



GREENWOOD INTERNATIONAL SCHOOL

SAFEGUARDING & CHILD PROTECTION POLICY

Academic Year 2026-2027

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Policy owner	Designated Safeguarding Lead
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Page references are updated for this 2026-2027 version.

1. Introduction and aims

Greenwood International School (GIS) is committed to safeguarding and promoting the welfare, dignity and wellbeing of every child in its care. The best interests of the child guide all safeguarding decisions and actions.

This policy aims to:

- Protect children from abuse, neglect, exploitation, discrimination, bullying and other forms of harm.
- Create a safe culture in which students are heard, respected and confident to report concerns.
- Ensure concerns are recognised, recorded and reported promptly without requiring proof.
- Define the responsibilities of school leaders, staff, contractors, volunteers, students and parents.
- Coordinate appropriate protection, support, external referral and follow-up.
- Maintain accurate, confidential and secure safeguarding records.

2. Scope

This policy applies to all employees, school leaders, governors, contractors, outsourced personnel, volunteers, Learning Support Assistants (LSAs), visitors and any other adult working with or having access to students. It applies on school premises, school transport, educational visits, extracurricular activities, remote learning and online or off-site incidents that affect a student's safety or wellbeing.

3. Legal and regulatory framework

- Federal Law No. 3 of 2016 on Child Rights (Wadeema's Law).
- Cabinet Resolution No. 52 of 2018 concerning the Executive Regulations of Federal Law No. 3 of 2016.
- Ministerial Resolution No. 659 of 2020 concerning the National Child Protection Policy in Educational Institutions.
- Federal Decree-Law No. 45 of 2021 concerning the Protection of Personal Data.
- Federal Decree-Law No. 26 of 2025 Regarding Child Digital Safety.
- The UAE School Inspection Framework and applicable KHDA requirements and guidance.

4. Safeguarding principles

GIS applies the principles of the child's best interests, equality and non-discrimination, early intervention, proportionate information sharing, confidentiality, protection of reporters, accessibility and cooperation with competent authorities.

5. Governance and responsibilities

5.1 Safeguarding leadership

Designated Safeguarding Lead (DSL): Loubna Hallab, School Counselor

The confidential Safeguarding Case Management Team consists of the DSL, Deputy DSL and Principal or nominated member of SLT. The Medical Lead, Inclusion Lead, Head of Section or another professional may be consulted when relevant and strictly on a need-to-know basis.

Parent representatives and Student Wellbeing Ambassadors may support safeguarding awareness and prevention, but they are not members of the confidential case-management team and do not have access to individual cases.

5.2 Key responsibilities

- **Principal:** Ensures implementation, appropriate staffing, resources, safer recruitment, training and cooperation with authorities.
- **DSL:** Receives concerns, assesses immediate risk, maintains records, coordinates referrals and oversees support and follow-up.
- **Deputy DSL:** Acts when the DSL is unavailable and supports implementation of safeguarding procedures.
- **All staff and adults:** Remain alert, follow the code of conduct, maintain professional boundaries and report concerns immediately.
- **Medical Team:** Provides urgent medical care, documents injuries accurately and reports concerns to the DSL.
- **Inclusion Department:** Ensures that communication, reporting and protective arrangements are accessible to Students of Determination.
- **Students:** Are encouraged to report concerns to any trusted adult and are never responsible for investigating or managing cases.
- **Parents/caregivers:** Are encouraged to raise concerns and cooperate with protective measures; consent is not required when reporting is legally necessary.

6. Safer recruitment and professional conduct

- Verify identity, legal working status and required qualifications and attestations.
- Obtain criminal-record or police clearance and professional references in accordance with current requirements.
- Review employment history and clarify unexplained gaps.
- Assess suitability to work with children during recruitment and induction.
- Complete required checks before unsupervised access to students.
- Maintain a central register of employees and other adults who work with or regularly access students.
- Require compliance with the Staff Code of Conduct, professional-boundary rules and reporting duties.

7. Training and awareness

All new teaching employees must complete child protection and safeguarding induction before beginning any teaching duties. All other employees, contractors, outsourced personnel, volunteers and LSAs must complete safeguarding induction before beginning duties or having access to students.

