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# SAFEGUARDING POLICY

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## GEMS SAFEGUARDING COMMITMENT STATEMENT

GEMS Education is driven by a single purpose – to put a quality education within the reach of every learner. As GEMS CEO, and as a father, I assure you that nothing is more important to me than the safety of every child that walks through the gates of one of our schools. It is our promise to every child, parent, employee and stakeholder, that our learning environments will make children feel completely safe, valued and able to learn and participate to their full potential.

As an organisation, we are united in our commitment to safeguarding the welfare of all our children, staff, volunteers and other stakeholders. We recognise our responsibility to take all steps possible to promote safe practice and protect children from harm, abuse and exploitation of any form.

It is our collective duty to act appropriately in response to any allegations, reports or suspicions of abuse. Additionally, staff and volunteers are tasked with working together to develop a culture that wholly embraces our differences and diversity, and which respects and upholds the rights of children and adults.

This is the introductory statement commitment for the GEMS Education Safeguarding Policy, a comprehensive set of documents, processes, guidance, policies and procedures adopted by every school.

This policy will be followed by all members of the organisation and promoted by those in positions of leadership.

**To fulfil their commitment to safeguard and promote the welfare of children, all GEMS Education schools and services must have:**

- » Clear priorities for safeguarding and promoting the welfare of children explicitly stated in all strategic policy documents
- » A clear commitment by senior leaders to the importance of safeguarding and promoting children's welfare
- » A clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children
- » Policies, approaches and a culture that supports and safeguards all children, staff and wider stakeholders, irrespective of their faith, gender, spiritual background or culture
- » Recruitment and human resources management procedures that safeguard and promote the welfare of children, including arrangements for appropriate checks on staff and volunteers
- » Procedures for dealing with allegations of abuse against members of staff and volunteers
- » Arrangements to ensure that all staff undertake appropriate training to equip them to carry out their responsibilities effectively and safely
- » A clear process to ensure all staff, including temporary staff and volunteers who work with children, are made aware of the school's arrangements for safeguarding and promoting the welfare of children as well as their responsibilities for these

- » Policies for safeguarding and promoting the welfare of children together with procedures that are in accordance with GEMS guidance and locally agreed national legislation
- » Arrangements to work effectively with other organisations to safeguard and promote the welfare of children, including arrangements for sharing information (e.g., child protection agencies, police, healthcare, mental health services and legal practices)
- » A culture of listening to, and engaging in dialogue with, children – seeking children’s views in ways that are appropriate to their age and understanding, and taking account of these views in individual decisions and the establishment or development of provision
- » Appropriate whistleblowing procedures and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed freely and without fear of recrimination
- » Senior leaders who understand the context of Child Law 12/1996 and Child Law 126/2008, the guiding law for safeguarding and child protection, and any relevant country-specific legislation.

**Principles upon which the Safeguarding Commitment Statement is based:**

- » The welfare of the child will always be paramount
- » The welfare of families will be promoted
- » The rights, wishes and feelings of children and their families will be respected and listened to
- » Keeping children safe from harm requires people who work with children to share information
- » People in positions of responsibility within the organisation will work in the best interests of children and follow the GEMS Safeguarding Policy
- » GEMS will ensure the application of this policy through clear management, governance and quality assurance

For these commitments to be effective, every member of the GEMS community – senior leaders, employees, volunteers, parents, services and children throughout the GEMS network – must play an active and conscientious part in embracing and embedding a positive safeguarding culture. This policy is our enduring pledge and promise to keep every GEMS child and employee safe

**Dino Varkey,**  
**Group Chief Executive Officer, GEMS Education**

**Date: 01.03.2023**



## 1. STATUS OF THE DOCUMENT AND HOW TO USE IT

This document is part of a group of policies intended to keep children, staff, other adults and the wider organisation of GEMS safe. This document outlines specific operational arrangements for the items listed in the contents. It should be read in conjunction with the guidance contained in the appendices of this policy and other associated safeguarding policies found in [GEMSNET - Policies & Documents Portal](#)

This document has been compiled from a wide range of international and best practice guidance, all of which is intended to ensure the safety of all parties.

In all situations which require human judgement, a policy or procedure is there as guidance. Wherever a matter of legal responsibility is relevant to the text in this policy, this is clearly highlighted.

## 2. ROLES AND RESPONSIBILITIES – SEE APPENDIX B:

**GEMS Education Board/Chief Education Officer** is responsible for corporate governance and oversight of the effective delivery of the GEMS Safeguarding Strategic Plan and Safeguarding Policy. The Board/CEdO ensure that GEMS' safeguarding, recruitment and managing allegations procedures take into account the advice and guidance contained in the GEMS Safeguarding Policy and any national legislation and guidance.

**GEMS Vice President – Safeguarding and Child Protection** is responsible for the development and strengthening of all activities relating to safeguarding and child protection across GEMS Education. This includes leading the overall development, implementation and monitoring of the organisational safeguarding strategy, policy and practice, providing real-time advice and guidance to country safeguarding teams on casework and embedding safeguarding throughout all GEMS' work. This is supported by the Senior Managers who form the central safeguarding team.

**GEMS Central Education Team** is responsible for monitoring and advising schools on the central responsibilities of governance. This includes arrangements for safeguarding for which an appointed, named Governor has responsibility for contributing to the strategic discussions at meetings, which help determine the vision and ethos of the school and clear strategic priorities and targets for the school's safeguarding and child protection responsibilities.

The **Senior safeguarding manager** is responsible for ensuring that all aspects of the GEMS Safeguarding policy are delivered effectively in their respective schools.

The **Principal/CEO** is responsible for ensuring that all aspects of the GEMS Safeguarding policy are delivered effectively in their school. The Principal/CEO ensures that staff, volunteers and children understand and implement the policy to safeguard children.

