



Greenwood International School

SAFEGUARDING POLICY

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SAFEGUARDING POLICY

Contents

| | |
|---|----|
| 1. Introduction..... | 4 |
| 2. General Child Protection Measures | 4 |
| 3. Child Protection Team | 5 |
| 1. School Counseling Department | 5 |
| ▪ Ethical standards for the school counselor | 5 |
| ▪ Confidentiality..... | 5 |
| 2. Definitions as recognized by GIS | 6 |
| ▪ Child abuse..... | 6 |
| ▪ Possible indicators of abuse | 6 |
| ▪ Potential abuse | 7 |
| 3. Child Protection Procedures..... | 8 |
| a) Reporting and documenting abuse cases according to perpetrator/victim relationship | 8 |
| o Reporting steps of abuse of a minor by a minor: | 9 |
| o Reporting steps of abuse of a minor by a parent:..... | 10 |
| o Reporting steps of abuse of a minor by a relative/family member..... | 11 |
| o Reporting steps of alleged abuse of a minor by a teacher or support staff member..... | 12 |
| o Reporting steps of alleged abuse of a minor by an outsider..... | 13 |
| b) Bullying interventions adopted at school | 14 |
| ▪ The Traditional Disciplinary Approach | 14 |
| ▪ Strengthening the victim | 14 |
| ▪ Mediation | 14 |
| ▪ Restorative Justice..... | 14 |
| ▪ The Support Group Method (formerly known as the No blame approach) | 14 |
| ▪ The Method of Shared Concern | 14 |
| o Recording Bullying Allegations:..... | 14 |
| 4. Roles and Responsibilities | 14 |
| o Dealing with a disclosure | 15 |
| a) Recording disclosure | 15 |
| b) Confidentiality..... | 15 |
| c) Record Keeping and Monitoring Procedures | 16 |



| | |
|---|----|
| d) Reporting Procedure..... | 16 |
| Step 1: Information Gathering and Data Analysis | 16 |
| Step 2: Devising an action plan..... | 16 |
| Step 3: Follow-up Procedures | 17 |
| 5. Staff..... | 17 |
| ▪ Recruitment Process | 17 |
| ▪ Staff Training | 17 |
| 6. Attendance | 18 |
| ▪ Record Keeping and Monitoring Procedures | 18 |
| 7. Safeguarding on site..... | 18 |
| ▪ Supervision Duty..... | 18 |
| a) Break | 18 |
| b) Dismissal | 18 |
| ▪ Special events and Fire Drills..... | 18 |
| 8. At-Risk Students | 19 |
| ▪ Definition..... | 19 |
| ▪ Identification..... | 19 |
| ▪ Behavior management..... | 19 |
| ▪ Inclusion Department | 24 |
| ○ Inclusion Department Head..... | 24 |
| ○ Inclusion Facilitators | 24 |
| ○ Learning Support Assistants (LSAs)..... | 24 |
| ○ External professionals | 24 |
| ○ Services provided: | 25 |
| a) Pull-Out and Push-in Sessions | 25 |
| b) Accommodations..... | 25 |
| 9. Medical Team | 25 |
| ▪ Staff and Facility Readiness | 25 |
| ▪ Services | 26 |
| ▪ Record Keeping..... | 26 |



Safeguarding Policy

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| PREPARED BY & DATE: School counselor/September 2022 | AUTHORIZED BY & DATE: Principal /September 2022 | NEXT REVISION NUMBER & DATE: 20September 2023 |
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1. Introduction

Greenwood International School (GIS) is committed to ensuring the safety, welfare, and wellbeing of all children in its care. This policy is aligned with:

- Federal Law No. 3 of 2016 (Wadeema’s Law – Child Rights Law)
- Federal Decree-Law No. 31 of 2021 (Penal Code updates)
- UAE Personal Data Protection Law (2021)
- KHDA regulations and Wellbeing Framework

The policy provides a clear framework for preventing harm, protecting children, and promoting a safe school culture.

Aims

- Ensure that all children are safeguarded from harm, abuse, neglect, exploitation, and bullying (including cyber).
- Empower students to have a voice in safeguarding and wellbeing.
- Establish clear reporting, record keeping, and accountability measures.
- Strengthen partnerships with parents, KHDA, CDA, DFWAC, DHA, and other relevant authorities.

2. Designated Safeguarding Lead (DSL): Loubna Hallab, Certified CPD Training (ID: ZPD-CTF-1670)

Safeguarding Committee Includes:

- DSL, Deputies, SLT, School Counselor, Medical Team,
- Inclusion Head, Parent Representative, and Student Wellbeing Ambassadors.

The DSL is responsible for:

- Managing safeguarding cases and maintaining the safeguarding register.
- Liaising with KHDA, CDA, DFWAC, and DHA.
- Overseeing staff training.
- Coordinating student wellbeing monitoring (Komodo data, surveys, referrals).



