

POLICY OWNER	Universal Private School
EFFECTIVE DATE:	1 September 2024
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APPROVAL	School Governing Body & ADEK (if applicable)

UNIVERSAL PRIVATE SCHOOL

SAFEGUARDING POLICY AND GUIDELINE

(Adapted from ADEK Policy)

1. Purpose and Context

1.1 Purpose of the Policy

Universal Private School (UPS) recognizes its paramount responsibility to safeguard and promote the welfare of children while they are in the school's care, during school visits, and when travelling to and from school.

The purpose of this policy is to provide clear guidance for UPS staff and employees to keep children safe and secure, and to inform parents and guardians how the school will safeguard their children while in its care.

UPS is committed to a culture of protection, prevention, and early intervention, ensuring that every child is supported to learn and thrive in a secure and respectful environment.

1.2 Safeguarding Responsibilities

All adults at UPS have a duty of care to protect children from harm and to report any concerns immediately in accordance with this policy. This includes teachers, administrators, support staff, volunteers, and contracted service providers such as bus drivers and security personnel.

Safeguarding encompasses preventing impairment of children's health or development, ensuring safe and effective care, and ensuring that every child grows up in circumstances consistent with the provision of safe and effective care.

1.3 Legal and Organizational Commitment

UPS operates in compliance with:

- The UAE Federal Law No. 3 of 1987 (Penal Code)
- Federal Law No. 3 of 2016 on Child Rights (Wadeema Law)
- ADEK Student Protection Policy (2024)
- ADEK Student Safeguarding Policy (2024)

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Universal Private School (UPS) | School Safeguarding Policy | Version **XX**
(Adapted from ADEK Policy January 2025 | Version 1.2 | ADEK School Safeguarding Policy)

- UAE Ministry of Education Child Protection Circular (October 2016)
- United Nations Convention on the Rights of the Child (1989)

UPS is committed to cooperating fully with the Ministry of Education (MoE), Ministry of Interior Child Protection Centre (Mol-CPC), Family Care Authority (FCA), and ADEK's Child Protection Unit (CPU).

These procedures apply to all staff, employees, and service providers working within Universal Private School (UPS).

The aim of this policy and its procedures is to prevent children from being abused and to safeguard and promote the welfare of all students at UPS through the following actions:

- Raise awareness among all staff and volunteers of their safeguarding and child protection roles and responsibilities.
- Develop, implement, and regularly review procedures that enable all employees and volunteers to identify, respond to, and report cases or suspected cases of abuse or neglect.
- Provide support for students who have experienced abuse, ensuring appropriate intervention and follow-up in line with an agreed child protection plan.
- Ensure inclusion and protection of students with additional or special educational needs through proactive support measures.
- Maintain safe recruitment practices, verifying and recording the suitability of all staff and volunteers to work with children in accordance with ADEK and UAE federal requirements.
- Create and sustain a safe school environment where every child feels valued, respected, and protected. This includes ensuring effective supervision of students 45 minutes before the start of the school day and up to 90 minutes after its conclusion.

- Ensure that all allegations or concerns involving staff are addressed in line with Ministry of Education and ADEK policies and procedures, in full collaboration with the relevant authorities and the police when required.

UPS: Principal and Governing Board Responsibilities

The Principal and Governing Board of Universal Private School (UPS) fully recognise their collective responsibility to safeguard and promote the welfare of all students.

The principal acts in loco parentis for every child in the school's care, including during transportation to and from school, school trips, and all school-related activities.

They ensure that effective safeguarding procedures are embedded across all aspects of the school's daily operations and culture.

Accordingly, UPS will:

- Ensure that the Principal and designated safeguarding leads (including the Child Protection personnel) receive accredited child protection training through the Ministry of Interior (Mol) or another ADEK-approved provider, ensuring that safeguarding remains central to the school's ethos and leadership practice.
- Allocate sufficient resources and funding for the continuous professional development of the, Safeguarding and support teams, and the Governing Board, to maintain a high standard of knowledge and readiness in child protection matters.
- Provide and maintain facilities that support the protection, privacy, and dignity of all students—this includes ensuring separate and age-appropriate changing rooms and toilet facilities for male and female students, particularly in shared or multi-phase campuses.

- Comply fully with ADEK safeguarding and safety requirements, including the installation and maintenance of CCTV systems, adherence to supervision standards, and the implementation of all relevant ADEK policies and Organising Regulations.
- Ensure supervision practices are consistent with the timeframes outlined in ADEK Organising Regulation Policy 3 – Article 5, which require adequate supervision of students 45 minutes before and up to 90 minutes after the school day.
- Ensure the provision of certified first aid training for key staff members and promote comprehensive awareness across the school regarding health, safety, emergency response, and child protection procedures, so that every staff member understands their responsibilities in keeping children safe.

UPS: Whole Staff Responsibilities

Universal Private School (UPS) recognises that all adults working within the school community have a shared duty of care to protect and promote the welfare of every student. Because of their daily contact with children, teachers, administrators, and support staff are often the first to observe signs that may indicate abuse, neglect, or emotional distress.

Accordingly, UPS staff will:

- Create and maintain a safe, respectful, and trusting environment where all students feel secure, are encouraged to express themselves freely, and know that they will be listened to and supported.
- Ensure students know which adults in school they can approach if they are worried, uncomfortable, or in need of help.
- Embed safeguarding awareness across the curriculum, giving students age-appropriate knowledge and skills to recognise unsafe situations and protect themselves from harm.