The **Designated Safeguarding Lead (DSL)** is a member of the school senior team who takes lead responsibility for safeguarding and child protection in the school. This responsibility may be delegated to an appropriately trained Deputy in the absence of the DSL.

### 3. CHILD PROTECTION PROCEDURES

#### i) Dealing with a disclosure or allegation by a child or another person:

Children in school may feel safe and secure enough to make a disclosure of past abuse or neglect, or an allegation of current abuse or neglect to a member of staff whom they feel they can trust. A disclosure of this kind can arise at any time and may have been anticipated by staff or equally be totally unexpected. In these situations, school staff should:

- » Demonstrate that they are willing to listen to what the child has to say
- » Be prepared to listen impartially to the child, giving appropriate support, but without introducing their own opinions or judgement
- » Be aware of documenting requirements
- » Remember that they are working as part of a team, and must never make an unconditional promise of confidentiality to a child
- » Report any concerns on Guard without undue delay. If further clarification or support is needed, then also to the DSL or the Deputy/SLT member in their absence
- » Be aware that what the child has to say may be uncomfortable or distressing to them, and make clear to them that they may seek support, help or advice for themselves if required

If a disclosure or allegation is made by any other person (parent, family member, another professional, etc.) regarding a safeguarding or child protection issue, the same principles regarding documenting and evidence will apply. Adults should be offered the opportunity to make a written statement, which should be signed and dated by them, and by any witness(es) to the statement. This should be uploaded to the specific concern on Guard.

The DSL or Principal must be notified immediately of any allegation or disclosure that calls into question the competence or suitability of another professional person (whether or not they are an employee of GEMS Education.) Such information must be treated as being strictly confidential. Verbal notifications of this kind that are made to the DSL, or to other senior staff, must be followed up formally in writing, and delivered electronically through the Guard system (see also APPENDIX I: GEMS Allegations Management Policy.)

## ii) Acting on a current child protection issue:

If, after discussion with a DSL there is still cause for concern about a child, then the Safeguarding and Child Protection procedures will be followed. The DSL or a named deputy or another person acting on his or her behalf will take the lead role in any safeguarding or child protection issue.

The Senior Manager – Safeguarding in the Central Safeguarding Team is the initial contact point for any referral and is the person responsible for keeping the school informed of the process and outcome from GEMS perspective. If this has not been done already, a decision will be reached as to whether any immediate action is necessary to secure the child's safety and welfare, and on any subsequent investigation or action to be taken.

GEMS schools should hold at least two emergency contact numbers for each child, usually both parents, and if it is deemed appropriate, (i.e. if there is not an allegation against one of those contacts) these people will be contacted in the event of any safeguarding concern or incident at school without undue delay.

If a child protection concern, allegation or incident relates to a member of staff or a person working with children, then the GEMS Vice President – Safeguarding and Child Protection must be notified on the same day the allegation is raised, without delay, once the allegation is substantiated. See GEMS Management of Allegations policy: Appendix I.

Discussions with the child's parents, or any other person who has been, or may be, implicated in the safeguarding concern must not take place without the agreement of the Vice President – Safeguarding and Child Protection and the Principal/CEO.

Where a child has made a specific statement, it may be necessary to clarify what they have said, and it is vitally important to document this information accurately together with the circumstances in which the statement was given. The relevant person in the school should meticulously document all observations, concerns, discussions and actions; inclusive of the date and time they were noted, this forms the safeguarding chronology. These records must be uploaded to Guard and may provide important information that may be required for external referrals or subsequent court proceedings. Guard populates a chronology as part of the case management system.

## 4. ALLEGATIONS AGAINST ADULTS:

All GEMS schools and services will have appointed at least two members of the SLT (allegations manager and deputy) to act as managers for allegations against staff. All staff should be made aware of their identity and how to share concerns about the behaviour of adults working with children. For details see Appendix I: GEMS Allegations Management Policy.

Employees with specific questions about the GEMS Allegations Management Policy or who have been subject to an allegation can access support through the school designated Allegations Manager, or if they feel this is a conflict of interest, they can raise their queries with the Principal or the school HR Business Partner, who may seek further advice from the GEMS Vice President – Safeguarding and Child Protection.





## 5. WHISTLEBLOWING

Whistleblowing is any disclosure of information that is made in the public interest and, in the reasonable belief of the individual that relates to suspected wrongdoing or dangers at work. This could be happening at the present time, have taken place in the past or is likely to happen in the future. This may include:

- » a criminal offence e.g. manipulation of accounting records and finances, or inappropriate use of school assets or funds
- » a miscarriage of justice
- » an act creating risk to health and safety
- » an act causing damage to the environment
- » a breach of any other legal obligation
- » a concern relating to the safeguarding of children or adults
- » the deliberate concealment of any of the above matters

GEMS expect all senior leaders to have disseminated the company's 'Whistleblowing Policy' to all employees. The school's leadership team through the DSL must have allocated a proportion of induction or orientation to highlighting the key principles of whistleblowing.

See [GEMS Whistleblowing policy](#)

## 6. COMPLAINTS PROCEDURES

Complaints whether directly made to the school are managed by the Principal/CEO, other members of the Senior Leadership Team and Governors (where appropriate.)

Complaints which escalate into a safeguarding/child protection concern will automatically be managed under the school's safeguarding/child protection procedures.

## 7. SAFER RECRUITMENT

It is the expectation that all schools and services comply with the requirements of the policy and procedures for safer recruitment in education. GEMS will audit the compliance with its safer recruitment policy periodically via review of individual schools Single Central Records.

Should senior leaders have questions about the detail of any of the GEMS safer recruitment checks these should be directed through the individual school's HR Business Partner. Please reference GEMS Safer Recruitment Policy for the detail relevant to your individual schools, see link below.



