



Sharjah American International School

Dubai Campus



Child Protection Policy

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KEY CONTACTS WITHIN THE LOCAL AREA

Dubai Foundation for Women and Children. www.dfwac.ae - Hotline 800111

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Latifa Hospital Child Welfare Unit. Tel. 04 2193000 /open 24hrs

Community Development Authority (Center). Tel. 800 988/open 24hrs

Al Ameen Reporting. www.alameed.ae/en/

CDA Child Protection Center. www.cda.gov.ae - Hotline 800988

Ministry of Interior Child Protection Center. www.moi-cpc.ae - Hotline 116111

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1. INTRODUCTION

Sharjah American International School SAIS-DUBAI takes the responsibility to protect its students and staff incredibly seriously and every effort is made to ensure that all staff at SAIS-DUBAI (including volunteers at the school) are committed to safeguarding and promoting the welfare of the children left in our charge. Staff members are trained to observe the outward signs of abuse which can include changes in behavior as well as failure to develop.

2. CHILD PROTECTION IN THE CONTEXT OF DUBAI

Within Dubai and the United Arab Emirates (UAE) there is still a developing infrastructure of Educational Safeguarding and/or Social Care Services. Following cases which caused concern in the Emirati community, Sheikh Mohammed, the Ruler of Dubai, supported the drafting of a Federal law on child protection “to ensure a secure and stable future for children in the U.A.E.”. In April 2012, it was reported that Dubai had “embraced a new draft policy to protect children against all forms of violence, abuse, exploitation and neglect and offer support and care for those in need”. The policy aims specifically at providing protection to Emirati and expatriate children under the age 18 who live permanently or temporarily in Dubai. The law also includes the creation of special units to intervene when children are at risk.

The federal law No 3 of 2016, formerly named Wadeema Law has taken effect since June 2016 – As a part of which, reporting cases of child abuse or negligence is now mandatory for all members of the community with the ultimate goal of transforming families & society and not dividing them. The law ensures that every child in the UAE, whether a resident or tourist, has the right to live, be safe, be educated and be protected from neglect and all forms of abuse, whether physical, sexual, verbal, emotional or psychological.

3. AIMS AND OBJECTIVES

Child protection refers to any activity which is undertaken to protect children who are suffering or are at risk of suffering significant harm. SAIS-DUBAI undertakes a whole school approach to child protection, and as such holds all staff responsible for safeguarding and promoting the welfare of children in our care. We strive to provide a positive, humane and safe environment for students, faculty and staff. We are concerned to establish and maintain an ethos in which the dignity, well-being and safety of all is paramount and we will at all times

respect and protect the dignity and human rights of all students, faculty and staff. Abuse (sexual or physical), bullying, harassment, physical intimidation or violence or intimidation of any form is against our school ethos and will not be tolerated.

Students, teachers and staff have a right to work in an environment that is free of any form of abuse, bullying, harassment, physical intimidation or violence; all members of our school communities share a responsibility for ensuring that this right is respected and that a safe environment exists at all times.

Individual children, especially some of the most vulnerable children and those at greatest risk of social exclusion, will need coordinated help from faculty and staff. This can be done through:

- Raising staff awareness and sense of responsibility for reporting possible cases of child abuse;
- Ensuring effective communication between all staff on child protection issues;
- Ensuring that all staff are aware of and follow the correct procedures.

4. PURPOSE

An effective whole-school child protection policy is one which provides clear direction to staff and others about expected behavior when dealing with child protection issues. An effective policy also makes explicit the school's commitment to the development of good practice and sound procedures. This ensures that child protection concerns, referrals and monitoring may be handled sensitively, professionally and in ways which support the needs of the child. The purpose of this policy is thus to protect all SAIS-DUBAI students and staff.

5. ROLES AND RESPONSIBILITIES

All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within the school who have specific responsibilities under child protection procedures. The names of those carrying out these responsibilities for the current year are listed on the cover sheet of this document.

5.1 Child Protection Officers (CPO'S)

The role of the CPO'S is to be familiar with the procedures and actions which should be taken by the school to support any child who may be at risk and to ensure that all staff (both teaching and non-teaching) are aware of

their responsibilities in relation to the protection of all students at SAIS-DUBAI. The child protection officers are guided by two principles:

- 1) The welfare of the child
- 2) The confidentiality of the situation

5.2 Teachers

Teachers will, in most cases, be the first person that a concern is raised by. They will:

- Have a 'duty of care' towards SAIS-DUBAI students, with responsibility for their safety and wellbeing.
- Staff must be trustworthy, responsible & show integrity.
- Be responsible for their own actions & behavior, and must avoid any conduct that would lead any reasonable person to question their professionalism.
- Collect detailed/accurate/secure written records of concerns, and liaise with the designated child protection staff.
- Have relationships which are professional and respectful.
- Not be involved in or tolerate physical or emotional abuse.
- Be role models to students with staff behavior being in accordance with SAIS-DUBAI local & legal expectations of professionalism.
- Be familiar with the policy below, and follow it.