3. Safer Recruitment:

- GIS follows safer recruitment practices to prevent unsuitable individuals from working with children:
- Police Good Conduct Certificate (valid 3 months) required.
- Verification of academic/professional qualifications.
- Cancellation from the previous job
- Proof of legal stay in the country (visit visa/employment visa/residency)

4. Staff Training & Ethical Standards

- **Induction Training:** For all new staff on safeguarding, Wadeema's Law, reporting, and code of conduct.
- **Annual Refresher:** Mandatory for all staff (teaching, non-teaching, ancillary, and contractors) on the the main types of child abuse, and how to detect the signs of distress and symptoms of child abuse and respond appropriately.
- **Advanced Training:** For DSL, Deputies, and SLT.
- **Specialized Training:** On online safety, managing disclosures, SEND safeguarding, and wellbeing.

The counsellor follows ASCA ethical standards adapted to the UAE context. Confidentiality applies, with breaches only in cases of self-harm, harm to others, or abuse disclosure. Parents are informed when appropriate. All records are securely stored, respecting UAE data protection law.

5. Reporting and Documentation

Reporting Channels:

- Direct report to DSL/Deputy DSL.
- Incident Report Form completed by staff.

Escalation:

- Immediate report to DSL.
- DSL reviews with Safeguarding Committee.
- If substantiated, DSL informs KHDA, CDA, DFWAC, and/or DHA.
- Action plan developed and monitored.

Confidentiality: Information is shared only on a need-to-know basis. Records are securely stored, with strict data protection compliance.



6. Child Protection Team

The Safeguarding Committee is led by the DSL (School Counselor, CPD-certified) and includes SLT, Inclusion, and Medical Leads. The team meets and liaises with KHDA, CDA, DFWAC, and DHA when required.

7. School Counseling Department

The School Counselor adheres to international ethical standards adapted for the UAE context, in alignment with KHDA regulations and Wadeema's Law. Counseling is confidential, except when a child is at risk of harm, where referral to parents, Inclusion, or external agencies is required. Records are securely stored. The counselor may alert authorities (KHDA, CDA, DFWAC, or police) without parental consent when mandated by UAE law.

▪ *Counselor Ethics and Confidentiality:*

The School Counseling Department follows UAE law and international ethical standards. The School Counselor's responsibilities toward students are clearly defined and communicated.

Counseling sessions are confidential; however, confidentiality is not absolute. Information may be shared when:

1. There is risk of harm to the student or others.
2. There are concerns of abuse or neglect (mandatory report to KHDA, CDA, DFWAC, or DHA).
3. Referrals are made to the Inclusion Department or external agencies.

All records are securely stored in line with UAE data protection requirements. Parents and students are informed about the boundaries of confidentiality at the outset. A detailed account of the School Counselor responsibilities towards the students which is known by all. The School Counselor is mandated by the UAE Law to alert authorities should the child express or exhibit any signs of abuse or neglect without consulting with the parents first.



8. Definitions as recognized by the school

- **Child abuse:** Child abuse includes physical, emotional, sexual abuse, and neglect. Different types of abuse are the following:
 - **Physical Abuse:** The deliberate use of force that causes or could cause injury (e.g., hitting, burning, slapping).
 - **Emotional Abuse:** Persistent mistreatment that damages a child’s emotional development (e.g., belittling, threats, rejection).
 - **Sexual Abuse:** Forcing, enticing, or grooming a child into sexual activity, including online exploitation and exposure to inappropriate material.
 - **Neglect:** Persistent failure to meet a child’s basic physical, medical, educational, or emotional needs, placing them at risk of harm.

Staff are trained to recognize possible indicators such as unexplained injuries, sexualized behavior, extreme anxiety, withdrawal, poor hygiene, or chronic absenteeism.

- **Potential abuse**

In certain situations where children may not have been abused but where social and medical assessments indicate a high degree of risk that they might be abused in the future, including situations where another child in the household has been abused, or where there is a known abuser. These indicators of abuse and neglect will be used by staff members as a guideline for reporting to the School Counselor who will determine if the case needs further attention and investigation. A report must be made when a staff member has reasonable doubts to believe that a child has suffered abuse or neglect. All reports are confidential and presented to the School Counselor in the form of emails, confidential referral forms, or verbal reports and are documented by the School Counselor a report entitled: “Suspected child abuse report”.

Bullying

Persistent harm (physical, emotional, relational, discriminatory, sexual, or cyber) is considered abuse. Details of interventions and sanctions are outlined in the Anti-Bullying Policy.