- Adhere strictly to all procedures issued by the Ministry of Education (MoE) and follow all relevant guidance provided by the Ministry of Interior (MoI) and ADEK on child protection and safeguarding.
- Handle all disclosures and student information with absolute confidentiality, ensuring that personal data is secured and shared only with authorised personnel.
- Ensure that parents understand the school's legal and ethical responsibilities for child protection, by clearly communicating the school's safeguarding commitments in reports, newsletters, and policy documents made available upon request.
- Report immediately to the Ministry of Interior Child Protection Centre (MoI-CPC) any case of alleged or suspected child abuse, ensuring that confidentiality and data protection standards are maintained.
- Inform parents of safeguarding concerns where appropriate and only when doing so does not place the child at additional risk.
- Notify the school social worker if a student has been absent without explanation for more than two consecutive school days.
- Maintain effective partnerships with the local police, the MoI Child Protection Centre, and other child welfare agencies to ensure coordinated and timely interventions.
- Collaborate with external agencies that provide social, psychological, or family support to students in need.
- Ensure that UPS appoints a trained Child Protection Liaison Officer (CPLO) and Deputy Child Protection Liaison Officer (DCPLO), ideally individuals holding pastoral or student welfare roles.
- Store all child protection records securely and confidentially, separate from academic files, with access restricted to authorised safeguarding personnel.

Report to the CPLO and school social worker any incidents of severe abuse involving a student, whether occurring within or outside the school, and forward such reports to the relevant authorities while maintaining open communication with parents as appropriate.

- Responsibilities of the Principal, CPLO, and the Pastoral/Safeguarding Committee
- The Principal, **Child Protection Liaison Officer (CPLO)**, and members of the Pastoral/Safeguarding Committee are responsible for ensuring the effective implementation of the school's Child Protection Policy.

Their responsibilities include the following:

- Ensure that the principal and all school staff are fully informed of their responsibilities and obligations under the Child Protection Policy.
- Ensure they have received appropriate child protection training and attend refresher training at least every two years.
- Ensure that all staff and volunteers are informed of the identity, role, and contact information of the designated CPLO
- Ensure that the CPLO, and committee members are clearly identified in the school's Child Protection Policy and other internal communications, including their contact details.
- Ensure that all staff and volunteers understand their responsibility to remain vigilant to signs of abuse and to refer any concerns to the CPLO promptly.

Whole-School Training

- Ensure that annual child protection training is conducted for all staff and volunteers, in line with Ministry of Education requirements
- Maintain secure, confidential written records of all child protection concerns, stored separately from pupil academic files, and use these records to assess and manage risk.
- Ensure that child protection records and/or records of concern are securely transferred (separate from the academic file) to a pupil's new school upon departure.
- Ensure that all relevant safeguarding information is transferred to the new school without delay when a pupil leaves.

- Ensure that all external service providers (e.g., music instructors, transport staff) provide evidence of having received child protection training or are given access to it through the school.
- Ensure that ancillary staff (e.g., cleaners, maintenance personnel, security, and canteen staff) have also received appropriate child protection training or are provided access to it.
- Ensure that any staff member involved in a safeguarding disclosure receives appropriate debriefing and/or counselling support as needed.
- Ensure that all child protection concerns are reported through the designated Safety Concern Portal in accordance with school protocols.

Responsibilities of Adults within the School Community

All adults working within the school community—whether staff, volunteers, or external partners—have a legal and ethical duty to uphold the safeguarding and protection of children. Their responsibilities include:

- All adults are expected to remain vigilant and be aware of the signs and indicators of abuse in all its forms.
- Any adult who suspects that a child may be experiencing abuse must document their concern clearly and report it to the designated Child Protection Liaison Officer (CPLO) as soon as practicable.
- If a child discloses an allegation or concern related to abuse, the adult must follow the response procedures outlined in the school's Child Protection Policy.
- If a disclosure involves an allegation against a staff member, the adult must follow the school's specific procedures for managing allegations against staff, as detailed in the policy.

- Embedding age-appropriate safeguarding content across the curriculum to build pupils' knowledge, resilience, and decision-making skills related to personal safety and wellbeing.
- Maintaining a positive, supportive, and secure school environment in which pupils feel safe, valued, and respected.

'Rights, Respect, and Responsibility' Framework

- Promoting a school-wide agenda based on the principles of children's rights, mutual respect, and individual responsibility.
- Fostering a culture in which pupils feel empowered to express concerns, knowing they will be listened to, supported, and taken seriously.

UPS Policy is Informed by:

United Nations Convention on the Rights of the Child (1989)

This international agreement sets out the minimum standards for protecting children's rights. It was incorporated into law through the Children Act 1989 and applies to all children under the age of 18. In relation to safeguarding, the Convention states that:

The best interests of the child must be the primary consideration in all actions concerning them.

Children must be protected from all forms of discrimination.

- Every child has the inherent right to life, survival, and development.
- Children must not be subjected to cruel, degrading, or humiliating punishment.
- Children have the right to be protected from all forms of abuse and neglect and must receive appropriate care from those responsible for them.

Children who are victims of abuse are entitled to care and treatment to support their recovery.

United Arab Emirates Federal Penal Code (Law No. 3 of 1987)

- With regard to child abuse and neglect, the law states:
- “A person who fails to report a criminal offence is liable to prosecution.”
- Relevant articles of the Penal Code that address different forms of abuse include:
- Physical Abuse: Articles 336, 337, 338, 339, 340, 341, 342, 343
- Sexual Abuse: Articles 354, 356, 358, 362, 363, 364
- Emotional Abuse: Articles 351, 352, 372, 373, 374
- Neglect: Articles 348, 349, 350

Additional Regulatory Guidance Followed by Universal Private School (UPS):

- ADEK Student Protection Policy 2024
- ADEK Student Safeguarding Policy 2024
- ADEK Child Protection Circular – October 2016
- Unified Child Protection Policy – 2016

CHILD PROTECTION PROCEDURES & GUIDANCE

Child Protection Procedures

At all stages, the primary concern must be the safety and well-being of the child. In situations where there is a conflict of interest between the child and their parent or guardian, the child’s best interests must take precedence.