5.3 School Staff

All school staff members have the responsibility to identify and report suspected abuse and to ensure the safety and well-being of the students in their school. In doing so they should seek advice and support as necessary from the Child Protection Officer. Members of staff are expected to provide a safe and caring environment in which children can develop the confidence to voice ideas, feelings and opinions. Children should be treated with respect within a framework of agreed and understood behavior. All school staff members are thus expected to:

- Be aware of signs and symptoms of abuse.
- Report concerns to the Designated Teachers as appropriate.
- Keep clear, dated, factual and confidential records of child protection concerns.
- Be alert to potential indicators of abuse or neglect.

- Be alert to the risks which individual abusers, or potential abusers, may pose to children.
- Share and help to analyze information so that an assessment can be made of the child's needs and circumstances.
- Contribute to whatever actions are needed to safeguard and promote the child's welfare.
- Take part in regularly reviewing the outcomes for the child against specific plans.
- Work cooperatively with parents unless this is inconsistent with ensuring the child's safety.

5.4 School Medical Team

Their role is to ensure that relevant information obtained in the course of their duties is communicated to the Child Protection Officer. Types of injuries, attendance and frequency are recorded.

6. CHILD ABUSE AND NEGLECT

6.1 Promotion of a positive, supportive, and secure environment

Students with high self-esteem, confidence, supportive friends, and clear lines of communication with a trusted adult all have been found to help in the prevention of abuse. To this end SAIS-DUBAI strives to:

- Maintain a school ethos which promotes a positive, supportive, safe and secure environment; provides students with a sense of being valued; and allows students to feel that they have a voice and are listened to.
- Ensure that students know that there are adults within the school who they can approach if they are worried or are in difficulty (class/subject/homeroom teachers, supervisors, Head of Schools, school counselor and even Vice principal and Principal).
- Uphold a school behaviour policy aimed at supporting vulnerable students in the school. The school will ensure that the student knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred.
- Include in the curriculum activities and opportunities which equip students with the skills they need to stay safe from abuse.
- Include in the curriculum material which will help students develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills.

- Ensure that wherever possible every effort will be made to establish effective working relationships with parents and external agencies which can further support the student (Psychologists, social workers, etc.).

6.2 When to be concerned (for additional information see appendix 1)

Staff should be concerned if a student:

- Has any injury which is not typical of the bumps and scrapes normally associated with children's activities.
- Regularly has unexplained injuries.
- Frequently have injuries, even when apparently reasonable explanations are given.
- Offers confused or conflicting explanations on how injuries were sustained.
- Exhibits significant changes in behaviour, performance or attitude.
- Indulges in sexual behaviour which is unusually explicit and/or inappropriate to his or her age.
- Discloses an experience in which he or she may have been significantly harmed.

6.3 What to do if you have concerns about a child?

We, SLT and staff members, at SAIS-DUBAI share the responsibility for keeping our children safe and committed to act for the child's best interests. You may have concerns about a child because of something you have seen or heard, or a child may choose to disclose something to you. If a child discloses information to you, you should:

- Not promise confidentiality, you have a duty to share this information and refer to the Child Protection Officers.
- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said.
- Reassure the child, but only as far as is honest, don't make promises you may not be able to keep e.g., "Everything will be alright now." or "You'll never have to see that person again."
- Do reassure and alleviate guilt, if the child refers to it. For example, you could say, "You're not to blame."
- Do not interrogate the child; it is not your responsibility to investigate.
- Do not ask leading questions e.g., "Did he touch your private parts?" ask open questions such as "Anything else to tell me?"

- Do not ask the child to repeat the information for another member of staff.
- Explain what you have to do next and who you have to talk to.
- Take notes if possible or write up your conversation as soon as possible afterwards. These notes are important and may be required in a court.
- Record the date, time, place any non-verbal behavior and the words used by the child (do not paraphrase).
- Record statements and observable things rather than interpretations or assumptions.
- Draw a diagram or take photographic evidence to indicate the position of any bruising or other injury; prior to that, consent from the individual being examined should be provided.

6.4 Procedures for the CPO in identifying and reporting cases

6.4.1 Decision Making:

- Record the grounds for your concern, either in the student's records or in another appropriate way.
- You should raise questions with the family and be open about your concerns, unless doing so would place the child at further risk of harm.
- You may wish to organize further contact by other members of your practice team or by suggesting a further appointment.
- You may wish to consult with colleagues. This may give you fuller information and help you decide on your best course of action.
- You may wish to discuss your concerns with the designated nurse or doctor for information regarding child protection.