9. Child Protection Procedures

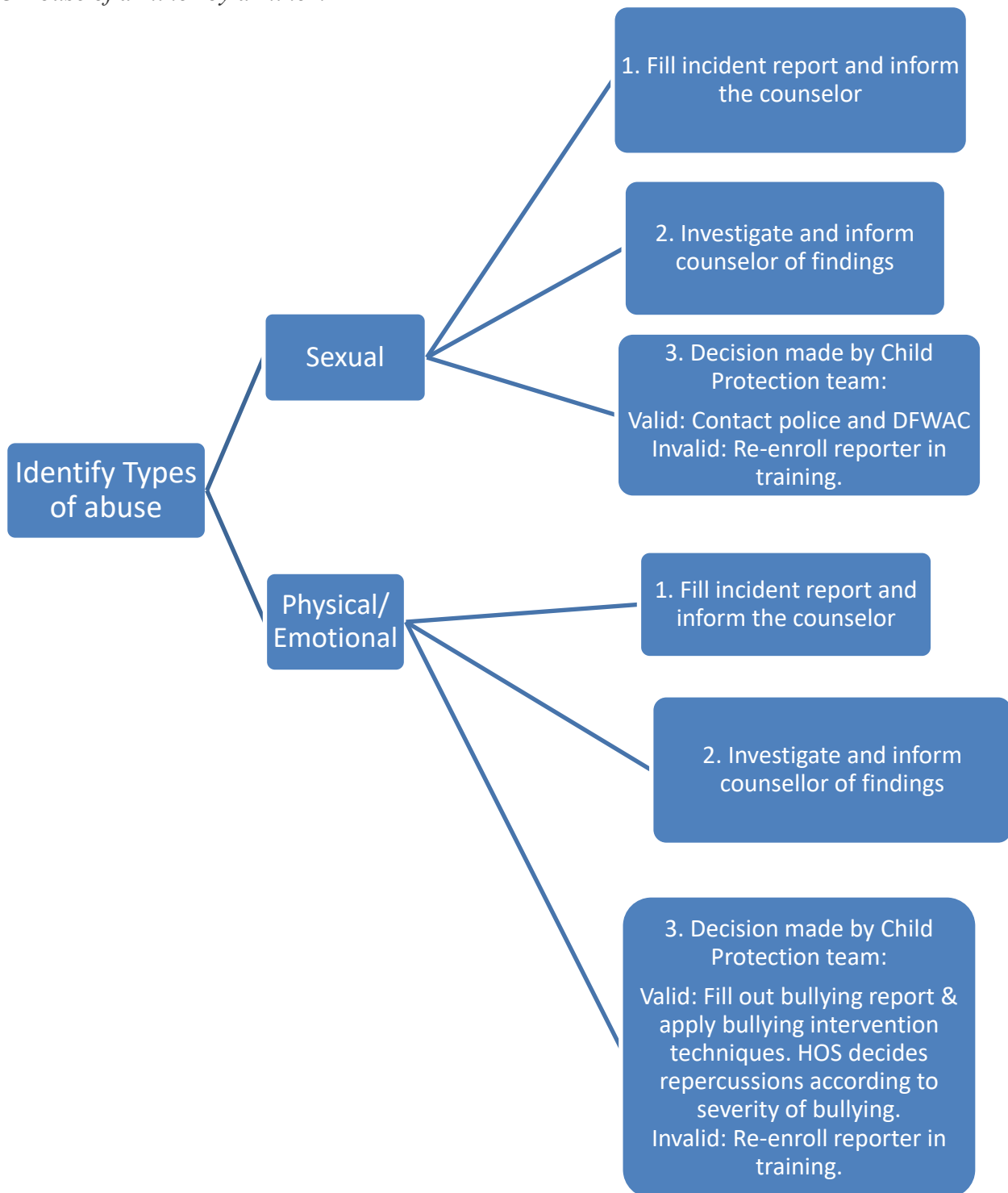
a) *Reporting and documenting abuse cases according to perpetrator/victim relationship*

There are five main categories of abuse of a minor:

- 1) Abuse of a minor by a minor
- 2) Abuse of a minor by a parent
- 3) Abuse of a minor by a relative/family member
- 4) Abuse of a minor by a teacher or support staff member
- 5) Abuse of a minor by an outsider (ex: on a field trip) or worker (ex: outsourced company)

