Safeguarding Policy

Date	Review Date	Lead Policy Writer(s)	Leader(s) Responsible
October 2026	September 2027	Nurka Bulic, School Psychologist	Principal

Revision History

Revision	Date	Comments / Changes
Original	24 September 2026	Supersedes Child Protection, Rev.3 (2018), Child Protection Rev.4 (30 Jan 2024), Anti-Bullying Rev.6 (24 Nov 2023)

1. Introduction and Statement of Commitment

The German International School Dubai (DISD) creates a pleasant and safe learning environment for its students. DISD's approach to child protection rests on the following aspects of school life:

- Creating an atmosphere in which children feel safe, can express themselves freely, and are heard.
- Assuring children that there is always a contact person at school – class teacher, subject teacher, school counsellor, or nurse – they can approach if something is worrying.
- Teaching, through Ethics and Islamic Studies lessons at primary level, which behavior towards children and young people is right and wrong, and how children can protect themselves.

This Statute applies to all DISD employees and is based on four main pillars:

1. Ensuring that staff selected are suited to working with children.
2. Building awareness of child protection among students and showing them how they can protect themselves.
3. Developing and implementing procedures for identifying and responding to cases of abuse.
4. Offering the necessary help and support to students who have been abused.

This policy brings the Statute: Child Protection together with DISD's other safeguarding-related policies – the Anti-Bullying at School Policy, the Suicide Prevention Policy, the School Counselling and Psychological Service statutes, and the School Clinic's Incident Reporting, Confidentiality, and Health File/Record Policies – alongside additional sections (online safety, peer-on-peer abuse, educational visits, photography consent).

1.1 Legal and Regulatory Framework

This policy is written with reference to:

- UAE Federal Law No. 3 of 2016 concerning Child Rights ("Wadeema's Law")
- KHDA's 2025 compliance handbooks for private schools, issued under Dubai's Flexible Regulation Framework (Education 33 Strategy), covering staffing, learner and parent rights, health and safety, and emergency preparedness.
- KHDA's Technical Guide for Appointing Teaching Staff in Private Schools (September 2025) and Staff Deregistration Technical Guide (September 2025).
- KHDA (Knowledge and Human Development Authority) inspection standards and guidance for schools in Dubai – the School Counselling framework is explicitly aligned with KHDA regulations for Dubai private schools.
- The United Nations Convention on the Rights of the Child

1.2. Best interest of the child

The best interests, emotional wellbeing and psychological safety of our students are the primary consideration in every safeguarding-related decision and action. Safeguarding goes beyond regulatory compliance, procedural requirements and institutional risk management. Its fundamental purpose is to protect and support children.

DISD applies a child-centred approach based on empathy, proportionality, sensitivity and, wherever appropriate, de-escalation. Particular care is taken with vulnerable students and emotionally sensitive situations. The manner in which concerns are investigated, students are questioned, parents are involved and decisions are communicated must itself contribute to the child's wellbeing rather than create additional distress.

Rules and procedures are essential, but their implementation always reflects the individual circumstances and needs of the children concerned. This principle governs how DISD acts. It never delays, restricts or replaces mandatory reporting to child protection authorities or emergency services.

2. Definitions

The terms of child abuse or child neglect describe a range of actions or expressions by persons known to the child that could consciously cause the child suffering or force the child to tolerate actions they cannot prevent. Child abuse can take place on a physical, sexual, psychological, or emotional level. All forms negatively affect the child's physical, social, psychological, and emotional development.

2.1 Physical Abuse

- Physical violence and severe reprimands such as blows, shaking, throwing, poisoning, burning, or other behavior patterns that hurt the child.
- Consciously inducing illness, e.g., by administering the wrong medication.

2.2 Emotional Abuse

- Long-lasting emotional maltreatment negatively affects the child, manifesting in the child's conviction that they are worthless, unloved, or inadequate, or only valued if they meet another person's expectations.
- Expressing expectations that are inappropriate for the child's developmental age.
- Constant hostile reprimands, devaluing, mocking, threatening, withdrawal of love, or isolation.
- Inappropriate controlling behavior, spoiling, or forcing the child into a partner-like role that overwhelms them.

2.3 Sexual Abuse

- Sexual abuse takes place when somebody takes advantage of their power, authority, or position and uses a child for sexual purposes. Both girls and boys can be affected. Sexual abuse includes cases where a child is forced or misled into taking part in sexual activities:
- Physical contact, irrespective of whether penetration is involved.
- Actions without physical contact – e.g. children being made to look at pornographic material or being involved in producing it.
- A perpetrator exposing themselves or engaging in exhibitionist behavior in front of the child.

2.4 Neglect

Neglect means failing to meet a child's physical and psychological needs in a way that will presumably lead to serious damage to their health and development. A parent or attachment figure does not comply with the following:

- Provision of appropriate food, clothing, and accommodation.
- Protection of the child from physical or emotional pain.
- Care and supervision by suitable people.
- Access to appropriate medical care.

2.5 Effects of Child Abuse

The effects of abuse on children are profound, and vary depending on the type and length of the abuse:

- Behavioral disorders
- Academic problems
- Mental disorders
- Relationship difficulties
- Drug and alcohol problems
- Self-harm, up to suicide

2.6 Bullying, Peer-on-Peer Abuse, and Safeguarding Leadership

Bullying and cyberbullying are addressed in Section 7. Peer-on-peer abuse is addressed in Section 5.

2.7 Children with Additional Vulnerability Factors

Some students may be at a heightened risk of harm, or may find it harder to disclose a concern, because of additional vulnerability factors. Staff apply extra vigilance – without lowering the threshold for any other student – where a child:

- Has a disability, SEND, or communication difficulty that may make disclosure harder.
- Is experiencing family breakdown, high-conflict custody arrangements, or a change of household.
- Has no extended family support network in the UAE (common among expatriate/third-culture families).
- May be exposed to domestic violence, substance misuse, or parental mental illness at home.
- Is from a diplomatic family, where jurisdictional and embassy coordination adds complexity (see Sections 3.2 and 4.2).
- Has limited English or German, which may affect their ability to disclose a concern clearly.

Staff should consider individual communication, sensory, cognitive, and developmental needs when supporting a student to disclose a concern.

