حكومة دبي
GOVERNMENT OF DUBAI

Knowledge المعرفة

Policy Framework for

Safeguarding and Learner Protection

in Dubai's Private Educational Institutions



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1

Introduction

1 Introduction

High-quality education can only be achieved in safe, inclusive, and supportive learning environments where every learner feels safe, respected, and has a strong sense of belonging, and is empowered to learn, grow, and participate with confidence. Learner safeguarding and protection is therefore a fundamental pillar of an education system that places learners at the heart of the educational experience and supports the ambitions of Dubai's Education 33 Strategy to elevate educational quality, enhance quality of life, and reinforce Dubai's position as a leading global destination for education.

The Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions marks a shift from responding to safeguarding concerns as they arise to a proactive, institution-wide approach that prioritises prevention, strengthens governance, builds capability, and embeds safeguarding within institutional policies, practices, and decision-making.

The Policy Framework affirms that safeguarding is a shared institutional responsibility, requiring leadership commitment, the engagement of all staff, and strong partnerships with parents and relevant stakeholders. It promotes a culture of prevention, vigilance, effective response, and continuous improvement.

1.1 Purpose

The Knowledge and Human Development Authority (KHDA) is a government entity in Dubai with a mandate to support the continuous development of the emirate's private education sector, while promoting Emirati values that place family wellbeing and the safety and protection of learners at the centre of educational practice.

Aligned with the United Arab Emirates' policies and legislation, the purpose of KHDA's **Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions** (hereafter referred to as the Framework) is to establish a clear regulatory basis for safeguarding and learner protection across Dubai's private education sector. It sets out the mandatory duties that educational institutions must meet, ensuring that learners are consistently protected and supported throughout their educational journey.

1.2 Scope

Safeguarding is a shared responsibility across the education community in Dubai. This Framework applies to **all private educational institutions permitted by KHDA**, across all phases and modes of provision, whether operating from physical premises or through virtual learning environments. This includes early childhood centres, schools, higher education institutions, and training or vocational institutes.

The Framework applies to **all learners enrolled in Dubai's private educational institutions, without exception**. Within this scope, educational institutions and their staff are responsible for ensuring the safety and protection of all learners and for addressing cases that may affect their safety or quality of life. This includes identifying cases requiring intervention, providing support, making internal reports, and taking appropriate action when necessary. This responsibility is implemented through two distinct pathways, depending on the learner's age, as follows:

- **Learners under 18 years of age:** All statutory requirements and procedures relating to children apply to them in accordance with the provisions of Federal Law No. (3) of 2016 on Child Rights (Wadeema). This includes mandatory referral to the Community Development Authority (CDA), notification of parents, guardians or caregivers, and other relevant procedures.
- **Learners aged 18 years and above:** The educational institution continues to have responsibilities towards these learners in relation to their safety and protection, while recognising their legal status as adults when applying requirements relating to confidentiality, consent, reporting and referral pathways. They may report directly any concerns relating to their safety or protection to the relevant staff within their educational institution and, where necessary, to the competent authorities outside the institution.



1.3 The Legal Mandate

This Framework is issued by KHDA under its statutory authority to regulate private education in Dubai. Compliance with this Framework is mandatory and legally binding. The Framework is underpinned by relevant federal and emirate-level legislation and policy instruments, including:

- Federal Law No. (3) of 2016 on Child Rights (Wadeema), its amendments and bylaws
- The National Child Protection Policy in Educational Institutions (2022)
- Relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai

These instruments provide the legal foundation for the safeguarding and learner protection requirements set out in this Framework. Definitions of all terms used in this document are provided in the glossary listed in **Appendix A**. The relevant legislative and regulatory instruments are listed in **Appendix C**.

1.4 How to Use this Document

All educational institutions must align their safeguarding and learner protection policies and practices with the Directives set out in this Framework and with all relevant legislation. This alignment establishes a consistent and comprehensive standard across all settings and will be monitored for compliance through established regulatory processes.

This Framework is organised around four interdependent pillars:

- **Safeguarding Foundations**
- **Enabling Mechanisms for Safeguarding**
- **Safeguarding Processes for Managing Concerns**
- **Safeguarding Rigour**

An overview of these pillars is provided in Section 2.1 and they are detailed in Sections 3-6. Across the pillars, the Framework sets out directives that specify what educational institutions are required to have in place and what they are expected to do in practice to meet safeguarding and learner protection obligations. The directives are presented using two categories of expectation:



Must (directive)
These are mandatory requirements that apply to all private educational institutions without exception. They are legally binding and enforceable under KHDA's regulatory authority, and compliance is monitored and enforced by KHDA.



Could (guidance)
These are optional practices and illustrative examples of best practice that educational institutions may adopt to strengthen their safeguarding arrangements beyond the minimum required standard. They are not mandatory, and do not form part of compliance requirements.

Compliance with this Framework is determined solely by adherence to the *must* directives. The inclusion or implementation of *could* guidance does not compensate for failure to meet mandatory requirements. Across this Framework, accountability for meeting the directives rests with the educational institution. While specific safeguarding duties may be carried out by designated roles, leaders, staff members, or third-party providers, the educational institution remains responsible for ensuring that all requirements are implemented and maintained.

Staff at all levels are required to be familiar with this Framework and to have a clear understanding of their responsibilities in relation to safeguarding and learner protection.

2

Safeguarding in Education: Overview of the Safeguarding Model

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Educational institutions play a central role in supporting learners' development, wellbeing, and their ability to participate fully in education. Safe, supportive learning environments enable learners to grow, build confidence, and engage positively with their education and the wider community.

However, learners may face risks that affect their safety, wellbeing, or ability to learn. **Abuse, neglect, exploitation, and other forms of harm** can have serious and lasting consequences for learners' physical, emotional, social and educational development. Such harm may occur in a range of environments, including homes, communities, educational settings, and online spaces, and may not always be immediately apparent.

Given the significant time learners spend in educational settings, educational institutions are often well placed to notice when a learner may be experiencing difficulty or at risk. Staff, through their regular contact with learners and understanding of their development and wellbeing, are often able to recognise changes in behaviour, attendance, engagement, or presentation that may indicate a learner needs support. This places educational institutions in a unique position of responsibility to recognise concerns early and ensure appropriate action is taken.

Within the education system, safeguarding and learner protection operate together to support this responsibility:

KEY TERMS

Safeguarding	Learner protection
Focuses on preventing harm by creating safe environments, promoting wellbeing, upholding rights, and reducing risks before they escalate. This includes building learners' capacity to recognise risks and make appropriate decisions to avoid them.	Focuses on responding when concerns arise, ensuring that learners at risk of harm are identified, supported, and protected through appropriate action.

Full definitions of all terms used in this Framework are provided in Appendix A.

Together, these complementary approaches form the foundation of the safeguarding system established by this Framework.

2.1 The Safeguarding Pillars

Safeguarding requires a whole-institution approach, supported by consistent understanding, coordinated action, and accountability at all levels. Effective safeguarding extends beyond policy compliance and depends on clear structures, defined roles and responsibilities, and consistent practice across the institution.

To support this, the Framework establishes an integrated safeguarding model structured around four complementary pillars:

Safeguarding Foundations (Section 3) set out the cultural, organisational, and preventive conditions that reduce risk and promote learner wellbeing.

Safeguarding Rigour (Section 6) provides the structured mechanisms for monitoring, review, and continuous improvement that ensure safeguarding arrangements remain effective.

Enabling Mechanisms for Safeguarding (Section 4) define the roles and responsibilities, structures, leadership arrangements, recruitment practices, training and professional expectations that support consistent safeguarding practice.

Safeguarding Processes for Managing Concerns (Section 5) describe the operational processes that apply when concerns arise, including recognising concerns, responding appropriately, reporting through authorised escalation routes, and maintaining accurate safeguarding records.

These pillars operate collectively rather than in sequence. Together, they form the safeguarding system established by this Framework.

2.2 Guiding Principles

Effective safeguarding and learner protection are underpinned by shared guiding principles that shape how institutions prioritise learner wellbeing, assess risk, and make safeguarding decisions in daily practice and in more complex situations. These principles provide a common foundation across roles and settings, supporting consistency while allowing for professional judgement.

Within this Framework, the guiding principles describe the core expectations and behaviours that inform safeguarding practice across all pillars. They are not operational requirements but provide the foundation for effective and consistent safeguarding practice. The guiding principles are expressed as SPARK (Safeguarding, Protection, Accountability, Responsibility, and Knowledge).

- **S - Safeguarding** – Creating safe environments where learners are supported, respected, and able to raise concerns about their safety or wellbeing.
- **P - Protection** – Acting promptly to minimise harm and safeguard learners when risks or concerns are identified, guided by the learner's best interests.
- **A - Accountability** – Ensuring safeguarding responsibilities are understood, owned, and subject to appropriate oversight at all levels.
- **R - Responsibility** – Embedding safeguarding as a shared institutional duty, rather than the function of a single role or team.
- **K - Knowledge** – Building awareness, skills, and confidence so that adults and learners can recognise risk and act in the learner's best interests.

These principles apply across all education phases and contexts and inform how safeguarding is understood and implemented throughout the Framework. Consistent application of safeguarding principles creates a culture where protection is a shared value, not merely a procedural requirement.

3

Safeguarding Foundations: Establishing a Positive Safeguarding Culture

3 Safeguarding Foundations: Establishing a Positive Safeguarding Culture

Safeguarding foundations describe the preventive structures within educational institutions that reduce risk and support learner safety and wellbeing. They are established through clear policies and consistent everyday practice, which together shape the safeguarding culture across the institution.

Foundations do not replace safeguarding action when concerns arise; rather, they reduce risk and support effective safeguarding responses. Policies set out the formal expectations for safeguarding and wellbeing, while institutional practices give effect to these expectations in daily operations.

Within this Framework, safeguarding foundations identify the key areas of preventative safeguarding practice, including learner wellbeing and welfare, learner voice and advocacy, safeguarding within the curriculum, attendance, and consistent safeguarding standards across all aspects of provision, including off-site and boarding arrangements.

3.1 Policies and Procedures

Clear safeguarding and wellbeing policies support safe practice within educational institutions. They set consistent standards, guide staff actions, and provide assurance that learner safety and wellbeing are prioritised. Written policies alone do not ensure effective safeguarding. Their effectiveness depends on clear communication, consistent implementation, and regular review in response to evolving risks, regulatory requirements, and practice.

Directive - Institutions must:

1. Develop, implement, and communicate a legally compliant suite of safeguarding, health and safety, and wellbeing policies aligned with UAE laws and regulatory requirements, relevant protocols adopted in the Emirate of Dubai, and KHDA guidance.
2. Ensure policies are formally approved by the board or governing body, following consultation with the institution's stakeholders' associations (including parents association).
3. Ensure that written policies address, at a minimum, the following safeguarding-related areas, informed by institutional context and risk profile, and set out clear, detailed arrangements, procedures and expectations consistent with this Policy[1]:

    - Safeguarding and Learner Protection
    - Addressing Extremism and Related Risks (including identification, reporting, and appropriate response to radicalisation risks)
    - Anti-Bullying
    - Attendance
    - Behaviour

[1] The Safeguarding and Learner Protection policy underpins this Framework. The remaining policies are listed in alphabetical order and do not indicate priority or hierarchy.

Directive - Institutions must:

- Critical Incident and Emergency Planning
- Digital Safety (including filtering and monitoring, AI, responsible use, and social media)
- Educational Visits and Offsite Provision
- Extracurricular Activities
- Food and Nutrition
- Health and Safety
- Inclusion
- Intimate Care (for younger learners or for learners who require health or personal care support, where applicable)
- Managing Allegations
- Medical Services and Clinic Provision
- Mental Health and Wellbeing
- Safer Recruitment
- Staff Code of Conduct
- Staff Disciplinary Procedures
- Substance Use and Abuse (including vaping/smoking)
- Whistleblowing (including reporting routes, protection for whistleblowers, procedures for handling anonymous disclosures and management of malicious allegations) in accordance with the relevant legal provisions.

4. Ensure the institutional safeguarding policy is aligned with and reflects the safeguarding processes set out in Section 5 of this Framework.

5. Ensure safeguarding and related policies are implemented consistently across all areas of institutional provision.

6. Ensure safeguarding and related policies are readily accessible and communicated to staff, parents, guardians, or custodians, and learners in culturally appropriate and accessible formats.

7. Ensure safeguarding and related policies are subject to formal review in accordance with Section 6 of this Framework.

8. Consult staff, parents, guardians, or custodians, and learners in the development and review of key safeguarding-related policies.

9. Upon joining the institution, ensure that learners and their parents or guardians, and upon appointment, staff members, are made aware of the ethical and societal values of the United Arab Emirates, based on relevant official sources and references, including Professional and Ethical Code of Conduct for School Staff, national guidance and curricula relating to the UAE's values and national identity, and any other references adopted by the competent authorities in the UAE. Institutions must also provide staff training that reinforces their commitment to these values, ensuring that practices or behaviours inconsistent with the values of the UAE are avoided.

Guidance - Institutions could:

- Create and maintain a structured calendar to schedule, track, and evidence policy and version updates.
- Develop supplementary policies tailored to the institution's context and risk profile.
- Use policy briefings, workshops, or digital summaries to strengthen staff and parent/custodian engagement.
- Translate key policies into multiple languages to improve accessibility.
- Involve learner councils or ambassadors in shaping policies, particularly those related to anti-bullying and digital safety.

3.2 Wellbeing and Support

Wellbeing and welfare underpin safeguarding by creating safe and supportive conditions for learners. Educational institutions promote learner wellbeing through everyday practices and support arrangements that reduce risk and enable early identification of concerns.

Learner wellbeing includes learners' physical, emotional, psychological, and social needs. It is supported through safe environments, access to appropriate support, positive relationships within the institution, and learning opportunities that help learners understand safety, wellbeing and help-seeking. Strong wellbeing arrangements support early intervention and reduce the likelihood of harm.

Wellbeing support may include counselling, mental health and resilience programmes, support for learners with additional needs, physical and medical care, and initiatives that promote positive relationships, digital safety, and emotional literacy.

These help reduce stigma, encourage help-seeking, and enable concerns to be identified and addressed early. Wellbeing arrangements may also involve coordinated engagement with families and, where appropriate, external organisations, as part of everyday safeguarding practice.

Directive - Institutions must:

10. Ensure learner wellbeing and mental health are consistently embedded within safeguarding procedures, staff training, and preventative practices, appropriate to the age, stage, and needs of learners.
11. Ensure wellbeing provision is accessible to all learners without discrimination or stigma and is appropriate to their age and developmental stage.
12. Ensure clear and accessible arrangements are in place for learners to access counselling or wellbeing services delivered by qualified, licensed professionals, in line with UAE and Dubai regulations. Regular professional supervision is provided for counsellors and CPC/DSLs to ensure the quality of practice and support staff wellbeing.

Directive - Institutions must:

13. Ensure that wellbeing support does not replace safeguarding action where a learner may be at risk of harm.
14. Ensure wellbeing and counselling provision operates in accordance with institutional safeguarding and information-sharing procedures, and that any concern indicating risk of harm is recognised and managed as a safeguarding concern in line with Section 5 of this Framework.
15. Prohibit the use of counselling or wellbeing interventions as disciplinary measures.
16. Ensure third-party wellbeing providers meet institutional safer recruitment and suitability standards, including holding the necessary licenses issued by the competent authorities in the UAE.
17. Ensure the curriculum includes age-appropriate learning opportunities that support learner wellbeing, including the development of resilience, emotional literacy, positive relationships, and digital awareness.
18. Provide awareness activities for learners, staff, and families to reduce stigma and promote help-seeking.
19. Ensure learners have access to appropriate and confidential spaces for wellbeing support, such as individual counselling rooms and separate spaces for conducting interviews and providing support, including arrangements that safeguard learner privacy and confidentiality when support is provided remotely.
20. Work with families and relevant agencies to ensure coordinated support and continuity of care.

Guidance - Institutions could:

- Assign a designated lead to coordinate counselling, wellbeing programmes and staff training.
- Use surveys, focus groups and other tools to evaluate wellbeing initiatives and adapt provision.
- Develop peer-support initiatives such as learner mentors or wellbeing ambassadors.
- Partner with external organisations, supported by clear mechanisms for their selection and governance, to expand access to specialised services.

3.3 Learner Voice and Advocacy

The voice of the learner plays a central role in creating a safe and inclusive educational community. Learners' views, wishes, and feelings about their safety and wellbeing inform safeguarding practice within educational institutions. When learner voice is valued and managed responsibly, it strengthens trust and supports learners to shape decisions that affect them.

Learner voice also supports safeguarding by providing insight into experiences, behaviours, and risks that may not always be visible to staff or the wider community, enabling institutions to identify issues and adjust practice where needed. These arrangements complement, but do not replace, formal safeguarding reporting processes.

Directive - Institutions must:

21. Ensure safe and age-appropriate arrangements are in place for learners to express views, wishes, and concerns about their safety, wellbeing and experiences - in accordance with prevailing social traditions and norms - without stigma, reprisal or adverse consequences, and that these are recorded, considered and inform safeguarding decisions and institutional practice.
22. Ensure structured, age-appropriate representative mechanisms, including learner councils, learner advisory groups, and learner-led forums, are in place to enable learners to contribute to safeguarding and wellbeing.
23. Ensure learners receive feedback, where appropriate, on how their views have been considered and acted upon.

Guidance - Institutions could:

- Develop, implement and communicate a Learner Voice Policy to formalise approaches to participation in safeguarding and wellbeing.
- Use councils, ambassador roles, suggestion boxes, surveys, or digital feedback tools to capture learner input regularly.
- Collaborate with learners to design posters, visual aids, and reporting routes to improve accessibility and ownership.
- Hold regular forums where learners can raise issues, with actions and outcomes documented and shared back.
- Encourage peer-to-peer advocacy programmes to strengthen learner confidence in raising concerns.
- Provide opportunities for learners to review and contribute to safeguarding policies.
- Launch initiatives and activities that promote the values of the United Arab Emirates and the ethical principles of its society, in coordination with learners, staff, and parents or guardians, thereby contributing to strengthening learners' sense of belonging and national identity.

3.4 Safeguarding in the Curriculum

Teaching and learning play an important role in supporting safeguarding within educational institutions. When safeguarding themes are embedded within the curriculum, learners develop the knowledge and confidence to support their own safety and wellbeing, as well as that of others.

Education related to safety, wellbeing, respect, inclusion, and responsible behaviour is most effective when delivered in age-appropriate, culturally sensitive ways aligned with applicable laws and regulations. Through curriculum-based approaches, safeguarding forms part of everyday learning and supports prevention, awareness, and early identification of risk.