For specific details relating to safer recruitment in GEMS' schools we ask all employees to direct these questions through the school's HR Manager. However, the exact detail and expectations of all pre-employment checks can be found in the Safer Recruitment policy found on GEMS SharePoint [GEMSNET Policies & Documents - Safer Recruitment Policy](#)

Employees will also be subject to ongoing checks through the government in the schools' locality.

## 8. ABUSE OF A POSITION OF TRUST

As a GEMS employee tasked with the responsibility of supervising/educating children you provide care, supervisory and educational support to children from a 'position of trust.' The position of trust carries with it certain expectations and responsibilities. Breaches of these expectations and responsibilities are likely to lead to disciplinary action and possible dismissal.

'Positions of trust' exist in professions where the professional is in a position of authority or status over a child or vulnerable person, e.g. school staff, volunteers, medical staff, therapists, coaches, drivers, services staff etc.

You are employed in a 'position of trust' in respect of all children connected to GEMS. All relationships developed with children will be as agents of the company and as such no personal relationships will be permitted outside the remit of the service.

This means that adults should always maintain appropriate professional boundaries and avoid behaviours, which might be misinterpreted by others. They should report and document any incident with this potential. See GEMS Safer Working Practice Guidance APPENDIX H.

## 9. SAFE WORKING PRACTICE/STAFF CODE OF CONDUCT

GEMS Safer Working Practice Guidance is attached as Appendix H. This provides practical guidance to all adults on which behaviours potentially constitute safe practice and which behaviours should be avoided. The document seeks to ensure that the responsibilities of senior leaders of educational settings towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. This guidance supplements the Ministry of Education Code of Conduct for Education Professionals in General Education.

## 10. STAFF TRAINING

There is an expectation that training is in place for the delegations in all GEMS Schools and any associated service including the Central Education Team:

The minimum expectation for a Designated Safeguarding Lead in a GEMS school or service is that they have undertaken the GEMS-specific DSL Level 3 training every 2 years and receive regular practice updates throughout the year through the GEMS Designated Safeguarding Lead teams group, which is mandatory to join. For full details of training required see the GEMS Safeguarding Training Matrix - Appendix D.



## 11. EMPOWERING CHILDREN TO KEEP THEMSELVES SAFE

GEMS Education ensures that children are taught about elements of safeguarding; including online safety, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum.' Where they exist, this is supported by the school inspection frameworks and legislative frameworks in the various countries in which GEMS operates. GEMS expects senior leadership teams to ensure a curriculum that is relevant, and is sensitive to social, cultural and moral principles, exists in all schools and for all age ranges.

Any area of the curriculum which explores aspects of safeguarding that could be perceived as 'culturally sensitive' should be married with relevant departmental advice from the GEMS Vice President – Safeguarding and Child Protection as well as the regulator and relevant content specialists. The relevant VP Education/Cluster Lead should be informed before content is implemented into the curriculum.

## 12. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

All schools in the GEMS network must be clear that there is sometimes a need to provide additional support to vulnerable children. Children in early childhood, those identified as having SEND concerns, children with mental health or medical conditions (some may be temporary) or are vulnerable in other ways.

They are considered vulnerable as they may not know that what is happening to them is abuse, they have additional communication needs (they may be non-verbal,) they need intimate care or are isolated from others or are dependent on adults/others for care.

This may apply to any of our children, and may present in a number of ways, including:

- » Communication difficulties – children may not have the vocabulary to articulate their needs or feelings and are unable therefore to share concerns. It is important that staff observe children for possible signs of concern.
- » Information regarding empowerment and how these children share information may need to be presented in an accessible way to provide opportunities outside of the usual verbal communication. They may also need further adaption and opportunities to share concerns in a non-verbal format.
- » Presenting behaviours (mood, self-injury, challenging behaviour) may be a way of communicating harm or impact of abuse. Staff must be aware of the need to look beyond the behaviour to the possible root cause and explore this with the child at an appropriate time.
- » These children may be more vulnerable to grooming, bullying, online harms or child-on-child abuse. Schools should regularly raise awareness with staff about early identification and how to respond to these issues.



### 13. ATTENDANCE/CHILDREN MISSING FROM EDUCATION

GEMS Education recognises that regular attendance and punctuality at school is important to the well-being and safety of all children and enables them to access the opportunities made available to them at school. Attendance must be monitored closely, and action taken where concerns are raised; whether learning is online, blended or physically in school. Every school must have an attendance policy that is reviewed regularly by the school leaders, and should monitor the impact of the policy in securing good attendance and punctuality.

Where a child has 5 consecutive school days of unexplained absence and all reasonable steps\* have been taken by the school to establish their whereabouts without success, the school will make an immediate referral for advice and guidance to the relevant Senior Manager – Safeguarding and ensure that this is recorded on the Guard platform.

\*Reasonable steps may include:

- » Telephone calls to all known contacts (local/international)
- » Emails to parents/guardians
- » Contact with other schools where siblings may be registered.
- » Enquiries to friends, neighbours etc. through school contacts.

### 14. BEHAVIOUR MANAGEMENT

Every school in the GEMS network must have a specific Behaviour Management Policy that is reviewed and ratified by the school SLT/Governors annually. Employees must have access to this document through a common ICT drive and be inducted in its relevance through annual induction and orientation. Any staff members with pastoral or supervisory support for children who present with challenging behaviour have a responsibility to work with individual SLTs to establish relevant training for themselves and the whole school staff team, seeking further advice and guidance from the GEMS Corporate Head of Inclusion where necessary.

GEMS do not recognise restrictive physical intervention to manage behaviour under any circumstances. Individual employees have a responsibility to ensure they familiarise themselves with the relevant Behaviour Management Policy for the school they work in. Failure to adhere to this policy could result in disciplinary action.