Every step of a safeguarding response is adapted to the child's age, needs, communication and vulnerability.

2.8 Transfer of Safeguarding Information

When a student leaves DISD to attend another school, either within the UAE or overseas, the DSL (Designated Safeguarding Lead) will complete the relevant safeguarding transfer form (from the receiving school).

Any confidential safeguarding information that needs to be shared with the Designated Safeguarding Lead at the receiving school must be communicated securely and directly, either by telephone, online meeting, or in person. Such information must never be included as part of the general academic transfer file or shared through routine academic documentation.

When a new student joins DISD, the DSL proactively requests safeguarding information from the student's previous school as part of admission.

2.9. Transport and Late Collection

Students are released only to a parent/guardian or an adult named on the student's authorized collection list; identification is checked for any unfamiliar collector.

Staff supervising school transport (bus) complete a headcount at every pick-up and drop-off point.

A student not collected within a reasonable period after dismissal is kept in a supervised, visible location (e.g. reception, main entrance area or another area covered by CCTV) while the school contacts parents/guardians. Wherever possible, two members of staff should be present. Where this is not feasible due to staffing, the supervising staff member ensures the student remains in a publicly visible area, the door remains open, or the area is covered by CCTV, and the contact with parents is documented.

3. Roles and Responsibilities

3.1 General Manager

- Acts as the legal representative of the school and holds ultimate accountability for safeguarding.
- Ensures the Principal is fully informed of their safeguarding responsibilities and appropriately trained.
- Ensures adequate resources and time are allocated to safeguarding work.
- General Manager is the first point of escalation for concerns and formal complaints about the Principal or School Leadership Team.

3.2 Principal and Deputy Principal (DISD's Safeguarding Officers) and Designated Safeguarding Lead (DSL)

- Act as the first point of contact for all safeguarding concerns received by email with a full report.
- May instruct the school nurse and school counsellor to carry out a risk assessment, following the child protection protocol.
- Convene emergency meetings with parents/guardians where a risk is identified, together with the school counsellor, minuted and filed in the child protection record.
- Report confirmed or uncooperative cases directly to the local child protection authority; report imminent danger to the Police Child Protection Department immediately.
- At least one of the two Safeguarding Officers (Principal or Deputy Principal) is contactable 24/7 during term time and on school trips. When both are unavailable, a nominated deputy is appointed and made known to staff.
- Ensure staff selected for employment are suited to working with children, as part of recruitment (see Section 6).
- Deputy Principal supports the Principal and acts with the Principal's full authority when the Principal is unavailable.
- Where appropriate, the Head of Inclusion/relevant SENDCo may be consulted where a safeguarding concern involves a student with SEND, particularly where individual communication or support needs to be considered.
- **Designated Safeguarding Lead (DSL):** receives, records and assesses all concerns, coordinates the response, and decides whether an external referral is made, in accordance with the principal and General Manager. The DSL reports to the Principal, or to the General Manager where the concern involves the Principal.
- No internal reporting line, approval step or internal process may delay or restrict mandatory reporting to the relevant child protection authorities or emergency services
- Mandatory external safeguarding reports do not require prior internal approval.

3.3 School Nurse and School Counsellor/Psychologist

- Carry out risk assessments when instructed by the principal, following the child protection protocol.
- Provide individual and group counselling to students (see Section 8).
- Maintain confidentiality of counselling content, subject to the safeguarding exceptions in Section 8.4.

3.4 All Staff, Volunteers, and Contractors

- Read, understand, and sign to confirm receipt of this policy as part of induction.
- Treat every student with respect, patience, and dignity, and act as positive role models.
- Know how to recognize signs of abuse, neglect, bullying, or a student at risk (see Appendix A), and report concerns promptly to the DSL by email, with a full report.
- Never investigate concerns themselves or promise a student unconditional confidentiality.

3.4.1. External Providers, Coaches, and Visitors

- No external coach, tutor, workshop facilitator or third-party activity provider works with students – on or off campus – without prior safeguarding screening equivalent to Section 6.1, a signed DISD Code of Conduct, and a named DISD staff member supervising the entire session.
- The CCA Coordinator is responsible for ensuring that all third-party providers engaged for co-curricular activities meet these requirements before any contact with students begins, and for maintaining records of screening, signed Codes of Conduct and supervision arrangements.
- All visitors to campus sign in, wear visible identification for the duration of their visit, and are accompanied at all times in areas where students are present.

3.5 Parents and Guardians

- Work in partnership with the school to safeguard their child's welfare.
- Inform the school of any change in circumstances that may affect their child's safety or wellbeing.
- Support the school's safeguarding procedures, including reporting obligations under UAE law.

4. Recognising and Reporting a Safeguarding Concern

4.1 What to Do if You Have a Concern

- It is not the responsibility of school personnel to investigate suspected cases of abuse. Their role is to recognize signs of abuse or neglect at an early stage (see Appendix A) and to report any concerns immediately to the Designated Safeguarding Lead (DSL) by email, providing a full written account of the concern. This will enable the DSL to assess the information and, where necessary, initiate the appropriate safeguarding procedures and next steps.
- A child may only trust an adult enough to disclose once – so this conversation must be handled very carefully.
- Use messages that build trust and safety, for example: – "I'm listening." – "I believe you." – "I'll talk to someone who can help you best."
- Never promise the child unconditional secrecy – explain that you may need to involve others to help keep them safe.
- Staff limit the number of adults involved, do not ask leading questions or ask the child to repeat their account, and offer the child a trusted adult to stay with them. The child is told honestly and in age-appropriate terms what will happen next.
- Students with communication difficulties should be given appropriate support and sufficient time to communicate a concern in a way that is accessible to them.

- At all times when students are on campus, on school transport, or on a DISD-organized trip or event, at least one trained safeguarding officer – the Principal, the Deputy Principal, or a nominated deputy in their joint absence – is contactable.

4.2 What the Principal Does Next

1. If necessary, the principal/DSL instructs the school counsellor/school doctor to carry out a risk assessment, following the child protection protocol.
2. If there is a risk, the principal invites the parents/guardians to an emergency interview with the relevant specialist (school counsellor) present. The meeting is recorded in writing and added to the child protection file.
3. Before any parent meeting, the DSL considers the child's wellbeing, the timing, who attends, and how the child will be supported before and afterwards. Decisions are explained to the child in a way that reassures rather than frightens them.
4. If the parents are not cooperative, or the suspicion is confirmed, the DSL reports the case directly to the local child protection authority. If there is imminent danger, the Police Child Protection Department is informed immediately.