3.4.1 Anti-Bullying

Institutions strengthen safeguarding when positive relationships and respect for diversity are actively promoted through teaching and learning. Bullying, whether physical, verbal, social, or online (cyberbullying), can negatively affect learners' wellbeing, learning, and inclusion. A proactive approach to anti-bullying education helps learners recognise risks, establish safe boundaries, and seek help.

Embedding anti-bullying themes within the curriculum and reinforcing them through the wider institutional culture fosters respectful environments and encourages learners to speak up without stigma. When teaching, learning, and safeguarding are aligned, learners are supported not only in academic development but also in building resilience, responsibility, and a sense of belonging within their educational community.



Directive - Institutions must:

24. Ensure effective anti-bullying arrangements are in place to prevent, identify, and address all forms of bullying, including cyberbullying.
25. Ensure clear expectations for respectful behaviour and inclusion are consistently promoted and reinforced across curriculum provision and the wider educational environment.
26. Ensure the curriculum includes age - and culturally-appropriate anti-bullying education that helps learners understand respectful relationships, inclusion, diversity, consent, emotional wellbeing, and responsible behaviour, in line with applicable laws and regulatory requirements.
27. Ensure structured opportunities are in place for learners to engage in anti-bullying education and awareness activities.
28. Ensure staff respond promptly to bullying and report concerns to the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) through safeguarding arrangements for review and determination of appropriate management.

Guidance - Institutions could:

- Engage learners, parents/custodians, and staff in developing and reviewing anti-bullying approaches.
- Establish learner mentors or anti-bullying ambassadors.
- Partner with external organisations to provide age-appropriate and culturally sensitive resources and workshops while ensuring that the external organisations and, where applicable, trainers or workshop providers are suitably qualified and hold the necessary licenses or permits issued by the relevant authorities in the UAE.
- Use surveys, focus groups, or councils to gather learner feedback and strengthen practice.
- Celebrate kindness, respect, and positive behaviour through recognition or reward schemes.
- Use creative approaches such as theatre, art, music or digital storytelling to build empathy and resilience.

3.4.2 Digital Safety

Digital technology offers significant opportunities for learning, connection, and innovation within educational institutions, while also exposing learners to risks that may extend beyond the institution. These risks include cyberbullying, excessive screen time, exposure to harmful or age-inappropriate content, unsafe contact, misuse of artificial intelligence (including manipulated content), digital coercion, online grooming, reputational damage, and other emerging harms as technology evolves.

Within safeguarding practice, digital safety is supported through curriculum-based learning, institutional policies, and protective measures that promote responsible and balanced use of technology and AI integration. When learners are equipped with the understanding and confidence to navigate digital environments safely, and when safeguarding approaches adapt to emerging risks, digital technology can be used to maximise learning opportunities while reducing potential harm.



Directive - Institutions must:

29. Ensure effective digital safety arrangements are in place to prevent, identify, and address risks associated with the use of technology, including cyberbullying, responsible use of technology (including artificial intelligence), social media, and screen time.
30. Ensure that filtering, monitoring, and safety controls appropriate to the institution's digital environment are applied to devices, networks, and digital platforms used within the institution.
31. Ensure the curriculum and pastoral programmes include age - and culturally-appropriate digital safety education that helps learners recognise online risks, protect personal information, and use digital technologies responsibly, in line with applicable laws and regulatory requirements.
32. Provide information and guidance to parents, guardians, or custodians to support digital safety and responsible technology use at home.
33. Ensure that digital safety concerns are reported through safeguarding arrangements to the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) for review and determination of appropriate management.

Guidance - Institutions could:

- Promote balanced and healthy digital use, including appropriate screen time practices.
- Use surveys, learner councils, or peer groups to inform digital safety strategies.
- Appoint Digital Safety Leaders or Cyber Wellbeing Ambassadors.
- Encourage learner-created projects, such as guides, podcasts, or campaigns, to promote online safety and foster ownership.
- Use creative approaches, such as theatre, art, or digital storytelling, to build empathy and resilience around online safety.
- Collaborate with external organisations to deliver workshops or awareness campaigns, while ensuring that the external organisations and, where applicable, trainers or workshop providers are suitably qualified and hold the necessary licenses or permits issued by the relevant authorities in the UAE.
- Celebrate positive and responsible digital behaviour through awards or recognition schemes.

3.4.3 Substance Use and Abuse

Substance use and abuse pose significant risks to learners' health, safety, and wellbeing. Preventive education helps learners understand these risks and make safe and responsible choices. Early exposure may increase the likelihood of later misuse or dependency.

Substances that may cause harm include tobacco products (including cigarettes and vaping products), alcohol, prescription or over-the-counter medications when misused, inhalants, and illicit drugs such as cannabis, opioids, amphetamines, cocaine, and other psychoactive substances.

Educational institutions support prevention and early intervention through age-appropriate education, open dialogue, and supportive environments that promote awareness and access to help. In line with applicable legislation, educational institutions operate smoke-free environments[2].

Directive - Institutions must:

34. Ensure that effective arrangements are in place to prevent and address substance use and misuse, including smoking and vaping. Institutions must have a written policy procedures appropriate to the age and stage of their learners, consistent with applicable laws and regulatory requirements, and aligned with the safeguarding thresholds in **Table 1** and the escalation routes in **Figure 3**.
35. Ensure that educational and related premises operate as smoke-free environments, in line with applicable legal and regulatory requirements.
36. Ensure staff respond promptly to suspected substance use and report concerns through safeguarding arrangements to the CPC/DSL for review and determination of appropriate management. As a minimum, the following must be reported to the CPC/DSL and assessed against the safeguarding thresholds in **Table 1**:
    - Any substance use or possession involving a learner under 18 years of age.
    - Any use, possession or supply of an illicit or controlled substance by a learner of any age.
    - The supply of any substance to a learner under 18 years of age, by any person.
    - Any substance use, including misuse of medication, that indicates a risk of harm, dependency, coercion or exploitation, or a risk to others.
37. Escalate substance use concerns that meet the safeguarding thresholds in **Table 1**, Section 5.3.2, through the reporting routes and timeframes in **Figure 3**. Ensure KHDA is informed in line with **Figure 3**, including details of actions taken, risk assessment outcomes, and any internal or external interventions initiated. For learners aged 18 and above, apply the adult learner pathway in Section 1.2 and, where required by applicable legislation, refer to Dubai Police or other competent authorities.
38. Ensure the curriculum includes age - and culturally-appropriate education on substance use and abuse that helps learners understand risks, develop protective behaviours, and seek help, including the risks associated with smoking, vaping, alcohol, medication misuse, and illicit substances, in line with applicable laws and regulatory requirements.[2]

[2] Federal Law No. (15) of 2009 on Combating Tobacco.

Guidance - Institutions could:

- Establish age-appropriate, dedicated workshops, campaigns or awareness activities to reinforce substance use and abuse prevention education and strengthen refusal skills and resilience.
- Work in partnership with health professionals or approved external organisations to deliver age-appropriate awareness sessions and specialist support.
- Engage families or caregivers in prevention efforts through information sessions or resources that reinforce healthy choices beyond the institution.
- Use learner feedback to inform and strengthen substance use and abuse prevention approaches.

3.5 Attendance Systems and Procedures

Consistent learner attendance and punctuality support wellbeing, a sense of belonging, and achievement, while effective attendance supervision within educational institutions contributes to safer learning environments. Regular routines and clear oversight strengthen relationships with learners and families, promote stability, and reduce vulnerability.

Within this Framework, attendance management includes ongoing monitoring of attendance and punctuality, alongside procedures to ensure learners are accounted for throughout the educational day and during transitions. Together, these arrangements support prevention, supervision, and learner safety across all education settings.

3.5.1 Managing Learner Attendance

Monitoring attendance and punctuality requires accurate daily oversight across all phases of education. Accurate attendance recording and timely follow-up on absences enable institutions to identify patterns and maintain continuity of learning.

Chronic absenteeism, whether prolonged or frequent, can affect learner engagement and achievement and requires focused attention within attendance management practices. Alongside promoting positive attendance, institutions support early identification of concerns and work with learners and families to encourage regular participation.



Directive - Institutions must:

39. Ensure a written attendance policy and effective attendance management arrangements are in place, appropriate to the institution's sector, delivery model and the age of its learners, to promote regular attendance, record absences, and follow up on unexplained or repeated absences, in line with applicable laws and regulatory requirements.
40. Ensure reliable digital or paper-based systems are used to accurately record daily attendance and are updated during the educational day, as appropriate to the setting, to enable timely identification of attendance concerns.
41. Ensure learner attendance and punctuality are consistently monitored and analysed across all phases of education to identify patterns, trends, and learners who require additional support.
42. Notify KHDA when a learner in a school reaches either of the following thresholds:
    - Five consecutive days of unjustified absence
    - Sporadic absences amounting to 10% of the total days in a term

    All other institutions must set absence thresholds in their attendance policy, appropriate to their delivery model, the age of their learners, and each learner's enrolled attendance pattern. Absences that reach these thresholds must be reviewed by the CPC/DSL and escalated in line with **Figure 3** where this may indicate a safeguarding concern.
43. Ensure attendance concerns are promptly followed up with parents, guardians or custodians for learners under 18. For learners aged 18 and above, follow up directly with the learner in line with Section 1.2, and involve parents, guardians or custodians with the learner's consent or where there is a risk of harm. All communication and agreed actions must be recorded.
44. Ensure staff respond to attendance concerns and report them through safeguarding arrangements to the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) for review and determination of appropriate management where concerns may indicate risk to a learner's safety or wellbeing.

Guidance - Institutions could:

- Link attendance monitoring with other safeguarding indicators, such as behaviour, academic progress, or wellbeing concerns.
- Designate an Attendance Lead or team to oversee monitoring and escalation in collaboration with safeguarding staff.
- Use mentoring, pastoral support, or catch-up programmes to support learners with attendance or punctuality concerns.
- Celebrate positive attendance patterns through recognition or reinforcement approaches.
- Work with external partners or agencies where attendance concerns are linked to wider family or social challenges.

3.5.2 Procedures For a Learner Missing During the Educational Day

Educational institutions have a duty of care to maintain oversight of learners' whereabouts throughout the educational day. Temporary absence from lessons or supervised areas may pose safeguarding concerns and require immediate attention and follow-up. Clear written procedures for identifying and responding when a learner is unaccounted for provide consistency and clarity in practice.

When a learner is identified as missing, prompt and coordinated action helps locate them quickly and safely. Clear procedures, staff awareness, and effective supervision, including during breaks and transitions, reduce the likelihood of incidents and support appropriate responses when concerns arise.



Directive - Institutions must:

45. Ensure a clear and effective written missing learner protocol is in place to prevent, identify, and respond to incidents involving learners who are unaccounted for during the educational day, including defined procedures, roles, notification requirements, and escalation routes in line with safeguarding requirements.
46. Ensure staff remain aware of learners' whereabouts and take prompt action when a learner does not return as expected.
47. Escalate repeated or concerning patterns of temporary absence (e.g. frequent visits to the bathroom or clinic) to the CPC/DSL where they may indicate risk to the learner's safety or wellbeing.
48. Provide additional monitoring and supervision for students of determination or identified vulnerabilities.
49. Ensure supervision arrangements are proportionate to the risk and respect learners' basic rights, including access to restroom breaks, medical care, food, water, and prayer.
50. Ensure supervision arrangements take into account environmental risks, including campus layout, shared facilities, and transition areas.
51. Ensure staff respond immediately to missing learner incidents, escalating and documenting all incidents through defined institutional escalation routes, including notifying the CPC/DSL, senior leadership, parents, guardians or custodians, and relevant authorities, in accordance with Section 5 and the relevant frameworks, guidelines, and protocols adopted in the Emirate of Dubai.
52. Ensure the missing learner protocol is periodically tested and reviewed, and that findings and any required updates are documented.

Guidance - Institutions could:

- Designate a Missing Learner Response Lead within the safeguarding team to coordinate responses.
- Involve security and facilities teams in site risk assessments to reduce opportunities for learners to go unnoticed.
- Use appropriate technology, such as electronic registration systems or tracking tools, to support timely identification of absences.

3.6 Safeguarding and Learner Protection Outside the Educational Institution

Safeguarding and learner protection within educational institutions extend beyond the physical boundaries of the main campus. Learners take part in off-site activities, including educational visits, residential trips, international programmes, work placements, internships, sports fixtures, and learning experiences in a range of environments.

Each context presents specific safeguarding considerations that require careful planning, supervision, and risk management. Within this Framework, educational institutions remain responsible for safeguarding learners whenever activities take place outside the main campus. This includes arrangements involving external organisations, transport services, or residential settings, such as boarding provision, which are addressed in the subsections that follow.

Learners are entitled to consistent standards of safeguarding, protection, and care, regardless of location or activity. These expectations are supported through clear policies, careful planning, risk assessment, appropriate supervision, and effective oversight of all off-site and externally delivered provision.



Directive - Institutions must:

53. Ensure effective arrangements are in place for planning, approving and overseeing off-site provision (off-site activities, trips, residential experiences, internships, work placements, camps and international programmes), including defined roles, supervision expectations, third-party safeguarding suitability requirements, and safeguarding oversight.
54. Retain institutional accountability for learner safety, wellbeing, and safeguarding oversight during all off-site activities.
55. Require formal institutional leadership approval for all off-site activities prior to their occurrence.
56. Conduct and document a risk assessment for every off-site activity prior to leadership approval, in collaboration with relevant educational and administrative staff, addressing, at a minimum, supervision arrangements and ratios, transport arrangements, medical needs, circumstances that may increase some learners' vulnerability to harm, accessibility, sleeping arrangements where applicable, professional boundaries, and emergency procedures.
57. Obtain parental or custodian/guardian consent for learners under 18 and informed consent from learners aged 18 and over.
58. Ensure staff leading or supervising off-site provision are appropriately trained in:
    - safeguarding arrangements and defined escalation routes
    - first aid in line with relevant guidance
    - emergency procedures
59. Ensure supervision arrangements, including ratios, are appropriate for learners' age, needs, and the risk profile of each activity.
60. Ensure staff respond to safeguarding concerns arising during off-site provision and report them through safeguarding arrangements to the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) for review and determination of appropriate management.
61. Ensure transport arrangements for off-site provision are safe, supervised, and subject to institutional safeguarding and behaviour expectations.
62. Establish written agreements with host organisations for internships and work placements, confirming safeguarding responsibilities, health and safety requirements, and duty of care.
63. For learners participating in international programmes or overseas visits, ensure pre-departure planning addresses: applicable local laws and child protection frameworks in the host country; emergency medical and evacuation procedures; communication protocols for contacting parents, guardians, or custodians and KHDA; and verification of the safeguarding arrangements of any host or partner organisation.

Guidance - Institutions could:

- Designate an Educational Visits Coordinator to oversee planning, approvals, and risk management for off-site provision.
- Conduct pre-activity briefings with learners and parents, guardians, or custodians to reinforce expectations, safeguarding procedures, and emergency arrangements.
- Use KHDA-aligned checklists and template agreements to support provider vetting and activity planning.
- Provide scenario-based training for staff on managing safeguarding issues during offsite activities.
- Use digital systems to log risk assessments, approvals, emergency contacts, and safeguarding documentation.
- Gather learner feedback following off-site activities to inform improvements to safety and wellbeing arrangements.
- Conduct audits or spot checks of host organisations to review safeguarding compliance.

3.6.1 Third-Party Providers and Transport

Educational institutions retain full accountability for learner safety and wellbeing when learners are in the care of external providers or transport services. This responsibility cannot be transferred through waivers, contracts, or service arrangements. Third-party providers include organisations that deliver educational programmes, work placements, internships, enrichment activities, or any learning experience on behalf of the institution. Transport services include coaches, buses, taxis, and any other transportation arranged for institutional activities. Safeguarding in third-party and transport contexts requires clear policies that address vetting requirements, due diligence checks to confirm providers meet safeguarding standards, contractual safeguarding expectations, supervision arrangements, emergency protocols, and monitoring processes to ensure ongoing compliance.

Clear accountability and effective oversight across all external arrangements ensure safeguarding standards remain consistent wherever learners are supervised, transported, or cared for as part of institutional provision.



Directive - Institutions must:

64. Perform due diligence prior to entering contractual or service agreements with third-party providers or transport services, including verification of licensing, staff background checks and suitability, safeguarding policies, insurance, safeguarding competence, and health and safety compliance.
65. Ensure that third-party providers and transport services maintain safeguarding policies and safer recruitment practices in accordance with the relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai, as well as applicable regulatory requirements throughout the duration of engagement.
66. Ensure transport arrangements recognise journeys to and from the institution as part of the institution's duty of care and include appropriate supervision, behavioural expectations, and safeguarding oversight.
67. Ensure staff leading off-site activities have access to provider contact details, defined escalation pathways, and emergency response protocols.
68. Ensure staff respond immediately to safeguarding concerns arising from external provision or transport services and report them through safeguarding arrangements to the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) for review and determination of appropriate management. Maintain an approved register of external service providers, informed by the findings of due diligence processes and regular reviews.

Guidance - Institutions could:

- Conduct joint risk assessments with external providers for higher-risk activities or programmes.
- Co-deliver safeguarding orientation or awareness sessions with external providers to support shared understanding of safeguarding expectations.
- Offer safeguarding information or training to external staff in additional languages where needed to support accessibility and understanding.
- Use learner and parent or custodian feedback to inform evaluation of external providers and transport services.



3.6.2 Boarding Provision

Boarding provision within educational institutions carries an extended duty of care, as learners reside within the institutional environment beyond the standard educational day. Learners in boarding accommodation are entitled to the same standards of safeguarding, protection, privacy, and respect as those in day provision, alongside additional arrangements appropriate to the residential context. These arrangements include out-of-hours supervision, access to medical and wellbeing support, digital safety measures, and the management of visitors and activities within boarding environments.

Embedding safeguarding principles across residential life, supported by clear oversight and care arrangements, helps ensure that boarding environments remain safe, supportive, and well-managed.



Directive - Institutions must:

69. Ensure effective arrangements are in place to safeguard learners in boarding provision, including supervision, care, and oversight appropriate for the residential setting.
70. Establish clear governance structures for boarding provision, including the appointment of a Residential CPC/DSL and a Deputy responsible for compliance and daily safeguarding oversight.
71. Ensure boarding staff are appropriately competent in safeguarding and learner protection expectations and emergency response procedures relevant to residential settings, including out-of-hours safeguarding protocols.
72. Ensure that risk assessments are conducted regularly for boarding provision, covering, at a minimum, accommodation, digital safety, supervision, transport, activities (including out-of-hours), and visitor access.
73. Ensure supervision arrangements, including staff-to-learner ratios, are appropriate for the residential context and provide gender-appropriate supervision in sleeping, bathing, and recreational areas.
74. Implement and maintain effective visitor control and access management systems for residential facilities.
75. Implement and maintain procedures governing leave of site for boarders permitted to leave the premises, including appropriate supervision and safeguarding oversight.
76. Establish clear guidelines for responsible technology use, online safety, and screen time in boarding environments.
77. Ensure induction arrangements for boarders include safeguarding information, reporting routes, and available wellbeing support services.
78. Ensure staff respond to safeguarding concerns within boarding provision and report them through safeguarding arrangements to the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) for review and determination of appropriate management.
79. Ensure boarders have access to appropriate medical care and mental health support, including arrangements for regular health checks by qualified personnel as appropriate.