6.4.2 Taking Action:

- You may decide, after consultation or independently, to make contact with Social Services. This could mean contacting them for a discussion or making a direct referral.
- You should have clear in your mind:
 - What information, allegation or observation leads you to be concerned at this moment?
 - What other information or observations might support this concern, drawing upon previous experience with the child or their family?
 - Is the situation urgent?

- o What are your expectations of making the referral?

6.5 Student disclosure and confidentiality

SAIS-DUBAI takes its responsibility to protect and safeguard the welfare of the students in its care seriously and acknowledges that each student has the explicit right to privacy and confidentiality. Staff must be cautious when passing information to others about a student and treat information they receive in a discreet and confidential manner. That being said, in the case of potential abuse, staff members must be cautious of promising confidentiality, as they are required to report all potential cases of abuse to the CPO. It is important that when a student provides information, the adult:

- Does not promise confidentiality.
- Listens to the child without directly questioning/leading him or her. The adult can also make use of ‘TED’ questions – Tell me what happened.....Explain.....Describe.....
- Does not stop a child freely recalling significant events.
- Do not ask the child to repeat a disclosure to another adult.
- Make a note of the discussion, recording time, setting and persons present as well as what is said.
- Completes a Child Protection Form (Annex 3) and refers to the school’s designated member of staff. The original must be securely filed as this may be used by police as evidence.
- Unless there are concerns that speaking to the parents may place the child in danger the CPO should see the parent(s) regarding any concerns e.g. a comment made by a child, an unusual mark or bruise. A record of this meeting should also be kept and a professional judgment has to be made whether the explanation is satisfactory. If there are any doubts or concerns the referral procedures to child services are followed.
- Dealing with a disclosure from a child is likely to be a stressful experience. The member of staff concerned should consider seeking support for him/herself and discuss this with the Principal.

7. WRITTEN COMMUNICATION WITH STUDENTS AND PHOTOGRAPHS

Staff should be cautious and follow the following guidelines with regards to communication with students:

- Electronic communication and feedback with regard to the student’s work and progress should be professional and supportive indicating in what way students may improve the quality of their work.
- Staff members are not allowed to ‘befriend’ students on social networks e.g., ‘Facebook’.

- Employees are not permitted to write inappropriate personal notes, emails or letters to students.
- Parental permission is required to take photographs of children. Photographs must be used for school professional use only. Permission must be granted by the relevant Head of School (HOS) for use of school photographs for course work.

8. PHYSICAL CONTACT WITH STUDENTS

Staff should not touch students particularly when reprimanding them. However, there may be occasions when a distressed student needs comfort and reassurance, which may include comforting such as a caring parent would give. Employees should use their discretion in such cases to ensure that, what is, and what is seen to be by others, is normal and natural and does not become unnecessary, unjustified contact, particularly with the same students over a period of time. Examples of appropriate physical contact include:

- Holding the hand of a younger child at the front/back of the line when going to assembly.
- Comforting a distressed student.
- Congratulating or praising a student.
- Demonstrating how to use a musical instrument.
- Demonstrating exercises, techniques during PE lessons and/or sports coaching (gender sensitivity should be considered). If it is necessary to physically guide or support a child, such as in a PE lesson, then great care should be taken that all touch is appropriate and where possible in a group situation. In the case of one-to-one lessons extra care must be taken that the teacher and student can be observed at all times.
- Administering first aid.

The law forbids a teacher to use any degree of physical contact that is deliberately intended to punish a student, or which is primarily intended to cause pain or injury or humiliation. It is essential that staff members do not give the impression that they have lost their temper or are acting out of anger, frustration or to punish the student. The degree of force must be in proportion to the circumstances of the incident and the seriousness of the behavior. Any force should be the minimum needed to achieve the desired result. In order to minimize the risk of accusations being made against staff as a result of their daily contact with students, staff should ensure that they consider the following points of guidance:

- Staff members are responsible for their own actions and behavior and should avoid any conduct which would lead to any reasonable questioning of their motivation and intentions.