4.3 Emergency/Immediate Danger

If a student is in immediate danger, the Principal or Deputy Principal must be informed without delay. Where there is an immediate risk to the student's safety or wellbeing, Dubai Police must also be contacted immediately.

4.4 External Referral Contacts

Organisation	Contact
UAE Ministry of Interior Child Protection Centre	Call 116111 or visit the MoI Child Protection Centre Website mpo-cpc.ae
Hemayati Application (UAE Ministry of Interior)	Child-protection reporting app, available iOs and Android
CDA – Community Development Authority	Child Protection Hotline: 800 988
Dubai Foundation for Women and Children	Child Protection Helpline: 800 111
Dubai Police (Emergency)	999
Ambulance	998

4.5 DISD Safeguarding Team

Role	Name	E-Mail
General Manager	Sener Erkol	general.manager@germanschool.ae
Principal	Patricia Reisyan	principal@germanschool.ae
Deputy Principal	Wencke Adler	principal@germanschool.ae
Administration Head	Stephanie Knauer	verwaltungsleitung@germanschool.ae

DSL/School Counselor	Nurka Bulic	safeguarding@germanschool.ae
School Doctor	Hilke Tegeler	doctor@germanschool.ae
School Social Worker	Nadine Othmann	safeguarding@germanschool.ae
School Counselor	Kathy Koenig	safeguarding@germanschool.ae
Facility Manager	Bibinosh Cherian	facility.manager@germanschool.ae

4.6 Unauthorized or Unexplained Absence

Persistent, unauthorized absence, a sudden pattern of missed school days, or a student going missing from education can itself be a safeguarding indicator. Attendance staff must flag such patterns to the DSL and the safeguarding team, who will consider whether a welfare check or referral is required.

4.7 Confidentiality and Information-Sharing

Safeguarding information is shared strictly on a need-to-know basis.

Safeguarding records are stored securely, separately from general student files.

Staff must never place a student's name in an email subject line or the first lines of an email when discussing a sensitive matter; use initials and request a face-to-face conversation instead.

Information may be shared without consent where a child is at risk of significant harm, in accordance with UAE law.

Personal data collected for safeguarding purposes (reports, risk assessments, health and counselling records) is processed in accordance with UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data. Such data is collected and used only for the purpose of protecting the child, stored securely with access limited to staff who have a legitimate need to know, and retained only as long as necessary. Disclosure of safeguarding data to a competent authority (Dubai Police, CDA, Dubai Health Authority, or KHDA) is treated as a lawful basis for processing without requiring separate parental consent.

5. Peer-on-Peer (Child-on-child) Abuse

Peer-on-peer abuse is distinct from ordinary bullying (Section 7) and must never be dismissed as "just banter," "part of growing up," or a normal part of relationships. It includes, but is not limited to:

- Physical abuse, including hitting, biting, kicking, or initiation-type violence.
- Sexual violence and sexual harassment, including unwanted physical contact, sexualized name-calling, or sharing of sexual images/messages ('sexting').

5.1 Key Principles

The absence of reported peer-on-peer abuse does not mean it is not happening – staff must remain proactively vigilant.

Both the affected student and the student(s) responsible are treated with care; disciplinary and safeguarding responses are considered separately.

Reports are recorded factually and confidentially, and referred to the DSL immediately, following the same procedure.

Where SEND is involved, staff should consider whether communication, social understanding, sensory needs, or emotional regulation may have contributed to the situation, without minimizing the safeguarding concern.

Support for all students involved is arranged first, and students are spoken to calmly, proportionately and without blame.

5.2 Response Procedure

The DSL and the principal are informed immediately and lead to the response.

Both students are spoken to separately, calmly, and without judgement, using trust-building messages.

A risk assessment is completed for both the affected student and the student(s) responsible, involving the school nurse/counsellor as needed.

Parents/guardians of all students involved are informed, in line with the child's best interests and any ongoing investigation.

If needed, appropriate support (counselling, pastoral care, external referral) is arranged for everyone involved, through the School Counselling service.

6. Safer Recruitment and Staff Conduct

6.1 Recruitment Screening

All staff, volunteers and regular contractors who have unsupervised access to students must provide a valid police clearance / good conduct certificate before commencing work with students. These checks are obtained and repeated in accordance with KHDA and UAE requirements.

Safer recruitment procedures include identity verification, reference checks, verification of qualifications, and a review of any gaps in employment history.

A minimum of two confidential references is obtained, with specific references to safeguarding and child protection.

All externally contracted staff (e.g. security, cleaning, catering) are required to meet equivalent screening standards, and any conduct of concerns are escalated to their employer's management.

Safeguarding training is role-specific and matches the individual's responsibilities (e.g. Educators, Support Staff, Senior Leadership, Coaches, External Providers). Automatic enrolment of all staff on the Level 1 Educators course has been discontinued. The appropriate course for each role is assigned by HR in consultation with the DSL/ Safeguarding Officers.

6.2 Code of Conduct

All staff, volunteers, coaches and external providers working with students are expected to always maintain clear professional boundaries, both in person and online. The following behaviors are not acceptable and will be treated seriously by the school. They may result in disciplinary action and, where appropriate, referral to external authorities:

- Working alone with a child in a non-visible location
- Consuming alcohol while responsible for students
- Providing alcohol to students or allowing its supply
- Smoking in the presence of students
- Inappropriate or unnecessary physical contact with a student
- Humiliating, degrading or belittling a student
- Having an intimate or sexual relationship with any student (abuse of a position of trust)
- Making sexually explicit comments or sharing sexually explicit material
- Sharing personal social-media accounts, private phone numbers or private messaging contact details with students
- Communicating with students via personal social media, WhatsApp or other private messaging apps (only school-approved platforms may be used)
- Staff must always act as positive role models and treat every student with respect, patience, and dignity.