Directive - Institutions must:

80. Ensure regular inspections of boarding facilities are conducted to identify risks and support compliance with health, safety, and fire requirements.
81. Maintain regular communication with parents, guardians, or custodians, where applicable, about learners' wellbeing, progress, and any safeguarding incidents in residential settings.

Guidance - Institutions could:

- Establish structured wellbeing programmes within boarding environments, including mentorship and peer support initiatives.
- Provide ongoing professional development for boarding staff in areas such as adolescent development, trauma-informed practice, and positive behaviour management.
- Work with licensed counselling services or community organisations to extend mental health, wellbeing, and recreational provision for boarders.
- Offer structured evening and weekend activities that promote balanced lifestyles, social integration, and positive use of time.



4

Enabling Mechanisms for Safeguarding

4 Enabling Mechanisms for Safeguarding

Effective safeguarding in educational institutions depends on clear structures that define how responsibilities are organised and carried out in practice. These enabling mechanisms provide the organisational framework for safeguarding by establishing governance and leadership oversight, defining roles and responsibilities, and supporting consistent institutional practice.

They include governance arrangements, leadership accountability, defined safeguarding roles, training and professional development, safer recruitment and suitability processes, professional conduct and management of concerns, and collaboration with external agencies. When embedded consistently across the institution, these mechanisms reduce risk, support staff in recognising and responding to safeguarding concerns, enable concerns to be raised and addressed appropriately, and promote coordinated and accountable safeguarding practice.

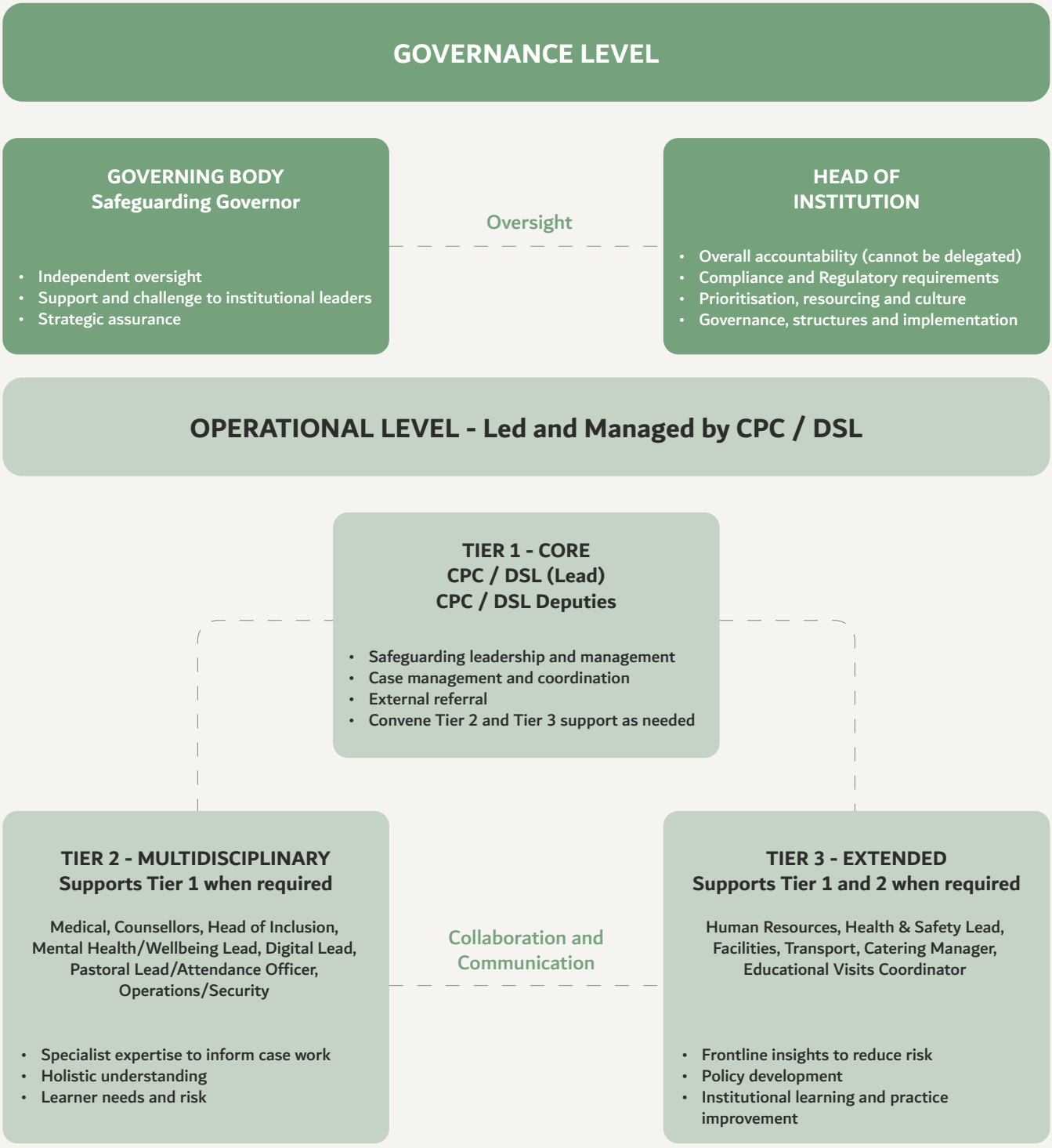
4.1 Roles and Responsibilities

Robust safeguarding within educational institutions is delivered through clear governance, leadership, and operational roles that establish accountability and support consistent safeguarding practice. Clearly defined responsibilities promote a positive safeguarding culture and enable safeguarding arrangements to operate effectively across the institution.

Within this Framework, safeguarding is organised through a tiered structure that links governance oversight and institutional leadership accountability to three interdependent operational safeguarding tiers (see **Figure 1**). This structure defines the safeguarding governance and operational responsibilities required under this Framework. All institutions must implement arrangements that reflect these defined roles and lines of accountability[3].

[3] In smaller institutions, individuals may hold more than one safeguarding role where necessary to reflect staffing capacity, provided that safeguarding responsibilities, accountability, and reporting lines remain clearly defined.

FIGURE 1:
Organisational Chart -
Tiered Safeguarding Structure



Governance and leadership connect directly to the operational tiers through defined lines of responsibility and communication. Together, these arrangements support clear decision-making, shared understanding of risk, and consistent safeguarding practice across the institution.

Governance provides independent oversight and strategic assurance, while institutional leadership holds executive accountability for ensuring safeguarding arrangements are properly resourced, implemented and monitored.

Operational safeguarding is delivered through three connected tiers, led and managed by the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL)

- **Tier One (Core Team)** provides essential safeguarding leadership and coordination through the Core Safeguarding Team, led by the CPC/DSL and supported by Deputies.
- **Tier Two (Multi-Disciplinary Team)** brings together specialist expertise to support a holistic understanding of learner needs and risk. It may be convened by the CPC/DSL when additional expertise is required to support safeguarding assessment and planning.
- **Tier Three (Extended Team)** embeds safeguarding across institutional systems, policies, and risk management processes, and provides operational insight that informs institutional learning, policy development, and practice improvement.

Tiers Two and Three may be scaled according to institutional context, size, and level of need, while maintaining clear accountability and sufficient safeguarding coverage.

4.1.1 Governance – The Safeguarding Governor

Strong governance is essential to effective safeguarding and learner protection within educational institutions. Governance oversight ensures that safeguarding remains a strategic priority and is subject to independent scrutiny and continuous improvement.

The Safeguarding Governor supports this oversight by engaging with institutional leadership and operational safeguarding teams, reviewing safeguarding information and institutional practice, and providing proportionate challenge and strategic assurance at the governance level. To maintain independence and transparency, the Safeguarding Governor does not participate in operational safeguarding decision making.



Directive - Institutions must:

82. Assign a Safeguarding Governor at Board, Governing Body, or Owner level, formally recorded in governance minutes, with responsibilities clearly defined in the role description.
83. Ensure the Safeguarding Governor is independent from operational safeguarding roles and senior executive positions (not the Head of Institution, Manager/CEO/Director/ Principal, Chancellor, Owner, Child Protection Coordinator (CPC)/Designated Safeguarding Lead (DSL), or Deputy).
84. Ensure the Safeguarding Governor completes mandatory safeguarding governance training, in accordance with Section 4.2.
85. Ensure safeguarding is a standing item at every board or governing body meeting.
86. Ensure the Safeguarding Governor meets regularly with the CPC/DSL to review safeguarding practice, emerging themes, and systemic risks, and document governance oversight.
87. Ensure safeguarding reports are submitted to the board or governing body at least once per academic term or equivalent reporting period.

Directive - Institutions must:

88. Publish the Safeguarding Governor's name and role in publicly accessible institutional materials.
89. Ensure governance oversight does not extend to operational decision-making in individual safeguarding cases, which remain managed in accordance with Section 5.

Guidance - Institutions could:

* Involve the Safeguarding Governor in external audits or inspection preparation to strengthen oversight.
* Establish annual summative board reporting on safeguarding performance, endorsed by the Safeguarding Governor and Chair of Governors following board scrutiny.

4.1.2 Leaders - Head of Institution/Manager/CEO/Director/Principal/ Chancellor

Institutional leaders hold overall accountability for safeguarding and learner protection across the education setting and are directly accountable to KHDA for compliance with mandatory safeguarding requirements. Leadership responsibility extends beyond procedural oversight to ensuring safeguarding is prioritised, suitably resourced, and embedded within institutional culture, decision-making, and operations.

While safeguarding may be delivered through designated roles and teams, accountability for safeguarding outcomes remains with institutional leadership, and cannot be delegated. Active governance oversight, clearly defined organisational structures, and consistent implementation strengthen compliance and reduce reliance on individual discretion.



Directive - Institutions must:

90. Ensure the head of institution (or equivalent) holds executive accountability for safeguarding and learner protection, including compliance with this Framework and effective implementation of safeguarding arrangements across the institution.
91. Ensure safeguarding accountabilities are clearly defined in job descriptions, governance records, and compliance reporting.
92. Ensure effective safeguarding structures and processes are established and maintained in line with the Tiered Safeguarding Structure (Figure 1).
93. Ensure safeguarding policies are effectively implemented and embedded across the institution.
94. Ensure cover arrangements are in place to maintain access to a CPC/DSL or Deputy during all operational hours, including extracurricular and offsite provision.
95. Ensure safeguarding concerns and required notifications are shared with KHDA and relevant partners in accordance with the reporting requirements set out in Section 5.3.3.
96. Ensure arrangements are in place for all adults working in, for, or on behalf of the institution to understand their safeguarding responsibilities under this Framework.
97. Ensure the CPC/DSL and deputies have access to peer supervision and/or reflective practice sessions to support safeguarding decision-making, professional judgement, and practitioners' wellbeing.

Guidance - Institutions could:

- Embed safeguarding responsibilities within leadership appraisals and institutional KPIs.
- Commission an annual independent review of safeguarding effectiveness, beyond internal self-assessment, to provide institutional leaders with objective assurance and identify areas for improvement.



4.1.3 Tier 1: Core Safeguarding Team

The Core Safeguarding Team sits at the centre of safeguarding practice within each educational institution, providing coordinated oversight of safeguarding concerns and supporting consistent responses. Through collective discussion and shared responsibility, the team brings together the CPC/DSL, Deputies and relevant safeguarding staff to review concerns, determine appropriate safeguarding actions, and monitor safeguarding arrangements, ensuring that safeguarding decisions are not dependent on a single individual.

Accessible safeguarding support is central to effective safeguarding systems. Clear and well-communicated routes for staff to contact the CPC/DSL or a Deputy during operational hours, extracurricular provision, and off-site activities support timely recognition of concerns and coordinated safeguarding responses.

Directive - Institutions must:

98. Establish a Core Safeguarding Team led by the CPC/DSL and supported by deputies, normally including at least two Deputies in line with the Tiered Safeguarding Structure, with arrangements proportionate to the size and staffing structure of the institution.
99. Define clear terms of reference for the Core Safeguarding Team outlining purpose, membership, confidentiality, and meeting arrangements.
100. Ensure the Core Safeguarding Team leads and coordinates the institution's safeguarding system, overseeing the assessment, response, reporting, recording, case management, and follow-up of safeguarding concerns in accordance with Section 5.
101. Ensure Core Safeguarding Team meetings are held regularly to review safeguarding and learner protection cases and that discussions, decisions and actions are documented and followed through to resolution and closure.
102. Ensure the Multi-Disciplinary Safeguarding Team and/or the Extended Safeguarding Team are engaged where specialist knowledge or broader collaboration is required.

Guidance - Institutions could:

- Rotate deputies to chair core safeguarding team meetings when the CPC/DSL is unavailable to strengthen leadership continuity and shared safeguarding expertise.
- Share anonymised case learning with staff to strengthen institutional safeguarding culture.

4.1.3.1 Child Protection Coordinator/Designated Safeguarding Lead

The Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) is the lead professional responsible for leading and coordinating safeguarding and learner protection across the educational institution. The role provides a clear point of oversight for safeguarding concerns and supports consistent implementation of safeguarding arrangements.

The CPC/DSL holds operational responsibility for the safeguarding system set out in Section 5, including the recognition, response, reporting and escalation, recording and coordination of safeguarding concerns, and ensuring appropriate engagement with external agencies where required. As part of the institutional safeguarding structure, safeguarding discussions may involve the Core Safeguarding Team, the Multi-Disciplinary Safeguarding Team, and the Extended Safeguarding Team when specialist input or wider institutional coordination is required.

These discussions are typically coordinated through the CPC/DSL. As such, the CPC/DSL role requires appropriate authority, training, expertise, and institutional support in order to carry out its safeguarding responsibilities effectively. Clear role definition and positioning support transparency and reduce conflicts of interest. Through leadership of the Core Safeguarding Team, the CPC/DSL supports coordinated and consistent responses to safeguarding concerns.



Directive - Institutions must:

103. Appoint one CPC/DSL, formally recorded in governance minutes, with safeguarding responsibilities and authority clearly defined in the role description.
104. Prohibit assignment of the CPC/DSL role to any individual holding a position that creates a conflict of interest or compromises safeguarding independence, including Head of Institution, Manager, Principal, CEO, Chancellor, Owner, Governor or Trustee, Counsellor, or HR Lead. Such individuals may provide relevant institutional input but must not hold or exercise CPC/DSL decision-making authority.
105. Ensure the CPC/DSL has the competence, safeguarding knowledge, and professional capacity required to fulfil the responsibilities of the role effectively.
106. Ensure the CPC/DSL completes safeguarding training in accordance with the requirements set out in Section 4.2.
107. Provide sufficient time and resources for the CPC/DSL to fulfil safeguarding responsibilities.
108. Ensure the CPC/DSL is consulted in institutional decision-making that may impact safeguarding arrangements or learner safety.
109. Ensure regular meetings are held between the CPC/DSL and institutional leadership to review safeguarding priorities, risks, and resourcing needs.
110. Ensure all safeguarding cases are subject to regular supervision and review, with decisions and actions recorded in accordance with Section 5.

Directive - Institutions must:

111. Ensure that the safeguarding assessment and response take into account the needs and vulnerabilities of learners who may be at increased risk due to disability, gender, financial circumstances, language barriers, or other contextual factors.
112. Ensure the CPC/DSL's role and professional contact details are published and clearly communicated to learners, parents, guardians, or custodians, staff, and KHDA, and promptly update all stakeholders when changes occur.

Guidance - Institutions could:

- Facilitate the CPC/DSL's participation in external safeguarding networks or professional forums.
- Allocate dedicated non-contact time for safeguarding coordination, proportionate to institutional size and complexity of caseload.
- Provide administrative support for safeguarding record keeping (with suitable confidentiality), freeing the CPC/DSL to focus on strategic oversight, case management and staff support.



4.1.3.2 Deputy Child Protection Coordinator/Designated Safeguarding Lead

Deputy Child Protection Coordinators/Designated Safeguarding Leads provide continuity in safeguarding arrangements and support the effective functioning of the safeguarding system.

The role ensures that safeguarding and learner protection leadership remains available and responsive, particularly when the CPC/DSL is unavailable, and supports the coordination of safeguarding practice across the institution. Clear role definition, appropriate authority, and institutional support enable deputies to act with confidence and consistency.

By working closely with the CPC/DSL and contributing to the core safeguarding team, deputies support collective decision-making and help maintain continuity in safeguarding leadership across daily operations and wider institutional activities.

Directive - Institutions must:

113. Appoint at least two Deputy CPCs/DSLs, formally recorded in governance minutes, with safeguarding responsibilities and authority clearly defined in their role descriptions.
114. Prohibit assignment of the Deputy CPC/DSL role to any individual holding a position that creates a conflict of interest or compromises safeguarding independence, including Head of Institution, Manager, Principal, CEO, Chancellor, Owner, Governor or Trustee, Counsellor, or HR Lead. Such individuals may provide relevant institutional input but must not hold or exercise Deputy CPC/DSL decision-making authority.
115. Ensure deputies complete safeguarding training in accordance with the requirements set out in Section 4.2.
116. Ensure Deputies are able to assume full CPC/DSL responsibilities during the CPC/DSL's absence, with appropriate case handover protocols in place.
117. Provide sufficient time and resources for deputies to fulfil their safeguarding responsibilities.
118. Ensure the Deputy CPC/DSL's role and professional contact details are published and communicated to learners, parents, guardians, or custodians, staff, and KHDA, and promptly update all stakeholders when changes occur.



Guidance - Institutions could:

- Facilitate participation of the Deputy CPC/DSL in external safeguarding networks or professional forums.
- Involve deputies in leading safeguarding awareness initiatives across the institution.
- In smaller institutions, collaborate with partner organisations or networks to strengthen safeguarding expertise and peer support.
- Ensure deputies have regular reflective practice conversations with the CPC/DSL to ensure consistency in decision-making.
- Develop future safeguarding leadership by involving appropriate and interested staff in safeguarding learning opportunities, such as observing safeguarding meetings where confidentiality safeguards are maintained.



4.1.4 Tier 2: Multi-Disciplinary Safeguarding Team

The Multi-Disciplinary Safeguarding Team brings together relevant expertise across the institution to support a holistic approach to safeguarding. By combining perspectives from health, wellbeing, inclusion, academic, technological, and operational areas, the team supports fuller understanding of concerns within the learner's wider context, while respecting the learner's privacy.