### 15. ONLINE SAFETY

Online communication between staff and children should not happen other than for the purposes of coordinating an aspect of education. All communications should be made on school devices through GEMS approved mail servers. All communications should be available on request to the SLT team of the specific school or service. For further information, please see [GEMSNET Policies & Documents – Safer Working Practice Guidance](#).



**Youth Produced Sexual Imagery (Sexting/sending nudes) See Appendix C – Child Protection Procedures for detailed information**

**Relevant legislation:**

- » [law no. 141/2021 amending some articles of the 58/1937 Penal Law](#)

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern will always be the welfare and protection of the children involved. Children who share sexual imagery of themselves or their peers are breaking the law. However, GEMS believes it is important to avoid criminalising children unnecessarily. Therefore, the school will work in partnership with parents and external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to YPSI is more or less serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, of which the member of staff may not be aware.

If, at any point in the process, there is concern that a child has been harmed or is at risk of harm, the DSL will contact the relevant Senior Manager – Safeguarding for further advice and guidance.

## **16. BULLYING**

Every school in the GEMS network must have a policy that addresses anti-bullying. This may be part of a wider group of linked policies including behaviour, online safety, complaints etc. This should be regularly reviewed, and GEMS children should be involved in its creation, implementation and review. See also Appendix C: Child Protection Procedures – Child-on-child abuse.

It is the responsibility of:

- » GEMS Corporate Governance to ensure schools have effective anti-bullying policies in place
- » The Principal/CEO to communicate the anti-bullying policy to the school community, to ensure that disciplinary measures are applied fairly, consistently and reasonably, and that there is an effective route for concerns to be raised without delay.
- » All staff, including: governors, senior leadership, teaching and non-teaching staff, to support, uphold and implement this policy accordingly
- » Parents/carers to support their children and work in partnership with the school
- » Children to abide by the policy.



## 17. ENGAGING WITH CHILDREN

When engaging with children who already have, or may be about to, make a disclosure of abuse, staff should be aware that the child may need to make a formal statement to external agencies and the police in the near future.

However, the reality is often that they will choose to disclose initially to a member of staff they feel that they can trust, and who will listen to them sympathetically. Therefore, the following points should be kept in mind:

- » Any discussion should be carried out in a way that minimises distress to the child concerned and maximises the likelihood that the information they provide is accurate and complete. Where the discussion takes place should be somewhere so that they feel safe, they are assured of privacy, and they are not distracted or interrupted.
- » Asking 'leading questions', or 'putting your own words as the child's must be avoided. Similarly, staff must not pass any opinions, or express their own feelings about what the child is telling them. It is acceptable for staff to reassure them that it is safe for them to tell staff, but it must be made clear that anything they say will have to be passed on to the DSL and possibly other people who work in child protection so that we can keep them safe.
- » Be aware that the child may need more time and more than one opportunity to speak before they feel safe to fully voice all their concerns.
- » The child may wish to retract a statement they have made earlier, or contradict a statement they have already made, or even refuse to speak at all. In these circumstances, it is not appropriate for staff to put any pressure on them, but their reactions and comments should be accurately documented, with times and dates.

It is important that in addition to a factual written statement of the disclosure, any member of staff who has been involved, or who was present at the time, should make a written record of the circumstances in which the disclosure came about, this should be directly entered, or the document uploaded directly onto Guard as part of the case management documentation.

It is important that all staff are aware of their own ability to deal with any safeguarding situation or issue. If a member of staff finds themselves in a situation where a child feels sufficiently comfortable to disclose information of a sensitive nature, the member of staff must consider very carefully how confident they feel about continuing to engage the child in this discussion.

If the member of staff/volunteer feels that they need support from a more experienced staff member, they should carefully explain to the child that they need to seek help from someone else. A more experienced member of staff may be able to help, or alternatively the child may wish to speak to the DSL.

However, if nobody else is available, and the child insists on talking, then the member of staff should continue to listen carefully, so that they do not feel that they are being rejected or ignored. As soon as possible, any disclosure made, or information given by the child must be carefully documented using the child's own words where possible.



## 18. SUPPORT FOR CHILDREN, FAMILIES AND STAFF INVOLVED IN A CHILD PROTECTION ISSUE

Child abuse is devastating for the child and can result in distress and anxiety for staff and parents/caregivers who become involved.

GEMS expects senior leaders to ensure that everyone involved in a child protection issue follows the procedures laid out in this policy and any other relevant policy including Whistleblowing and Allegations Management where appropriate. Senior leaders will ensure that all suspicions and disclosures are taken seriously.

The DSL will act as a central point of contact, offering details of helplines, counselling or other avenues of external support where necessary, seeking advice and guidance from the relevant Senior Manager - Safeguarding as appropriate.

## 19. SITE SECURITY

Visitors to the school, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. All visitors are expected to follow the school's safeguarding and health and safety regulations to ensure children in school are kept safe, including expectations of parents/caregivers to wear the relevant school lanyard.

The Principal/Manager of School Operations will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. Where possible and practical, contractors will be engaged before or after regular school hours.

## 20. EXTENDED SCHOOL AND OFF-SITE VISITS

All extended and off-site activities are subject to a risk assessment and must satisfy health and safety and safeguarding requirements.

When GEMS children attend off-site activities, including day or residential visits and work-related activities, the Principal is responsible for ensuring that effective safeguarding and child protection arrangements are in place.

Where extended school activities are provided by and managed by the school, the GEMS Safeguarding policy and school-specific on-site procedures apply, including the mandate to escalate any safeguarding concerns as per policy. If other organisations provide services or activities on the school site, the school will check that those organisations have appropriate procedures in place, including safer recruitment and health & safety procedures.