- Staff members should work, and be seen to work in an open and transparent way (especially when working with individual students). Staff members should not allow students to visit their place of residence. In particular, staff members should not be engaged in private tuition where they are visiting the students' private homes or the students are visiting the teachers' homes.
- Staff members should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident, which may give rise for concern.
- Records should be made of any such incident and of decisions made/further actions agreed and the Principal should be informed.
- Staff members should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

The member of staff should also try and get help from another member(s) of staff and continue to try and communicate with the child throughout the incident making clear that physical contact or restraint will stop as soon as it ceases to be necessary. Sometimes it may be dangerous to try and restrain a student. In this instance remove other students, send for help and try to make the area as safe as possible continuing to try to communicate with the student. Any instances where reasonable force or physical restraint has been used must be reported to the relevant Head of School through a written incident slip. A copy of the completed form should also be kept in the students' record. Parents should be immediately informed and a meeting arranged to address the issues.

The following are examples of where reasonable force and physical restraint may be used (see appendix 4 for more information on physical restraint):

- A student attacks a member of staff or another student.
- Students engaged in deliberate damage or vandalism.
- Students running down a corridor or stairway in a way likely to cause injury.
- Students leave a classroom without permission or try to run away from school.

Before intervening physically, a staff member should tell the student to stop and what will happen if he or she does not. Physical intervention may involve:

- Physically interposing between students.
- Blocking a student's path.
- Holding.
- Leading a student by the hand or arm.

- Shepherding a student away by placing a hand in the center of the back.

Staff should never:

- Hold a student around the neck, by the collar or in any way that might restrict the student's ability to breathe.
- Slap, punch, push, trip, or kick a student.
- Twist or force limbs against a joint.
- Hold or pull a student by the hair or ear.
- Hold a student face down on the ground.
- Hold a student inappropriately.

9. PHYSICAL CONDUCT BETWEEN STUDENTS AND BULLYING (see code of conduct policy)

Bullying can be defined as 'deliberate hurtful behavior, usually repeated over time' and can involve name-calling, threats, taking personal items, hurting, spreading gossip, excluding from group etc. SAIS-DUBAI does not accept bullying on any level (physical, verbal, or emotional), whether it involves students, staff members or even parents. Any cases will be referred to the HOS or SLT and could lead to disciplinary action.

10. ALLEGATIONS AGAINST STAFF (including HOS and volunteers)

Sometimes it does occur that malicious accusations are brought against staff members by children and/or their parents. It is important that procedures be applied with common sense and unbiased judgment. The relevant HOS and school principal have to be informed of the allegation/s on the same day and will be responsible for conducting the investigation.

The staff member in question must be informed that an allegation has been made and that a thorough investigation will be conducted and they will be kept informed. It should be made clear that the interview is not a formal disciplinary hearing but is for the purpose of putting forward a serious matter which may lead to suspension and further investigation. The staff member is then provided with an opportunity to provide their side of the story. The principal will then decide on a relevant action or request additional time for further

investigation. Unless there is an objection by the, the student, parents and member of staff must be informed of the likely course of action. Allegations found to be malicious must be removed from personnel records. Records must be kept of all other allegations but any that are not substantiated, are unfounded or malicious, must not be referred to in employer references.

11.MISSING STUDENTS

It is important that immediate action is taken if a student is found to be missing. A senior member of staff must be informed and if the student is not found after the buildings and grounds have been searched the parents must be informed and the police called.

12.RECORDS AND MONITORING

Well-kept records are essential to good Child Protection practice. Concerns and disclosures should be recorded in writing by the member of staff who receives them and passed to the CPO without delay. The CPO, in consultation with the Principal, will then decide on further action and any appropriate monitoring program for the student. Records are stored in a dedicated filing system maintained by Principal. When students with records in this filing system pass on to their next school the Principal is responsible for transferring information judged to be relevant.

13.STAFF TRAINING

All staff should receive Child Protection training as part of their CPD program and should be aware of the information and procedures within this policy document. Staff will also be informed of any new changes to this policy document.

14. VIGILANT RECRUITMENT

SAIS-DUBAI's recruitment procedures will be followed in the employment of all staff.

All applicants will be subject to a rigorous recruitment process to ensure, as far as possible, their suitability to work with children and eligibility to work in the UAE.

Safer recruitment means that all applicants will:

- Provide two references, including at least one who can comment on the applicant's suitability to work with children.
- Provide evidence of identity and qualifications.
- Be checked through the Criminal Records Bureau as appropriate to their role.
- Be interviewed.

All new members of staff will be provided with a copy of the safeguarding and child protection policy and will be required to sign a document to confirm they have received a copy of the child policy and they have read it and abided by its contents.

15. CHILD PROTECTION AND THE CURRICULUM

The school curriculum is important in the protection of children. At SAIS-DUBAI we aim to ensure that curriculum development meets the following objectives:

- Developing student self-esteem.
- Developing communication skills.
- Informing about all aspects of risk.
- Developing strategies for self-protection.
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults.
- Developing non-abusive behaviour between students.

Included in the curriculum are materials which will help students develop realistic attitudes towards the responsibilities of adult life, particularly with regard to parenting and child rearing skills.