Suspected Abuse

If a staff member suspects abuse (e.g. physical injury or behavioural indicators), they must follow the steps below:

- Record concerns using 'My Concern'
<https://login.thesafeguardingcompany.com/Identity/Account/Login?ReturnUrl=%2F>
- Report immediately to the Child Protection Liaison Officer (CPLO) or the principal.
- Assess the need for medical intervention.
- If immediate medical attention is required, assistance must be requested without delay.
- Make a detailed written record of the incident within 24 hours, including:
 - Date and time of the observation(s)
 - Date and time of any conversations or disclosures
 - Details of any injuries observed
 - Explanations provided by the child or adult

Actions taken in response to the concern

These prompts are provided within the My Concern system.

- All records must be signed and dated by the person making the report.
- Do not take photographs as evidence. If necessary, document injuries using a body map.

Reported Abuse

- Once a concern is reported, the Principal or CPLO must take the following actions:
- Assess whether there are sufficient grounds to suspect child abuse.

If so, a formal referral must be made via the Safety Concern Portal:

<https://daasafetyconcern.abudhabi/>

The referral should clearly state:

- Known facts
- Any suspicions or allegations
- Whether there has been contact with the child's family

Consultation (if unsure):

If the CPLO is uncertain whether the threshold for referral has been met, they may contact the Ministry of Interior Child Protection Centre for advice and clarification.

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Note: Seeking advice does not constitute a formal referral, but can support sound decision-making.

Appendix1: UPS Youth Engagement & Safeguarding Guidelines

Responding to a Child's Disclosure of Abuse

In the course of youth volunteering activities, a child may choose to share concerns about abuse with a UPS employee or volunteer. Such disclosures may not always be direct—they may emerge through conversation, behaviour, drawings, or play. It is critical to understand that children disclose sensitive information to individuals they perceive as trustworthy, regardless of rank or role within the organisation.

The responsibility of the UPS employee or volunteer receiving the disclosure is to listen supportively and report appropriately—not to conduct any form of investigation. All investigative actions must be managed by the appropriate child protection authorities. Missteps, such as leading a conversation or influencing a child's statement, can have serious implications, including undermining legal proceedings.

Appropriate Response Protocol

When a child initiates a disclosure, UPS employees or volunteers should adhere to the following best practices:

- Provide full attention to the child, maintaining a calm, composed presence.
- Express empathy and reassurance without showing visible distress or emotional reactions. Acceptable responses include:
 - *“That sounds very difficult for you.”*
 - *“You did the right thing by telling me.”*
- Avoid direct questioning. Let the child speak freely and avoid interrupting. Your role is to listen and clarify only if essential.
- Ask whether the child has spoken to a parent or guardian, particularly if the concern involves someone outside the home—or one parent, if the other is implicated.
- Assess any immediate safety or medical needs and escalate as appropriate.

- Ensure the child does not need to repeat their story to multiple individuals. Record the disclosure once, clearly and accurately.
- Document the interaction thoroughly, including:
 - Date and time of the conversation
 - Location
 - Names of those present
 - Exact words used by the child (using their own language or expressions)
 - Your name and signature
 - Submit this documentation directly to the Designated Safeguarding Lead (DSL)
- Retain any materials (e.g., drawings or written statements) shared by the child, as these may be relevant to subsequent investigations.
- Seek personal support or debriefing, as disclosures can be emotionally impactful.

Actions to Avoid

In the interest of maintaining both legal integrity and child safety, the following actions are strictly prohibited:

- Do not promise confidentiality. Clearly explain that information may need to be shared with appropriate authorities to ensure their safety.
- Do not ask leading or suggestive questions.
- Do not express judgment, speculate, or assign blame.
- Do not attempt to gather excessive detail or request a full account.
- Do not offer false reassurance (e.g., “everything will be fine”) or make promises that cannot be upheld.
- Do not undertake any investigative role—this is the remit of external safeguarding professionals.

Effective Questioning: Open vs. Closed

To ensure you do not influence a child’s account, use open-ended questions when clarification is necessary.

Avoid (Closed Questions) Use Instead (Open Questions)

Did	Tell me...
Do	Explain to me...
Can	Describe to me...
Would	Who...
Could	What...
Are	When...
	Where...
	How...

Avoid using “Why?” – it may confuse the child or lead to feelings of guilt or blame.

Initial Supportive Language

Following a disclosure, a child may feel relief, but also confusion or vulnerability. Employees and volunteers are encouraged to use the following statements:

Appropriate to say:

- *“Thank you for telling me.”*
- *“I’m sorry this happened to you.”*
- *“I’m going to help by reporting this to the right people.”*
- *“You are not to blame.”*
- *“This should not have happened.”*

Avoid saying:

- *“It will all be okay soon.”*
- Making any commitment you cannot fulfil
- Statements that imply fault or blame

UPS is committed to maintaining the highest standards of safety and safeguarding in all youth-related programs and community engagements. Employees and volunteers must act in alignment with this guidance to ensure appropriate, legally sound, and child-centred responses to any disclosure of harm or abuse.

For questions or to report a concern, immediately contact the UPS Safeguarding Officer or the Designated Safeguarding Lead (DSL) for your region.

Appendix 2 – Safe Working Practice

This appendix provides mandatory guidance for all UPS personnel—staff, contractors, and volunteers—working with children or young people in school or youth program settings. It outlines expectations for professional conduct, procedures for reporting concerns, and safeguards to prevent situations that may give rise to allegations of misconduct.

2. Duty to Report Concerns Regarding Adults

All individuals working in UPS-supported educational environments are required to report any concerns regarding the behaviour of colleagues or volunteers

2.1 Reporting Procedure

Concerns about any staff member or volunteer must be reported to the Principal as soon as practicable and within 24 hours.

If the allegation involves the Principal, the concern must be escalated to the UPS Director of Education (DoE), who is responsible for referring the matter to the Abu Dhabi Department of Education and Knowledge (ADEK) within 24 hours.