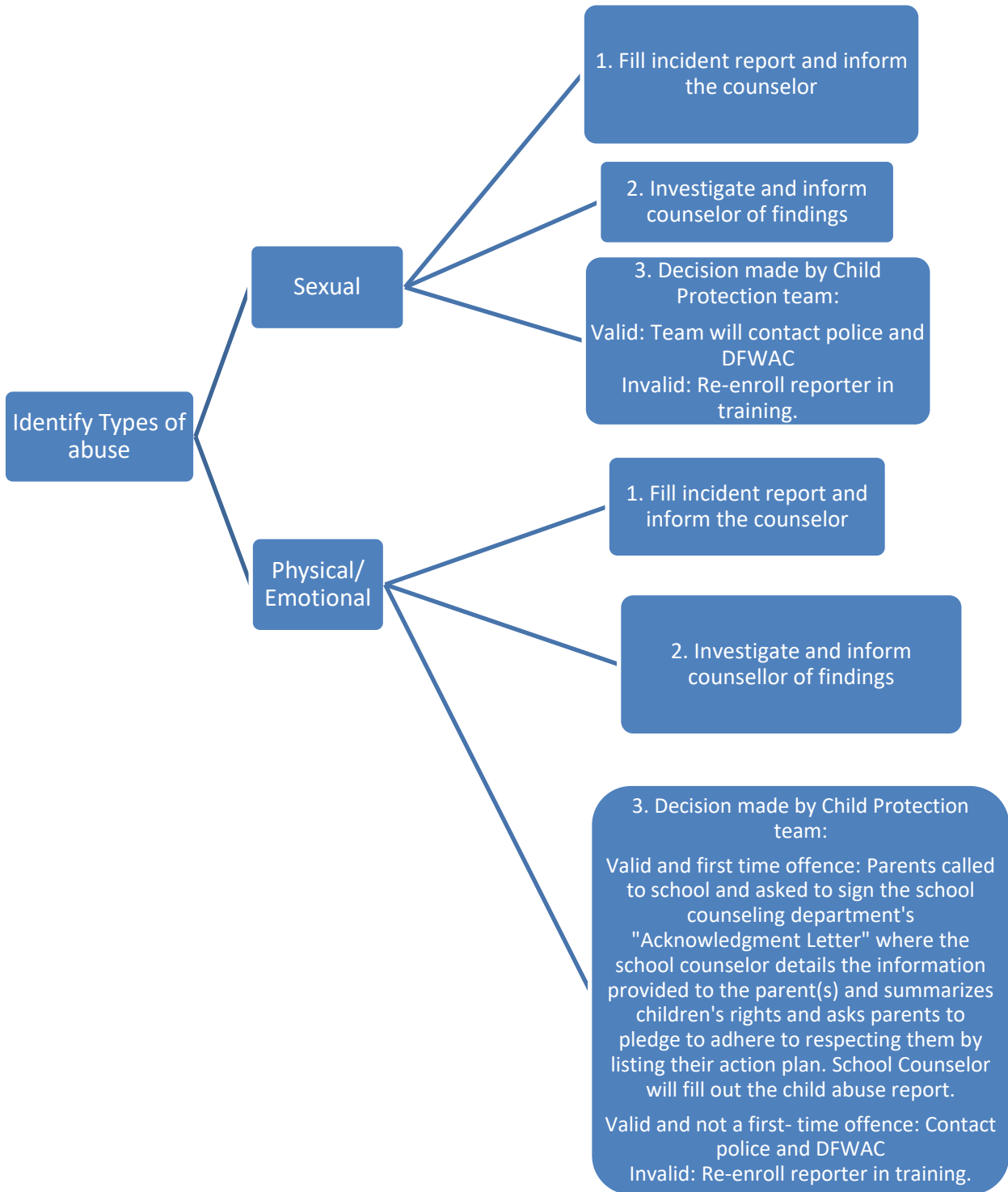
The procedures that the school follows are dictated by the below flow charts.

O Abuse of a minor by a minor:



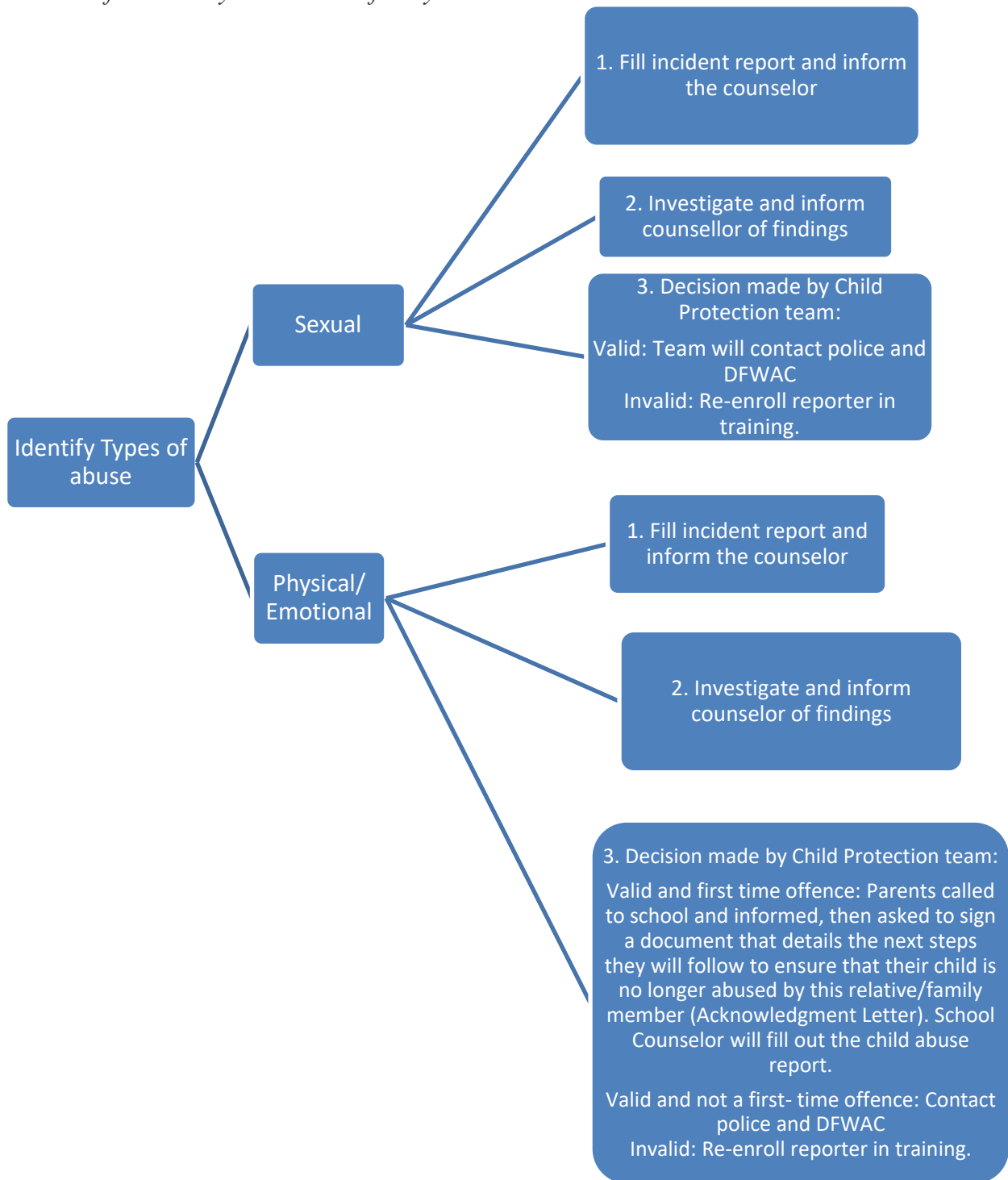
The student who has been the victim of any type of abuse can refer the case directly, or with the help of a reporter to the School Counselor.

○ Abuse of a minor by a parent:



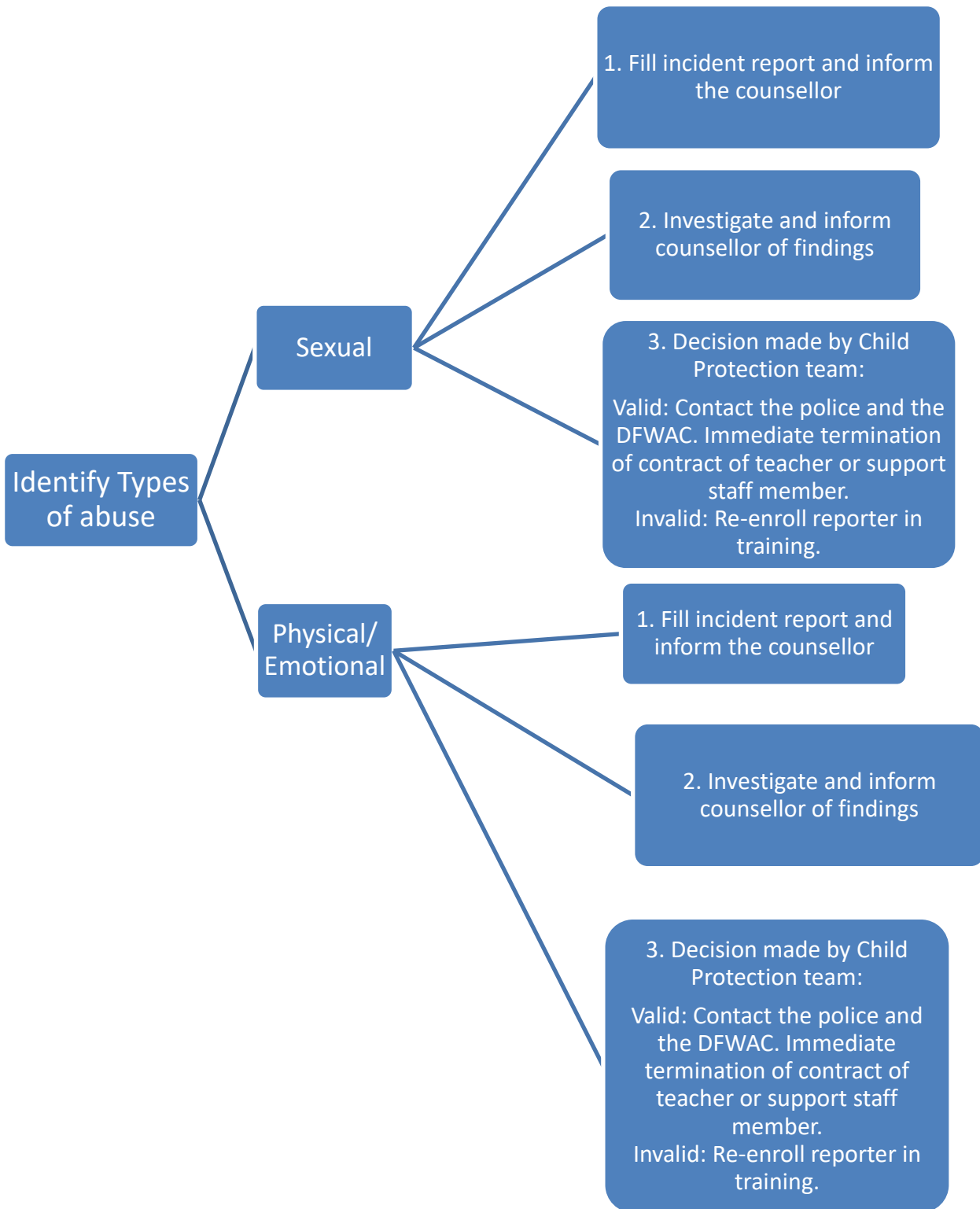
The student who has been the victim of any type of abuse can refer the case directly, or with the help of a reporter to the School Counselor.