16. NON-DISCRIMINATION POLICY

SAIS-Dubai has a commitment to maintaining an educational environment where racism and intolerance, including discrimination on the basis of race, color, religious creed, national origin, gender identity, disability, marital or civic union status, homelessness or age, are not tolerated.

SAIS-Dubai prohibits discrimination, including all forms of harassment and hate crimes, as well as retaliation, of/against any of its students, as such conduct is contrary to the mission of the school and its commitment to equal opportunity in education.

Harassment consists of unwelcome conduct, whether verbal or physical, that is based on a characteristic protected by law, such as race, color, religious creed, national origin, homelessness, gender identity, disability, or age. It is prohibited by SAIS-Dubai and violates the law of UAE. For purposes of this policy, “school” includes school – sponsored events, trips, sports events, and similar events connected with school. Further, any retaliation against an individual who has complained about discrimination or harassment, or any retaliation against any individual who has cooperated with an investigation of a discrimination, harassment or retaliation complaint, is similarly unlawful and will not be tolerated.

SAIS-Dubai takes allegations of discrimination, including all forms of harassment and hate crimes, as well as retaliation seriously and will respond promptly to complaints. Where it is determined that harassing conduct which violates the law and this policy, has occurred, SAIS-Dubai will act promptly to eliminate the conduct and will impose corrective action as necessary, including disciplinary action where appropriate, which may include school-related discipline (refer to code of conduct).

SAIS-Dubai also prohibits bullying, as set forth in the Bullying Policy section in the school’s code of conduct.

Definitions:

“Discrimination” is defined as treating people differently, or interfering with or preventing a person from enjoying the advantages, privileges or courses of study in the school because of an individual’s actual or perceived race, color, religious creed, national origin, homelessness, gender identity, age, or disability (i.e., protected status). A person may not be subjected to discipline or more severe punishment for wrongdoing, nor denied the same rights as other students, because of his/her membership in a protected class.

“Harassment” is defined as unwelcome conduct, whether verbal or physical, that is based on race, color, religious creed, national origin, homelessness, gender identity, age. Discrimination and or harassment include, but are not limited to:

Display or circulation of written materials or pictures that are degrading to a person or group based upon the criteria listed above.

Verbal abuse or insults about, directed at, or made in the presence of an individual or group described above because of one of the criteria listed above.

Any action or speech that contributes to, promotes or results in a hostile or discriminatory environment for an individual or group described above.

Any action or speech that is sufficiently severe, pervasive or persistent that it either (i) interferes with or limits the ability of an individual or group (as described above) to participate in or benefit from a school program or activity at SAIS-Dubai; or (ii) creates an intimidating, threatening or abusive educational environment.

Harassment can be communicated in any form, including verbally, in writing, or electronically via the Internet, cell phones, and text messaging, social media or in any other way that shows disrespect to others based on race, color, religion, national origin, homelessness, gender identity, disability, or age.

What constitutes harassment is determined from the perspective of a reasonable person with the characteristics on which the harassment is based.

“Hate Crime” is defined as a crime motivated by hatred, bias, or prejudice, or where the victim is targeted or selected for the crime at least in part because of his/her actual or perceived race, color, religion, national origin, homelessness, gender identity, disability, or age. A hate crime may involve a physical attack, threat of bodily harm, physical intimidation, or damage to another’s property.

“Retaliation” is defined as any form of intimidation, reprisal, or harassment by a student directed against any student, staff or other individual for reporting or filing a complaint, for aiding or encouraging the filing of a report or complaint, for cooperating in an investigation under this policy or the *UAE law*, or for taking action consistent with the policy.

The definitions of discrimination and harassment are broad. In addition to the above examples, other unwelcome conduct, whether intended or not, that has the effect of creating a school environment that is hostile, offensive, intimidating, or humiliating to either male or female students may constitute discrimination and/or harassment

Reporting Complaints of Discrimination, Harassment, Hate Crimes and Retaliation

If any student believes, in good faith, that he or she has been subjected to harassment or discrimination described above, the individual has a right to file a complaint with the Supervisor, Head of School, Vice Principal, or the Principal. This may be done orally or in writing. Teachers or other staff members who observe incidents of harassment involving students, or are in receipt of a complaint from a student, shall report such incidents immediately to the Supervisor, Head of School, Vice Principal, or the Principal.

Please note that while these procedures relate to the Schools' policy of promoting an educational setting free from discrimination and harassment, as detailed further in this policy, these procedures are not designed nor intended to limit the Schools' authority to discipline or take remedial action for conduct which the School's deems unacceptable.