8. Definitions and indicators

8.1 Recognised forms of abuse

- **Physical abuse:** The deliberate use of force that causes or could cause injury, including hitting, burning, shaking or other physical harm.
- **Psychological or emotional abuse:** Persistent or serious behaviour that harms a child's emotional development, dignity or sense of safety, including threats, rejection, humiliation or intimidation.
- **Sexual abuse:** Forcing, enticing, exploiting or grooming a child to participate in or be exposed to sexual activity or material, including online conduct.
- **Neglect:** Persistent failure to meet a child's physical, medical, educational, emotional, supervisory or safety needs.

8.2 Additional safeguarding concerns

Safeguarding concerns may also include child-on-child abuse, bullying and cyberbullying, sexual harassment, harmful sexual behaviour, inappropriate touching, grooming, exploitation, trafficking, exposure to domestic violence, coercion, sharing or threatening to share sexual images, self-harm, suicidal risk, substance-related risk and online abuse. These concerns may occur inside or outside school and may involve adults or other children.

Child-on-child harm: Harm must not be dismissed as joking, experimentation, conflict or normal behaviour. The same reporting and protective procedures apply regardless of age, gender or relationship.

8.3 Possible indicators

One indicator does not necessarily prove abuse. A pattern, disclosure or reasonable concern is sufficient to report. Indicators may include:

- Injuries that are unexplained, frequent or inconsistent with the explanation provided.
- Sudden changes in behaviour, mood, attendance, achievement, relationships or engagement.
- Fear of a person or place, withdrawal, extreme anxiety, aggression or heightened vigilance.
- Sexual knowledge, language or behaviour that is unusual for the child's developmental stage.
- Poor hygiene, hunger, inadequate clothing, untreated medical needs or inadequate supervision.
- Concerning online contact, coercion, image-sharing, unexplained gifts, self-harm or fear of returning home.

A safeguarding report must be made whenever there is a disclosure, observation, allegation, pattern or reasonable concern that a child may have experienced, or may be at risk of experiencing, abuse, neglect, exploitation or significant harm. Staff are not required to prove that harm occurred.

9. Responding to a disclosure or concern

When a child discloses harm or a safeguarding concern becomes known, the adult receiving the information must:

1. **Listen calmly.** Take the child seriously and allow them to speak in their own words.
2. **Reassure.** Explain that they did the right thing by telling and that the concern will be shared only with people who need to help.
3. **Do not promise secrecy.** Explain that complete confidentiality cannot be promised when someone may be unsafe.
4. **Ask only minimal clarification.** Do not use leading questions, conduct an interview, seek proof or repeatedly ask the child to describe events.
5. **Do not confront anyone.** Do not contact or challenge the alleged person responsible or discuss the matter with colleagues who do not need to know.
6. **Report immediately.** Tell the DSL or Deputy DSL without waiting until the end of the day.
7. **Record promptly.** Write the date, time, location, exact words used, observations and actions taken. Sign and submit the record securely.