o Abuse of a minor by a relative or family member:



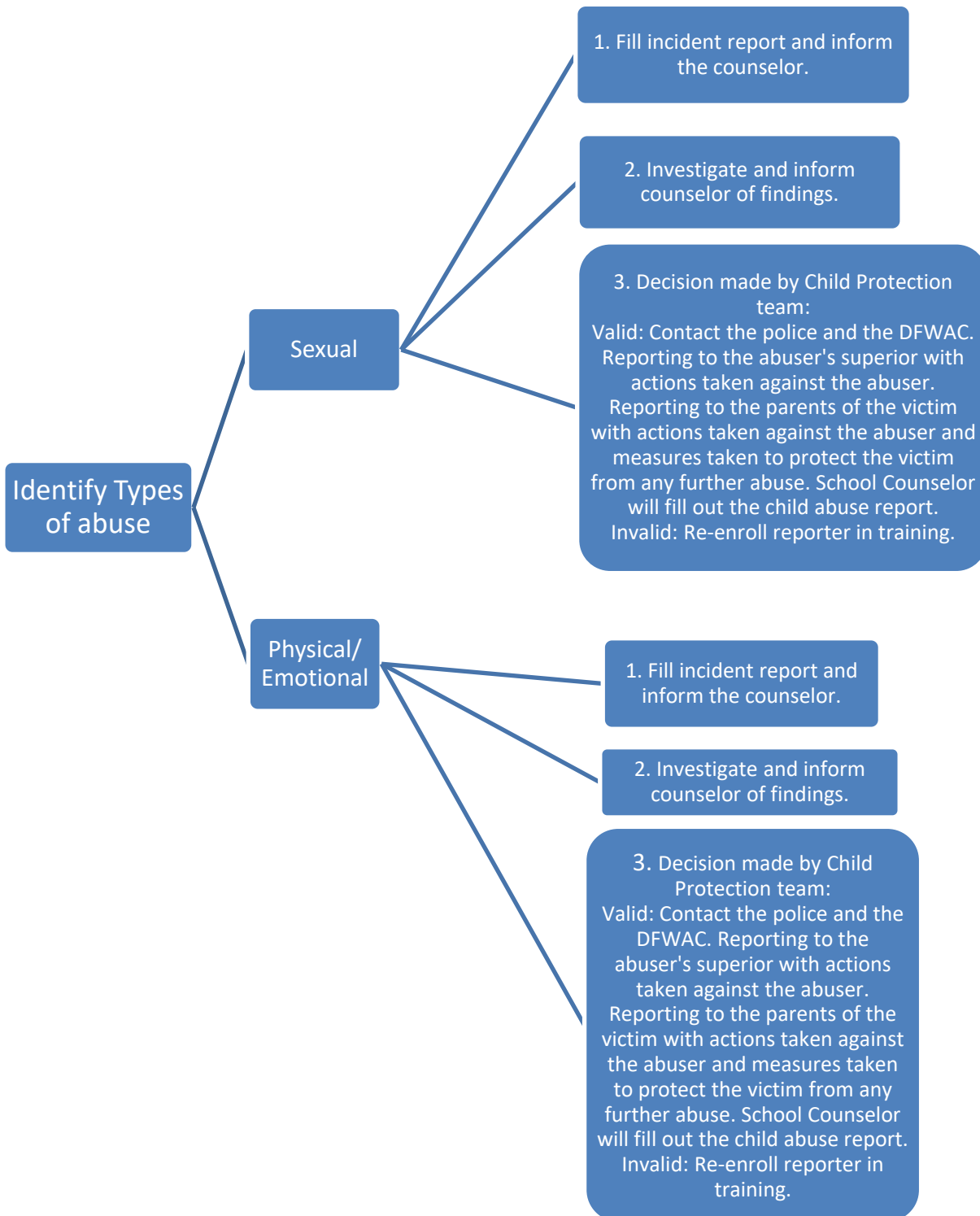
The student who has been the victim of any type of abuse can refer the case directly, or by the help of a reporter to the School Counselor.