The team may be convened or consulted by the CPC/DSL where additional expertise is required to inform safeguarding assessment, planning, or response. Through shared discussion and coordinated planning, the Multi-Disciplinary Safeguarding Team contributes specialist insight to support informed safeguarding decisions and consistent practice across institutional services. This collaborative approach strengthens coordination among safeguarding functions and supports responses that reflect the diverse needs of learners, including learners of determination and those facing additional vulnerabilities.



Directive - Institutions must:

119. Establish a Tier 2 Multidisciplinary Safeguarding Team that meets regularly and, when convened by the core safeguarding team, includes, where such roles exist, clinic staff, counsellors, pastoral and inclusion staff, and any other relevant professionals.
120. Establish clear terms of reference that outline the purpose, membership, confidentiality, and meeting arrangements.
121. Ensure additional specialist staff are engaged as required, as permanent or ad-hoc members to support safeguarding practice (such as digital safety leads, mental health leads, site security, or facilities staff).
122. Ensure meetings review safeguarding cases holistically within the wider learner context, including health, counselling, SEND support, attendance, parental input, academic progress, and behaviour patterns, to inform safeguarding decisions.
123. Ensure that safeguarding discussions, decisions, and actions arising from Multidisciplinary Safeguarding Team involvement are recorded in accordance with Section 5.



Guidance - Institutions could:

- Review Tier 2 effectiveness periodically, considering whether membership, processes and meeting frequency remain appropriate to institutional safeguarding needs.
- Use secure digital platforms to share anonymised safeguarding information across relevant disciplines to support coordinated responses.
- Where appropriate, draw on inclusion specialists, counsellors, and other relevant external professionals to strengthen safeguarding strategies for learners with additional or complex risks.

4.1.5 Tier 3: Extended Safeguarding Team

Safeguarding extends beyond individual cases to the institution's wider systems, policies, and risk management processes. The Extended Safeguarding Team supports institutional safeguarding by examining how policies, operational practices and environmental factors influence learner safety across the institution. Through systems-level oversight, the team reviews safeguarding trends, incidents, and institutional arrangements to identify risks, strengthen safeguards, and support continuous improvement.



Directive - Institutions must:

124. Establish a Tier 3 Extended Safeguarding Team that meets regularly and when convened by the Tier 1 Core Safeguarding Team.
125. Ensure the Tier 3 Extended Safeguarding Team provides systems-level oversight of safeguarding by reviewing trends, incidents, risks and institutional arrangements and policies, including safer recruitment practices, offsite provision, learner health needs, premises and facilities and barriers affecting learners with additional vulnerabilities, to identify and communicate improvements and strengthen safeguarding practice, ensuring alignment with regulatory requirements and institutional policies.
126. Ensure safeguarding discussions, decisions, and actions arising from Tier 3 Extended Team meetings are recorded in accordance with Section 5.
127. Ensure safeguarding assurance reports are provided to governance at least once per term, summarising oversight findings and institutional actions.



Guidance - Institutions could:

- Invite relevant external specialists (such as catering, transport, or digital safety providers) to contribute to institutional safeguarding oversight where appropriate.
- Use risk registers or compliance dashboards to monitor institutional safeguarding risks and track actions.
- Conduct tabletop exercises with leadership teams (e.g., for critical incident or emergency planning) to test safeguarding systems.

4.2 Training

Safeguarding training ensures that all adults within an educational institution understand their safeguarding responsibilities and can respond confidently and appropriately to concerns. Effective training ensures that safeguarding expectations are clearly communicated, knowledge remains up to date, and practice is consistent across roles and settings, enabling staff to act confidently and responsibly to protect learners.

Regular, role-specific learning opportunities embed safeguarding in everyday practice. When aligned with regulatory guidance and regularly reviewed for effectiveness, training contributes to a strong safeguarding culture and supports informed decision-making and accountability across the institution.

Directive - Institutions must:

128. Ensure all safeguarding training provided, particularly in relation to learners who are more vulnerable to harm, is aligned with the relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai, this Policy Framework, and KHDA training requirements, including mandated training types, minimum content and frequencies, as set out in KHDA guidance and supporting resources.
129. Ensure safeguarding training arrangements are planned, implemented, and monitored so that all adults working in, for, or on behalf of the institution maintain the knowledge and competence required to fulfil their safeguarding responsibilities.
130. Ensure accurate records are maintained to evidence completion of safeguarding training, refresher dates, and compliance status for all adults working in, for, or on behalf of the institution.
131. Provide safeguarding training compliance evidence and data to institutional governance and KHDA, where required, for monitoring and compliance purposes.

Safeguarding Governor

132. Require the Safeguarding Governor to complete safeguarding governance training within three months of appointment.
133. Require the Safeguarding Governor to complete refresher safeguarding governance training at least once every two years in line with relevant guidance.

Head of Institution and Senior Leaders

134. Require the Head of Institution and senior leaders to complete safeguarding leadership training proportionate to their role and in line with relevant guidance, covering, as a minimum:
    - oversight of safeguarding thresholds and escalation
    - escalation accountability
    - managing allegations against staff and adult-conduct concerns
    - institutional safeguarding governance

Directive - Institutions must:

CPC/DSL and Deputies

135. Require the CPC/DSL and all Deputies to complete role-specific CPC/DSL safeguarding training before undertaking safeguarding case responsibilities. This training must meet the minimum content, duration, delivery, assessment and provider requirements set out in KHDA guidance and supporting resources, as issued and updated by KHDA.
136. Require the CPC/DSL and all Deputies to complete CPC/DSL refresher safeguarding training at least once every two years, meeting the minimum requirements set out in KHDA guidance and supporting resources.
137. Ensure all deputies complete the same role-specific CPC/DSL training as the CPC/DSL, in line with Directives 135 and 136, and are competent to respond to safeguarding concerns and to act in the CPC/DSL's absence.
138. Provide sufficient time and institutional support for CPC/DSLs and Deputies to fulfil safeguarding training obligations.

Staff Involved in Recruitment

139. Require all staff involved in recruitment, shortlisting, or interviewing to complete safer recruitment training.
140. Ensure that at least one person with safer recruitment training completed within the past two years is present on every recruitment panel.

All Adults Working with Learners

141. Ensure all adults working in, for, or on behalf of the institution are informed of this Framework and understand the safeguarding responsibilities relevant to their role as part of safeguarding induction and refresher training.
142. Provide safeguarding induction training to all adults working with learners prior to commencement of duties, including governors, third-party providers and volunteers.
143. Provide safeguarding training for all adults working with learners at least annually.
144. Ensure safeguarding training includes, at a minimum, recognising and responding to safeguarding concerns, internal reporting routes, recording procedures, safe working practices, professional boundaries, and whistleblowing obligations.
145. Ensure staff working in contexts requiring enhanced safeguarding awareness (including boarding, off-site provision, sports, transport, digital environments, and one-to-one settings) receive additional role-specific safeguarding training.

Guidance - Institutions could:

- Provide advanced or specialist safeguarding training beyond minimum regulatory requirements to strengthen institutional safeguarding capability.
- Use anonymised case studies and scenario-based exercises that reflect local context and diverse learner needs to strengthen applied safeguarding judgement and escalation confidence.
- Use digital systems to track safeguarding training completion, renewal dates, and compliance reporting.

4.3 Safer Recruitment and Suitability of Staff

Safer recruitment is a critical safeguard that helps ensure suitable and appropriately vetted adults work with or around learners in the educational institution. Effective recruitment practices reduce the risk of abuse, exploitation, and unsafe practice by verifying identity, qualifications, employment history, and suitability before individuals begin working with learners.

Suitability extends beyond appointment and must be maintained throughout employment. Ongoing oversight of professional conduct, vigilance by staff and leaders, and timely action when concerns arise help protect learners and uphold institutional integrity. Further guidance on recruitment and de-registration processes is provided in KHDA Technical Guide for Appointing Teaching Staff in Private Schools in Dubai.[4]

Directive - Institutions must:

146. Apply safer recruitment practices to all adults with access to learners in both physical and online environments, including employees, contractors, volunteers, governors, visitors, and third-party personnel.
147. Follow transparent recruitment procedures, including advertising, shortlisting, structured interviews, verification of references, and documented decision-making.
148. Ensure that at least one member of any recruitment panel has completed recognised safer recruitment training, aligned with the relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai, this Framework, and KHDA training requirements, including mandated training types and frequencies.
149. Ensure that all candidates are subject to comprehensive and satisfactory pre-employment vetting before appointment, including identity verification, right to work checks, verification of references, and criminal records clearance, including, where appropriate, the UAE Good Conduct Certificate.
150. Ensure all records and outcomes of recruitment checks and suitability decisions are recorded in a single, auditable database and maintained for compliance, review and audit purposes.
151. Ensure proportionate action is taken when a concern about an adult's suitability is raised, in accordance with Section 5.

[4] KHDA Technical Guide for Appointing Teaching Staff in Private Schools in Dubai

Guidance - Institutions could:

- Assign a designated Safer Recruitment Lead (for example, within HR in partnership with the CPC/DSL) to oversee safer recruitment compliance.
- Embed safer recruitment and suitability requirements into contracts with third-party providers and verify compliance through appropriate assurance mechanisms.

4.4 Professional Conduct and Safe Working Practice

A clear code of conduct and safe working practices are essential for establishing and maintaining a culture of trust in which learners are protected, and adults carry out their roles responsibly. Clear professional boundaries reduce the risk of harm to learners and help safeguard adults from behaviours that could lead to allegations of misconduct.

Where safe working practices are not upheld, safeguarding risks increase, and concerns must be addressed through the institution's reporting, allegations management and disciplinary procedures. Consistent expectations for conduct across physical and online environments support safe learning spaces and reinforce a safeguarding culture across the institution.

Directive - Institutions must:

152. Ensure the institutional code of conduct and safe working practice arrangements are in place and aligned with this Framework and relevant national[5] or KHDA professional standards and guidance.[6]
153. Ensure the institutional Code of Conduct and safe working practice arrangements apply across physical and online environments.
154. Define and implement clear professional standards governing conduct, communication, boundaries, and supervision expectations for all adults working in, or on behalf of the educational institution who interact with learners.
155. Require adherence to the professional conduct standards set out in the Code of Conduct.
156. Prohibit personal or secretive relationships with learners, use of private contact details, and use of personal devices or social media for communication with learners.
157. Require communication and teaching to take place only through institutionally approved devices and platforms.
158. Monitor staff suitability throughout employment and take appropriate action where concerns arise.

[5] UAE Code of Conduct for Education Professionals in General Education
[6] KHDA Technical Guide for Appointing Teaching Staff in Private Schools in Dubai

Directive - Institutions must:

159. Provide clear guidance on professional use of social media, photography, and digital content involving learners, protecting both learner privacy and staff professional reputation.
160. Prohibit staff from accepting unauthorised gifts, showing preferential treatment to learners, or engaging in conduct that breaches professional boundaries.
161. Require staff to work in visible, open environments wherever practicable, with appropriate safeguards and supervision arrangements documented when closed or one-to-one settings are necessary.
162. Require all adults to read, acknowledge, and formally confirm compliance with the institutional Code of Conduct on induction and at least annually thereafter, with records of signed acknowledgement maintained.
163. Ensure the Code of Conduct is clearly communicated and accessible to learners, staff, and parents, guardians, or custodians.
164. Identify higher-risk activities (e.g. sports coaching, performing arts, swimming, one-to-one activities, transport) and ensure that appropriate safe working practices, supervision and staff training are in place.

Guidance - Institutions could:

- Involve staff and learners in developing and periodically reviewing safe working practice guidance, ensuring policies reflect lived experience and operational realities.
- Develop quick-reference safe working practice checklists for staff and volunteers.

4.5 Whistleblowing: Reporting Concerns About Safeguarding Practice

Clear whistleblowing arrangements support learner protection and the ongoing suitability of adults working in education. When staff feel safe to raise concerns about poor practice, adult conduct, unsafe behaviour, or safeguarding failures, institutions are better able to identify risks and address issues early.

A culture of transparency and accountability encourages staff to raise concerns as a professional duty. Clear reporting procedures, together with protections for those who raise concerns in good faith, strengthen safeguarding practice and support effective oversight of safeguarding within the institution.

Directive - Institutions must:

165. Ensure effective whistleblowing arrangements to enable staff to report concerns about safeguarding practice, adult conduct, and institutional failure, in accordance with the relevant frameworks, guidelines, and protocols adopted in the Emirate of Dubai and applicable UAE legislation.
166. Ensure whistleblowing arrangements include protections for individuals who raise concerns in good faith, including protection against retaliation or victimisation.
167. Ensure procedures are in place to handle anonymous disclosures and that they are taken seriously and investigated proportionately, given available information.
168. Ensure whistleblowing procedures operate alongside the safeguarding reporting obligations set out in Section 5 and do not replace or override them.
169. Ensure whistleblowing reporting channels are confidential, accessible, and clearly communicated to all staff.
170. Ensure all staff are informed of their right to escalate concerns directly to KHDA when internal reporting routes are unavailable, compromised, or ineffective.
171. Ensure disciplinary measures are in place to address whistleblowing concerns found to be malicious or knowingly false, in accordance with institutional procedures.

Guidance - Institutions could:

- Provide confidential reporting channels such as dedicated email addresses, hotlines, or secure digital platforms.
- Commission periodic external reviews of whistleblowing arrangements to strengthen independence and confidence.
- Promote whistleblowing as a professional safeguarding duty by sharing anonymised learning examples to train staff and demonstrate its role in protecting learners.
- Link whistleblowing arrangements to institutional values, ensuring all staff recognise raising concerns as a professional and ethical responsibility.

4.6 Partnership Working

Safeguarding is strengthened through effective partnership working. Protecting learners often requires educational institutions and external agencies to work together to identify risks, respond appropriately, and provide coordinated support. Educational institutions often partner with external organisations, including health and mental health services, relevant child protection authorities, community organisations, employers, and enrichment providers.

These partnerships support learner wellbeing and help ensure consistent safeguarding standards across services that interact with learners. Working collaboratively with relevant agencies reinforces safeguarding and learner protection as shared responsibilities across the wider education and community environment.

Directive - Institutions must:

172. Ensure effective and formal arrangements are in place to collaborate with relevant external agencies to support preventative safeguarding education, early identification of risks and coordinated protection of learners.
173. Ensure safeguarding continuity during learner transitions through timely and secure transfer of relevant safeguarding information in line with agreed procedures.
174. Engage with relevant external agencies to coordinate timely support, safety planning, and protective action for learners at risk.
175. Ensure interactions with external agencies relating to safeguarding concerns, including advice received, referrals made, responses and follow-up actions, are managed and recorded in accordance with Section 5.
176. Designate the CPC/DSL as the primary safeguarding contact for external agencies, supported by senior leadership as appropriate.
177. Ensure clear and written procedures are in place for referral to external agencies and appropriate information sharing to support preventative, early help and safeguarding responses in line with safeguarding requirements.
178. Participate in multi-agency safeguarding meetings where required or invited to support coordinated safeguarding decision-making and protection planning.



Guidance - Institutions could:

- Engage in joint training or learning opportunities with external agencies to strengthen shared safeguarding understanding.
- Invite external agency representatives to contribute to safeguarding awareness activities for staff, learners, or families.
- Review the effectiveness of safeguarding partnerships periodically, including as part of institutional safeguarding self-assessment or monitoring processes.



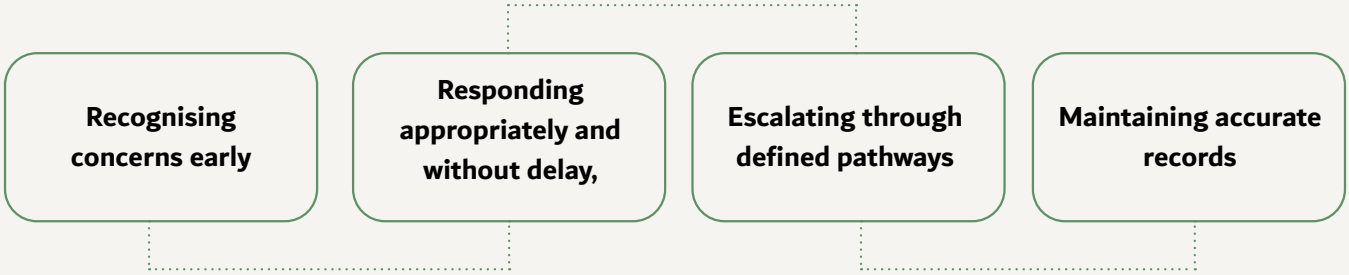
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Safeguarding Processes For Managing Concerns

5 Safeguarding Processes For Managing Concerns

While a strong preventive culture and enabling mechanisms reduce risk, effective safeguarding also requires timely and appropriate action when concerns arise or harm is suspected. The safeguarding system provides the structured processes through which institutions identify, respond to, escalate, and record safeguarding concerns with clarity and accountability.

The core safeguarding processes within this system are:



Together, these processes enable the timely protection of learners, proportionate risk management, and transparent institutional responses. A clear safeguarding system supports consistent decision-making and coordination with external agencies where required. It reinforces individual responsibility, so adults act on concerns rather than delaying action or relying on informal judgement or assumptions.

The subsections below describe how concerns within educational institutions in Dubai are identified, how disclosures and suspicions are handled, how escalation operates, and how records support accountability and continuity.

5.1 Recognising Safeguarding or Learner Protection Concerns

Recognising safeguarding and learner protection concerns is the first step in protecting learners from harm. Concerns may arise in different ways. A learner may disclose information directly, concerns may be raised by a third party, or staff may observe indicators that suggest a learner may be experiencing harm or neglect. Effective recognition therefore depends on staff remaining attentive to changes in a learner's behaviour, wellbeing, attendance or engagement that may indicate risk. Educational institutions are often well placed to notice these changes because staff interact with learners regularly and may observe patterns of behaviour, presentation, and engagement over time.

Recognition requires staff to remain alert to both immediate risks and emerging patterns that may indicate a safeguarding concern, and to understand how abuse and neglect may present across different relationships and environments. Abuse may involve acts committed against the learner as well as failures to act that place the learner at risk. It can include physical, emotional, or sexual abuse, and/or neglect. Abuse may occur as a single incident or as a pattern over time, and learners may not always recognise their experiences as abusive or may find it difficult to describe them as such.

Abuse may not always be visible and may be perpetrated by adults or other learners within or outside the educational setting, including through digital technology. Less visible behaviours, cumulative neglect, sustained emotional harm, coercive control or online exploitation may also pose significant safeguarding concerns.