The School Management will work with an individual who files a complaint of discrimination or harassment; including conducting an investigation and holding conferences, in order to fairly and expeditiously resolve the complaint. Whenever possible, a conference should be scheduled during a time that does not conflict with regularly scheduled work and/or school programs.

Permissible Disciplinary Sanctions and Corrective Actions in Response to Discrimination, Harassment, Hate Crimes and Retaliation

Disciplinary sanctions and corrective actions may include, but are not limited to, one or more of the following:

- A written warning;
- Parent's Meeting;
- Classroom transfer;
- Limiting or denying student access to a part or area of a school;
- Adult supervision on school premises;

- Exclusion from participation in school-sponsored functions, after-school programs, and/or extracurricular activities;
- Suspension;
- Exclusion, expulsion, or discharge from school;
- An apology to the victim;
- Reporting the case to KHDA;
- Awareness training (to help students understand the impact of their behavior);
- Participation in empathy development, cultural diversity, anti-harassment, anti-bullying or inter-group relations programs;
- Mandatory counseling or any other action authorized by and consistent with the disciplinary code and this handbook.

False Charges

Any student who knowingly makes false charges or brings a malicious complaint may be subject to any of the disciplinary and/or corrective action(s) detailed above.

Student Responsibilities

Each student is responsible for:

- Complying with this policy and the UAE law.
- Ensuring that (s)he does not harass or discriminate against another person on school grounds or in a school-related function, event or activity because of that person's race, color, religion, national origin, homelessness, gender identity, disability, or age;
- Ensuring that (s)he does not bully another person on school grounds or in a school-related function, event or activity;
- Ensuring that (s)he does not retaliate against any other person for reporting or filing a complaint, for aiding or encouraging the filing of a report or complaint, or for cooperating in an investigation of harassment, bullying, discrimination, or a hate crime; and
- Cooperating in the investigation of reports or complaints of harassment, bullying, discrimination, retaliation, or a hate crime.

Protection against Retaliation

The school will take appropriate steps to protect students from retaliation when they report, file a complaint of, or cooperate in an investigation of a violation of this policy. Threats or acts of retaliation, whether person-to-person, by electronic means, or through third parties, are serious offenses that will subject the violator to significant disciplinary and other corrective action, including short or long-term suspension, exclusion or expulsion.

Discrimination, Harassment, Hate Crimes and Retaliation Grievance Procedures

Informal Resolution of Complaints

Before initiating the formal procedure, the student may wish, if possible, to resolve the complaint on an informal basis.

The student can raise the issue with the Supervisor, Head of School, Vice Principal, or the Principal.

The appropriate department or school administrator shall attempt, within his/her authority, to work with the individual to resolve the complaint fairly and expeditiously within three (3) working days of receiving the complaint.

Whichever option is chosen, attempts will be made to resolve the matter to the satisfaction of the student who has made the complaint. If the student is not satisfied with the resolution, or if the student does not choose an informal resolution, then the student can begin the formal complaint process.

Formal Resolution of Discrimination and Harassment Concerns:

A student may file the complaint in writing to the Supervisor, Head of School, Vice Principal, or the Principal no later than five (5) calendar days after the alleged discriminatory practice has occurred in order for an expeditious investigation to be conducted, unless extenuating circumstances exist. However, all students should know that the School management will investigate any complaint no matter when it is filed. The student shall provide a written complaint that will state the name of the individual and the location of the place where the alleged discriminatory practice has occurred, the basis for the complaint and the corrective action the student is seeking

The school management will conduct the necessary investigation promptly after receiving the complaint. In the course of its investigation, a member of the SLT shall contact those individuals that have been referred to as having pertinent information related to the complaint. This process shall include, at a minimum, contacting the complainant and the person against whom the complaint was filed and/or the Principal or appropriate authority involved. Strict timelines cannot be set for conducting the investigation because each set of circumstances is different. For example, sometimes the employees or students that are involved in the complaint are not immediately available. The school management, however, will make sure that the complaint is handled as quickly as feasible and will strive to complete the investigation within ten (10) working days. When more than ten (10) working days is required for the investigation, the school management shall inform the student who filed the complaint that the investigation is still ongoing.

While the School cannot guarantee complete confidentiality given the nature of the investigatory process, the investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.

After completing the formal investigation of the complaint, the school management shall make a decision on the complaint, and shall inform the complainant and the person against whom the complaint was filed, of the results of the investigation. If the school management finds that there is reasonable cause for believing that a discriminatory or harassing practice has occurred, the school management refers the matter to a disciplinary committee for appropriate action, up to and including discipline for either the employee or the student(s) who engaged in the harassing conduct.

If no satisfactory resolution can be reached through the informal or formal resolution procedures detailed above, the student or employee has the right to take the complaint to KHDA.