10. Reporting and external escalation

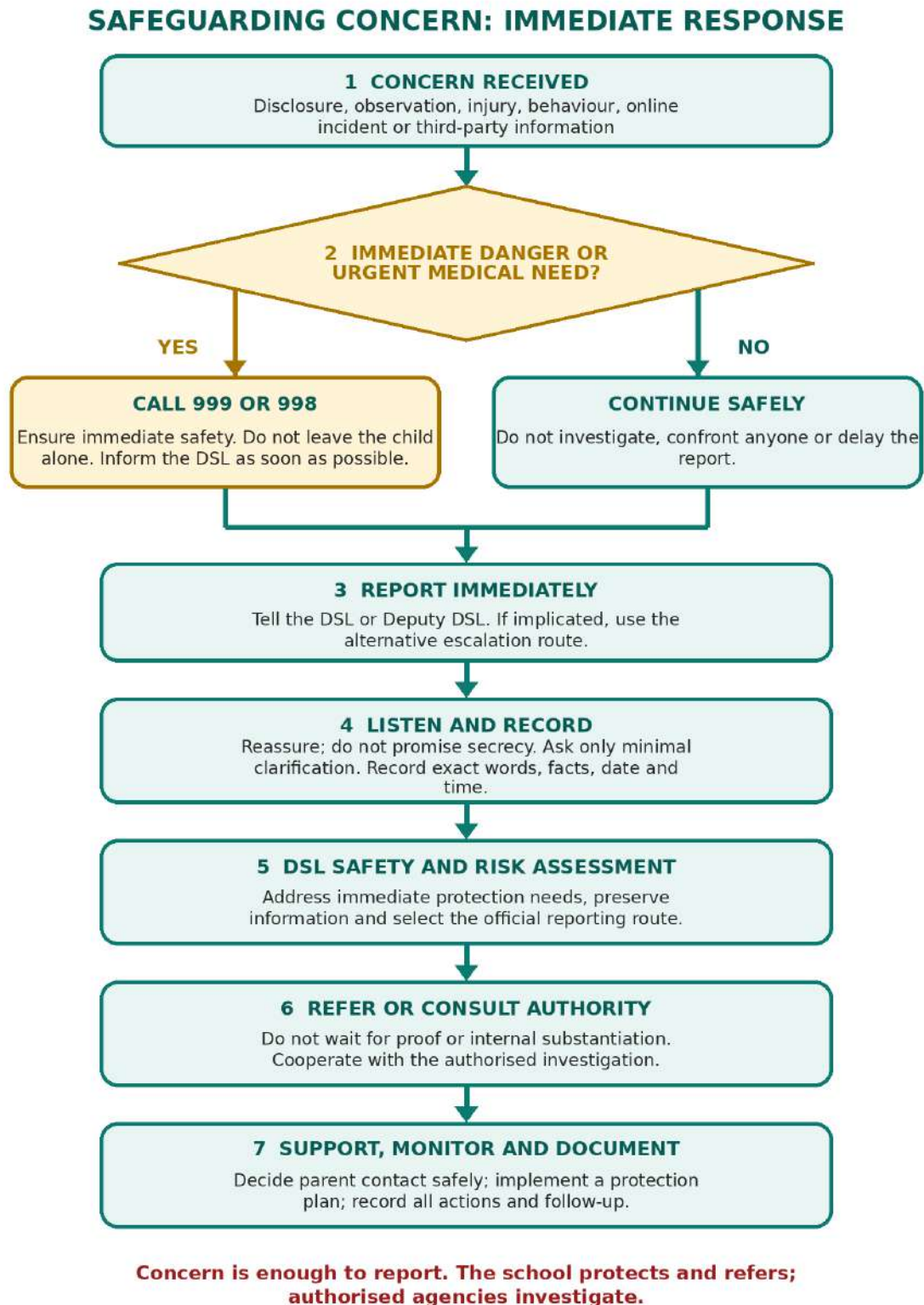
Immediate danger or urgent medical need

Call Police on 999 or Ambulance on 998, ensure the child is not left alone, and inform the DSL as soon as possible.

Every employee and adult working with students has an individual duty to report any safeguarding concern or suspected abuse immediately. Proof or substantiation is not required.

- Report to the DSL or Deputy DSL verbally when urgent and through the school safeguarding concern form or secure reporting system.
- If the concern involves the DSL, report directly to the Principal.
- If the concern involves the Principal, report to the school owner/governing body and the appropriate external authority.
- Staff may contact an external authority directly if school leaders are unavailable, implicated or fail to take appropriate action.
- The DSL records the concern, assesses immediate safety and referral needs, preserves available information and selects the appropriate official reporting route.
- External referral must not be delayed while the school attempts to prove, disprove or internally substantiate the allegation.
- The school may gather only the basic facts required to establish immediate safety and make a referral; authorised agencies conduct the child-protection investigation.
- The school cooperates with authorities and maintains appropriate safety, support and monitoring arrangements.
- The identity of a person raising a genuine concern will be protected as far as legally and operationally possible. No person will be disadvantaged for reporting a concern in good faith.

11. Quick-reference reporting flowchart



12. External reporting and emergency contacts

Service	Contact	Primary use
Immediate police emergency	999	Immediate danger, crime in progress or urgent police protection
Ambulance	998	Urgent medical care
Dubai Police	901	Non-emergency police support and Child Protection Service
MOE Child Protection Unit	80085	Suspected abuse involving a student in an educational institution
Ministry of Interior Child Protection Centre	116111	National child-protection reporting and support
Community Development Authority	800988	Dubai Child Protection Hotline
Dubai Foundation for Women and Children	800111	24-hour protection and support helpline
KHDA	As required	Notification through applicable KHDA procedures or following authority direction

The DSL selects the appropriate reporting route according to the circumstances and level of risk. It is not necessary to report every concern to every organisation. DHA or another medical authority is involved when medical or public-health action is required.

13. Allegations or concerns involving adults

This section applies to employees, leaders, governors, contractors, outsourced personnel, volunteers, visitors and LSAs.