Recognition, therefore, depends on staff knowing learners as individuals and remaining alert to indicators of harm or changes in their usual behaviour, presentation or engagement. Ongoing observation and professional relationships are essential, as risk may be hidden, emerging, or context-specific.

A clear and shared understanding of safeguarding terms supports consistent recognition of concerns and appropriate action across the educational institution. The formal definitions that inform this Framework are set out in **Appendix A** and indicative signs and symptoms of abuse are provided in **Appendix B**.

Directive - Institutions must:

179. Ensure that the safeguarding definitions set out in **Appendix A** are reflected in the institutional safeguarding policy, staff training materials, and written procedures.
180. Ensure staff receive training and guidance on recognising signs and indicators of direct and indirect abuse, neglect, and harm, including risks arising in educational settings, homes, communities and online environments, in accordance with **Appendix B**.
181. Ensure identification of safeguarding concerns is not influenced or limited by a learner's demographic, cultural, disability, or other contextual characteristics.
182. Ensure cumulative low-level concerns are recognised as potential indicators of risk and appropriately recorded, reviewed and actioned.
183. Ensure staff understand that proof or certainty is not required to raise a safeguarding concern and that concerns may be raised on reasonable suspicion.
184. Ensure any adult working in, for, or on behalf of the institution may identify and raise a safeguarding concern in accordance with safeguarding procedures.
185. Ensure emerging safeguarding concerns and risk indicators are identified and recorded in accordance with Section 5.

Guidance - Institutions could:

- Provide structured tools or guidance materials to support staff in identifying early signs of a safeguarding concern.
- Promote consistent safeguarding terminology across internal guidance, communications, parent and staff briefings to strengthen shared understanding of risk indicators and concern thresholds.
- Review and update safeguarding awareness materials regularly to reflect emerging risks, contextual trends, and institutional learning.
- Incorporate varied safeguarding scenarios and contextual examples into staff awareness activities to strengthen recognition of risks across different environments and relationships.

5.2 Responding to a Safeguarding Concern

Responding to a concern involves the immediate actions taken to support the learner, reduce risk, and manage the concern safely once it is recognised. The quality and consistency of responses influence safeguarding outcomes and determine whether learners feel protected, supported, and able to trust in safeguarding processes.

Responding sits alongside reporting and recording but focuses on immediate care, appropriate conduct, and protective action when concerns arise. Clear expectations support consistency across institutions and reduce the risk of actions that could compromise safeguarding processes.

Effective responses prioritise learner safety and wellbeing and follow defined procedures rather than relying on informal judgement. Effective responses also depend on environments that support disclosure and reduce barriers that may prevent learners from speaking up. This includes ensuring adults respond calmly, respectfully, and proportionately when concerns are raised.

Learner voice is central to effective safeguarding responses. Seeking and considering learners' views, wishes, and feelings helps inform decisions and strengthens learners' confidence and trust that their concerns are taken seriously.

5.2.1 Learners at Risk

Learners may face safeguarding risks arising from a wide range of personal, social, and environmental circumstances. While some concerns emerge through specific incidents, others may become visible through patterns of behaviour, changes in wellbeing, or situations that increase a learner's vulnerability. Factors such as family circumstances, social pressures, health or wellbeing concerns, experiences outside the institution, or barriers linked to age, disability, language, culture, ethnicity, or socioeconomic circumstances may affect how risks are experienced or disclosed. Some learners may be particularly vulnerable as a result of these circumstances.

Effective safeguarding practice, therefore, depends on staff remaining attentive to early indicators of vulnerability, patterns of concern, and contextual risks affecting learners. Awareness of how individual circumstances and background factors may interact with safeguarding risks helps staff recognise concerns that might otherwise go unnoticed. Early recognition and timely response enable institutions to provide appropriate support and protection before concerns escalate.



Directive - Institutions must:

186. Ensure processes are in place to identify learners with additional or heightened vulnerability and to ensure these factors are considered in safeguarding assessment and response.
187. Ensure safeguarding responses are adapted and proportionate to learners' individual circumstances and assessed risk.
188. Ensure processes are in place to identify and review cumulative or repeated low-level concerns in order to recognise emerging safeguarding risks and determine when escalation or intervention is required.
189. Ensure accessible information and appropriate signposting are available to support learners and families experiencing increased vulnerability.
190. Ensure trauma-informed approaches are applied when supporting learners who are particularly vulnerable, so that responses promote safety, stability and trust.

Guidance - Institutions could:

- Assign a named, trusted adult to each learner identified as at heightened risk, ensuring consistent, relational support and regular check-ins.
- Conduct termly reviews of safeguarding patterns and emerging risks affecting specific learner groups and use findings to strengthen preventative support and early intervention.
- Develop proactive wellbeing monitoring systems to identify early signs of declining wellbeing or emerging risk, enabling intervention before concerns reach safeguarding thresholds.
- Work with inclusion colleagues, where appropriate, to review safeguarding processes to improve inclusivity and accessibility.

5.2.2 Overcoming Barriers to Disclosure

Learners may disclose concerns about themselves or others to any adult in the institution, including staff, third-party providers, or volunteers. However, many learners face barriers to speaking out, such as fear of consequences, shame, coercion, or challenges linked to disability, culture, or language. Safeguarding arrangements that reduce these barriers and provide safe, accessible, and trauma-informed environments help learners share concerns and seek help when needed. Clear and accessible reporting routes increase learners' confidence that concerns will be taken seriously and managed safely.

Directive - Institutions must:

191. Ensure safeguarding arrangements identify and address barriers that may prevent learners from disclosing harm, including fear of retaliation, coercion, social pressure, or minimisation of harmful behaviour.
192. Ensure all adults working with learners are trained to respond calmly and appropriately to disclosures and to follow safeguarding response processes.
193. Ensure safeguarding arrangements provide multiple, clear, and accessible reporting routes for learners to disclose concerns, tailored to their age, language, cultural context, and additional needs, and, where possible, include alternative or anonymous options that allow learners to raise concerns safely and independently of staff.
194. Ensure safeguarding arrangements clearly explain to learners, in age-appropriate terms, how information will be handled, including when it may need to be shared to protect them or others.
195. Ensure learners are informed and educated, through accessible, age-appropriate communication and curriculum integration, about recognising and sharing safeguarding concerns and seeking help.

Guidance - Institutions could:

- Designate private physical spaces such as wellbeing rooms or counsellor offices for learners to disclose concerns, in line with institutional safe working practice.
- Implement additional learner-friendly reporting mechanisms, including anonymous reporting options, digital platforms, or peer safeguarding mentor roles.
- Develop case studies and scenarios for training staff that reflect local contexts and diverse learner needs.

5.2.3 Responding to a Disclosure or Suspicion of Abuse or Neglect

When a learner shares a concern or when abuse or neglect is suspected, the initial response plays a critical role in safeguarding outcomes. Learners are more likely to disclose when they feel listened to, taken seriously, and treated with respect. How adults respond can either support further engagement or create additional barriers to disclosure.

An appropriate response is calm, attentive, and focused on the learner's immediate safety and wellbeing. Learners should be reassured that they have done the right thing by speaking up, that they will be listened to without judgment and that they will be given a clear, age-appropriate explanation of what will happen next.

This includes explaining to learners that concerns will be passed on promptly through the institution's safeguarding arrangements so that appropriate support can be provided. Responses that undermine trust, such as making promises of secrecy, expressing shock or distress, asking leading questions, delaying action, or attempting to investigate concerns independently, can place learners at further risk and compromise safeguarding processes. Clear institutional expectations therefore help ensure that adults working with learners respond consistently and appropriately to disclosures and concerns across all settings.

Directive - Institutions must:

196. Ensure that immediate assessment of learner safety is conducted at the point of disclosure and that interim protective measures are implemented where required.
197. Ensure that clear expectations are defined and communicated for staff conduct when responding to safeguarding disclosures or concerns, including that concerns must be reported without delay and without requiring proof or verification, in accordance with safeguarding procedures.
198. Ensure staff respond to disclosures calmly, attentively, and without judgement, reassure learners and explain, in simple and age-appropriate terms, what will happen next, including that concerns will be shared through safeguarding procedures so appropriate support can be provided.
199. Ensure clear expectations are defined and communicated that staff must not:
    - delay reporting or adopt a "wait and see" approach
    - express shock, disbelief, blame or distress
    - promise confidentiality or secrecy to learners when safeguarding concerns arise

Directive - Institutions must:

- ask leading questions or seek unnecessary detail beyond what learners choose to share
- make the learner feel ashamed, blamed or responsible for the harm disclosed
- independently investigate concerns or share information outside authorised safeguarding channels.

200. Ensure that institutional safeguarding procedures prohibit photographing or filming learner injuries, as part of learner safety and protection procedures within the educational institution.

Guidance - Institutions could:

- Provide staff-facing guidance materials, such as response checklists or scripts, to support consistent and appropriate handling of disclosures.
- Provide opportunities for regular briefings regarding effective handling of disclosures to staff, third-party staff and volunteers.



5.3 Reporting and Recording a Safeguarding Concern

Reporting and recording are central to effective safeguarding and learner protection. When there is knowledge or suspicion that a learner may be experiencing abuse or neglect, concerns are addressed through formal safeguarding reporting procedures rather than managed informally or outside authorised routes. Timely reporting supports early intervention and access to protection, even where full details are not yet available.

Accurate, timely, and confidential recording of all safeguarding reports, actions, and decisions is essential to ensure continuity of support, evidence-informed decision-making, and accountability throughout all stages of case management. Safeguarding is a collective responsibility, and all staff working in educational settings have a legal duty to report safeguarding concerns about learners. Federal Law No. (3) of 2016 on Child Rights (Wadeema Law) establishes these obligations:

"It is mandatory for educators, doctors, specialists, or any individuals entrusted with the protection, care, or education of a child to report incidents."[7]

5.3.1 Case Management

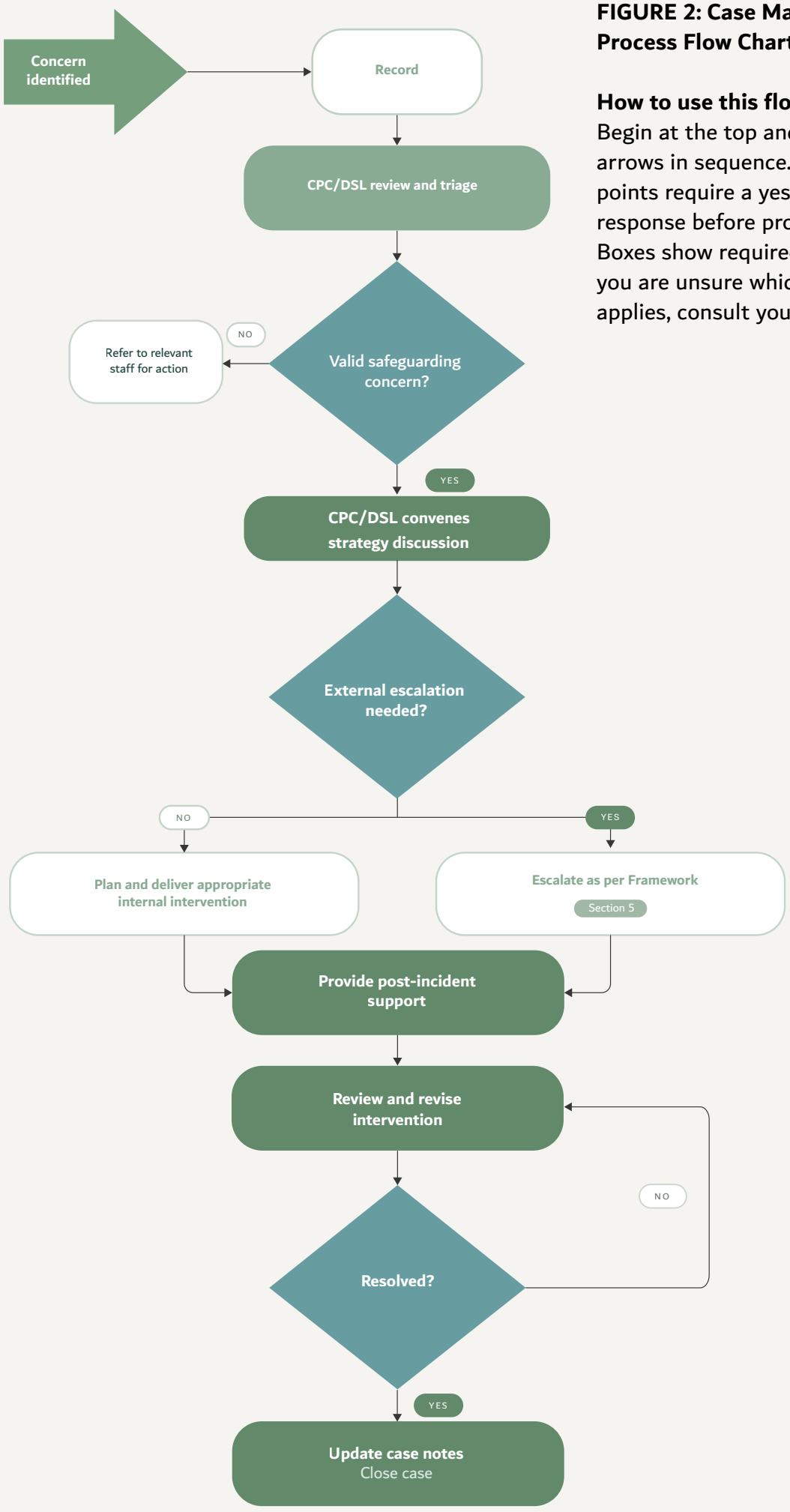
Strong case management ensures that every safeguarding and learner protection concern is handled consistently, promptly, and effectively. Clear processes for recording, assessing, escalating, and reviewing concerns support learner protection, strengthen accountability, and demonstrate regulatory compliance.

Case management also includes post-incident support, such as access to counselling, reintegration arrangements, academic adjustments, and support for families or reporters where appropriate. Institutions retain oversight of safeguarding outcomes, including when third-party systems or platforms are used. Figure 2 below illustrates the case management process flow.

[7] Chapter 9, Article (42), Clause 2

FIGURE 2: Case Management Process Flow Chart

How to use this flowchart: Begin at the top and follow the arrows in sequence. Decision points require a yes or no response before proceeding. Boxes show required actions. If you are unsure which pathway applies, consult your CPC/DSL.



Directive - Institutions must:

201. Establish and maintain a structured safeguarding case management system for all learner protection concerns.
202. Ensure the safeguarding case management system supports clearly defined safeguarding stages, including:
    - Timely capture and recording of safeguarding concerns once identified
    - Prompt triage and assessment of safeguarding risk in accordance with safeguarding threshold criteria
    - Accurate documentation of concerns and chronology of actions taken and by whom
    - Referral and escalation
    - Ongoing monitoring of the learner's safety and wellbeing
    - Periodic review of the effectiveness and proportionality of interventions
    - Formal case closure with documented rationale and any required follow-up or support arrangements
203. Ensure safeguarding concerns are triaged promptly by the CPC/DSL and/or Core Safeguarding Team, and that case decisions are not made in isolation.
204. Ensure structured case supervision arrangements are in place to provide regular oversight of safeguarding decisions, support professional judgement, and ensure accountability at all levels.
205. Ensure the case management system enables tracking of referrals and external escalation in accordance with safeguarding reporting requirements.
206. Ensure safeguarding records are maintained securely in accordance with safeguarding recording procedures, stored separately from academic or administrative files and access is restricted to authorised safeguarding staff.
207. Retain full institutional accountability for safeguarding responsibilities when using third-party digital case management or safeguarding platforms and ensure that such systems comply with UAE safeguarding, confidentiality, and data protection requirements.

Guidance - Institutions could:

- Use digital case management platforms with dashboards or analytical tools to support oversight, identify patterns, and track interventions.
- Implement multi-layered security protections for safeguarding systems and records, such as encrypted storage, two-factor authentication, and tiered access permissions.
- Provide CPCs/DSLs with reflective practice (structured opportunities to review and learn from their handling of safeguarding cases and decisions) or supervision opportunities linked to case management.

5.3.2 Learner Safeguarding And Protection Thresholds

Safeguarding and learner protection thresholds provide a shared framework for assessing the seriousness of a concern and determining the urgency and type of response required. They support consistent decision-making by distinguishing between concerns that can be addressed through early intervention, those requiring coordinated or multi-agency support, and those requiring immediate statutory action.

Table 1 (Risk Levels and Descriptions) sets out the recognised thresholds within this Policy, with narrative examples of the circumstances associated with each level. The table is intended to support professional judgement, not replace it, and should be considered alongside the wider context of the learner's circumstances and any cumulative or emerging risks.

Using thresholds consistently helps ensure that responses are proportionate, timely, and focused on the learner's safety and best interests. Applying appropriate thresholds requires professional judgement and regular review, as circumstances may change when new information emerges or as interventions take effect.

TABLE 1: Risk Levels and Descriptions

Risk Level	Description	Examples of Situations
HIGH	There is a significant and immediate threat to the child's safety or wellbeing. High-risk cases may involve strong evidence or suspicions of physical or sexual abuse, severe neglect, or other forms of abuse requiring urgent intervention. Children in these high-risk situations face immediate danger or harm, necessitating swift action, such as removing the child from the harmful environment and involving law enforcement and emergency services to take immediate measures to protect the child.	A 5-year-old child who witnesses domestic violence daily and shows physical signs of injury is an example of a high-risk situation. The presence of multiple injuries, such as cuts and bruises, suggests direct physical harm. Additionally, living in a tense, conflict-ridden environment significantly affects the child's physical and psychological wellbeing. Signs of neglect, such as irregular meals, poor hygiene, wearing dirty or inappropriate clothes and school absenteeism, indicate a lack of proper care in the child's environment. The child may also experience disturbed sleep patterns, insomnia or frequent nightmares. This example shows the child is in direct and immediate harm by being in an environment marked by violence, inadequate care, significant physical and psychological harm and lack of access to essential services.

Risk Level	Description	Examples of Situations
MEDIUM	While there is no immediate threat to the child's safety, concerns remain about the potential for harm if the situation does not improve or if risk factors escalate. This level often involves neglect, emotional abuse, or other circumstances that adversely affect the child's development and psychological wellbeing. Intervention strategies include closely monitoring the situation, providing student and family support and resources as required, and implementing preventive measures to reduce risk.	A 12-year-old student shows consistent emotional distress at school, such as frequent crying, withdrawal from peers, declining academic performance, and reluctance to return home after classes. Teachers also observe that the child occasionally reports feeling "unwanted" or "unheard" at home, though there are no physical signs of abuse or immediate threats to safety. While the child is not in immediate physical danger, the emotional neglect and lack of adequate parental attention could escalate into more severe psychological harm if unaddressed.
LOW	A low level of risk indicates minimal concerns about the child's safety and wellbeing, with no immediate threat present. However, certain conditions, if unaddressed, could escalate to a higher risk level over time. In these cases, the focus is on providing the family with information, support, and access to community resources to enhance their ability to care for the child. The goal is to foster a safe and healthy environment for the child's growth and development while monitoring for any changes.	A 9-year-old student occasionally arrives late to school and sometimes forgets their lunch or homework. Despite these minor concerns, the child appears generally well cared for, attends school regularly, engages positively with peers, and shows no signs of distress, harm, or neglect. Teachers observe that the child is cheerful, responsive, and participates actively in class. While these issues suggest mild family or organisational challenges, there is no evidence of immediate or potential harm. The situation can be addressed through supportive communication with parents, gentle monitoring, and access to community or school-based resources, ensuring early intervention before concerns escalate.

