

GEMS
EDUCATION



**Safeguarding is
everyone's responsibility**
me, you, us

**GUIDANCE FOR SAFER WORKING
PRACTICE FOR ADULTS WHO WORK
WITH CHILDREN AND STUDENTS**

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This guidance has been updated from 'Guidance for safe working practice for those working with children and young people in education settings 2022'. Adapted and updated by the Safer Recruitment Consortium from an original IRSC/DFE document.



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SECTION 1: OVERVIEW

Background

All adults who come into contact with students have a duty of care to safeguard and promote their welfare.

This means that an individual must take all reasonable steps to ensure the safety of any student involved in any activity or interaction for which that individual is responsible. Any person in charge of, or working with, students in any capacity must, both legally and morally, provide a duty of care.

GEMS Education expects all schools and services to safeguard and promote the well-being of all students. This includes the need to ensure that all adults who work with, or on behalf of students, are competent, confident and safe to be trusted in that role.

Almost all adults who work with students act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for everyone in their care. However, it is recognised that the behaviour of adults can give rise to allegations of abuse being made against them. These allegations may be malicious or false and may arise from differing perceptions of the same event.

Equally, it must be recognised that some allegations will be substantiated and that there are adults who will deliberately seek out, create or exploit opportunities to abuse students. It is therefore essential that all steps are taken to safeguard students and ensure that the adults working with them are fully vetted and understand safeguarding and safer working practices.

This document provides practical guidance for anyone who works with, or on behalf of students, regardless of their role or responsibilities. It seeks to ensure that the duty to promote and safeguard the well-being of all students is in part, achieved by raising awareness of illegal, unsafe and inappropriate behaviours.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that this guidance cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance provided. It is expected that in these circumstances adults will always advise their line manager or a senior colleague of the justification for any such action already taken or proposed.

It is also recognised that not all adults who work with students are paid or contracted employees, for example, parent volunteers and LAB members. The principles and guidance outlined in this document still apply and should be followed by any adult who comes into contact with students.

The guidance contained in this document has due regard to current legislation, international best practice, statutory guidance and GEMS policies and procedures.



1.1. What to do if you are worried a student is being abused

Adults working with students should be familiar with GEMS policies and local procedures and protocols for safeguarding the welfare of students. School staff have a duty to report any safeguarding, child protection or welfare concerns on the Guard platform and to the Designated Safeguarding Lead (DSL) in their school or service. If the Designated Safeguarding Lead is unavailable, adults should report to a Deputy DSL. In the case of volunteers and visitors, all safeguarding, child protection or welfare concerns are to be immediately reported to the Designated Safeguarding Lead, Deputy DSL or Principal.

SECTION 2: USING THE GUIDANCE

2.1. Status of the document

This guidance document is intended to both supplement and complement GEMS policies and procedures relating to safeguarding and child protection. This includes but is not limited to:

- » GEMS Safeguarding Policy
- » GEMS Safer Recruitment Policy
- » GEMS Services Safer Recruitment Policy
- » GEMS Whistleblowing Policy
- » GEMS Gift & Hospitality
- » GEMS Employee Discipline Policy
- » GEMS Offsite Educational Trips and Visits Policy
- » GEMS and school-based Code of Conduct/Staff Handbooks

2.2. Purpose of the guidance

It is important that all adults working with students understand that the nature of their work and their responsibilities place them in a position of trust. This guidance provides clear advice to support safe behaviours for all adults working with students, regardless of whether in a paid or unpaid capacity, in all settings, and in all contexts. The purpose of this guidance is to:

- » Keep students safe by outlining safe practice for adults
- » Assist adults working with students to understand safe and responsible working practices and how to monitor their own practice



- » Support schools and employers in setting clear expectations of behaviours and/or codes of practice, in relation to safeguarding
- » Support schools and employers in making it clear that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken
- » Support safer recruitment practice
- » Minimise the risk of misplaced or malicious allegations made against adults who work with students
- » Reduce the incidence of positions of trust being abused or misused

2.3. Underpinning principles

- » The welfare of the student is paramount
- » It is the responsibility of all adults to safeguard and promote the welfare of students. This includes those adults employed, commissioned, or contracted to work with students, whether in a paid or voluntary capacity
- » Adults who work with students are responsible for their own actions and behaviours and should avoid any conduct which could lead any person to question their motivation and intentions
- » Adults should work in an open and transparent manner
- » The same professional standards should always be applied regardless of culture, disability, gender, language, ethnicity, and/or religious belief
- » All adults have a responsibility to continually monitor and review their practice and to ensure that they follow the guidance contained in this document and GEMS policies