○ Abuse of a minor by teacher or support staff member:



The student who has been the victim of any type of abuse can refer the case directly, or by the help of a reporter to the School Counselor.

o Abuse of a minor by an outsider:



The student who has been the victim of any type of abuse can refer the case directly, or by the help of a reporter to the School Counselor.



10. *Bullying interventions adopted at school.*

The school counseling department at Greenwood International School adopts an interventionist (selective) approach to bullying intervention as well as a whole school-based approach (please refer to the **Anti-Bullying policy** for details). The interventionist approach follows 6 main bullying intervention techniques that are detailed in the school's Anti-bullying policy that are practiced by the School Counselor following bullying claims:

- The Traditional Disciplinary Approach
Strengthening the victim
 - Mediation
Restorative Justice
 - The Support Group Method (formerly known as the No blame approach)
 - The Method of Shared Concern
- o *Recording Bullying Allegations:*
- All bullying allegations are recorded in a formal Bullying Report by the School Counselor.
 - The report documents the incident, students involved, protective measures, and sanctions applied.
 - Outcomes and interventions are aligned with the GIS Anti-Bullying Policy.

11. **Roles and Responsibilities**

- **All Staff:** Report safeguarding concerns immediately; maintain a safe, respectful environment.
- **Medical Team:** Document and report injuries or health-related safeguarding issues.
- **Inclusion Department:** Safeguard Students of Determination under UAE Inclusive Education Policy (2017); monitor IEPs and accommodations.
- **Counselor:** Provide support, manage referrals, uphold confidentiality within UAE law, and liaise with external agencies.
- **Students:** Actively participate through peer support, Student Ambassadors, and report concerns.
- **Parents:** Collaborate with the school, disclose relevant concerns, and uphold child protection measures.



12. Safeguarding Guidance for Staff:

Indicators of Concern: Staff should be vigilant if a student:

- Presents injuries inconsistent with normal activities.
- Has frequent or unexplained injuries.
- Gives conflicting explanations for injuries.
- Exhibits sudden changes in behavior, attitude, or academic performance.
- Displays unusually explicit sexual behavior inappropriate for age.
- Discloses experiences suggesting significant harm.

13. Dealing with a disclosure

Staff must:

- a. Listen calmly without disbelief or judgment.
- b. Allow the child to speak freely; use open-ended questions.
- c. Reassure the child it was right to disclose, without promising absolute confidentiality.
- d. Avoid criticizing the alleged perpetrator.
- e. Explain next steps clearly.

14. Recording disclosure

- Make accurate notes promptly (date, time, location, child's words, observed behavior).
- Avoid interpretation, record only observations and statements.
- Provide the record directly to the School Counsellor.

Confidentiality:

- Information is shared strictly on a **need-to-know basis**.
- Staff must seek advice from the Child Protection Team if uncertain about sharing.
- All records are securely stored by the School Counsellor and Clinic (if relevant).

15. Reporting and Investigation Procedure

Step 1: Information Gathering and Data Analysis

- Staff report immediately to the School Counsellor.
- Counsellor investigates, consults staff, and reviews child's history.
- If substantiated: referral to the Child Protection Unit (CDA) or DFWAC.
- If unsubstantiated: case recorded in Supervisor Log, reporter updated.
- Data analysed and reported to KHDA as required.

Step 2: Devising an action plan

Based on acquired information, a plan of action will be developed to assist the child and family. Actions that shall take place are:

1. Referral to external professional support (with CDA/DFWAC/ KHDA involvement).
2. Coordination of strategies between external and in-school support.
3. Ongoing monitoring by the Child Protection Team.
4. Weekly meetings for serious cases to monitor, adjust and modify the action plan based on their observations and the recommendations of the Child Protection Unit at the CDA or the DFWAC and KHDA.

Step 3: Follow-up Procedures

Subsequent to a reported and/or substantiated case of child abuse or neglect:

- The Child Protection Team maintains contact with the child and family.
- Counsellor provides staff strategies and liaises with external professionals.
- Regular review meetings held to evaluate progress and adjust plans.
- Documentation stored confidentially; exceptions only if the child remains at risk

16. Staff Training

All staff receive annual safeguarding training, including:

- Civil Defense Workshop:
 - Fire Evacuation
 - First Aid
- Tawjeeh Lecture for security and cleanliness
 - Admin
 - Ancillary
 - Security
 - Maintenance
- Wadeema's Law Lecture for all teaching staff
 - Children's Rights
 - Children's Safety
 - Children's Digital Safety

17. Safeguarding on site

- **Supervision:** Staff supervise during breaks, dismissal, and special events. Student Council may assist under supervision.
- **Visitors:** All visitors must register with Emirates ID and receive a Visitor's Pass.
- **Trips:** All drivers and assistants must hold valid RTA permits; students are always accompanied by staff.
- **Safety Drills:** Fire drills are conducted several times yearly to ensure readiness.