Note: The examples provided are illustrative only and should not be regarded as exhaustive or prescriptive. Institutions must assess each case on its own merits, exercise professional judgement, and act in accordance with the requirements of this policy.

Directive - Institutions must:

208. Apply the prescribed safeguarding risk threshold criteria to all safeguarding concerns, in accordance with the relevant frameworks, guidelines, and protocols adopted in the Emirate of Dubai and this Framework.
209. Use safeguarding thresholds to determine the appropriate response to concerns, including internal management, targeted intervention or referral to statutory authorities.

Directive - Institutions must:

210. Ensure that the Core Safeguarding Team applies safeguarding thresholds consistently when assessing risk, determining responses, or deciding on escalation.
211. Ensure safeguarding risk assessment is embedded across all safeguarding procedures, with outcomes and the rationale for decisions documented.
212. Ensure each safeguarding case record clearly documents:
    - the threshold level applied
    - the decision taken and by whom
    - the rationale for that decision
213. Ensure safeguarding thresholds are applied with due regard to the learner's context, needs, vulnerabilities, and best interests, ensuring cultural considerations inform assessment without introducing bias or lowering safeguarding standards.

Guidance - Institutions could:

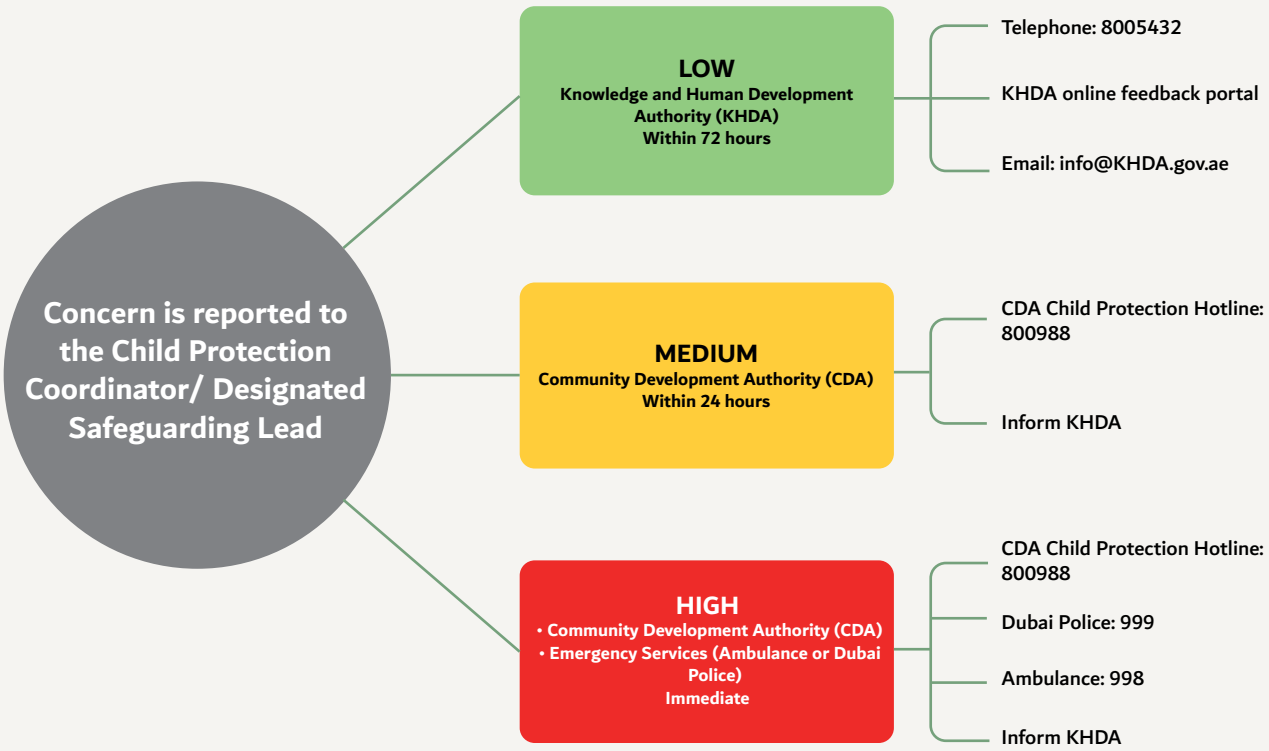
- Use anonymised case studies within safeguarding team meetings to strengthen shared understanding of thresholds and ensure consistent application.
- Partner with other institutions or relevant agencies to review anonymised threshold decisions and refine safeguarding responses, maintaining confidentiality.

5.3.3 Reporting and Escalation Routes

Concerns, suspicions, or disclosures about a learner's safety or wellbeing may arise in many forms and contexts, and may be identified through direct disclosure, third-party information, or observation. Even when concerns are not yet verified, prompt escalation supports early intervention and access to appropriate protection for learners. All adults in contact with learners have a responsibility to raise and escalate concerns through the appropriate reporting routes. Clear, accessible, and visible reporting routes support timely escalation and consistent safeguarding practice. Older learners who support younger learners as part of their education may require guidance and support, in line with their age and stage of development, to understand how to seek help or raise concerns safely and to safeguard both themselves and others. **Figure 3** illustrates the escalation routes used within this Policy Framework.

FIGURE 3. Escalation Routes for Concerns

How to use this flowchart: Start at "concern is reported", follow the relevant priority level, and complete the required actions within the stated timeframe. If unsure, consult your CPC/DSL.



Directive - Institutions must:

214. Ensure reporting and escalation routes for safeguarding concerns are clearly defined and communicated across the institution in accordance with this Framework and the relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai.
215. Ensure safeguarding reporting routes and emergency contact information are readily accessible to all adults working with learners and kept up to date.
216. Require the CPC/DSL to escalate safeguarding concerns in accordance with the safeguarding risk thresholds and statutory referral pathways and timeframes set out in **Figure 3**.
217. Ensure that the CPC/DSL coordinates the safeguarding assessment of all reported concerns and determines the appropriate course of action, including escalation to external authorities where required, in accordance with safeguarding system requirements and aligned to this Framework.
218. Ensure high-level safeguarding concerns that pose an immediate risk to a learner's safety are referred immediately to the Community Development Authority (CDA) and/or the relevant emergency service (Dubai Police or Ambulance), and that KHDA is informed, in accordance with the reporting pathways set out in **Figure 3**.

Directive - Institutions must:

219. Ensure that medium-level safeguarding concerns are reported to the Community Development Authority (CDA) within 24 hours, and that KHDA is informed of the report, in accordance with the reporting pathway set out in **Figure 3**.
220. Apply reporting and escalation procedures consistently across all areas of institutional provision and all contexts in which learners engage, including on-site, off-site, digital and online environments, boarding, transport, and third-party provision.
221. Ensure parents/custodians/guardians are informed of any referrals without delaying reporting when abuse is suspected or confirmed.
222. Require all adults to report safeguarding concerns to the CPC/DSL or authorised deputy, rather than attempting to investigate the concern themselves, and to report repeated or continuing concerns even where a previous report has already been made.
223. Ensure adults working with learners understand that raising a safeguarding concern through a single appropriate reporting route is sufficient and that duplicate reporting via multiple routes is not required.
224. Ensure full cooperation with safeguarding investigations conducted by the Child Protection Specialist or relevant authorities, including providing timely access to staff, information, records, and documentation as required.
225. Ensure staff are aware of their right and duty to escalate concerns directly to KHDA or relevant authorities if internal safeguarding processes are ineffective or obstructed in line with Section 4.5.



Guidance - Institutions could:

- Provide quick-reference materials, such as lanyard cards or digital inserts, outlining reporting pathways and key contacts.
- Develop safeguarding awareness materials for physical and digital spaces to reinforce escalation procedures.
- Use digital tools or platforms that log and timestamp safeguarding referrals to support timely reporting and traceability.
- Provide guidance on writing effective referrals for staff so that reports are factual, clear and relevant.

5.3.4 Reporting and Allegations Against Staff

Safeguarding includes protecting learners from harm arising from the actions or behaviour of adults working in, for, or on behalf of educational institutions. For the purposes of this section of the Framework, "staff" includes employees, contractors, third parties, volunteers, and other adults in positions of trust who work with or have access to learners.

Concerns or allegations about staff can present serious risks and require prompt and careful handling. Clear procedures foster confidence in the safeguarding system and help ensure that concerns about staff are managed consistently and fairly. Accessible reporting routes, clear professional boundaries, trained and trusted staff, appropriate escalation, and timely action are essential to maintaining learner safety and institutional accountability.

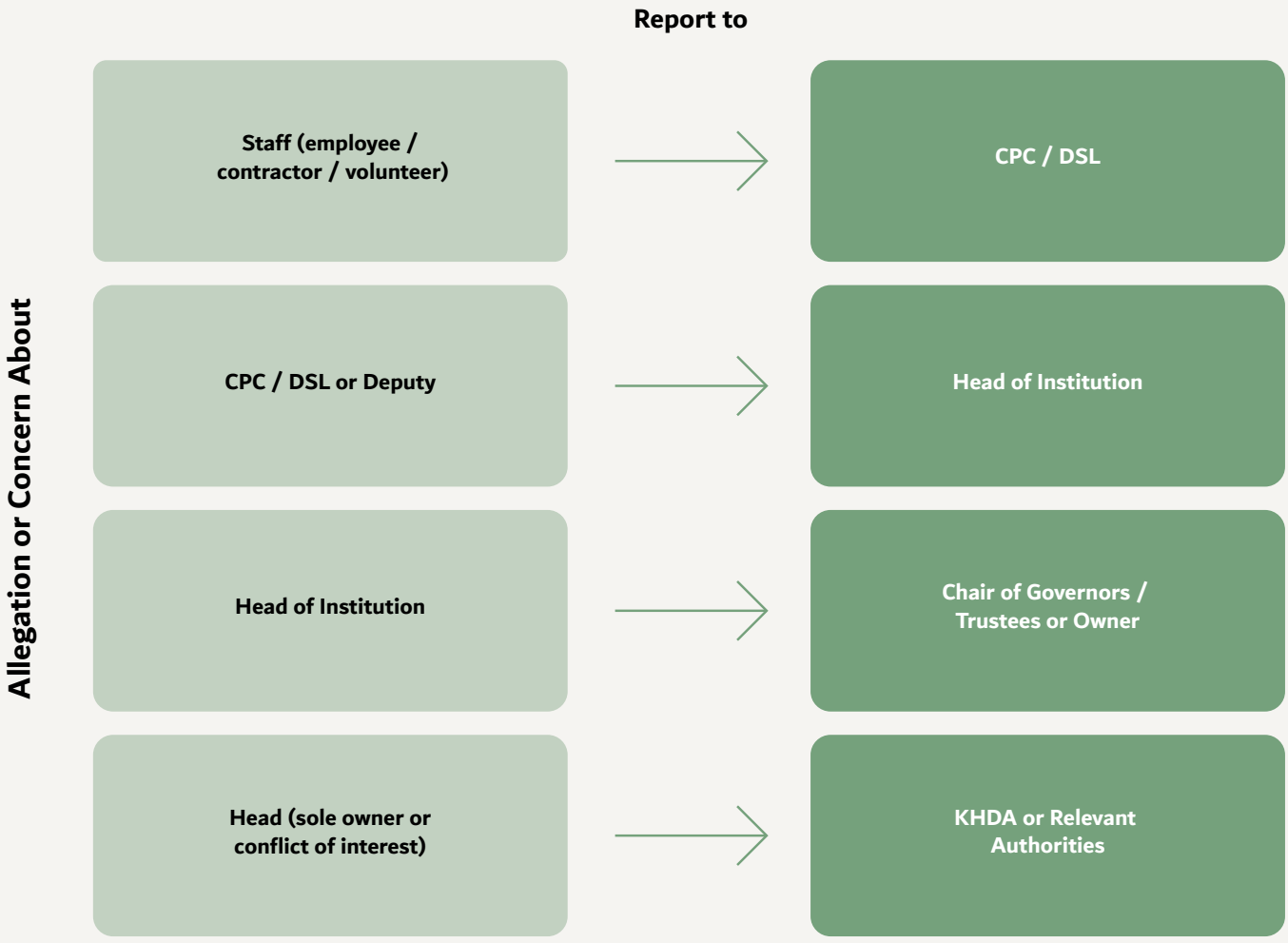
Directive - Institutions must:

226. Ensure clear written procedures and secure reporting channels are in place for conduct concerns or allegations about members of staff.
227. Require concerns about staff to be reported without delay and no later than the same working day.
228. Require concerns or allegations about staff to be escalated through the reporting hierarchy set out in **Figure 4**.
229. Inform external providers or third parties working with learners of their right to report directly to KHDA or relevant authorities.
230. Ensure staff understand that they may escalate concerns directly to KHDA or the relevant authorities where internal reporting routes are ineffective, inaccessible, or unsafe, or if conflicts of interest prevent appropriate reporting.
231. Ensure proportionate interim safeguarding measures are implemented where necessary, including removal from duties or suspension, to protect learners while staff-related concerns are assessed or investigated.
232. Ensure reporting pathways and contact information for raising concerns about staff are clearly communicated and accessible to all staff and learners, including alternative routes where the usual reporting line may not be appropriate.

Guidance - Institutions could:

- Use visual flowcharts, quick-reference guides, or digital resources to help staff understand and follow escalation pathways for concerns or allegations about adults.
- Conduct annual reviews of all staff conduct concerns and allegations to identify patterns and strengthen prevention, including safer recruitment processes.

FIGURE 4:
Reporting Routes for Allegations against Staff



5.3.5 Reporting Safeguarding Concerns During Off-Site Activities

Safeguarding responsibilities extend beyond the institution's physical boundaries. During off-site activities, whether local or international, learners may participate in trips, placements, internships, residential programmes, or other experiences where risks may differ from those on campus.

Effective safeguarding arrangements ensure that learners and staff have the same access to reporting routes and protective support off-site as they do within the institution. Clear procedures, risk assessments, advance communication, and appropriate supervision help ensure that concerns raised during off-site activities are addressed promptly, consistently, and in line with institutional safeguarding processes.

Directive - Institutions must:

233. Require all safeguarding concerns arising during off-site activities, including near misses, to be reported through the reporting and escalation routes set out in Section 5.3.3 of this Framework and recorded in accordance with institutional safeguarding procedures, with designated trip leaders or supervisors responsible for ensuring incidents are documented and actions taken.
234. Ensure safeguarding reporting procedures and routes are clearly communicated to staff, learners, parents, guardians, or custodians and relevant supervisors prior to offsite activities, remain accessible throughout and are evidenced through documentation.
235. Ensure the CPC/DSL or a designated deputy is contactable during off-site activities, with appropriate arrangements for out-of-hours or residential support.
236. Provide a dedicated "safeguarding phone" or emergency communication channel for off-site activities.
237. Ensure that safeguarding incidents occurring during off-site activities are formally recorded and reviewed by the CPC/DSL in accordance with institutional safeguarding procedures.
238. Ensure clear guidance is in place on when and how to notify parents, guardians, or custodians of safeguarding concerns arising during off-site activities.
239. Develop joint safeguarding protocols with third-party providers involved in off-site activities, such as placement hosts or residential centres, to clarify roles and responsibilities.



Guidance - Institutions could:

- Provide trip leaders with emergency safeguarding cards containing key contacts (e.g. CPC/DSL, Head of Institution, KHDA, local emergency services, embassy contacts for international trips, etc.).
- Hold debrief sessions between trip leaders and the CPC/DSL after off-site activities where safeguarding concerns arose to review actions taken and identify learning for future activities.
- Involve learners in risk assessment and incorporate their views into risk mitigation actions.

5.3.6 Failure to Report

Safeguarding relies on every adult taking responsibility for raising concerns promptly and appropriately. When concerns are ignored, minimised, or withheld, learners may be exposed to further harm and institutional safeguarding arrangements are weakened. Legal and regulatory frameworks mandate clear duties for those working with learners to report suspected or confirmed abuse or neglect.

Failure to meet these responsibilities may result in serious legal, professional, and institutional consequences. These may include disciplinary action, regulatory sanctions, loss of licensing, and, in some cases, criminal liability. Further details on roles and responsibilities are set out in Section 4.1.

Directive - Institutions must:

240. Require all adults to take personal responsibility for reporting safeguarding concerns and prohibit delegation or reliance on others to report on their behalf or any assumption that concerns have already been reported.
241. Treat failure to report suspected or confirmed abuse or neglect as a serious safeguarding breach.
242. Ensure it is clearly communicated that failure to report safeguarding concerns may result in legal, professional, or disciplinary consequences, including referral to relevant authorities or professional bodies.
243. Ensure safeguarding policies and reporting routes are clearly accessible and periodically reinforced through briefings or exercises so staff remain confident in how to report concerns promptly.
244. Apply protections for individuals reporting safeguarding concerns in accordance with Section 4.5.

Guidance - Institutions could:

- Promote a culture of openness by recognising examples of timely and responsible safeguarding reporting.
- Share brief guidance materials or reminders that highlight the duty to report concerns immediately and the risks of inaction.

5.3.7 Recording Learner Safeguarding Concerns

Accurate and timely record keeping supports effective safeguarding and learner protection. Clear records provide accountability, inform decision-making, and enable concerns to be monitored over time. Consistent recording practices ensure that disclosures, suspicions, and actions taken are captured in a structured way that supports timely safeguarding responses and effective protection of learners.

This includes concerns arising from learner disclosures, suspected abuse, incidents during supervised activities, missing learners, off-site activities, staff conduct concerns, and any safeguarding-related risk requiring assessment or escalation. Standardised recording approaches help institutions maintain clarity, continuity, and oversight across all safeguarding cases, while safeguarding information is stored securely and accessible only to authorised personnel.