All concerns must also be documented and submitted via the Safety Concern Portal:
<https://daasafetyconcern.abudhabi>

3. Promoting a Safe and Professional Culture

UPS expects all staff and volunteers to conduct themselves with the utmost integrity and professionalism to minimise the risk of misinterpretation or misconduct.

3.1 Conduct and Transparency

Operate in an open, transparent manner that would not lead a reasonable observer to question motives or intent.

Dress in a manner appropriate to the professional environment and responsibilities.

Avoid unnecessary physical contact with children. Where physical contact is required:

Understand and follow UPS and school protocols regarding physical intervention.

Seek verbal consent from the child when appropriate.

If intervention is needed to prevent harm, document the incident and report to the Principal immediately.

All contact, even accidental, must be reported and not concealed.

3.2 Abuse of Power and Influence

- Recognise the influence held by adults in a school setting. Do not misuse authority for personal gain or to form inappropriate relationships.
- Do not accept regular gifts from children, nor provide personal gifts to them.
- Do not participate in activities outside of school that may compromise your professional integrity or position.

4. Boundaries in Relationships with Pupils

Establishing or attempting to establish personal relationships with pupils outside of school is strictly prohibited.

Examples of unacceptable conduct include:

- Communicating with pupils via personal email or private messaging platforms.
- Sharing personal contact information (home address, mobile number, private email).
- Transporting pupils in a private vehicle without prior written authorisation.
- Connecting with pupils through social media or networking sites.
- Volunteering to accommodate children overnight in your private residence.

5. Technology and Information Management

- All communication with pupils must take place via official school systems.
- Images of children must only be recorded as part of pre-approved educational activities, with explicit parental consent.
- All data, including photographs, must be managed in accordance with UPS data protection and digital safeguarding policies.

6. Curriculum Content and Respect for Privacy

- Curriculum content involving sensitive or explicit themes must comply with school policy and be age-appropriate.
- Support privacy when children are changing clothes; respect must be given to age, gender, culture, and individual needs.
- Avoid working alone with pupils unless specifically authorised under an Individual Education Plan or safeguarding protocol.
- Meetings with pupils in closed rooms are only permitted when senior staff are notified in advance and have given written approval.

7. Prohibited Conduct and Activities

- UPS enforces a zero-tolerance policy toward the following actions:
- Use of physical punishment under any circumstances.
- Accessing or distributing inappropriate online content.
- Blurred boundaries during informal events such as school trips, after-hours clubs, or off-site activities.
- Using physical touch as part of instructional techniques or claiming such contact is pedagogically necessary.

8. Self-reporting and Allegation Management

All staff and volunteers are responsible for proactively informing leadership if:

- They are involved in an incident that could give rise to concerns about their conduct.

- They believe that a pupil may have developed an inappropriate attachment or excessive interest in them.
- Staff who are subject to safeguarding allegations are encouraged to seek independent legal advice and will be supported through internal and external processes as required.

9. Compliance Statement

- Adherence to these standards is mandatory. Failure to comply may result in disciplinary action, up to and including dismissal, and referral to external safeguarding authorities.
- UPS is committed to fostering a safe, respectful, and transparent culture across all educational programs. Maintaining professional boundaries and safeguarding children is the responsibility of every individual involved.

Appendix 3 – Intimate Care

UPS Guidance on Toileting Support in Educational and Early Years Settings

1. Purpose and Scope

This guidance outlines best practices and compliance expectations for managing toileting and intimate care needs of children in UPS-affiliated early years and school settings. It applies to all children, including those with short- or long-term toileting needs, disabilities, or medical conditions that impact continence or independence.

The policy:

- Reinforces the importance of working collaboratively with parents and carers.
- Promotes child dignity, health and safety, and safeguarding.
- Aligns with UAE Special Educational Needs and Disability Discrimination legislation.
- Applies to all personnel providing direct care or support to children.
- Where the term “child/children” is used, it refers to all individuals in pre-school and school-age education.

2. Core Principles

- All children have an equal right to access education, irrespective of their toileting needs or developmental stage.
- Support must be respectful, dignified, and child-centred.
- Care arrangements must reflect the child’s developmental capacity, health needs, cultural context, and privacy.

Reasonable adjustments must be made to accommodate toileting needs in compliance with disability and inclusion legislation.

3. Collaboration with Parents and Carers

A strong partnership with parents/carers is essential to support children effectively. This includes:

- Maintaining open, supportive communication.
- Recognising family experiences with toileting challenges, including past stigma or negative encounters.
- Encouraging honest dialogue around the child’s routines, concerns, and emotional needs.

Ensuring parents are confident in the setting's ability and willingness to manage toileting positively.

4. Involvement of Children and Young People

Children should be actively involved in planning their care, to the extent appropriate to their age and understanding. This promotes:

- Ownership and cooperation
- Self-esteem and confidence
- A gradual move toward independence

5. Best Practice Standards

Educational settings are expected to:

- Work in partnership with parents/carers and relevant professionals.
- Create and review written care plans that reflect the child's evolving needs.
- Acknowledge that some children may never achieve full continence due to medical or developmental conditions.
- Apply consistent approaches between home and school.
- Equip staff with the required training, resources, and supervision.
- Conduct appropriate health and safety risk assessments.
- Involve the Head of Inclusion, school nurse, or counsellor where school attendance is impacted.

6. Legal Considerations: Definition of Disability

A child with a physical, sensory, mental impairment, or medical condition that impacts day-to-day functioning is considered to have a disability under UAE law.

Delayed continence should not be a barrier to admission or participation.

Children with global developmental delays may require long-term toileting support.

Schools have a legal duty to accommodate toileting needs as they would for any other developmental delay.

7. Admission and Readiness for School

Children with toileting difficulties must be admitted alongside their peers. The presence of toileting needs:

Should not delay school entry or limit participation in early years programming.
Is not by itself evidence of special educational needs but may be part of a broader developmental profile.