18. Special Events, Visitors, and Fire Drills

- All visitors must register with Emirates ID and receive a Visitor's Pass before entering the school.
- Maintenance work is only conducted outside student hours.
- During trips, students are always accompanied by staff; bus drivers and assistants hold valid RTA permits.
- Fire drills are conducted several times a year to ensure safe evacuation.
- All staff receive regular training in fire safety and emergency response.

19. At-Risk Students

Definition: Students whose academic, social, or emotional attributes create barriers to learning and wellbeing. Students of Determination fall within this category.

Identification: Teachers, counselors, or heads of section flag concerns via observation, records, or parent information.

Support:

- Inclusion Department coordinates IEPs and accommodations.
- Counsellors provide emotional and behavioural support.
- Supervisors monitor ongoing progress and record incidents.

Behaviour Management:

- Respectful, safe, inclusive school environment upheld for all.
- Consistent implementation of behavior policies.
- Escalation from verbal warnings → letters → suspension → expulsion, only when necessary to safeguard others.

School community responsibilities:

- Respect the rights, values, and beliefs of the individual.
- Promote good relationships and a sense of belonging to the school community.
- Provide clear behavioral expectations.
- Protect the physical environment of the school.
- Tolerate and respect different cultures and traditions.
- Reject and correct any conduct involving bullying or harassment.
- Help build strategies to eliminate unacceptable behavior and apply them consistently.

Stakeholder Responsibilities:

- **SLT:** Monitor safeguarding culture, ensure secure facilities, support staff.
- **Staff:** Model positive behaviour, prevent disruption, praise achievement.
- **Students:** Be punctual, respectful, accountable, and aligned with school values.
- **Parents:** Ensure attendance, collaborate with staff, and disclose health/mental health issues affecting the child.

20. Inclusion Department

- Head of Inclusion
 - Conducts regular observations of Students of Determination.
 - Ensures communication with teachers, parents, and external professionals in the best interest of each student
- Inclusion Facilitators
 - Deliver both pull-out and push-in sessions.
 - Monitor academic, social, and behavioral progress.
 - Develop and implement Individualized Education Plans (IEPs) in consultation with teachers, parents, and external professionals.
- Learning Support Assistants (LSAs)
 - Assigned to students requiring additional support in sessions or classrooms.
 - Hired by parents under the guidance of the Inclusion Department, which screens candidates and advises families.
 - Matched carefully to students' needs and personalities.
 - Sign a **Confidentiality Agreement** binding them to protect student information.
 - Log daily attendance at reception and wear official LSA ID cards for proper identification.
 - Receive orientation and ongoing training from the Inclusion Department.
- External professionals
 - Must present Emirates ID/company ID and sign in/out at reception.
 - Issued a Visitor badge during sessions or classroom observations.
 - Work in coordination with school staff to support student wellbeing.
- Services provided:
 - **Pull-Out & Push-In Sessions:** Conducted with parent consent. Schedules are shared with teachers, supervisors, and Section Heads. Dedicated pull-out rooms are provided in each building. Attendance for every session is recorded.
 - **Accommodations:** Classroom and assessment adjustments are provided as per KHDA and UAE Inclusive Education Policy (2017), including but not limited to extra exam time, modified seating, and differentiated learning support.

21. Medical Team

- *Staff and Facility Readiness*

- Two fully licensed school clinics staffed by a DHA-licensed doctor and two DHA-licensed nurses.
- Equipped with: Automated External Defibrillator (AED), emergency medication, and first aid kits across all key areas (gym, labs, buses).
- Buses carry first aid kits; drivers and assistants are trained in basic emergency procedures.
- Medical staff maintain current Basic and Pediatric Advanced Life Support Certification.
- COVID Task Force Team coordinates reporting and compliance with DHA and KHDA guidelines.
- Medical staff undergo continuous professional development and refresher workshops annually.

- *Services:*

- First aid for injuries, health assessments, vaccinations, and management of chronic illnesses.
- Routine height, weight, and general health monitoring of students.
- Health education workshops for staff and students to promote hygiene and prevent cross-infection.
- Monitoring of lunch boxes and reinforcement of healthy eating practices.
- Immediate action on communicable diseases following DHA and KHDA guidelines.

- *Record Keeping:*

- Each student has an individual medical file documenting health history and interventions.
- Files are confidential and accessed only on a **need-to-know basis**.
- Students of Determination have duplicate files maintained by both the Inclusion Department and the Medical Team to ensure coordinated care.