support and to encourage all parties and professional bodies to work collaboratively in the best interests of the child. If you would like to see a copy of this guidance, please refer to your school or service DSL.