- Report the concern immediately to the DSL and Principal. If either is implicated, use the alternative escalation route in Section 10.
- Take immediate steps to protect the child and prevent unsupervised contact where necessary.
- Do not confront or conduct an untrained interview with the accused person.
- The Principal consults the appropriate external authority and follows applicable KHDA, legal and HR procedures.
- Temporary reassignment, restricted duties or suspension may be considered as a neutral protective measure and does not constitute a finding of guilt.
- No automatic termination or finding is made before an appropriate authorised investigation and employment process.
- Maintain confidentiality and provide appropriate support to the child, reporter and affected staff member.

14. Child-on-child harm and bullying

Child-on-child harm includes physical violence, threatening or coercive behaviour, bullying, cyberbullying, discriminatory harm, sexual harassment, harmful sexual behaviour, inappropriate touching, image-based abuse, exploitation and abuse within intimate or peer relationships. Concerns may also include grooming, cyberbullying, coercion, sexual-image sharing; including AI-generated or manipulated images, sextortion, impersonation, doxxing, threats, exploitation, harmful content promoting self-harm, suicide, violence or extremism, location sharing or unsafe contact.

- All reports are taken seriously and assessed for immediate safety, power imbalance, repetition, coercion, sexual content, age and developmental needs.
- The child who may have been harmed and the child alleged to have caused harm are supported separately and information is shared only when necessary.
- Mediation or restorative practice must not be used when there is suspected abuse, coercion, sexual harm, significant power imbalance or when participation may increase risk.
- Protective arrangements, parent communication, disciplinary measures and external referral are determined according to risk and the applicable Safeguarding, Anti-Bullying and Behaviour policies.
- Safeguarding records are maintained separately from ordinary behaviour or bullying logs when the threshold for a safeguarding concern is met.

15. Online safeguarding

The school responds to online harm when it occurs on school systems or premises and when off-site or personal-device activity affects a student's safety, welfare, relationships or ability to participate in school.

- Concerns may include grooming, cyberbullying, coercion, sexual-image sharing, sextortion, impersonation, threats, exploitation, harmful content, location sharing or unsafe contact.
- Staff report concerns through the same safeguarding procedure and preserve relevant information without unnecessarily downloading, copying or forwarding harmful material.
- Sexual images of a child must never be forwarded, printed or stored on personal devices. Staff seek immediate DSL and police/authority guidance.
- The school applies appropriate filtering, monitoring, access controls, acceptable-use expectations and age-appropriate digital-safety education.
- Students and parents are informed about safe reporting routes and the importance of not retaliating, reposting or attempting their own investigation.

Online harm crosses the school boundary

A concern does not become "outside school" simply because it occurred after school or on a personal device. If it affects a student's safety or school experience, it must be assessed and addressed.

16. Confidentiality and record keeping

Safeguarding information is confidential but not secret. Information is shared only when necessary to protect a child, fulfil a legal or regulatory duty, or provide appropriate support.

- Maintain a separate, secure safeguarding record for every concern, including concerns that do not lead to external action.
- Record the date, time, source, child's exact words where relevant, observations, decisions, rationale, referrals, protective action, communication and follow-up.
- Keep records factual and distinguish observation, allegation, professional opinion and confirmed information.
- Restrict access to authorised personnel and maintain secure access, transfer and retention arrangements in line with the school's approved retention schedule and UAE data-protection requirements.
- Do not place detailed safeguarding information in the student's ordinary academic file or circulate it through informal messaging or ordinary group email.
- When a student transfers, safeguarding information is transferred securely and separately to the appropriately authorised person, where lawful and necessary.
- The reporter may be informed that the concern has been received and acted upon but will not receive confidential case details unless required for safeguarding.

17. Communication with parents and caregivers

Parents or caregivers will normally be informed and involved when a safeguarding concern arises. Contact must first be considered with the DSL and, where relevant, the external authority.

Parents or caregivers must not be contacted before consultation when:

- A parent, caregiver or family member may be implicated.
- Contact could increase risk to the child or another person.
- Notification could interfere with an authorised investigation or the preservation of evidence.
- The child protection authority or police advises the school not to make contact.

Parental consent is not required when the school has a legal or safeguarding duty to report a concern, obtain emergency help or take immediate protective action.

18. Attendance and missing students

Attendance may be an important safeguarding indicator. The school maintains accurate attendance and punctuality records and promptly follows up unexplained absence.