## 21. SAFEGUARDING/CHILD PROTECTION LEGISLATION AND GUIDANCE

Without exception, GEMS will adopt the relevant law governing the jurisdiction of the operating locality of the school. In the different countries in which GEMS operate, subtlety of legal interpretation may exist. Throughout our safeguarding policies, we have broadly accepted the principles and ethos of UK safeguarding legislation, as we believe this to be some of the most robust legislation internationally. Keeping Children Safe in Education commissioned and developed by the Department for Education England and Wales, is debatably the most robust educational safeguarding resource in circulation.

## 22. RECORD KEEPING

The GEMS Guard Safeguarding Platform should be used as the system to report, document, escalate, review and evaluate outcomes of cases, in conjunction with the school safeguarding dashboard. All safeguarding concerns must be entered on the Guard platform and staff must be trained in how to raise concerns on the Guard system.

Following an initial concern being raised on Guard, it is essential that any subsequent discussions with children or others are accurately documented on Guard as soon as possible.

Any written information should be clearly signed and dated then be uploaded onto the Guard platform by attaching a PDF of the original documentation. The original information should always be filed and stored securely with the DSL.

Any records may be required as part of a subsequent investigation, and they could be used as evidence in court if there is a criminal prosecution. Consequently, it is vital that all written records are accurate and factual. Any allegations or statements made by a child or by any other person should be documented verbatim (documenting the exact words used) wherever possible. The person, who made the allegation or statement, and any witness who was present, should countersign any written record.

As soon as a child protection issue or concern has been raised, a timely and accurate record must be made by the DSL of all events, reports, decisions, actions taken and outcomes. This should be entered into the Guard platform.

On some occasions, it may be deemed necessary to obtain photographic evidence of suspected injuries to a child. School staff (including medical staff) must not photograph children. This evidence will be obtained by the police or external medical professionals or child protection services.





School staff may document details in writing of any visible injuries or illustrate the position and extent of the injuries on the Guard platform using the body map but must not take any photographs of a child in these types of circumstances.

The privacy of children's sensitive information is taken seriously. Therefore, safeguarding/child protection information must be stored confidentially. Any records should be uploaded onto Guard where these can be stored securely linked to individual children.

Only the GEMS Vice President – Safeguarding and Child Protection, Senior Safeguarding Managers, the Principal/CEO's and DSL's in individual schools should and will have access to all safeguarding files. These same end users will also make decisions about with whom they are to be shared.

### **23. CONFIDENTIALITY AND INFORMATION SHARING**

Whilst gathering information following a child welfare concern, the appropriate information sharing guidance must be followed. When working with confidential, personal information of a very sensitive nature, staff should be aware at all times of the GEMS current guidance on information sharing in the best interest of a child and data protection. See above for how records are kept confidentially.

Appendix E contains a link to the standard format for requesting or sharing relevant safeguarding information between GEMS schools to ensure an effective transfer for any vulnerable child. Upon confirmation that a child has transferred to another GEMS school, any safeguarding records should be transferred to the DSL of the receiving school. The DSL of the current school should also contact the DSL/ Principal in the receiving school by telephone to provide a full picture of the child(ren).

When children transfer to a school outside of the GEMS' network, every effort should be made to contact the DSL/Principal by telephone regarding any vulnerable child and share appropriate information in the best interest of the child. Further advice and guidance can be sought from the relevant Senior Manager Safeguarding.



## APPENDIX A: ARAB REPUBLIC of EGYPT GOVERNMENT SAFEGUARDING MANDATE FOR EDUCATORS

The following information can be used in a school/service's literature/website to inform parents of the expectations of the school staff regarding Egyptian child protection legislation:

'Under Egyptian governmental guidance, schools must make arrangements to safeguard and promote the welfare of children. Parents/carers should know that the law requires all school staff to pass on information, which gives rise to a concern about a child's welfare, including risk from, neglect physical, emotional or sexual abuse. Staff will seek, in general, to discuss any concerns with the parent/carer and discuss the need to make a referral to Egyptian child care agencies if that is considered necessary, however, this discussion will only take place where such discussions will not place the child at increased risk of significant harm or cause undue delay.

The school will seek advice from Egyptian child protection agencies when they have reasonable cause to suspect a child may be suffering or likely to suffer significant harm. Occasionally, concerns are passed on which are later found to be unproven. Parents/carers will appreciate that the school's Designated Safeguarding Lead carries out their responsibilities in accordance with the law and acts in the best interests of all children.

### Article 60

Basic education shall develop the capabilities and aptitudes of students, satisfy their needs, and provide them with the necessary values, information, and behavioral, practical and professional skills appropriate to their different environments, hence enabling those who complete the compulsory basic education stage to proceed forward to a higher education stage to become, after suitable professional training, productive citizens in their communities.

### Article 61

The secondary general education stage shall prepare students for practical life and for higher and university education, as well as for public life participation, along with promoting religious, behavioral, and national values and principles.



## APPENDIX B: ROLES AND RESPONSIBILITIES

### The Governing Body (GEMS Education) ensures that schools:

- » Have safeguarding, recruitment and managing allegations procedures that take into account the procedures and practice of GEMS Education, the country of operation and any national legislation/guidance.
- » Appoint a Designated Safeguarding Lead who is recommended to be a member of the senior team and who must have undertaken GEMS DSL training at level 3, in addition to GEMS Level 1 Safeguarding Basic Awareness training.
- » Ensure that the DSL role is explicit in the role holder's job description and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- » Have a Safeguarding and Child Protection policy and procedures, including a staff code of conduct, that are consistent with GEMS, and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.
- » Have procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the Principal/CEO and allegations against other children.
- » Follow safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification by professional association regulations
- » Develop an induction strategy that ensures all staff, including the Principal/CEO, and volunteers receive information about the school's safeguarding arrangements, Safer Working Practice (Code of Conduct) and the role of the DSL, on induction and before they start work at the school.
- » Develop a training strategy that ensures all staff and volunteers receive appropriate and regularly updated safeguarding and child protection training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively in line with any requirements of GEMS. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties below, these include joining the GEMS Designated Safeguarding Teams group.
- » Teach children about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.