- In addition, all staff, volunteers and contractors are expected to:
- Make the safety and wellbeing of every student their utmost priority.
- Never use language or behavior that is violent, discriminatory, or otherwise inappropriate.
- Never accept or give gifts to a student without the knowledge of parents/guardians.
- Never share or publish images of students without appropriate parental consent (see Section 12).
- Report any concern about the conduct of a colleague, in line with the procedure in Section 14.

6.3 Physical Intervention and Restraint

Staff have a duty to intervene to prevent students from hurting themselves or others. There may also be situations in which a student seriously disrupts good order in the school or causes damage to property. If a member of staff ever needs to intervene physically, the following will apply.

Physical intervention is used only as a last resort, to prevent a student from causing harm to themselves, others, or serious property damage.

Any physical intervention must be reasonable, proportionate, and the minimum necessary — never used as a punishment. After any physical intervention, the student's wellbeing is checked, the incident is explained to them calmly, and support is offered.

Every instance of physical intervention is recorded in writing and reported to the Principal/Deputy Principal and the student's parents/guardians on the same day.

Part of the preventative approach to risk reduction involves looking for early warning signs, learning and communicating any factors which may influence unexpected behavior and taking steps to divert behaviors leading towards foreseeable risk.

For students with identified additional needs, known triggers, early warning signs, and agreed de-escalation strategies should be reflected in the student's individual Risk Assessment / Safety Plan where required.

7. Guiding Principle

The guiding principle of DISD is that everyone from the school community recognizes the basic principles of respectful and peaceful togetherness and assumes responsibility for this in their own area. In view of DISD's intercultural environment, tolerance in terms of ethnic origin, religion, social background, talents, etc. is indispensable to a positive and harmonious school climate.

DISD creates a caring, friendly, and safe environment so that every student can learn free from repeated degradation or humiliation through bullying. The school rejects any form of bullying and will respond promptly and effectively wherever it becomes apparent – DISD will not turn a blind eye.

7.2 Aims of This Policy

- To prevent all kinds of unacceptable behavior such as bullying, from the very beginning.
- To resolutely counteract unacceptable behavior — broken rules result in clear consequences.
- To protect the victim and offer the victim support.
- To correct the culprit's misconduct with pedagogical, educational, and ultimately proper disciplinary measures.

7.3 Definition of Bullying

Bullying is verbal abuse, wearing people down, and the systematic tormenting and victimizing of another person. It is characterized by:

- An entrenched conflict between two or more students.

- An imbalance of strength (physical or mental) between victim and culprit(s) — it is not bullying when two equally strong students have a dispute.
- Systematic, conscious targeting of the victim over a period of time, without the victim being able to resolve it alone.

Passive/mental bullying includes:

- Ignoring the victim; speaking badly about them behind their back.
- Spreading rumors and lies; unfriendly behavior; threat of violence.

Active/physical bullying includes:

- Physical violence to varying degrees.
- Blackmailing protection money; theft or damage of the victim's belongings.

Other forms:

- Cyberbullying: hostile, hateful slogans sent via various media to slur the victim's reputation; provocative comments and images posted online.
- Racist/religious bullying: a child excluded or marginalized due to skin colour, ethnic background, culture, or country of origin.
- Disability-related bullying: children with a physical/mental disability or learning difficulty insulted, avoided, or made fun of.

7.4 Anti-Bullying Rules (for Students)

I. We do not bully anybody else. We do not accept bullying and do not tolerate any aggressive behavior.
II. We try to help everybody who is being bullied.
III. We try to integrate everybody who has been excluded.
IV. If we are aware of somebody being bullied, we tell an adult at school or at home about this.

7.5 Prevention

- The school's mission of respectful, peaceful togetherness is continuously communicated, and its adherence demanded.
- All adults hold positions of authority and are expected to behave as positive examples.
- Teaching staff are vigilant in the classroom and during supervision to detect signs of bullying early and are called upon to address cases directly rather than ignore them.
- Class and subject teachers create an environment where students can speak openly or individually about bullying and are open for confidential discussions.
- Orientation lessons and project days address conflict management, dealing with attacks, and tolerance, using role-play, theatre, film, literature, and graphic images; lessons also cover safer internet use and misuse of social networks.

7.6 Response Procedure — the "Farsta Method"

Teachers and other authorized people must report any bullying or aggressive behavior to the class teacher, school counsellor, or Principal. Where clear information is available on victim and culprits, DISD applies the Farsta Method:

- A joint school workgroup discusses the report and gathers initial information from the informant.
- Contact with the victim is made through teachers/informers with strict anonymity, so bullying pupils are not forewarned. The exact occurrence is carefully reconstructed (what happened, how often, who did what, who is involved); the victim may be asked to keep a bullying diary if necessary and is given assurance and safety. The team decides whether and how to involve parents.

- Individual, unannounced meetings (5–10 minutes each) are held with each culprit, without warning. The meeting is conducted calmly and objectively, without moralizing or accepting justifications; culprits are told plainly that bullying is known, taken seriously, and must stop. Further meetings on subsequent days are announced.
- Follow-up meetings (5–10 minutes) shift toward how the culprit(s) can help improve the victim's situation – recruiting them as cooperation partners for prevention, with a probation period. Culprits do not need to explain to the class why they were called out, protecting reintegration.
- A further meeting with the victim follows, with increased supervision of the class and observation of reintegration. A final review meeting will be held in a few weeks.
- If bullying has not stopped, school management invites the parents of the bullying student(s) to a meeting to jointly find a solution – which may include counselling sessions or moving the student(s) to a parallel class.
- Each step is adapted to the age, vulnerability and emotional state of the students involved, and the least distressing effective approach is used.

DISD's school counselling service supports both the affected student and the student(s) responsible: restoring the victim's self-confidence and sense of protection; helping the victim cope with bullying situations; supporting the culprit in reflecting on their behavior; and helping parents with related educational issues.

Cyberbullying (including online harassment, sharing of harmful content, or misuse of social media, messaging apps or school platforms) is treated as a form of bullying under this section and as an online safety concern under Section 9.

8. School Counselling and Psychological Services

DISD considers professional social-emotional support one of its most important tasks. Structures at school level include a School Psychological Service available to every student, peer support and a "Vertrauenslehrer" (trusted teacher) team offering an advisory first point of contact.