- Parents/caregivers are contacted promptly when a student does not arrive as expected and no satisfactory explanation has been received.
- Repeated or concerning absence, sudden attendance changes, unexplained lateness or a missing student is reported to the DSL for safeguarding consideration.
- If a student cannot be located during the school day, the school activates the missing-student and emergency procedure immediately, informs the Principal and DSL, and contacts parents and police as required by risk.
- Attendance information is analysed for patterns and linked with existing safeguarding or wellbeing concerns.

19. Safeguarding on site, transport and trips

19.1 Supervision and site security

- Students are supervised by authorised adults during lessons, transitions, breaks, dismissal, activities and special events.
- Students may support peer-awareness and wellbeing initiatives but must never replace adult supervision or manage safeguarding concerns.
- Visitors sign in, verify identity, wear a visitor pass and remain appropriately supervised. Unscreened visitors must not have unsupervised access to students.
- Maintenance and contractor work is planned to prevent inappropriate access to students and is supervised where required.
- The school conducts and records appropriate security, fire, evacuation, lockdown and other emergency drills and reviews any issues identified.

19.2 Transport, educational visits and activities

- Transport personnel hold required permits and complete applicable safeguarding and background checks.
- Students are supervised on school transport and safe handover/dismissal procedures are followed.
- Trips and off-site activities have documented risk assessments, supervision ratios, emergency contacts, medical information and safeguarding arrangements.
- Any concern arising on transport, a trip or an external activity is reported through the same safeguarding procedure.

20. Students who may be particularly vulnerable

Some students may face increased safeguarding vulnerability due to age, disability, communication needs, family circumstances, previous harm, social isolation, language barriers, mental-health needs or other individual factors. Students of Determination are not automatically considered at risk; however, reporting routes, communication and protective support must be accessible and appropriate to their needs.

- Use the child's preferred and most effective communication method and provide interpretation or communication support when required.
- Do not assume that behaviour, distress or an injury is explained by a disability or diagnosis.
- Consider dependency on adults, difficulty recognising unsafe behaviour, limited communication and possible increased exposure to bullying or exploitation.
- Involve the Inclusion Department on a need-to-know basis without delaying immediate safeguarding action or external referral.
- Provide reasonable adjustments to enable the student to understand, report and participate safely in support planning.

21. Inclusion and medical safeguarding

21.1 Inclusion Department

The Inclusion Department supports accessible reporting, appropriate communication, safeguarding adjustments and coordinated support for Students of Determination. LSAs and external professionals follow the same screening, identification, confidentiality, professional-boundary and reporting requirements as other adults working with students. Detailed provision is governed by the GIS Inclusion Policy.

21.2 Medical Team

DHA-licensed medical staff provide first aid and urgent care, document injuries and medical concerns accurately, maintain secure medical records, share relevant information on a need-to-know basis and report safeguarding concerns immediately to the DSL. Where sexual abuse is suspected, staff seek police or child-protection guidance before arranging a non-urgent forensic examination; urgent medical treatment is never delayed.

The Medical Team follows applicable DHA and KHDA requirements concerning communicable disease, medication, emergency response, health records and student safety. Detailed procedures are governed by the GIS Medical and Health and Safety policies.

22. Monitoring, review and related policies

22.1 Monitoring and review

- The DSL maintains the safeguarding register and reviews case patterns, response times, referrals and recurring risks.
- The Principal and DSL review implementation, training completion, awareness, site safety and record quality at least annually.
- Students, staff and parents receive age-appropriate information about reporting routes and how to seek help.
- This policy is reviewed annually and earlier following a legal or regulatory change, a serious safeguarding incident, an identified procedural concern or relevant authority guidance.
- Policy revisions are approved by the Principal and communicated to staff, students and parents in an accessible form.

22.2 Related GIS policies and procedures

- Anti-Bullying Policy
- Behaviour Policy
- Online Safety and Acceptable Use Policy
- Staff Code of Conduct and Professional Boundaries
- Safer Recruitment and HR Procedures
- Attendance and Missing Student Procedure
- Health and Safety, Transport and Educational Visits Procedures
- Inclusion Policy
- Medical Policy
- Data Protection and Records-Retention Policy
- Counselling and Confidentiality Procedures
- Whistleblowing and Complaints Procedures

22.3 Official references

- [UAE Ministry of Education - National Child Protection Policy in Educational Institutions](#)
- [UAE Ministry of Education - Child Protection Unit](#)
- [UAE Government - Children's Safety](#)
- [Community Development Authority - Child Protection](#)
- [Dubai Foundation for Women and Children - Helpline](#)