8. Preparing to Support a Child with Toileting Needs

Prior to enrolment:

- Collect information from parents, the child, and involved professionals.
- Conduct risk assessments and identify any training or specialist input needed.
- Draft a care plan, agree it with parents, and ensure all responsible staff are informed.
- Plan ahead to ensure all hygiene facilities and supplies are in place.
- Care plans should be regularly monitored and reviewed to ensure ongoing appropriateness.

9. Operational Guidance for Supporting Toileting

Each child is unique; however, the following procedures represent good practice:

- Information gathering: Understand routines, past challenges, phobias, and successful strategies used at home.
- Plan development: Collaboratively define roles, responsibilities, schedules, and hygiene protocols.
- Clothing: Recommend easily manageable clothing to promote independence.
- Contingency planning: Ensure changes of clothes are available; staff must not leave children soiled or wet for parents to change later.
- Staffing: Assign a familiar staff member to support toileting at regular intervals.
- Routine and consistency: Maintain clear, predictable routines; shorten intervals to reduce accidents as needed.
- Encouragement: Promote self-esteem and praise effort; use subtle reminders and visual aids as required.
- Hydration: Provide regular access to drinking water in manageable amounts.
- Discretion and response to accidents: Respond calmly and discreetly to accidents. Never shame the child.

10. Off-Site Activities

Toileting needs must be considered in advance when planning trips or activities outside the setting. Children must not be excluded from off-site opportunities due to incontinence.

11. Children with Additional Needs or Disabilities

Additional considerations include:

- Coordination with healthcare professionals for medical advice and staff training.
- Risk assessments tailored to the child's physical needs.
- Provision or procurement of specialist equipment.
- Ongoing consultation with the child's support team.

12. Health and Safety

UPS-affiliated settings must adhere to:

- Hygiene, infection control, and manual handling protocols.
- Relevant health and safety policies covering intimate care.
- Allergy awareness in toileting products and procedures.
- Leadership (Principals or Managers) are responsible for ensuring appropriate planning and oversight of toileting programs.

13. Safeguarding and Child Protection

Routine toileting and changing procedures do not normally present child protection risks, but:

- All intimate care must be conducted professionally and appropriately.
- A second staff member is not required, but may be appropriate for older students or children with complex needs.
- The school nurse or designated safeguarding staff may provide additional oversight if needed.
- All concerns or anomalies observed during care must be documented and escalated per safeguarding procedures.

14. Use of Technology

Staff must not use personal phones for any purpose during care routines.

Where a personal device is temporarily authorised (due to lack of allocated school device):

- Images must only be taken for approved educational purposes with parental consent.
- Photos must be uploaded to secure platforms immediately and deleted from personal devices before leaving the site.

UPS is committed to promoting inclusive, dignified, and safe toileting support in its educational programs. Staff must follow this guidance to ensure:

- Children are treated with respect and care
- Legal obligations are fulfilled
- Staff are supported and protected
- Families feel confident in the care their child receives
- All care plans and toileting support must align with UPS's broader safeguarding and inclusion frameworks.

Appendix 4 – Grooming

UPS Guidance on Identifying and Responding to Grooming Behaviours

1. Purpose and Scope

This guidance outlines the nature of grooming, its manifestations—both online and in-person—and the appropriate safeguarding response in educational or youth settings supported by UPS. All staff and volunteers have a duty to recognise signs of grooming, take proactive action, and escalate concerns in accordance with safeguarding policies.

2. Definition of Grooming

Grooming refers to the deliberate process by which an individual builds an emotional connection with a child or young person to gain their trust for the purpose of sexual abuse or exploitation. Grooming may occur in physical settings (e.g. school, community) or through digital platforms (e.g. social media, messaging apps, online games).

Key points:

- Groomers may be male or female, of any age.
- They may be strangers, acquaintances, family members, peers, or professionals.
- Many children do not recognise they are being groomed, nor understand that what is occurring constitutes abuse.

3. Contexts in Which Grooming May Occur

In school or youth program environments, grooming may be initiated by:

- Older peers or students
- Adults within the school or program
- Online contacts posing as peers or trusted individuals

4. Grooming Tactics and Manipulation Techniques

Groomers often invest significant time building trust before exploiting the child. Tactics may include:

- Impersonation: Pretending to be someone of similar age (particularly online).
- Gifts and incentives: Offering money, items, or access to experiences (e.g. gaming credits, mobile devices).
- Attention and flattery: Offering praise, emotional support, or special attention.
- Exploiting authority: Using a position of power or professional status.
- Isolation: Encouraging secrecy and distancing the child from family and peers.

- Blackmail and intimidation: Using guilt, threats, or emotional manipulation to silence the child.

5. Online Grooming

The digital space is a high-risk environment for grooming due to anonymity and accessibility.

- Common platforms used:
 - Social media (e.g. Instagram, TikTok, Snapchat)
 - Messaging services (e.g. WhatsApp, Discord)
 - Online games with chat functions
- Common online grooming behaviours:
 - Targeting user profiles with vulnerable or sexualised language
 - Engaging in flirtatious or manipulative conversation
 - Building rapport based on the child's interests
 - Sending mass messages to multiple users and responding to those who engage
 - Persuading children to share explicit content or engage in live sexual activity via webcam
 - Groomers may never meet their victims in person but can still inflict significant harm through online sexual exploitation.

6. Signs and Symptoms of Grooming

Children may not disclose abuse directly. Staff should be alert to both physical signs and changes in behaviour.