8.1 Purpose and Scope

School Psychological Service is a counselling body available to students, teaching staff, parents, administration, and school leadership for school-related, educational, and social-emotional problems and questions. It supports difficulties and advises psychological questions in the school context, on a voluntary basis. The school psychologist is bound to neutrality and cooperates – subject to confidentiality and data-protection rules – with other counselling services. This framework aligns with DISD's values and with KHDA regulation for Dubai private schools.

Scope includes individual and group counselling; diagnostic work outside the clinical domain; psychologically oriented class and group work; mediation, intervention, and moderation of conflicts; creating support plans in cooperation with teachers and parents; and advising on systematic school development.

Support for the student comes first, and information is shared in ways that do not add pressure or distress.

8.2 Individual Counselling

Individual counselling addresses motivation problems, disruptive work behavior, school/career-path decisions, learning and performance support, and counselling during acute crises (e.g. self-harm, school refusal), as well as strengthening students' social-emotional competence and self-esteem.

A request may come from parents, students, or teaching staff. Parents do not need to be informed before a student's first or a self-initiated counselling session; if the student seeks further sessions, parental consent is obtained before proceeding, and a support plan is created.

8.3 Group Counselling and Group Work

Group counseling resolves problems or conflicts affecting two or more students directly. Group work addresses social difficulties within a class or group community arising from group dynamics, worked through via discussion circles, training programmes, and psychological-pedagogical techniques – used for destructive group dynamics, weak group cohesion, or one or more students feeling excluded.

A request may originate from staff or from students themselves; staff may refer a class/group situation to the school psychologist/school counsellor, who decides – together with the class teacher where relevant – whether further work with the group is needed.

8.4 Confidentiality and Its Exceptions

Counselling is voluntary and free of charge. The content of a student's first, self-initiated counselling session is not passed to any third party — except in the following cases, which always involve school leadership and are handled under strict confidentiality, escalated to state authorities where necessary:

- Expressed suicidal thoughts or suspected suicide risk.
- Suspected violence by adults or peers.
- Suspected physical or emotional neglect by a parent/guardian.

School leadership is also informed where a student's academic performance and/or social-emotional state is negatively affected on an ongoing basis.

8.5 Case Handoff

A counsellor should hand off a case where they notice their own bias toward the topic or person, have a personally difficult history with the topic, lack sufficient familiarity with the issue, are confronted with a similar unresolved problem themselves, or are not accepted or trusted by the student concerned.

9. Online Safety and Digital Safeguarding

9.1 Purpose

DISD recognises that students' safety online is as important as their safety on campus. This section sets out how the school promotes safe and responsible use of technology, and how it responds to online safeguarding concerns.

9.2 Responsibilities

The IT Team takes lead responsibility for online safety concerns and applies the same reporting procedure as other safeguarding concerns (Section 4).

School-owned and school-managed devices are provided primarily to support teaching, learning, and school-related activities. Users must use devices responsibly and in accordance with the school's policies and instructions.

- Devices must only be used for school-related or authorised purposes.
- Use of devices and the school network must comply with the school's Code of Conduct and applicable school policies.
- Users must not use school devices or technology resources for unauthorised, inappropriate, or unlawful activities.
- Users must protect school information and respect the privacy and rights of others when using school technology.
- The school applies content filtering at the firewall and through MDM policy to maintain a safe learning environment.

- The following categories on firewall are blocked on the student network for content filtering purposes:
  Abortion, Adultery, Alcohol and Tobacco, Auctions, Copyright-Infringement, Cryptocurrency, Dating, Drug Abuse, Extremism, Gambling, Games, Grayware, Hacking, High-Risk Websites, Hunting and Fishing, LGBT Related, Malware, Medium Risk Websites, Military, Nudity, Peer to Peer, Phishing, Social Networking, Swimsuits and Intimate Apparel, Weapons
- In addition, web content filters are enabled by MDM policy on student iPads to limit adult content and blocklist websites.
- Unlawful, harmful, age-inappropriate and high-risk content (such as malware, phishing and gambling sites) is blocked on the student network and on student iPads.
- The IT Department maintains the list of blocked categories and may block or unblock sites as needed.
- Users must not attempt to bypass the filter. Requests to unblock a site for educational use go to the IT Department through the Helpdesk.
- Content filtering does not replace supervision.
- School-owned devices and networks use age-appropriate filtering and monitoring. Staff report on any monitoring alerts that raise safeguarding concerns to the DSL on the same day.
- Staff do not communicate with students via personal social media, WhatsApp, or private messaging apps. Only school-approved platforms are used.

Network & Internet Use

- **Technical safeguards:** Users must respect the technical safeguards in place (firewalls, internet filters, antivirus, restricted user accounts, and access rights). Attempts to circumvent these, conceal network identities, or gain unauthorized access to systems and services are strictly prohibited.
- The use of VPN apps, personal hotspots, tethering, or other methods to bypass the school network is generally prohibited on school devices and networks. VPN use is also subject to UAE laws and may require appropriate authorization. Setting up ad-hoc or peer-to-peer networks, including "hotspot boosting" using personal mobile devices, is also prohibited.
- **Social media:** Access to social media platforms is blocked over the school network during school hours, unless expressly part of a lesson directed by a teacher.
- **Prohibited content:** Users must not upload, downloaded or accessed that are unlawful, offensive, vulgar, criminal, racist, or otherwise likely to cause harm or distress to others, or that are prohibited under local law.
- **Photographs and recordings:** Photographs and audio/video recordings of individuals or groups must only be taken with their consent and with authorization from school staff for instructional purposes. Publishing such recordings on social media or public platforms is prohibited.
- Personal devices may access school systems only where the school permits it, and only through approved school apps (for example, Outlook or OneDrive).
- Staff must protect the device with a passcode or biometric lock and keep it updated.
- Staff must not save or forward school or student data to personal storage, email or cloud accounts.
- Staff must not photograph or record students on a personal device unless the school has authorised it.
- Staff must report a lost, stolen or compromised device to the IT Department immediately.

9.3 Curriculum and Prevention

Age-appropriate online safety education is embedded in the curriculum.

Lessons already cover safer internet use and misuse of social networks as part of DISD's Anti-Bullying prevention work (Section 7.5).

9.4 Responding to Online Safety Concerns

Concerns about online grooming, sexting, cyberbullying, or exposure to harmful content are reported to the DSL immediately, using the procedure in Section 4.