### The Principal/CEO:

- » Ensures that the GEMS Safeguarding Policy and procedures are understood and implemented by all staff including how to identify, raise, record and escalate concerns effectively.
- » Allocates sufficient time, training, support and resources, including cover arrangements, when

necessary, to enable the DSL and Deputies to carry out their roles effectively, including the assessment of children and attendance at any external agency discussions, training and other necessary meetings.

- » Ensures that all staff receive safeguarding training in line with the GEMS Safeguarding Policy before they commence working with children.
- » Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the GEMS whistle blowing procedures and allegations management policy.
- » Ensures that children are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe, including when online, as part of a broad and balanced curriculum.
- » Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the GEMS Vice President – Safeguarding and Child Protection on the day of the allegation and documents it as an allegation on the Guard Online Safeguarding platform.
- » Appoints an Allegations Manager and Deputy who is a member of the senior leadership team (if not themselves) to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made in line with the GEMS allegations management policy.

#### **The Designated Safeguarding Lead (DSL):**

- » Is recommended to be a senior member of staff from the school's leadership team. The DSL must have the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff.
- » Takes lead responsibility for safeguarding and child protection in the school, the overall responsibility of which cannot be delegated. However, the day-to-day activities of the DSL may be delegated to appropriately trained deputies.
- » Is appropriately trained, receives Level 3 DSL refresher training at two-yearly intervals and further training regularly (through attendance at the GEMS Designated Safeguarding Lead Teams group) and updates their knowledge and skills to keep up with any developments relevant to their role.
- » Acts as a source of support and expertise to the school community.
- » Encourages a culture of listening to children and taking account of their wishes and feelings.
- » Is alert to the specific needs of children in need, including those with special educational

needs or other vulnerabilities.

- » Has a working knowledge of relevant local law, education inspection process, and inter-agency support.
- » Keeps detailed records of all safeguarding concerns using the Guard platform, ensuring that such records are stored securely.
- » Refers cases of suspected abuse to the local child protection agency or the Police as appropriate and seeks advice and guidance from the relevant Senior Manager – Safeguarding, prior to any external referral.
- » Attends and/or contributes to any external child protection meetings and chairs regular school Safeguarding Committee meetings.
- » Co-ordinates the school’s contribution to any meetings with external agencies, attending and actively participating in all relevant discussions
- » Develops effective links with relevant statutory and voluntary agencies.
- » Ensures that all staff sign to indicate that they have read and understood the GEMS Education Safeguarding Policy: POLCSG001V2 and Safer Working Practice guidance.
- » Has a working knowledge of relevant national safeguarding guidance.
- » Ensures that the school safeguarding and child protection procedures are regularly reviewed, in collaboration with the whole school community of children, parents, staff, and volunteers.
- » Liaises with, the Principal/CEO and relevant Senior Manager – Safeguarding for any Child Protection issues.
- » Keeps a record of staff attendance at school-based Safeguarding/Child Protection training, which is signed by individual staff members.
- » Makes the Safeguarding and Child Protection policy available publicly for staff, e.g., on the learning management system, school’s website or by other means.
- » Ensures parents are aware of the school’s role in safeguarding and that referrals about suspected abuse and neglect may be made (see Appendix A.) In addition, the GEMS Safeguarding and Child Protection policy commitment statement signed by the GEMS Education CEO, should be freely available as a link or PDF document on the school website for easy access for parents. That is updated by the Central safeguarding team annually.
- » Ensures that the Principal/CEO is aware of the DSL responsibility under relevant law and GEMS expectations and keeps them informed of any relevant safeguarding and child protection issues.

### The Deputy Designated Safeguarding Lead(s)

- » Is/are appropriately trained to the same level as the DSL and, in the absence of the DSL, carries out those functions as necessary to ensure the ongoing safety and protection of

children. In the event of the long-term absence of the DSL, the deputy will assume all the functions above, with approval of the Principal.

## APPENDIX C: CHILD PROTECTION PROCEDURES

Definitions taken from *Keeping Children Safe in Education*, Department for Education, (2022)

### Recognising abuse

To ensure that GEMS children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. This is covered in GEMS Level 1 Basic Awareness face to face and online training.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler. Abuse may be committed by adult men or women and by other children.

### Abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the Designated Safeguarding Lead (or Deputy).

All should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will occur concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

### Definitions of abuse and neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.



It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The sexual abuse of children by other children is a specific safeguarding issue (also known as Child-on-Child abuse) in education and all staff should be aware of it and their school's policies and procedures for dealing with it.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and

emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Domestic Abuse:** Domestic abuse can encompass a wide range of behaviours, maybe a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of domestic abuse at home and/or suffer domestic abuse in their own relationships. All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.

### **Safeguarding issues and risk of harm**

All staff should have an awareness of the safeguarding issues that can put children at risk of harm. Behaviours linked to drug-taking and/or alcohol misuse, deliberating missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be



signs that children are at risk.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or the increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Abuse**

All staff should be aware that children can abuse other children (referred to as child-on-child abuse). All staff should be clear as to the school's policy and procedures regarding child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Child-on-child abuse is most likely to include, but may not be limited to:

- » bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- » abuse in intimate personal relationships between peers;
- » physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- » sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- » sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- » causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- » consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery – See YPSI section below);
- » up-skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- » initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- » Online child-on-child abuse is any form of child-on-child abuse with a digital element, for example 'sexting', online abuse, coercion and exploitation, peer on peer grooming, threatening



language delivered via online means, the distribution of sexualized online content and harassment.