The UAE Government has introduced federal legislation on 15 July 2015 of Law No. 2 of 2015 which specifically prohibits all forms of discrimination on the basis of religion, belief, sect, faith, creed, race, color or ethnic origin (each being a “Protected Characteristic”). The Law defines “religion” as “the heavenly religions – Islam, Christianity and Judaism” and therefore the law does not apply in respect of discriminatory conduct against an individual based on any other religion.

The Law is drafted in broad terms to ensure that it encompasses all discriminatory conduct regardless of how it is expressed (e.g. through speech, writing, drawing, photography, singing, acting or miming) and irrespective of

the means/channels through which it is expressed (e.g. online, by phone or video, and whether written or oral).

Notably, Article 17 of the Law states that a representative, manager or agent of a company will be punished (by the same penalties that would apply if s/he had committed the offence themselves) if a crime prohibited by the Law is committed by any personnel of the company in its name and on its behalf, and provided that the representative, manager or agent is aware of the same.

Furthermore, Article 6 of the Law is a broad catch-all provision which states that a person who commits an act of discrimination may face imprisonment of up to 5 years and/or a fine of between AED 500,000 and AED 1,000,000. The same penalties may be imposed where a discriminatory act is “committed by a public employee upon or due to performing his job” (Article 9). Through this provision, the Anti-Discrimination Law specifically links the prohibition against discrimination to an employment context; however the reference to “public employee” seems to indicate that this Article is limited to governmental employees only. Even if Article 9 only applies to governmental employees, the broad prohibition against discrimination in Article 6 of the Law has the potential to be applied more broadly including within the private sector, and whether in an employment context or otherwise.

In addition, the Law prohibits:

- producing, promoting or selling any products or material which include any expression involving religious contempt, discrimination or hatred speech (or being in possession of such material for the purpose of distribution or display);
- establishing, managing or participating in any group or organization for the purpose of religious contempt, discrimination or hatred speech;
- organizing or participating in a conference or meeting for the purpose of religious contempt, discrimination or hatred speech; or
- Providing, requesting, receiving or delivering money or material support directly or indirectly for the purpose of committing any of the acts which are prohibited by the law.

17. POLICY REVIEW

This policy is to be reviewed annually, though if any deficiencies or weaknesses in children protection arrangements are identified within the year, they will be remedied without delay. The Child Protection Officers will undertake an annual review of the school's Child Protection policy and procedures and of the efficiency with which the related duties have been discharged. The list of key contacts on the cover sheet is kept up to date.

18. APPENDICES

- a. Appendix 1 – Definitions of abuse and neglect with signs for teachers to be aware of

1) Physical Abuse

- Definition: May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or caregiver simulates the symptoms of, or deliberately causes ill health to a child in their care.
- Signs: Unexplained recurrent injuries, bruises, burns, cuts, or welts; improbable excuses or refusal to explain injuries; wearing clothes to cover injuries even in hot weather; refusal to undress for gym; bald patches; chronic running away; fear of physical contact – shrinking back if touched / flinches at sudden movements; admit that they were punished, but punishment is excessive (such as being 'beaten' every night to "make him study; fear of suspected abuser being contacted; seems afraid to go home; is always alert as if they anticipate something bad is going to happen.

2) Emotional Abuse

- Definition: The persistent emotional ill-treatment of a child such as to cause severe and persistent effects on the child's emotional development. It may involve conveying to a child that they are unloved, worthless, inadequate, or valued only insofar as they meet the needs of another person. It may feature expectations, which are age or developmentally inappropriate, being imposed on a

child. It may involve a child frequently feeling frightened or in danger, or the exploitation or corruption of a child or children.

- Signs: Physical, mental and emotional development delays; sudden speech disorders; continual self-depreciation (“I’m stupid, ugly, worthless”, etc.); overreaction to mistakes; extreme fear of any new situation; inappropriate response to pain (“I deserve this”); neurotic behavior (rocking, hair twisting, etc.); extremes of passivity or aggression; excessive withdrawal, fear, or anxiety about doing something wrong; does not seem to be attached to the parent or caregiver; exhibits either extremely adult-like behavior (like being overly responsible for other children) or extremely infant like (for example thumb-sucking or temper tantrums; stealing; destructiveness or cruelty to animals, siblings or other children).

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3) Sexual Abuse

- Definition: The forcing or enticing of a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts. They may include non-contact activities such as involving children in looking at, or the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- Signs: Being isolated or withdrawn; inability to concentrate; lack of trust or fear of someone they know well (such as not wanting to be alone with the baby sitter) or child-minder; bedwetting; nightmares; worried about clothing being removed trouble walking or sitting; has an interest or knowledge in sexual content which is inappropriate to his/her age; seductive behavior; makes a strong effort to avoid a specific person or place (home or specific relative for example) without an apparent reason; spontaneous crying excessive hygiene/washing; unexplained money or gifts; and runaway or delinquent behaviors.