The school may restrict, suspend, or withdraw access to school networks, devices, systems, or digital services. Online concerns are handled without blaming or shaming the child who has been affected.

Staff violations will be handled in accordance with the school's standard HR and disciplinary procedures.

Violations by contractors, vendors, or other authorised users may result in loss of access and, where applicable, action under the relevant contract.

Violations that may constitute a breach of UAE law may be reported to the relevant authorities.

10. Suicide Prevention and Student Mental Health

DISD believes a school environment is key to supporting students' mental health, and maintaining a safe environment is a priority. Teachers, mental health providers, and other personnel who interact with students are trained to respond to warning signs. This policy uses DISD's "comprehensive approach":

- Promote emotional wellbeing and connectedness among students.
- Identify students who may be at risk of suicide and assist them in getting help.
- Be prepared to respond effectively if a death by suicide occurs.

This policy is in line with DISD's school mission and KHDA Forms and Guidelines.

10.1 Risk Factors

Immediate risk

- Speaking about wanting to die or to kill oneself.
- Looking for a way to kill oneself.
- Talking about feeling hopeless or having no reason to live.

High risk (especially if new and/or linked to a painful event, loss, or change)

- Talking about feeling trapped or in unbearable pain; talking about being a burden to others.
- Self-hating/self-lowering talk; increasing use of alcohol or drugs.
- Reckless behavior, withdrawal, or strong isolation; extreme mood swings.

Possible risk (most mentioned)

- Death in the student's close environment.
- Victim of long-term or intense short-time bullying.
- Suffering from mental illness that negatively affects the way of feeling; individual response to a traumatic event.

10.2 Prevention – Promoting Wellbeing and Connectedness

Positive, supportive community activities: sport and mindfulness days, "Students help students" projects, teambuilding, Winter bazaar, class trips, Wellbeing days.

Peer support groups teaching students about mental illness and encouraging them to seek help.

A positive feedback culture: self-reflected questionnaires, individual feedback meetings with subject teachers, training in non-violent communication, and mental health.

10.3 Identifying and Assisting Students at Risk

DISD's suicide-risk screening is used for students displaying warning signs of elevated risk, opening up about suicidal thoughts, non-suicidal self-injury, or being treated outside school for depression, bipolar disorder, or eating disorders. In case of a death by suicide, staff and parents pay close attention to the risk factors above to identify students who may be at risk of a similar path (suicidal ideation/contagion).

- In any case of suspicion, parents are informed and encouraged to close cooperation with school staff.
- On a positive screening result, the student is guided to connect with professional support outside the school.
- Parents sign a Parents-School contract consenting to provide the school with full psychological assessments/reports and/or a weekly psychological report.
- The school works in cooperation with an external therapist/psychologist alongside the school psychologist/counsellor, and with certified, evidence-based therapy institution groups.

10.4 Preparedness and Training

The response approach includes both immediate response and long-term follow-up and support, overing guidance and suicide first aid to a person at risk, key elements of an effective suicide safety plan, and integrating life-promotion and self-care into the school community.

DISD's Medical Director and School Psychologist are experienced and trained in supporting students and assisting parents/caregivers.

10.5 Responding to a Death by Suicide

DISD applies the psychological first-aid model with five core points: Listen (observe verbal/nonverbal signs of stress), Protect (answer questions honestly, communicate what is being done to ensure safety), Connect (find support resources, encourage interaction with friends), Model (staff awareness of their own reactions), and Teach (demonstrate healthy coping strategies).

A Crisis Team — formed from the Counselling and Medical departments — notifies school staff and parents and gives students the opportunity to discuss and understand what they may have heard, balancing what the family wishes to share with what authorities have already reported. Additional support is offered through school counsellors, community mental health providers, and techniques such as a "grieving desk" where students can leave messages.

DISD's central message to students spread through all channels: there are many solutions to a problem, and suicide is never one of them.

5. School Clinic: Incident Reporting, Health Records, and Confidentiality

This section incorporates the DISD School Clinic's Incident Reporting Policy, Health File/Record Policy, and Confidentiality Policy, which support the school's broader safeguarding duty of care.

11.1 First Aid and Emergency Response

If First Aid is required, the school nurse/doctor must be informed immediately: Tel. **832** or **897** / mobile **0589805498**. If unavailable, contact the school secretary.

All staff must complete a First Aid course every two years.

The decision to call an ambulance rests with the school nurse/doctor; in case of doubt, an ambulance should always be called (Dubai emergency: 998, dial 9 for an outside line from an internal phone).

An injured student is never transported alone; the principal designates an accompanying adult if parents cannot be reached, and the school secretariat informs parents/relatives immediately.

11.2 Incident Reporting

The supervising staff member completes a written, signed Incident Report in English as soon as possible after the event.

Reports must include exact location, date/time, names of personnel/witnesses, description of the event, initial actions taken, and the nature of injuries — factual and objective only, no opinions.

A log of all accidents and incidents is maintained by the clinic; the incident report is filed with the student record.

Parents of the affected student are informed as soon as possible; sufficiently severe incidents are notified to relevant authorities.

11.3 Health Records

Every student's School Health Record is maintained confidentially by the clinic.

Students' School Health Record must be maintained (the original/copy) for a minimum of five (5) years after the student turns eighteen (18) years of age, or five (5) years after the student leaves the educational or academic institution.

The student's original, complete, and cumulative health record shall be transferred to the health facility of the new school to which the student is transferring, or handed over to the parents, as appropriate. A copy of the health record shall be retained by the school in case the student subsequently transfers to another educational or academic institution.

Immunization records are maintained and monitored in line with DISD's Immunization Policy.

11.4 Confidentiality of Health Information

Students have the right to privacy and confidentiality regarding their health information.

Health record information is not released to third parties except with written parental/guardian consent, or a directive from the Dubai Health Authority or other competent ministry.

Records are always secured, including electronic confidentiality safeguards.

Staff handling health records are trained in confidentiality requirements and are personally responsible for maintaining full confidentiality.

Any authorized release of information is documented, recording the date, description of information released, recipient, and reason.

Any suspected breach of confidentiality is addressed in accordance with UAE Executive Council Resolution No. 32 of 2012 (Dubai Health Authority).