- Possible behavioural indicators:
 - Increased secrecy, especially about online activity
 - Relationships with significantly older individuals
 - Possession of unexplained valuables (e.g. clothes, devices)
 - Visiting unfamiliar locations or engaging in risky activities
 - Sudden behavioural changes: withdrawal, aggression, anxiety, depression
 - Demonstrations of sexualised behaviour that are age-inappropriate

Other warning signs:

- Absenteeism or frequent lateness
- Sleep disturbances or nightmares
- Changes in eating habits
- Self-harm, substance misuse, or suicidal ideation

7. Reasons Children May Not Speak Out

Victims of grooming may be unable or unwilling to report the abuse due to:

- Shame or guilt
- Belief they are in a consensual relationship
- Lack of understanding that what occurred is abuse
- Fear of consequences or disbelief
- Emotional dependence on the abuser

8. Reporting Responsibilities

Grooming is a safeguarding concern and should be treated as a reportable child protection issue. If a staff member suspects that a child is being groomed or is at risk:

- Do not delay reporting.
- Follow the established reporting procedure through the Principal or Safeguarding Lead.
- Record factual observations, not assumptions, and avoid confronting the alleged perpetrator.

9. Preventive Strategies in Educational Settings**9.1 Staff Vigilance**

- All staff and volunteers must:
- Remain observant for unusual relationships or behavioural patterns.
- Identify early indicators of grooming behaviours, particularly in peer-to-peer contexts.
- Foster an environment where students feel safe to disclose concerns.

9.2 Student Education

- Age-appropriate digital safety education should be embedded into the curriculum to help students:

- Understand online risks, including grooming and exploitation.
- Learn that personal information should never be shared with strangers.
- Recognise that individuals may misrepresent themselves online.
- Develop critical thinking about what constitutes a safe and respectful relationship.

9.3 Parental Guidance

- UPS-supported schools should engage parents/carers by:
- Providing advice on online safety.
- Recommending children use non-identifiable, age-appropriate usernames online.
- Encouraging open discussions at home about digital interactions.

Grooming is a deliberate, manipulative process that often precedes abuse. It can occur online or in person, and victims may not always understand the nature of the exploitation. UPS is committed to ensuring that all staff are trained, vigilant, and proactive in identifying and reporting suspected grooming behaviours.

All staff must:

- Act immediately if concerned.
- Prioritise child safety above all else.
- Follow the reporting protocol without exception.

Appendix 5– Social Media(UPS Guidance on Digital Safety, Online Conduct, and Preventing Abuse via Social Platforms

This appendix outlines UPS’s approach to addressing the risks associated with social media and digital communications in school and youth program settings. While social media can offer meaningful connection and communication, it also presents significant risks related to grooming, cyberbullying, and exploitation.

All UPS-affiliated educational personnel—including staff, volunteers, and digital service providers—must understand the safeguarding implications of social media use and proactively promote safe, respectful, and responsible online behaviour.

2. Safeguarding Risks Associated with Social Media

Social networking platforms enable users to share personal information, images, and messages. These platforms are also frequently used by:

- Adults seeking to groom or exploit children
- Peers engaging in cyberbullying or harassment
- Children unintentionally exposing themselves to risk through oversharing
- All staff must be alert to digital behaviours that may indicate a child protection concern and report suspicions promptly to the Child Protection Liaison Officer (CPLO).

3. Education and Awareness: Student-Focused Guidance

3.1 Creating Personal Profiles

Social media platforms allow users to post identifying information and content.

Students must be taught that:

- Personal information (e.g. address, phone number, school name) should never be shared online.
- Content posted online may be permanent—even if deleted from their profile.
- Passwords should be complex, private, and never shared—even with close friends.

3.2 Privacy Settings

Platforms offer adjustable privacy controls, which can be modified without notice as new features are added.

Students should be taught to:

- Set privacy settings to their highest levels.
- Restrict access to personal data to known and trusted individuals only.
- Regularly review privacy settings to stay secure.

3.3 Making 'Friends' Online

Connecting with others on social platforms opens access to personal content.

Students should be reminded:

- Only accept friend or connection requests from people they know in real life.
- Never arrange to meet someone they've only met online.

3.4 Sending Messages

Messaging features, including direct messaging and real-time chats, create opportunities for private communication.

Students must understand:

- Messages from strangers or content that causes discomfort or distress should be reported immediately to a trusted adult.
- Once a message is sent, it cannot be retrieved—similar to sending a letter.

3.5 Posting Images

Photos are frequently shared via profile pages and albums, often without proper control over who can view or distribute them.

Students must be advised:

- Once posted, images may be copied, shared, or misused indefinitely.
- Privacy settings for photos should always be set to the most restricted level.
- Inappropriate or compromising images must never be posted or shared.

4. Preventing and Addressing Online Abuse and Cyberbullying

UPS recognises that cyberbullying, including harassment via messaging apps or social platforms, can be as harmful as face-to-face bullying. As such, it is treated with the same level of seriousness under UPS's safeguarding and behaviour frameworks.

4.1 School Responsibilities

UPS-affiliated schools and programs must:

- Create a culture where students and parents feel safe and supported in reporting digital concerns.
- Pay particular attention to vulnerable groups, including girls and youth with disabilities, who may be disproportionately affected by online abuse.
- Integrate digital citizenship and e-safety education into the curriculum, promoting empathy, accountability, and responsible digital conduct.

5. Safeguarding Strategies

5.1 Parental Engagement

Schools should:

- Provide clear guidance to parents about online risks and protective strategies.
- Share trusted resources and updates through parent sessions and school communication platforms.

5.2 Student Support

Deliver age-appropriate digital safety education focusing on key principles:

- Not everyone is who they claim to be online
- Personal information is private and should be protected
- Once something is shared, it cannot be taken back
- THINK before you post (True, Helpful, Inspiring, Necessary, Kind)
- Where and how to seek help
- Adherence to the school's Acceptable Use Policy (AUP) for digital tools and internet use

5.3 Staff Guidance

UPS schools must provide:

- E-safety induction training for all new staff
- Access to an internal e-safety resource hub with:
- Links to key safeguarding websites
- Continuing professional development (CPD) materials

Reporting procedures for online incidents involving students or staff

6. Policy Enforcement and Monitoring

Violations of digital safeguarding principles by students or staff—whether through inappropriate communication, sharing of explicit content, or online harassment—will result in formal investigation under UPS’s safeguarding and disciplinary frameworks.