### **Youth Produced Sexual Imagery "Sexting" (YPSI)**

If staff become concerned about a YPSI issue in relation to a device in the possession of a child (e.g. mobile phone, tablet, digital camera), the member of staff will support the child to take the device immediately to the DSL. Staff will not look at or print any indecent images.

The DSL will discuss the concerns with appropriate staff and speak to any child involved as appropriate. Parents/carers will be informed at an early stage and involved in the process after the DSL has discussed the issue with the Principal and the relevant Senior Manager – Safeguarding.

If, at any point in the process, there is concern that a child has been harmed or is at risk of harm, a referral will be made to the relevant external agency, after speaking to the GEMS Vice President – Safeguarding and Child Protection.

The DSL will make a judgement about whether a reported YPSI incident is experimental or aggravated.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by children. These include possible adult involvement or criminal or abusive behaviour by children such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a child who is pictured.

Review of what response is necessary will facilitate consideration of whether:

- » There are any offences that warrant a police investigation
- » Child protection procedures need to be invoked
- » Parents/carers require support in order to safeguard their children
- » Any of the perpetrators and/or victims require additional support.

Examples of aggravated incidents include:

- » Evidence of adult involvement in acquiring, creating or disseminating indecent images of children (possibly by an adult pretending to be a child known to the victim)
- » Evidence of coercing, intimidating, bullying, threatening and/or extortion of children by one or more other child to create and share indecent images of themselves
- » Pressure applied to a number of children (e.g. all female children in a class or year group) to create and share indecent images of themselves
- » Pressurising a child who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- » Dissemination of indecent images of children to a significant number of others with an



intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)

- » What is known about the imagery suggests the content depicts sexual acts
- » Sharing of indecent images places a child at immediate risk of harm, for example the child is presenting as suicidal or self-harming

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident, or whether the school is able to contain the situation in partnership with all parents of the children involved, arrange for the parents to ensure that all indecent images are deleted and that the children involved learn from the incident in order to keep themselves safe in future.

**Viewing the Imagery** – As a rule, adults should **not** view child produced sexual imagery. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on local laws, safeguarding best practice and never taken in isolation. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child or has the potential to be viewed as a criminal activity in country in which the school operates. Any decision should be initially discussed with the Principal and GEMS Vice President – Safeguarding and Child Protection and if a decision is made to view imagery, they will be satisfied that viewing:

Is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the child involved)

Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the child or parent in making a report

Is unavoidable because a child has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery, then the DSL will:

Never copy, print or share the imagery; this is illegal

Ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the Principal

Ensure viewing takes place with another member of staff present in the room, ideally the Principal another DSL or a member of the senior leadership team. The other staff member does not need to view the images

Wherever possible ensure viewing takes place on school premises, ideally in the Principal or DSL's office

Ensure wherever possible that images are viewed by a staff member of the same sex as the



child in the imagery

Document the viewing of the imagery on the Guard safeguarding platform, including who was present, why the image was viewed and any subsequent actions and outcomes.

**Deletion of Images** - if the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery, this will be in consultation with parents. Where the device is not owned by the school, advice should be sought from the relevant Senior Manager - Safeguarding.

### **Indicators of abuse**

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'.

It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused or neglected may:

- » have bruises, bleeding, burns, fractures or other injuries;
- » show signs of pain or discomfort;
- » keep arms and legs covered, even in warm weather;
- » be concerned about changing for PE or swimming;
- » look unkempt and uncared for;
- » change their eating habits;
- » have difficulty in making or sustaining friendships;
- » appear fearful;
- » be reckless regarding their own or other's safety;
- » self-harm;
- » frequently miss school or arrive late;
- » show signs of not wanting to go home;
- » display a change in behaviour - from quiet to aggressive, or happy to withdrawn;
- » challenge authority;

- » become disinterested in their schoolwork;
- » be constantly tired or preoccupied;
- » be wary of physical contact;
- » be involved in, or particularly knowledgeable about drugs or alcohol; and/or
- » display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development.
- » acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk. Any concern, may be part of a bigger picture for that child which if known, could give context to a situation and help to protect them.

### **Impact of abuse**

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood, and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

### **Taking Action**

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".

### **GEMS Guard Online Safeguarding Platform**

All staff have access to the GEMS Guard safeguarding platform and concerns relating to any aspect of a child's welfare, safeguarding and protection must be logged [here](#)

**Where there is concern about the immediate welfare of a child, the DSL should also contact the relevant GEMS Safeguarding Senior Manager for advice and guidance immediately.** Any potential inter-agency involvement with statutory, and public bodies, including the Police/Social Services/regulatory bodies, must be notified to the relevant Senior Manager Safeguarding.

For any incident categorised as serious as per the Guard safeguarding severity category (Appendix F), the Vice President – Safeguarding and Child Protection should be informed by the DSL/Principal within 1 hour of the incident being identified at school level.

Key points for staff to remember when taking action are:

- » In an emergency take the action necessary to help the child
- » Report your concern to the DSL as quickly as possible and report on Guard, staff should never leave site with an undisclosed concern.
- » Do not start your own investigation.
- » Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- » Seek support for yourself if you are distressed or need to debrief

### **If a member of staff or volunteer is concerned about a child's welfare**

There will be occasions when staff may suspect that a child may be at risk but have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the child the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. It is fine for staff to ask the child if they are OK or if they can help in any way.

Staff should report these concerns to the DSL and log on Guard as per any other concern about a child's welfare, it might be part of a wider picture.