12. Educational Visits, Trips, and Off-Site Activities

12.1 Planning and Risk Assessment

A written risk assessment is completed and approved before any off-site trip, CCA activity or overnight excursion.

Risk assessments take account of any individual SEND, medical, communication, mobility or supervision needs and any reasonable adjustments required for safe participation.

Staff-to-student supervision ratios are set according to the age of students, the activity, and the destination.

12.2 Overnight Stays

Sleeping arrangements are planned with careful consideration of student safety, age, and gender.

Overnight trips require a written safeguarding briefing for all accompanying staff and a named DSL contact who remains reachable throughout the trip.

Staff are briefed on expected conduct and safeguarding practices specific to the trip.

12.3 During the Trip

Safeguarding responsibility on trips rests with the Heads of Department / Trip Leaders. The Principal/Deputy Principal remains contactable 24 hours a day for safeguarding advice.

Staff may not be alone with a single student in circumstances where they cannot be seen or heard by others.

Any safeguarding concern arising during a trip is reported to the Principal/Deputy Principal as soon as practicable, following the procedure in Section 4.

13. Facilities & Premises Security

13.1. Site Security and Access Control

The school maintains appropriate access control measures, including controlled access doors, gates, security personnel, and other security systems, to help safeguard students, staff, and visitors during school hours.

The school's perimeter fencing and walls are inspected regularly. Any damage or security weakness identified is reported and repaired promptly.

External doors, other than the monitored and controlled main entrance, remain locked during the school day. Emergency exits are maintained in accordance with fire and life-safety requirements.

All visitors and contractors are required to sign in upon arrival, provide the required identification, and wear a visible visitor/contractor identification badge for the duration of their visit.

Visitors and contractors are escorted or appropriately supervised when accessing areas where students are present, unless they have been formally authorised to work independently and have completed the required safeguarding and site induction procedures.

Any construction, maintenance, repair, or other high-risk work is planned and controlled to minimise risks to students and staff. Wherever practicable, construction and maintenance activities are scheduled outside school hours, after students have left the premises, particularly where the work may create a safeguarding, health and safety, or access risk.

Where work must take place during school hours, the affected area is securely isolated from students, with appropriate barriers, warning signage, controlled access, and supervision in place.

13.2 CCTV

CCTV cameras are installed throughout the school to support the safeguarding and protection of students, staff, and visitors. Coverage includes entrances, perimeter areas, corridors, and playgrounds, in accordance with applicable SIRA requirements in Dubai.

CCTV is never installed in toilets, changing rooms, or medical/counselling rooms.

CCTV footage is retained for 31 days, unless a longer retention period is required due to an incident, investigation, or legal/regulatory requirement.

Access to CCTV footage is strictly restricted to authorized personnel, including the General Manager, Principal, Deputy Principal, Head of Administration, and Facilities Manager. Footage is treated as confidential and is accessed only where there is legitimate safeguarding, security, operational, or legal requirement.

ll contractors working on school premises are required to complete a Permit-to-Work and site induction briefing appropriate to the nature of their work before commencing any activity.

Any contractor or vendor working unsupervised on campus during school hours undergoes a police clearance / background check equivalent to Section 6.1 before work begins.

Contractors receive a safeguarding induction briefing, appropriate to their role, before starting work on-site.

The Facilities team notifies the Principal/Deputy Principal in advance of any external worker who will have proximity to students.

13.3 Premises Safety and Risk Assessments

Fire safety equipment, fire alarms, emergency exits, and evacuation routes are inspected and tested at scheduled intervals by competent personnel and/or an approved external contractor. Appropriate inspection, testing, and maintenance records are retained by the school.

Playground and sports/PE equipment undergo scheduled safety inspections to identify damage, defects, or potential hazards. Any identified issues are recorded, and corrective action is taken promptly.

For swimming pool, pool fencing, access controls, supervision arrangements, water quality, and chemical storage are checked and documented regularly. Lifeguards conduct safety checks twice daily, and appropriate records are maintained.

The canteen and food service areas are subject to regular food safety and hygiene monitoring. Third-party food sample collection is carried out as required, and staff hygiene checks and relevant food safety documentation are maintained.

The canteen/food service area holds current food safety and hygiene certification.

The Facilities team, together with the Principal/Deputy Principal, identifies areas of reduced visibility (stairwells, storage rooms, isolated corridors) and ensures they are covered by supervision, CCTV, or restricted access.

13.4 Lockdown and Emergency Infrastructure

The Safety Officers, representing the Facilities team and the pedagogical team respectively, coordinate emergency preparedness and evacuation procedures in collaboration with the Principal/Deputy Principal.

A full lockdown drill is conducted at least once per academic year during the staff preparation week, before students return to school.

At least two fire drills are conducted per academic year, involving the entire school community, including students and staff. The Safety Officers coordinate the preparation, execution and review of these drills.

All lockdown and fire drills are documented, including the date, participants, key observations, identified areas for improvement and any follow-up actions.

13.5 Reporting Duty

Facilities and maintenance staff are bound by the same mandatory-reporting duty set out in Section 4 as teaching staff. A safety hazard that could enable harm to a student — such as a broken toilet lock, a malfunctioning gate, or a non-working CCTV camera in a supervised area — is reported to the Principal/Deputy Principal immediately, in addition to being logged as a maintenance issue.

Any broken lock, non-functioning CCTV camera or unsecured access point in a student area is reported to the Principal/Deputy Principal/ DSL and Facility Manager on the same day.

14. Photography, Images, and Social Media Consent

DISD's registration process already includes parental consent covering the use of a student's photo in school media (posters, yearbook, CD, brochures, website) and external school-related press releases. This section extends that consent framework into day-to-day safeguarding practice.

14.1 Principles

Photographs or videos of students are published only where written parental/guardian consent has been given at registration or subsequently confirmed.

Consent status is checked before any student image is used publicly (e.g. website, social media, press release, yearbook).

Staff and volunteers use only school-issued devices to photograph students during school activities, not personal phones or cameras.

14.2 Withdrawing Consent

Parents/guardians may withdraw media consent at any time in writing to info@germanschool.ae. The school then updates its records and removes previously published images where reasonably practicable.