Staff are reminded that online conduct both inside and outside the workplace may be subject to scrutiny, particularly when interacting with or being observed by students or young people.

UPS is committed to creating safe, inclusive, and digitally secure learning environments. Social media is a powerful tool, but it must be used with awareness, responsibility, and caution.

All personnel must:

- Educate students on the risks and safe practices of online engagement.
- Remain vigilant to potential signs of digital harm.
- Act promptly and appropriately in the event of suspected grooming, bullying, or abuse online.
- Safeguarding is a shared responsibility—and that includes the digital world.



1. After submitting the [Safety Concern Form](#) on the digital safety concern portal, a copy of the report is automatically shared with FCA, ADEK CPU, and MoI CPC.
2. For cases occurring within educational institutions' supervision, the ADEK CPU will review the information first before referring to the FCA for case management. Note: The ADEK CPU will take the necessary procedures to follow-up on the cases after receiving the report.

Relevant contact details are as follows:

- Abu Dhabi Police: 999
- Family Care Authority (FCA): 800444 icm@adfca.gov.ae
- MoE Child Protection Unit (CPU)*: 80085 cpu@moe.gov.ae
- Safety Concern Portal: <https://daasafetyconcern.abudhabi/>

*Educational institutions should contact the MoE CPU, which is the hotline for all reporting from where the request will be redirected to the ADEK CPU.

Appendix:6 Transporting Children

UPS Guidance for the Safe Transportation of Children During School and Program Activities

1. Purpose

This appendix outlines minimum standards and safeguarding expectations for any individual responsible for transporting children or young people as part of UPS-affiliated educational or youth programs. While the provision of transport services may fall outside the direct remit of some schools, UPS requires that all transportation arranged under its auspices prioritise child safety, wellbeing, and protection from harm.

2. Applicability

This guidance applies to:

- School drivers or contracted transport providers
- Staff or volunteers transporting children in private or school-authorised vehicles
- Any individual involved in organising or overseeing student transport for school trips, events, or daily commutes

3. Driver Requirements

All individuals authorised to transport children must:

- Hold a valid driving licence appropriate to the vehicle type.
- Be in good physical and mental health, with no medical condition that could impair driving ability.
- Demonstrate fitness to drive, including not being under the influence of alcohol, drugs, or medication that impairs performance.
- Undergo safeguarding background checks, as required by school and jurisdictional regulations (e.g. police clearance, background screening).

4. Vehicle Safety Standards

All vehicles used to transport children must meet the following requirements:

- Be roadworthy and regularly maintained, including functional brakes, lights, tyres, wipers, and mirrors.
- Be appropriately licensed, insured, and compliant with local transport regulations.

- Be fitted with working seat belts for all passengers.
- Where appropriate, use child locks and safety features.
- Maintain cleanliness and appropriate safety equipment, including fire extinguishers and first-aid kits (where applicable).

5. Safe Transport Protocols

Drivers must adhere to the following safety expectations at all times:

- Comply fully with local road traffic regulations, including speed limits and right-of-way rules.
- Ensure all children are seated and wearing seat belts before the vehicle is in motion.
- Use child-proof locks when necessary, particularly for younger children.
- Ensure pick-up and drop-off points are safe, clearly designated, and supervised where necessary.
- Never leave children unattended in a vehicle under any circumstances.

6. Prohibited Practices

To uphold UPS's commitment to safeguarding, the following are strictly prohibited:

- Use of mobile phones while driving (unless hands-free and lawful).
- Transporting children without prior authorisation from school leadership or the designated safeguarding lead.
- Allowing unauthorised individuals to travel with children (e.g. friends or relatives of the driver).
- Transporting children in non-approved vehicles, such as motorcycles, open trucks, or non-roadworthy cars.
- Driving while fatigued, under the influence of substances, or during unsafe weather conditions without proper risk assessment.

7. Supervision and Ratios

Wherever possible:

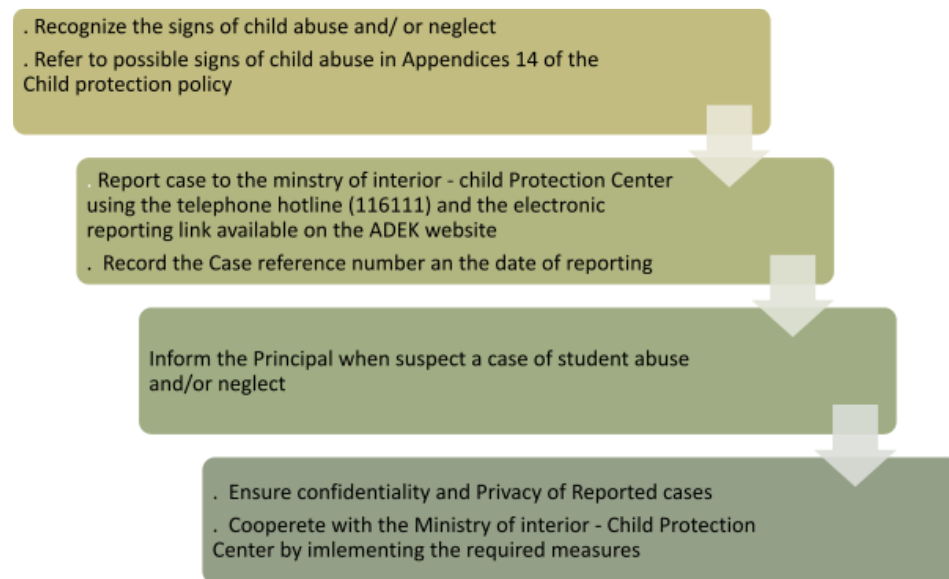
- At least one additional adult (staff member or volunteer) should accompany the group when transporting multiple children.
- For 1:1 transport (e.g. emergency pick-up), the situation must be pre-approved by a senior manager, and parents/carers must be informed in advance.
- Logs of transport arrangements should be kept, including:
 - Driver's name
 - List of children transported
 - Journey start and end times
 - Destination
 - Any incidents during the journey

8. Reporting Concerns

Any transport-related incident, safety concern, or breach of this guidance must be reported immediately to:

- The school principal or site manager
- The Child Protection Liaison Officer (CPLO)
- The relevant transportation authority or contractor, if applicable
- All incidents should be formally documented in accordance with the school's safeguarding and incident reporting procedures.