Directive - Institutions must:

245. Ensure written procedures are in place governing how learner protection concerns are recorded, managed within the case management system, and escalated in accordance with safeguarding procedures.
246. Ensure all safeguarding concerns are recorded in the case management system on the same day the concern arises, and updated following each action or decision.
247. Ensure records include the learner's own words where relevant, all discussions, decisions with rationale, actions taken and by whom, referrals made with confirmation, and follow-up actions, with dates and times documented throughout.
248. Ensure safeguarding records are factual, objective, clearly written, dated, maintain a clear chronology, and are attributable to the author.
249. Ensure safeguarding records include relevant contextual information appropriate to the setting, including for boarding, residential provision, off-site activities, placements, transport, and third-party involvement.
250. Document case closure decisions, including the rationale, threshold level at closure, and any ongoing monitoring or support arrangements.

Directive - Institutions must:

251. Ensure that third-party providers engaged in safeguarding or case management services comply with UAE confidentiality and data protection requirements for safeguarding.
252. Ensure that safeguarding records are retained for all safeguarding concerns and incidents across all areas of provision, in accordance with the relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai and applicable UAE legislation.
253. Ensure safeguarding records are stored securely, kept separate from academic or administrative records, and accessible only to authorised safeguarding staff.

Guidance - Institutions could:

- Use case management systems with structured fields, chronological sequencing, and audit trails to strengthen accuracy and accountability.
- Organise safeguarding records so that related concerns are clearly linked to support effective identification of patterns of risk.

5.3.8 Information Sharing

Effective safeguarding relies on timely, accurate and appropriate information sharing between those responsible for protecting learners. While confidentiality and privacy must always be respected, there are circumstances in which information must be shared to prevent harm, support continuity of care, or enable coordinated safeguarding action.

Clear standards help staff understand when and how to share information lawfully and proportionately, in the learner's best interests. Safeguarding information must be handled securely and objectively, in line with applicable privacy requirements and relevant legislation.[8]



[8] Federal Decree by Law No. (26) of 2025 Regarding Child Digital Safety.

Directive - Institutions must:

254. Ensure that all safeguarding information sharing is lawful, secure, proportionate, and in the learner's best interests, in accordance with KHDA guidance, the relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai, and applicable UAE legislation.
255. Require staff to share safeguarding information where necessary to protect the learner's safety, wellbeing, education, or health, in accordance with this Framework and applicable legislation.
256. Ensure relevant safeguarding information is shared with authorised government entities and partner agencies where required to support continuity of care, coordinated safeguarding action, or safe transitions.
257. Ensure safeguarding information is shared only on a strictly need-to-know basis, limited to what is necessary and proportionate, and that consent is sought where appropriate and safe, recognising that consent is not required where there is a risk of harm.
258. Ensure safeguarding information sharing is recorded in accordance with Section 5.3.7, including what was shared, the rationale for sharing, recipient details, date, time, and details of the authorising individual.
259. Ensure that any breach of safeguarding information, confidentiality, or safeguarding records is reported without delay to the CPC/DSL and managed in accordance with safeguarding and legal reporting requirements.

Guidance - Institutions could:

- Use secure digital systems to facilitate appropriate information-sharing across safeguarding disciplines.
- Implement layered security measures to safeguard records, including appropriate authentication controls, encryption, and tiered access permissions.
- Develop internal checklists or templates to support consistent safeguarding information-sharing decisions.
- Designate a responsible lead to oversee safeguarding information governance and support secure information-sharing practices.





6

Rigour: Monitoring, Review, Learning and Improvement

6 Rigour: Monitoring, Review, Learning and Improvement

Rigour ensures safeguarding practice remains consistent, transparent, and accountable through three key components: monitoring, review, and improvement. Together, these components provide the structures through which safeguarding arrangements are overseen, evaluated, and strengthened over time.

Monitoring is ongoing and provides oversight to ensure that safeguarding policies and practices are implemented consistently and effectively. It enables institutions to track safeguarding activity, identify gaps in compliance, and recognise emerging safeguarding risks before they escalate.

Review involves periodic, structured evaluation of whether safeguarding arrangements are working well, remain fit for purpose, and continue to respond to changing circumstances. Leadership oversight, governance scrutiny, and planned evaluation create opportunities to strengthen safeguarding practice based on evidence and experience.

Learning and improvement enable safeguarding arrangements to evolve in response to evidence, emerging risks, and changing institutional contexts. When institutions embed learning across policy development, training design, and operational practice, safeguarding arrangements remain current, proportionate, and focused on positive learner protection outcomes.

Safeguarding accountability is strengthened when monitoring, review, and improvement are embedded within leadership oversight, quality assurance processes, and institutional performance frameworks. This includes drawing on the experiences of learners, staff, parents, guardians, or custodians, the wider community, and relevant partners to inform ongoing practice.

6.1 Monitoring

Monitoring provides ongoing oversight of safeguarding arrangements, revealing whether policies, procedures, and practices are being implemented consistently and effectively. When monitoring is systematic and regular, institutions can identify gaps in compliance, recognise emerging risks, and address areas where safeguarding systems are not operating as intended.

Routine checks, audits, and analysis of safeguarding activity and outcomes enable timely corrective action and strengthen accountability across the institution. Effective monitoring embeds safeguarding expectations in day-to-day practice, making them visible and actionable rather than abstract policy commitments.

Directive - Institutions must:

Implementation and Compliance Oversight:

260. Monitor implementation of all safeguarding arrangements, procedures and policies across all areas of provision, including off-site activities, transport, third-party provision and boarding where relevant, to ensure they are communicated, understood by staff, and applied consistently.
261. Maintain and monitor records of safeguarding training compliance for all required roles and review renewal status at least termly to ensure staff remain up to date.
262. Monitor safer recruitment practices and staff suitability compliance to ensure safeguarding recruitment procedures are implemented consistently across the institution.
263. Ensure CPC/DSLs and Deputies participate in regular peer supervision and reflective practice (at least termly) to support oversight of safeguarding decision-making and strengthen professional practice.
264. Monitor staff awareness of safeguarding reporting duties and confidence in using reporting routes through periodic checks, training evaluations, or staff feedback mechanisms.

Safeguarding Practice and Case Management Oversight:

265. Regularly monitor safeguarding incidents, referrals, case outcomes and trends to identify systemic risks and areas requiring corrective action, and document findings and actions taken.
266. Monitor compliance with safeguarding reporting duties through audits, spot checks, or other oversight mechanisms to identify delayed or missed reporting.
267. Conduct periodic audits of safeguarding cases, records and decision-making processes to assess quality, accuracy, consistency and compliance with safeguarding procedures.
268. Conduct periodic audits of safeguarding information-sharing decisions to ensure lawful and proportionate practice.
269. Monitor the operation of the safeguarding case management system to ensure timely recording, escalation, case progression and closure in accordance with the Framework.
270. Monitor the provision of safeguarding-related support, including wellbeing services and internal or external referral pathways, to ensure alignment with safeguarding responsibilities and the effectiveness of support available to learners.
271. Monitor safeguarding interventions and case outcomes to evaluate whether actions taken have reduced risk and improved learner safety and wellbeing.

Directive - Institutions must:

Governance and System Oversight:

272. Ensure termly safeguarding monitoring reports to governance include anonymised case trends, training compliance data, attendance and wellbeing indicators, and other relevant systemic risk indicators.
273. Ensure the Safeguarding Governor meets regularly with the CPC/DSL to review implementation of the safeguarding system, anonymised case trends, systemic risks, and monitoring findings, independently of operational case management.
274. Ensure safeguarding data and thematic information are provided to KHDA and relevant partners through structured and secure reporting mechanisms that support regulatory oversight and system improvement.

Guidance - Institutions could:

- Incorporate safeguarding compliance checks into routine quality assurance processes or internal inspections.
- Use digital case management platforms with oversight dashboards to track safeguarding activity, interventions and emerging trends.
- Use digital monitoring systems to identify patterns in attendance, behaviour, and wellbeing that may indicate safeguarding risk.
- Collect and analyse aggregated safeguarding data to identify patterns, emerging risks, and areas for improvement, while maintaining confidentiality.
- Use anonymised monitoring data and case studies to identify recurring risks, strengthen threshold consistency and inform policy review, system improvement and staff training needs.
- Involve the Safeguarding Governor in external audits or inspection preparation to strengthen safeguarding oversight.

6.2 Review

Review involves taking regular, structured time to evaluate whether safeguarding arrangements are working well, remain fit for purpose, and meet regulatory requirements. When institutions review their safeguarding practice, they can reflect on what is working, evaluate outcomes and the effectiveness of interventions for learners, and determine whether their approach needs to adapt to changing circumstances or emerging risks.

Leadership oversight, governance scrutiny, and planned evaluation create opportunities to strengthen safeguarding arrangements based on evidence and experience. Review turns monitoring information into meaningful insight, supporting better decisions about where to focus effort and resources. It provides an opportunity for institutions to consider evidence, reflect on safeguarding practice, and determine whether adjustments are needed to strengthen learner protection.

Directive - Institutions must:

Policy Review:

275. Ensure the Safeguarding Policy is reviewed annually, led by the CPC/DSL and approved by the board or governing body.
276. Ensure related safeguarding policies and procedures are reviewed periodically and updated in response to legislative changes, regulatory requirements or emerging safeguarding risks.

Institutional Safeguarding System Review:

277. Conduct a comprehensive annual safeguarding review covering safeguarding systems, procedures, escalation routes, contact details, all areas of provision including boarding (where applicable), off-site activities, transport, third-party provision, safer recruitment, staff suitability compliance, and external safeguarding partnerships.
278. Ensure findings from annual safeguarding reviews are documented, reported to governance where appropriate, and followed by corrective actions where required.
279. Review safeguarding data termly to evaluate case handling, identify patterns and systemic risks, and inform safeguarding practice.
280. Review safeguarding records and case management practices annually to evaluate effectiveness and identify areas for improvement, documenting findings and corrective actions.
281. Review allegations against adults and adult-related safeguarding concerns to identify patterns, inform preventive action, and strengthen professional conduct safeguards.
282. Evaluate safeguarding-related support provision, including wellbeing services and internal or external referral pathways, taking into account referral data, learner feedback, and service outcomes to ensure quality, effectiveness and alignment with safeguarding needs.
283. Ensure periodic safeguarding self-evaluation is conducted, drawing on monitoring data, safeguarding reviews, case outcomes, and stakeholder feedback to assess the overall effectiveness of safeguarding arrangements and identify areas for improvement.

Governance Review:

284. Schedule termly safeguarding reviews at board meetings, informed by CPC/DSL reports on patterns, trends, risks, and system performance.
285. Ensure annual safeguarding performance reporting is provided to governance, including independent oversight from the Safeguarding Governor. Ensure Governors review whistleblowing arrangements and reporting mechanisms at least every two years to confirm effectiveness, accessibility, and independence.

Directive - Institutions must:

Safeguarding Practice Review

286. Conduct structured safeguarding learning reviews following significant incidents or systemic failures to identify lessons and strengthen practice.
287. Evaluate the effectiveness and proportionality of safeguarding arrangements across all Framework components as part of the annual institutional review.
288. Ensure review findings, conclusions, and recommendations are presented to governance, and that resulting actions are formally documented, tracked, implemented, and monitored.

Guidance - Institutions could:

- Use stakeholder feedback from learners, parents, guardians, or custodians, and staff to inform safeguarding reviews, while maintaining appropriate confidentiality.
- Commission peer reviews or external assurance where appropriate to provide independent perspectives on safeguarding effectiveness, maintaining confidentiality.
- Partner with other institutions or agencies to share learning and reflect on safeguarding approaches.
- Conduct thematic safeguarding reviews (e.g. on attendance, digital safety, or mental health) to identify emerging risks and inform preventive strategies.
- Use case audit tools to review the quality and consistency of safeguarding decision-making.
- Provide structured opportunities for CPC/DSLs and Deputies to review safeguarding case files and decision-making practice to support professional reflection and consistency.
- Partner with other institutions or local agencies to review threshold decisions and refine responses, while maintaining appropriate confidentiality.
- Incorporate safeguarding reporting compliance into internal audit or performance management processes.

6.3 Learning and Improvement

Ongoing improvement ensures that safeguarding arrangements continue to evolve in response to what institutions learn, the risks they identify, and any changes they may experience in the operating environment. It supports safeguarding practice to strengthen through reflection, adaptation, and the application of insights gained from monitoring, review, and safeguarding experience.

By embedding learning into safeguarding strategy and policy development, training, and operational practice, institutions support safeguarding arrangements that remain responsive, resilient, and learner-centred.

Directive - Institutions must:

Safeguarding System Improvement:

289. Ensure safeguarding improvement actions are developed and documented in response to monitoring, review and safeguarding learning review findings.
290. Ensure safeguarding improvement actions are subject to periodic progress reviews by institutional leadership or governance and are tracked through to completion.
291. Assign clear responsibility, timescales, and accountability for safeguarding improvement actions.
292. Ensure evidence of implemented improvements and institutional learning is documented.
293. Ensure safeguarding improvements and key learning are communicated to relevant staff and governance where appropriate.

Safeguarding Learning and Practice Development:

294. Ensure CPC/DSLs and Deputies participate in regular peer supervision and reflective practice (at least termly) to support critical reflection on safeguarding decisions and strengthen professional practice.
295. Ensure the Tier 3 Extended Safeguarding Team contributes to the identification, development, and dissemination of institutional safeguarding learning, based on analysis of monitoring findings, safeguarding reviews, and systemic risks.
296. Ensure lessons identified through safeguarding monitoring, reviews, or safeguarding learning reviews are incorporated into staff training, safeguarding procedures, and institutional practice where appropriate.

Guidance - Institutions could:

- Embed safeguarding responsibilities within leadership appraisals and institutional performance measures.
- Invite external safeguarding professionals to periodically review safeguarding practice and provide recommendations for improvement.
- Conduct scenario-based exercises to test safeguarding systems and emergency preparedness.
- Use post-activity debriefs following offsite trips or placements to review safeguarding concerns and inform future risk assessments and practice.
- Share anonymised case learning with staff to strengthen safeguarding practice and culture.
- Use anonymised or aggregated safeguarding data for research, planning, and service improvement, while ensuring ethical and legal compliance.

Guidance - Institutions could:

- Use anonymised wellbeing data to inform safeguarding strategies and risk assessments.
- Incorporate learner feedback into safeguarding audits, evaluations, or institutional reviews.
- Involve learners and parents or caregivers in improving access to safeguarding contact details and escalation routes.
- Partner with other institutions or agencies to share anonymised safeguarding learning and strengthen safeguarding practice.
- Share anonymised safeguarding case learning with staff to strengthen safeguarding awareness, professional judgement, and institutional safeguarding culture.
- Use anonymised safeguarding case studies in staff training to illustrate risks, reinforce professional boundaries, and strengthen safeguarding awareness.
- Engage inclusion specialists, counsellors, and external professionals where appropriate to strengthen safeguarding strategies for learners with heightened risk.



7

Implementation and Phased Compliance

7 Implementation and Phased Compliance

This Policy Framework takes effect on the date of publication (the effective date). Its directives apply in two stages, so that learners are protected from the effective date while institutions put in place the wider structures and systems required by the Policy Framework.

Immediate compliance

The directives listed in Table 2, effective from the date of publication, protect learners immediately, and most reflect duties already imposed on institutions by UAE law and KHDA requirements. KHDA's compliance processes apply to them from the effective date.

Phased compliance

All other MUST directives must be in place within 12 months of the effective date. Some have earlier deadlines within this period, as shown in Table 2.

TABLE 2: Implementation timeline

Immediate compliance

When	Requirement	Directives
From the effective date	CPC/DSL and at least two Deputies appointed, recorded, and their contact details shared	103, 112, 113, 118
	Reporting and escalation of safeguarding concerns within the timeframes outlined in Figure 3	214–219, 221–223, 240–242
	Responding to disclosures and immediate safety	196–200
	Concerns and allegations about staff and other adults	170, 225–232
	Recording safeguarding concerns in a structured electronic case management system	201, 202, 205–207, 246–248, 251, 253
	Lawful information sharing and cooperation with authorities	224, 254–259
	Safer recruitment checks for new appointments	146, 149, 151, 158
	Professional boundaries	156, 157, 160, 161
	Missing learners and absence notification	42, 46, 47, 51
	Off-site activities approved after the effective date	55–57, 235, 236
	Residential CPC/DSL and Deputy in boarding provision	70
	Safeguarding induction for new adults, and a briefing for all staff on reporting routes	141, 142

Immediate compliance

When	Requirement	Directives
From the effective date, with training within six (6) months	Each CPC/DSL and Deputy holds evidence of CPC/DSL training completed in the last two years, or a documented training plan. Only those with training evidence take on safeguarding case responsibilities, and at least one must hold such evidence. Others complete role-specific CPC/DSL training that meets KHDA's minimum requirements within six months	135–137

Phased compliance

When	Requirement	Directives
Within three (3) months	Safeguarding training for staff in post who are not yet trained, and for staff in higher-risk settings	143, 145
Within nine (9) months	Appointment of the Safeguarding Governor, with governance training within three months of appointment	82–88, 132, 133
Within 12 months	All other MUST directives, including the policy suite, safeguarding teams and protocols, remaining training, safer recruitment arrangements, curriculum and learner voice, and monitoring and review	All directives not listed above

Existing institutional safeguarding policies remain in force until the revised policy suite is approved by the board or governing body. If an existing policy does not align with a directive that applies from the effective date, the directive takes priority.

During the 12-month period, KHDA reviews institutions' progress through its quality assurance activities. Once a directive applies, KHDA addresses non-compliance through its regulatory and enforcement processes, including formal compliance notices, administrative penalties, restrictions on permit renewal, and regulatory sanctions under the relevant Executive Council Resolutions listed in Appendix C. The consequences of failing to report safeguarding concerns are set out in Section 5.3.6.

The Safeguarding Training Matrix in the Safe Space portal sets out the training schedule for each role and staff group.

8

Conclusion

8 Conclusion

The Knowledge and Human Development Authority places the highest importance on safeguarding, recognising that the safety, wellbeing, and happiness of every learner form the foundation of education and the nation's future. Learner voice and advocacy are central to this vision, ensuring that learners are consistently heard, respected and supported in environments where their dignity, safety and potential are protected.

Safeguarding every learner strengthens families, builds confident and resilient generations, and reinforces the shared commitment to nurturing learners who are able to participate, contribute and thrive within their communities. Safeguarding also supports the world-class education system envisioned in the Dubai's Education 33 Strategy (E33), helping to make Dubai not only one of the best places in the world to live, but also one of the safest and most supportive environments for learners to grow, learn, and thrive.

Through KHDA's guiding principles, SPARK: Safeguarding, Protection, Accountability, Responsibility, and Knowledge, this Framework provides institutions with the clarity, direction and tools needed to embed safeguarding into everyday practice, moving beyond compliance to a culture of care, vigilance and shared responsibility. It enables educational institutions not only to protect learners from harm, but also to advocate for their wellbeing, ensuring that safety, respect and belonging remain at the heart of education.