15. Allegations Against Employees, Volunteers, and the Principal

Any accusation of child abuse against teachers, employees, or volunteers of DISD is taken up quickly and immediately, to protect both the child (and other children) and the accused person. Children involved in an allegation are supported throughout, kept informed in an age-appropriate way, and protected from avoidable distress.

15.1 Validity

This procedure applies to DISD employees. Accusations against security personnel, cleaning personnel, or catering staff are notified directly to the management of the relevant contracted company; the Principal is obliged to pursue the case in cooperation with that company's management.

15.2 Initial Report – Employees

Each concrete accusation arising from the conduct of a school employee must be reported to the Principal of DISD as soon as possible.

The Principal must promptly consult with the DSL and HR to determine whether the information and facts presented provide sufficient grounds to classify the case as one involving abuse.

Formal complaints concerning the Principal or the School Leadership Team are addressed to the General Manager, who is the first point of escalation. The General Manager addresses and manages them in the first instance, including appropriate investigation, documentation and resolution.

The matter is escalated to the Board of Directors only where it remains unresolved, involves the General Manager, presents a conflict of interest, or is sufficiently serious to require immediate Board oversight.

The Board's role is governance and oversight. It does not become directly involved in the day-to-day management of complaints or substitute itself for the General Manager.

Where a concern is that a child has been harmed or is at risk of harm, the General Manager ensures it is reported to the relevant authorities without delay, and any internal process is conducted so as not to prejudice or delay their work.

15.3 General Whistleblowing

Anyone who has concerns about a colleague's conduct or the handling of a safeguarding matter has a duty to report those concerns to the Principal.

Where the concern relates to the Principal or the School Leadership Team, it should be raised with the General Manager.

Where the concern relates to the General Manager, it should be reported to the Chair of the Board of Directors.

Anyone who raises a concern in good faith will be protected from any form of detriment or adverse treatment as a result.

16. Training

All staff receive safeguarding induction training before, or within their first days of contact with students.

All staff complete refresher safeguarding training every two years.

Additionally, the Safeguarding Team conducts an internal safeguarding workshop during the preparation week, every year.

The Principal, DSL, School Psychologist, School Doctor and Deputy Principal complete "Safeguarding Children Level 3" (title: Designated Officer) training every two years. Training records are maintained by HR.

Safeguarding training is role-specific, as set out in Section 6.1.

Safeguarding training should include awareness of the additional vulnerabilities of students with SEND, including barriers to communication and disclosure.

17. Monitoring, Review, and Complaints

This policy is reviewed at least annually, or sooner if required by a change in UAE legislation, KHDA guidance, or best practice — matching the review cadence already used for the Statute.

Review is led by the Principal/Deputy Principal in consultation with the General Manager and the Board of Directors and the safeguarding team.

Complaints about this policy or about how a safeguarding matter has been handled are directed to the Principal.

Complaints concerning the Principal or the School Leadership Team are directed to the General Manager (Section 15.2).

Complaints concerning the General Manager are directed to the Chair of the Board of Directors.

This policy is published on the DISD website and Parent Portal, and forms part of new employee induction.

18. Staff Acknowledgement

I confirm that I have read, understood, and agreed to abide by the DISD Safeguarding and Child Protection Policy.

Full Name: _____

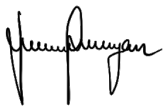
Role: _____

Signature: _____

Date: _____

19. Linked Policies

- Child Protection Rev.4 (30 Jan 2024),
- Anti-Bullying Policy Rev.6 (24 Nov 2023)
- Suicide Prevention Policy (27 Oct 2020)
- School Psychological Services Policy (29 Jan 2020)

Principal:		Date:	27.10.2026
General Manager:		Date:	27.10.2026

Appendix A: Types and Signs of Abuse

Most children injure themselves quite frequently while playing. Signs should always be viewed against the background of the child's social environment, developmental level, and their own explanation — no single sign confirms abuse.

A.1 Physical Abuse

- Injuries for which the child has no, or no convincing, explanation.
- Injuries to body parts that rarely occur during normal play (e.g. cheeks, back, chest, thighs).
- Scratches on the face, back, stomach, arms, bottom, ears, or hands; burn marks (e.g. from cigarettes); permanent redness or burns; bite injuries.
- Avoiding parents; aggressive behavior or outbursts of rage; running away from home or fear of going home.
- Wincing when touched; avoiding showing bare skin; unnatural obedience.

A.2 Emotional Abuse

- Developmental delays; non-organic growth disorders; sudden language development disorders.
- Compulsive behavior such as twisting hair or rocking; reluctance or inability to play; pronounced fear of making mistakes.
- Self-harming; avoiding telling parents; very low self-esteem.
- Pronounced urge for attention, recognition, and appreciation; inability to accept praise.

A.3 Sexual Abuse

Sexual abuse may include:

- Inappropriate or unwanted touching of a child or young person.
- Sexual comments, messages, or communication directed towards a child.
- Exposing a child to sexual images, videos, or other sexual content.
- Involving a child in sexual activities or behaviour that they cannot understand or consent to.
- Grooming, exploitation, or other sexually inappropriate behaviour towards a child.

A.4 Neglect

- Neglect is often seen as the lesser form of child abuse, but its signs should be taken equally seriously.
- Hunger or stealing from others; uncombed, often unwashed or unclean appearance; sudden weight loss or being underweight.
- Unsuitable clothing for the season; untreated illnesses; tiredness.
- Frequent absence or lateness or not being collected from school; missed medical appointments; few friends; unsupervised at home.

Appendix B: DISD Safeguarding Concern Report Form

Per DISD's Statute: Child Protection, this report is emailed to the DSL/Principal as soon as possible after a concern arises.

Student name	
Grade / Class	
Date and time of concern	
Reported by (name and role)	
Nature of concern (factual, in the student's own words where possible)	
Any visible injuries or physical signs	
Witnesses (if any)	
Immediate action taken	
Report emailed to (Principal / Deputy Principal name)	
Date/time sent	
Follow-up actions	

Appendix C: School Clinic Incident Report Form

Student name	
Grade / Class	
Exact location of incident	
Date and time	
Staff/witnesses present	
Factual description of the event (no opinions)	
Nature of injury (if any)	
First aid / action taken	
Ambulance called? (Y/N, by whom)	
Parents informed? (Y/N, time, by whom)	
Report completed by	
Signature and date	