4) Neglect

- Definition: The persistent failure to meet a child’s basic physical and/or physiological needs, likely to result in the serious impairment of the child’s health or development. It may involve a parent or

caregiver failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment.

- Signs: Dirty skin, offensive body odor, unwashed, uncombed, or matted hair; under or oversized and unclean clothing; dressed in different clothing that is inappropriate to weather or situation; frequently left unsupervised or alone for extended periods of time; untreated illness or physical injuries; is often late or frequently missing from school.

b. Appendix 2 – Lost child procedure

Prevention is always better than cure, thus all staff are required to be as vigilant as possible in checking the number of students in their care. This means that in addition to the keeping of attendance registers, headcounts after break times and at the beginning of lessons should be taking place to identify any possibly missing students as quickly as possible. Should a child be found to be missing, the loss should immediately be reported to the Supervisor who should inform the Head of School (HOS), Principal or member of the SLT who can then coordinate the course of action. This action may include:

1. Alert other members of staff to aid in the search whilst maintaining adequate supervision of the remaining students.
2. Question students in the class and vicinity to see if there is any additional information or clues to the students' whereabouts.
3. Conduct a thorough search of the buildings and outdoor area.
4. If the child has not been found within 15 minutes, parents should be contacted and possibly also the police.
5. Continue to search involving as many adults as possible, opening up the area and keeping in touch by mobile telephone.

Appendix 3 – Late collection procedure

If a child is not collected at the end of the school day, the child remains the responsibility of the class teacher or assistant until alternative arrangements have been made. Each instance is different and staff are required to act on initiative but the following procedure is likely to be “best practice”:

1. If the parent has not arrived by 2:24pm, class teachers must escort the child/children in their care to the designated waiting area where there are two teachers on duty.
2. If students have not been collected by 3:00pm, then on-duty teachers escort the students in their care to the reception area. Students are then allowed to call their parent/s or guardian.
3. If a child still has not been collected and parents cannot be contacted after 3:30pm, refer to emergency contacts.
4. No child should be left alone and the student needs to be reassured that the situation will be resolved.
5. Under no circumstances should a child be allowed to go with another parent without consent from the child’s own parent/s.

Late collection from after school activities

Those in charge of after school activities have a responsibility to ensure that the students in their care are safely collected at the end of the session. In the event of a child not being collected, the “activity leader” will stay with the child/children until 3:45pm to allow for normal delay or lateness. After this time, the activity leader will either escort the child/children to the designated waiting area or if the activity is off-site the teacher in charge must remain with the child and follow the late collection procedure from point 4 above.

c. Appendix 4 – Restraint of students

If SAIS-DUBAI is aware of a student who may behave in a way that requires physical restraint, it will be sensible to plan how to respond in advance, should such a situation arise. This plan should be shared with parents and other staff taking into account the school policy and legislation. If physical restraint is likely to be necessary this should be included in the student’s behavioral intervention plan (BIP), or Individual Education Plan (IEP) together with information on: de-escalation strategies; the manner in which the student will be held; how support can be summoned if needed; any medical factors to be considered.

Types of Restraint

The procedures of restraints apply to students of either sex and of any age. Restraints can be:

A) Partial, restricting and preventing particular movements.

- Covers a wide range of techniques which can be applied in degrees
- May involve
 - o Physically moving a student from a situation where there is an imminent risk of a violent incident and the student has refused to respond to a reasonable verbal request.
 - o Holding students to restrict their movements.
 - o Allocate a safe area in order to prevent individuals or property being damaged.

B) Total, as in the case of immobilization.

- Where students are held in such a way which prevents them from moving (like being held on the floor).
- This is an extreme form of restraint and would be used only when an assault was being thought a serious risk to others.

Staff should be aware that for some students, the use of physical restraint may act as positive reinforcement for their behavior. Should staff ever have cause to use physical restraint, details must be recorded and the incident reported to the Headmaster and/or HOS, and/or relevant member of the SLT, who will ensure that parents are informed before the end of the day.

d. Appendix 5 – Child protection referral document

Designated reporter:	Date:
Person/ People Involved:	
Nature of concern: Be specific/ Be detailed / Write down person's words or attach any notes (dated and signed)	
Action taken:	
Resolution:	
Who is aware of incident:	
Signed	

Appendix 6- Child protection flow chart

*in the event all of these reporters are not available, teacher reports to head of department or member of Senior Leadership Team