2.4. Definitions

- » Schools/Services: encompass all types of educational establishments e.g. Early Years settings, Post-16, service/business units, on and off-site provision
- » Students/children/young people are interchangeable and refers to someone who has not yet reached their 18th birthday
- » Adults: refers to any adult who is employed, commissioned or contracted to work with, or on behalf of, students in either a paid or unpaid capacity, including volunteers
- » Supervisor/Manager/Principal/Leader refers to those adults who have responsibility for managing staff and/or services including the supervision of employees and/or volunteers, at any level.



- » Employer: refers to the school/service which employs or contracts the use of services of individuals. In the context of this document, the term 'employer' is also taken to include 'employing' the unpaid services of volunteers
- » Safeguarding: Is the process of protecting students from abuse or neglect and ensures they grow up in circumstances consistent with the provision of safe and effective care; enabling them to have optimum life chances and enter adulthood successfully
- » Duty of Care: the responsibility which rests with an individual or school/service to ensure that all reasonable steps are taken to ensure the safety of a student involved in any activity or interaction for which that individual or school/service is responsible

This document is relevant to both individuals and schools/services working with, or on behalf of students.

Each section provides general guidance about a particular aspect of work undertaken with students and, in the right-hand column, identifies specific advice about behaviours.

It is recommended that schools/services use this guidance to develop and promote safer working practice. They should ensure that all adults know its contents through having access to the document and that adults comply with the expectation that they will work to it.

Incorporating the guiding principles of this document in recruitment and selection processes will help to prevent and deter unsuitable people from working with our students. Providing employees and volunteers with clear guidance on appointment and revisiting this guidance as part of induction, supervision, performance management, training programmes etc. will also help to ensure a safer workforce. Individuals should follow this guidance in their day-to-day practice and should refer to this when taking on new work, different duties or additional responsibilities.

Line managers will be better placed to deal with inappropriate behaviour as expectations have been made clear and reinforced throughout a person's employment. (Evidence should be kept to demonstrate that this has been done e.g. training records etc.).



SECTION 3: GEMS GUIDANCE FOR SAFER WORKING PRACTICE

3.1. Introduction

Adults working in educational settings have a crucial role in shaping the lives of young people. They have a unique opportunity to interact with students in ways that are both affirming and inspiring. This guidance has been produced to help adults establish the safest possible learning and working environments whilst reducing the risk of adults working with students being falsely accused of unprofessional conduct.

3.2. Unsuitability

If an adult's practice deviates from GEMS Policies, this guidance and/or their professional or employment - related code of conduct, may bring into question their suitability to work with students in any capacity.

3.3. Duty of Care

Adults are accountable for the way in which they exercise authority, manage risk, use resources and safeguard students.

All adults, whether paid or voluntary, have a duty to keep young people safe and to protect them from abuse and report safeguarding concerns. Students have the right to be safe and to be treated with respect and dignity. It follows, adults

This means that these guidelines:

- » Apply to all adults working or volunteering in educational settings, whatever their position, role, or responsibility
- » Provide guidance where an individual's suitability to work with students has been called into question
- » Complement the work of the GEMS School Support Centre to provide clarity to schools on safer working practice

This means that adults should:

- » Have a clear understanding of GEMS Policies and the content of this document
- » Discuss any uncertainties or confusion with the school Principal, Designated Safeguarding Lead or line manager
- » Understand behaviors which may call into question their suitability to work with students

This means that adults should:

- » Understand the responsibilities of their role, and be aware that sanctions will be applied if these are breached
- » Always act in the student's best interests
- » Avoid any conduct which would lead any person to question their motives and intentions



are expected to take reasonable steps to ensure the safety and well-being of students. Failure to do so may be regarded as professional misconduct.

The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between adults and students and through behaviours by adults that demonstrate integrity, maturity and good judgement. When adults accept a role that involves working with children and young people, they must understand and acknowledge the responsibilities and trust involved.

Schools and employers have a duty of care to provide a safe working environment for adults and guidance about safe working practices. This includes having a duty of care for the well-being of adults and ensuring that adults are treated fairly and reasonably in all circumstances. Adults who are subject to an allegation should therefore be supported and treated fairly throughout the process.