Reporting Suspected Cases of Abuse or Neglect



Appendix 7: What is Child Abuse and Neglect

UPS Guidance on the Nature, Types, and Indicators of Abuse

Abuse and neglect are forms of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse and neglect can occur within families, institutions, or community settings. The perpetrator may be someone known to the child — including family members, peers, or professionals — or, less commonly, a stranger. Abuse may be committed by an adult or by another child or group of children.

Physical Abuse

Physical abuse involves causing physical harm to a child. It may include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise inflicting physical injury. Physical harm may also occur when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Indicators of physical abuse may include:

- Multiple or unexplained bruises, particularly on soft areas such as the face, neck, back, or inner thighs.
- Bruises or marks that resemble objects such as belts, sticks, or buckles.
- Burns, scalds, or bite marks.
- Injuries inconsistent with the explanation given.
- Reluctance to change clothes for sports or physical activities.
- Fearfulness around adults or flinching when approached.

Extreme compliance or aggression.

Avoidance of medical attention or an excessive fear of medical help.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and long-lasting adverse effects on emotional development. It may involve making children feel worthless, unloved, inadequate, or valued only when meeting another's needs. Emotional abuse can include age-inappropriate expectations, overprotection, limitation of learning opportunities, or prevention of normal social interaction. It may also involve exposure to domestic violence, persistent criticism, or bullying.

Indicators of emotional abuse may include:

- Delays in emotional, physical, or language development.
- Poor school performance or sudden changes in academic engagement.
- Excessive fear of making mistakes or extreme self-deprecation.
- Low self-esteem, withdrawal, anxiety, or depression.

Over-compliant or passive behaviour.

Aggressive or destructive tendencies.

- Self-harm, eating disorders, or substance misuse.
- Insecure, clingy, or excessively dependent behaviour.
- Fear of parents being contacted or an inappropriate sense of guilt or responsibility.
- All forms of abuse and neglect carry an emotional component, but emotional abuse can also occur in isolation.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution or exploitation, regardless of whether the child is aware of what is happening. Activities may involve physical contact, such as rape, molestation, or oral sex, as well as non-contact acts such as involving children in producing or viewing sexual images, watching sexual activities, or encouraging sexually inappropriate behaviour.

Indicators of sexual abuse may include:

- Genital, anal, or oral injuries.
 - Sexually transmitted infections or unexplained genital discomfort.
 - Pregnancy, particularly at a young age.
 - Sudden onset of urinary tract infections or abdominal pain.
 - Age-inappropriate sexual knowledge or behaviour.
 - Sudden withdrawal, anxiety, or depression.
 - Dramatic changes in behaviour, including aggression or restlessness.
 - Self-harming behaviour or suicidal thoughts.
 - Social isolation or fear of certain individuals.
 - Nightmares, regression, or sexualised drawings and language.
-
- Eating disorders or substance misuse.

Sexual abuse is frequently premeditated and may involve grooming, both of the child and of the child's environment, to reduce suspicion. It is often perpetrated by someone known and trusted by the child.

Neglect

Neglect is the persistent failure to meet a child's basic physical or emotional needs, likely to result in serious impairment of the child's health or development. Neglect can occur before birth due to maternal substance misuse or after birth when parents or carers fail to provide adequate care, supervision, or emotional support.

Neglect may include failure to:

- Provide adequate food, clothing, or shelter, including abandonment or exclusion from the home.
- Protect a child from physical or emotional harm or danger.
- Ensure appropriate supervision or care by a responsible adult.
- Secure access to medical care or education.
- Respond appropriately to a child's emotional needs.

Indicators of neglect may include:

- Constant hunger, scavenging, or stealing food.
- Poor hygiene, dirty or inappropriate clothing.
- Frequent illnesses, untreated injuries, or dental neglect.
- Chronic tiredness or lethargy.
- Repeated lateness or absence from school.
- Lack of supervision or inappropriate caregivers.
- Isolation or withdrawal from peers.

Developmental delays or emotional flatness.

Neglect can be difficult to identify, particularly in its early stages. It is often mistaken for poverty or parenting challenges, but early recognition and support can prevent significant harm. Concerns should always be discussed with the Designated Safeguarding Lead (DSL) or Child Protection Liaison Officer (CPLO).

Cumulative and Overlapping Harm

Abuse and neglect often do not occur in isolation. Children experiencing one form of maltreatment may be exposed to others. Each form of abuse—particularly when persistent—can cause lasting harm to physical health, emotional wellbeing, and social development. Children living in neglectful or violent environments are at increased risk of mental health challenges, learning difficulties, and social isolation.

Professional Responsibility

All UPS-affiliated staff and volunteers must remain alert to the signs of abuse or neglect.

When concerns arise:

- Do not attempt to investigate or question the child.
- Record factual observations and disclosures.
- Report concerns immediately to the Designated Safeguarding Lead (DSL) or CPLO.

Early reporting and intervention are essential. Uncertainty should never prevent action. If in doubt, staff must share their concern — safeguarding is everyone’s responsibility.

UPS is committed to a zero-tolerance approach to all forms of child abuse and neglect. Every child has the right to safety, protection, and dignity. It is the duty of all personnel to ensure these rights are upheld in every aspect of UPS’s educational and community operations.