To support institutions in the consistent application of these directives, KHDA will issue further detailed guidance and resources, including supplementary tools, templates, and training materials, to strengthen implementation and continuous improvement across all educational settings.



Appendix A: Glossary

Abuse	Any act or failure to act that results in physical, psychological, emotional, or sexual harm to a child, thereby impeding their ability to grow and develop in a safe, secure, and healthy environment.
Accountability	The requirement for leaders and staff to demonstrate compliance with safeguarding duties, ensuring oversight, monitoring, and responsibility which cannot be delegated.
Best interest of the child/learner	Placing the learner's best interests above any other considerations, and making it a priority in all conditions, regardless of the interests of other parties.[9]
Bullying	A form of aggressive behaviour in which a person intentionally and repeatedly causes injury or distress to another. It involves a power imbalance, with the bully using their strength, popularity, or other advantage to harm or control the victim. It can be physical, verbal, social, psychological, or digital (cyberbullying).
Case management	A structured process for recording, comprehensively assessing the learner's family and social circumstances across all areas affecting their life, managing and referring safeguarding concerns, in order to understand their needs and develop a tailored intervention plan to ensure their safety and wellbeing.
Child	Any person born alive who has not yet reached 18 years of age.[10]
Child/learner abuse	Any act or omission that is detrimental to the child, impeding their proper, safe and healthy upbringing and development[11]. This includes acts or omissions that lead to physical, psychological, emotional, or sexual harm to the learner.
Child/learner protection	Coordinated responses across relevant entities to ensure the safety and wellbeing of the learner when exposed to neglect or abuse in any form, by providing immediate and long-term protection, ensuring the necessary psychological and social support for the learner and their family, and applying legal procedures to hold perpetrators accountable and prevent recurrence.
Child Protection Coordinator or Designated Safeguarding Lead (CPC/DSL)	The trained employee appointed by the educational, health or social establishment, or any other entity, to coordinate and follow up on matters related to implementing the child/learner protection policy within their establishment. The coordinator serves as a liaison between the institution and the relevant authorities and is responsible for reporting cases of abuse, following up on services provided, and evaluating to ensure that necessary support and protection are provided to learners.[11]

[9] Cabinet Resolution No. (52) of 2018 Concerning the Executive Regulation of Federal Law No. (3) of 2016 on Child Rights Law (Wadeema) - Article (1) Definitions.

[10] Cabinet Resolution No. (52) of 2018 Concerning the Executive Regulation of Federal Law No. (3) of 2016 on Child Rights Law (Wadeema) - Article (1) Definitions.

[11] Federal Law No. (3) of 2016 on Child Rights Law (Wadeema) - Article (1) Definitions

Child Protection Specialist	The person, licensed and appointed by the competent authority or relevant entities, tasked with safeguarding children's rights and protection within the bounds of their legal competencies. Responsible for coordinating and managing services for children and their families exposed to neglect and abuse in its various forms. Duties include assessing the needs of children and their families, developing tailored plans to meet those needs, and coordinating promptly and effectively among different service providers.
Custodian	The person legally in charge of the learner or who is entrusted with the learner's custody.
Chronic absenteeism	A pattern of frequent absence from education that places a learner at risk of harm, disengagement, or reduced achievement. Persistent absence may indicate underlying safeguarding concerns such as neglect, family difficulties, or hidden harm and must be monitored and addressed by the institution.
Confidentiality	Protecting sensitive safeguarding information, while ensuring concerns are appropriately shared to protect a learner from harm.
Confidential reporting/ whistleblowing	A process that allows staff to raise safeguarding concerns about unsafe practice or conduct without fear of reprisal.
Deputy Child Protection Coordinator/Designated Safeguarding Lead (DCPC/DDSL)	A trained staff member who supports and deputises for the CPC/DSL.
Disclosure	When a learner, parents/custodians, or a third-party shares information that raises a safeguarding concern. Disclosures may be direct or indirect, verbal or non-verbal.
Duty of Care	The duty of care is the responsibility of all staff to act in the best interests of learners, and to take all reasonable steps to protect them from foreseeable harm. It applies to every aspect of an educational institution's activities and cannot be delegated.[12]
Educational institutions	Any entity providing educational services at any stage or type, including early childhood centres, schools, higher education institutions, and technical and vocational education and training institutes licensed and permitted by the KHDA.
Emotional abuse	Non-accidental (intentional and repeated) verbal or symbolic acts or behaviours by a parent, caregiver, or anyone interacting with the learner, that expose the learner to circumstances that threaten their psychological safety or undermine their positive self-concept, and that are likely to cause significant or severe psychological harm affecting their growth and psychological development. Includes exposure to domestic abuse.

[12] Federal Law No. (3) of 2016 on Child Rights Law (Wadeema)

Exploitation	The use of children in activities that are inappropriate or contrary to their safety, health, and wellbeing, including their employment in activities that benefit others, whether financially, sexually, or politically. This includes activities such as child trafficking and the use of children in pornographic material.
Extremism	Actions or beliefs that disrupt public order, promote discrimination, or incite hatred. Under UAE law, promoting extremist ideologies in schools or online is classified as extremism.
Governance	The systems, procedures, and roles of entities that ensure the effective implementation and oversight of the policies, laws, and services aimed at protecting children from abuse, neglect, and exploitation.
Information sharing	The lawful and proportionate sharing of safeguarding information to protect learners, in line with KHDA guidance, the relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai, and UAE legislation.
KHDA	Knowledge and Human Development Authority, the regulator responsible for education quality in all private education institutions in Dubai.
Learner	Inclusive term used in this Framework to describe all individuals accessing education and/or training in KHDA-licensed institutions.
Learner at risk	Learners living in social and family conditions that increase their risk of abuse and neglect. These conditions include, but are not limited to: poverty, addiction or mental illness in the learner's family, high-conflict parental divorce, or imprisonment of a parent.[13]
Learner safety and Wellbeing	Includes all aspects of the child's life that contribute to their health and sound growth and development, including their physical, psychological, mental and social safety.
Learner criminal exploitation	Occurs when learners are coerced, manipulated, or forced into criminal activity (e.g., drug networks, theft, forced labour) for the benefit of others. Learners who exploit peers may also be victims themselves.
Learner sexual exploitation	A form of sexual abuse where a learner is manipulated, coerced, or forced into sexual activity in exchange for something (e.g., money, gifts, affection, or status).
Learner voice	The meaningful involvement of learners in shaping safeguarding practice, ensuring their perspectives are heard and acted upon.

Mandated reporter/ duty to report	Reporting is mandatory for all professionals tasked with child protection, requiring them to report to relevant authorities when any form of child abuse or neglect is suspected or confirmed.[13]
Near miss	An event that did not result in harm but could have, used to strengthen future safeguarding measures.
Neglect	Failure by parents or caregivers to take the necessary measures to preserve the learner's life and their physical, psychological, intellectual, and moral safety from harm, and to protect their various rights, as well as the persistent failure to meet the learner's basic physical and emotional needs, likely to result in serious harm.
Person with Disability	A person with a permanent or temporary physical, sensory, mental, communicative, learning, or psychological deficiency or impairment which, as a result of interaction with other physical and behavioural barriers, may hinder full and effective participation in society on an equal footing with others.[14]
Physical abuse	Deliberate assault, harm or neglect that results in physical suffering or harm to the learner.
Professional boundaries	Standards of behaviour that maintain safe, professional relationships between staff and learners, both online and in person.
Risk assessment / thresholds	A structured process for assessing the seriousness of a safeguarding concern and determining the appropriate level of response, using criteria from the relevant frameworks, guidelines, and protocols adopted in the emirate of Dubai.
Safeguarding	Proactive measures to ensure learners grow up safe, healthy, and supported. Includes promoting welfare, preventing harm, and creating safe environments.
Safer Recruitment	A set of practices ensuring staff and volunteers are suitable to work with learners, including background checks, reference verification, and induction.
Safer working practices	Institutional policies and behaviours that ensure safe conduct of adults in both physical and online environments.
Sexual abuse	All acts involving the participation of the learner in sexual activities that cause harm, whether through coercion, enticement, or intimidation.

[13] Federal Law No. (3) of 2016 on Child Rights Law (Wadeema) - Chapter 9: Protection Mechanisms, Article (42), items 1, 2

[14] Law No. (3) of 2022 Concerning the Rights of Persons with Disabilities in the Emirate of Dubai – Article (2) Definitions

Substance abuse	The harmful or hazardous use of alcohol, tobacco products, drugs, or other psychoactive substances. Such use can cause serious health problems for individuals and place social and financial strain on families and communities.
Substance use	The use of selected substances, including alcohol, tobacco products, drugs, inhalants, and other substances that can be consumed, inhaled, injected, or otherwise absorbed into the body with possible dependence and other detrimental effects.
Tier 1 – Core Safeguarding Team	Team led by CPC/DSL that provides consistent oversight and coordinated responses to safeguarding matters.
Tier 2 – Multi-disciplinary Team	Specialist team established to manage complex cases requiring a coordinated response from multiple specialties.
Tier 3 – Extended Safeguarding Team	Team embedding safeguarding into wider institutional systems, compliance, and risk management.
Wellbeing	A learner's holistic physical, emotional, and social health, promoted through counselling, inclusion, and health initiatives.
Wider safeguarding issues	Risks or vulnerabilities beyond direct abuse or neglect that may affect learners' safety or wellbeing (e.g., bullying, online harms, exploitation, domestic abuse).



Appendix B: Signs and Symptoms of Abuse and Neglect

Identifying child abuse or neglect is a process that demands careful attention. It often begins with recognising circumstances that increase a child's/learner's vulnerability to harm, along with the most common signs and symptoms that indicate abuse or neglect. Some of these symptoms may require immediate intervention, signalling that the child/learner is in urgent need of protection and care, suggesting a high level of risk. Other signs may indicate situations with a lower critical level of risk.

Symptoms requiring immediate intervention and indicating a child's need for urgent protection and care:

Examples include, but are not limited to:

1. Recurrent physical injuries, bruises, burns, or fractures resulting from physical assault or neglect of safety measures in the child/learner's environment. These injuries may be visible or subtle and often lead to frequent hospital or clinic visits.
2. Self-harm or suicide attempts indicate severe psychological distress, requiring immediate intervention.
3. Signs of sexual abuse such as complaints of pain in the genital or anal areas, bleeding, or bloodstains on underwear or clothing.
4. Extreme and uncharacteristic aggression, anger or hostility, suggesting a psychological crisis that demands immediate attention and action.
5. Fear of parents or reluctance to return home, indicating potential danger in the child's/learner's home environment.
6. Running away or hiding, often indicating that the child/learner is trying to avoid an unsafe home environment.
7. Severe anxiety and tension, inability to relax, preoccupation, and other signs of chronic psychological stress.
8. Stealing food or money to obtain food, medical drugs, or narcotics.
9. Chronic and persistent fatigue as a result of sleep deprivation.
10. Clear signs of neglect in personal hygiene, self-care and health.

Signs and Symptoms of different forms of abuse

Common signs and symptoms indicative of abuse:

1. The child/learner directly discloses the abuse to another child/learner or trusted adult.
2. Frequent or unexplained absences from educational institutions.
3. Multiple signs and symptoms occurring simultaneously, such as developmental delays, physical injuries, and behavioural changes.

Signs and symptoms of physical abuse

1. The learner exhibits injuries sustained at different times.
2. The learner exhibits injuries to the face, particularly among infants and preschool-aged learners.
3. The learner exhibits injuries inconsistent with their age or typical activities.
4. The learner exhibits multiple injuries at various stages of healing.

Signs and Symptoms of physical abuse (continued)

5. The learner cannot recall how the injuries occurred.
6. The learner provides inconsistent explanations for their injuries.
7. The learner exhibits caution or hesitancy when interacting with adults.
8. The learner may flinch when touched or if someone approaches unexpectedly.
9. The learner exhibits clear signs of aggressive behaviour or noticeable social withdrawal.
10. The learner seeks affection and attention in random or inappropriate ways.
11. The learner attempts to cover or conceal injuries inappropriately.
12. The learner shows fear or reluctance when returning home, or exhibits fear when in the presence of their parents or other adults.

Signs and symptoms of sexual abuse

There are two categories of signs that may indicate a learner is experiencing sexual abuse:

Category 1

Behavioural, emotional, and physical indicators

1. The learner prefers to be alone, appears constantly isolated, or is fearful of familiar people.
2. The learner uses language or exhibits sexual behaviour that is inappropriate for their age.
3. The learner engages in sexually themed play or has sexual knowledge beyond their age or developmental stage.
4. The learner experiences recurrent nightmares or bed-wetting.
5. The learner abuses alcohol or drugs.
6. The learner engages in self-harm.
7. The learner displays changes in eating habits or develops an eating disorder.
8. The learner exhibits mood swings or anger with unfamiliar circumstances or things.
9. The learner shows significant behavioural changes, such as suddenly dropping out of the educational institution, not wanting to go home, or running away.

Category 2

Online Sexual Abuse Indicators

1. The learner spends an unusual (whether more or less than usual) amount of time online, texting, gaming, or using social media.
2. The learner withdraws, becomes upset, or shows anger after using the internet or texting.
3. The learner is secretive about who they communicate with or what they do online or on their phone.
4. The learner insists on being online at specific times or rushes to check their phone frequently.
5. The learner has many new phone numbers, text messages, or email addresses on their mobile phone, laptop, or tablet.
6. The learner shows an increased need for money, which could suggest they are being blackmailed.
7. The learner spends long periods of time in restrooms or isolated/secluded areas, whether with or without taking a phone.

Signs and symptoms of emotional abuse

1. The learner shows a loss of confidence and has low self-esteem.
2. The learner has difficulty regulating their emotions, often overreacting or being overly sensitive when interacting with others.
3. The learner frequently uses offensive language towards others, mirroring the language they may be exposed to.
4. The learner displays extreme behaviours, such as being overly demanding, aggressive, explosive, or passive.
5. The learner struggles to form or maintain relationships.
6. The learner engages in behaviour that is either overly childlike or overly adult-like for their age.
7. The learner repeatedly attempts to run away from home or has frequent, unexplained absences from school.
8. The learner feels anxious, sad, or socially withdrawn.
9. The learner has few or no friends.
10. The learner feels emotionally distant or isolated from their parents or family.
11. The learner exhibits poor social skills.
12. The learner engages in self-harm or attempts suicide.
13. The infant or young learner is excessively attached to their parents in a way that is inconsistent with typical developmental patterns.
14. The infant or young learner is overly eager or impulsive around strangers.

Signs and symptoms of neglect fall into four categories

Category 1

Appearance and hygiene indicators:

1. The learner has an unpleasant odour.
2. The learner appears hungry or lacks money to buy food.
3. The learner wears unwashed or dirty clothing.
4. The learner wears inappropriate clothing.
5. The infant has recurrent, untreated diaper rash.

Category 2

Health and developmental indicators:

1. The learner shows signs of malnutrition or anaemia.
2. The learner exhibits muscle weakness or noticeable joint protrusions.
3. The learner has untreated medical issues or poor dental care.
4. The learner frequently misses important medical appointments, such as vaccinations.
5. The learner is not receiving medications as prescribed.
6. The learner demonstrates delayed language or social development.
7. The learner suffers from frequent illnesses or infections.
8. The learner has recurrent injuries or wounds, often resulting from inadequate supervision.
9. The learner has skin conditions, such as sores, rashes, flea bites, or scabies.
10. The learner has a tender or swollen abdomen.
11. The learner appears persistently fatigued.
12. The learner has untreated or neglected injuries.
13. The learner shows signs of poor weight gain or growth issues.

Category 3

Housing and family-related indicators:

1. The learner lives in an unsafe home environment with unsecured hazardous materials or equipment, and may feel threatened, persistently or temporarily, by the presence of abusive individuals in the home environment.
2. The learner is left unaccompanied for extended periods without adequate care or supervision.
3. The learner takes on caregiving responsibilities for other family members, such as siblings, elderly individuals, or those with health issues.

Category 4

Behavioural indicators:

1. The learner displays excessive stubbornness or relentless behaviour.
2. The learner exhibits aggressive behaviour.
3. The learner shows signs of withdrawal, depression, or anxiety.
4. The learner has noticeable changes in eating habits.
5. The learner engages in obsessive or compulsive behaviours.
6. The learner has difficulty concentrating or participating in activities.
7. The learner is frequently absent from school.
8. The learner shows signs of self-harm.
9. The learner uses drugs or alcohol.



Appendix C: Regulations

United Arab Emirates Federal Legislation

1. Federal Law No. (3) of 2016 Regarding the Child Rights Law (Wadeema), as amended
2. Federal Decree by Law No. (45) of 2021 Regarding the Protection of Personal Data
3. Federal Decree by Law No. (26) of 2025 Regarding Child Digital Safety
4. Federal Law No. (29) of 2006 on the Rights of Persons with Disabilities, as amended
5. Federal Decree Law No. (31) of 2021 Promulgating the Crimes and Penalties, as amended
6. Federal Decree-Law No. (34) of 2021 On Countering Rumors and Cybercrimes
7. Federal Decree by Law No. (30) of 2021 On Combating Narcotics and Psychotropic Substances
8. Federal Law No. (15) of 2009 on Combating Tobacco
9. Cabinet Resolution No. (52) of 2018 Concerning the Executive Regulation of Federal Law No. (3) of 2016 on Child Rights Law (Wadeema)

National Policies

10. National Child Protection Policy in Educational Institutions (2022)

Dubai-Level Legislation and Protocols

11. Law No. (2) of 2021 Concerning the Knowledge and Human Development Authority in Dubai
12. Executive Council Resolution No. (2) of 2017 Regulating Private schools in the Emirate of Dubai
13. Executive Council Resolution No. (35) of 2020 Regulating Early Childhood Centres in the Emirate of Dubai, as amended
14. Executive Council Resolution No. (21) of 2011 Concerning Higher Education Institutions in the Free Zones in the Emirate of Dubai, as amended
15. Executive Council Resolution No. (50) of 2015 Regulating Training Institutes in the Emirate of Dubai
16. Executive Council Resolution No. (30) of 2021 Regulating Vocational Education in the Emirate of Dubai
17. Law No. (5) of 2025 Concerning Public Health in the Emirate of Dubai
18. Law No. (3) of 2022 Concerning the Rights of Persons with Disabilities in the Emirate of Dubai, and its Implementing Bylaw, as amended
19. Administrative Resolution No. (54) of 2025 Concerning the Requirements and Procedures for the Appointment of School Staff in Private Schools in the Emirate of Dubai
20. Administrative Resolution No. (16) of 2024 Approving the Framework of School Inspection and Assessment Standards for Private Schools in the Emirate of Dubai
21. Dubai Inclusive Education Policy Framework (2017)



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