Concerns which do not meet the threshold for child protection intervention will be managed through the safeguarding/welfare process.

### **If a child discloses to a member of staff or volunteer**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a child talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the child know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the child is a matter for professional judgement. Children may reconsider their disclosure at this point and should not be forced to disclose.

During their conversations with children, staff will:

- » Allow them to speak freely
- » Remain calm and not overreact – the child may stop talking if they feel they are upsetting their listener
- » Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- » Not be afraid of silences – staff must remember how hard this must be for the child and should not attempt to force a child to disclose

- » **Under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think about all this (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. when did this happen, where did this happen?)
- » **Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused**
- » Avoid reprimanding the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong
- » Tell the child what will happen next
- » Let them know that someone (either you or another named person, e.g. the DSL) will come to see them before the end of the day
- » Enter the concern on the Guard platform as soon as possible including full details of the conversation(s).
- » Report verbally to the DSL
- » Seek support if they feel distressed or need to debrief

### **Notifying parents**

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from the relevant Senior Manager – Safeguarding.

### **Making a referral to an external agency**

The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay. Advice and guidance may be sought from the relevant Senior Manager – Safeguarding.

The DSL will make a referral to the relevant agencies, and the police, if it is believed that a child is suffering or is at risk of suffering harm

### **GEMS Central Safeguarding Team**

Decisions related to safeguarding and child protection are made in the best interest of the child. Therefore, decisions regarding strategy and actions will not be made in isolation by individuals but in collaboration with the Vice President – Safeguarding & Child Protection.



## APPENDIX D: GEMS EDUCATION SAFEGUARDING TRAINING MATRIX

### Staff with DSL responsibility:

#### Every 2 years

Mandatory for Designated Safeguarding Lead (DSL) and Deputy DSL – GEMS Level 3 Designated Safeguarding Lead training. Schools may also elect to train pastoral team members, counsellors or other key staff in GEMS Level 3 DSL training, including the members of the Safeguarding Committee, SLT etc.

#### Annually – All staff

- » Face to Face Level 1 Basic Awareness safeguarding training for all staff.
- » Training register completed and maintained to ensure total attendance.
- » Signed acknowledgement that attendees have understood and will comply with GEMS Safeguarding Policy, Code of Conduct, Health & Safety, Acceptable Use.
- » Online Level 1 Safeguarding Basic Awareness course with successful completion of the assessment through GEMSU Learning Management System.
- » GEMSU Safer recruitment online training for staff involved in recruitment and interviewing.

#### Induction

- » Any new starters during the year receive face to face and online training (GEMSU) on or before their first working day.

#### Site Users including SSC/Outside providers/Services/Therapists/ESM Cover Teachers

- » All new starters including those who start outside of the usual induction window at the start of a term receive face to face safeguarding training and additionally, (if a GEMS employee,) GEMSU online training in Level 1 Basic Awareness, on or before their first working day (irrespective of when they start during the year.)

#### Annually

- » School provides safeguarding training with a register signed before outside providers/SSC staff including therapists begin work onsite.
- » All CET staff undertake online Safeguarding training with assessment through GEMSU Learning Management System.
- » ESM and all other Services provide Face to face Level 1 Basic Awareness safeguarding training for all staff.
- » Training register completed to ensure total attendance.



### **Termly**

- » Safeguarding updates face to face by the DSL for services/ESM/contractors.
- » Where contractors are on site without safeguarding training e.g. emergency works etc. MSO Department or Security Team must always supervise.
- » Commitment by all that any necessary work will be arranged whilst children are not on site if possible.
- » Undertaking by all, that new staff from agencies on site is highlighted to the MSO and the Designated Safeguarding Lead for on-site training prior to starting.

### **Volunteers**

- » Face to face safeguarding training annually with register and policy documents signed.
- » As with all working/volunteering in schools – good conduct certificates must be provided in line with Safer Recruitment policy.
- » Confidentiality agreement and code of conduct/expectation document signed before volunteer commences.

### **Monitoring of training**

- » Safeguarding should be a standing agenda item in SLT, HSE and pastoral meetings including regular updates on the impact of training and compliance with policy.

## **APPENDIX E: GEMS TRANSFER OF INFORMATION TEMPLATE**

[GEMSNET Policies & Documents Portal \(Safeguarding - Transfer of Information template\)](#)





## APPENDIX F: GUARD ESCALATION ROUTES

[Guard Escalation Routes](#)

## APPENDIX G: INTIMATE CARE AND TOILETING GUIDANCE STATEMENT

This guidance statement is designed to promote best practice and to safeguard children and practitioners. It applies to everyone involved in the intimate care routines of children. The guidance should be read in conjunction with the settings' policies as below:

- » Child protection and safeguarding guidance
- » Staff code of conduct and guidance on safer working practices
- » Health and safety guidance and procedures
- » Special educational needs guidance
- » Whistle-blowing guidance
- » Safer recruitment practices guidance

It is the expectation of GEMS that any child who requires support with intimate care is provided with a risk reduction plan (a plan to reduce instances of the requirement for intimate care.) This should be created in conjunction with the child's parents and the setting.

## APPENDIX H: GEMS SAFER WORKING PRACTICE GUIDANCE

[GEMSNET Policies & Documents - Safer Working Practice Guidance](#)

## APPENDIX I: GEMS ALLEGATIONS MANAGEMENT POLICY

[GEMSNET Policies & Documents - Allegations Management Policy](#)

## APPENDIX J: GEMS SAFER RECRUITMENT POLICY

[GEMSNET Policies & Documents - Safer Recruitment Policy](#)

## APPENDIX K: GUARD REPORTING GUIDANCE

[GEMSNET Policies & Documents - Walkthrough - Logging a Safeguarding concern on Phoenix HSE](#)