Where GEMS provides services or activities directly or indirectly under the supervision or management of the school, GEMS and the school's arrangements for safeguarding must be followed.

- » Take responsibility for their own actions and behaviours including the reporting of any concerns

This means that schools/employers should:

- » Foster a culture of openness and support
- » Ensure that systems for raising concerns are in place, are communicated to all and are used effectively
- » Ensure that there are effective recording systems to confirm discussions, decisions and outcomes of any actions taken
- » Ensure that adults are not placed in situations which render them particularly vulnerable
- » Ensure that all adults are aware of expectations, policies and procedures
- » Ensure that, where services or activities are provided by another provider, that they have appropriate safeguarding policies and procedures in place

This means that Local Advisory Boards should:

- » Ensure that appropriate safeguarding and child protection policies and procedures are adopted, implemented and monitored



3.4. Making Professional Judgements

There may be occasions and circumstances in which adults have to make decisions

or take actions in the best interests of the student, which could contravene this guidance or where no guidance exists.

Adults are expected to make judgements about their behaviour in order to secure the best interests and welfare of students. Such judgements should always be recorded and shared with the Designated Safeguarding Lead and the Principal.

Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.

3.5. Position of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working in educational settings are in positions of trust in relation to the students.

A position of trust is one in which the adult is in a position of power or influence by virtue of their work or the nature of their activity. It is vital for adults to understand the power this can give them over students and the responsibility they must exercise as a consequence of this relationship.

A connection between an adult and a student is not a relationship between equals. There is potential for exploitation and harm.

Where no specific guidance exists, adults should:

- » Discuss the circumstances that informed their actions, or their proposed action, with the Designated Safeguarding Lead and, where appropriate, the Principal.
- » Always discuss any misunderstanding(s), accident(s) or threat(s) with the Principal or Designated Safeguarding Lead
- » Always record any areas of disagreement about the course of action taken and, if necessary, refer the matter to GEMS Corporate Head of Safeguarding and Child Protection for advice and guidance
- » Ensure records which confirm decisions, discussions and reasons why actions were taken are recorded immediately on Guard.

This means that adults should not:

- » Use their position to gain access to information for their own or others' advantage and/or a student's detriment
- » Use their position to intimidate, bully, humiliate, threaten, coerce or undermine students
- » Use their status and standing to form or promote relationships which are of a sexual nature, or which may become so



Adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Adults should always maintain appropriate professional boundaries and avoid behaviours which might be misinterpreted by others. They should report and record any incident with this potential. This is as relevant in the online world as it is in the classroom; staff engaging with students online have a responsibility to model safe practice at all times.

3.6. Confidentiality

Adults may have access to confidential information about students in order to undertake their responsibilities. In some circumstances adults may be given highly sensitive information.

Adults should never use confidential or personal information about a student or her/his family for their own, or another's advantage. Information must never be used to intimidate, humiliate, or embarrass the student or their family.

Information about a student should never be used casually in conversation or shared with any person other than on a need-to-know basis in the best interests of the student.

In circumstances where the student's identity does not need to be disclosed the information should be used anonymously. There are some circumstances in which an adult may be expected to share information about a student, for example when abuse is alleged or suspected.

In such cases, adults have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

This means that adults should:

- » Be clear about when information can and should be shared and in what circumstances it is appropriate to do so
- » Treat information they receive about students in a confidential manner including where relevant, transition information between schools
- » Seek advice from the DSL/ Principal/ line manager, GEMS Corporate Head of Safeguarding and Child Protection if they are in doubt about sharing information they hold or which has been requested of them
- » Know and follow the school/service procedures for reporting concerns and/ or allegations against staff



If anyone makes a disclosure regarding abuse or neglect, adults must always take any such concerns seriously. Adults should follow the school/employers safeguarding procedures and record on Guard, without delay. The adult must never promise confidentiality but should give reassurance that the information will be treated sensitively.

If an adult is in any doubt about whether to share information they should seek guidance from the Designated Safeguarding Lead, Principal or line manager

Any media or legal enquiries should be passed to the Principal or line manager who will immediately seek advice from the GEMS School Support Centre Communications Dept.

3.7. Standards of Behaviour

All adults working with students have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of all students. They should adopt high standards of personal and professional conduct.

Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position in their workplace, bring GEMS into disrepute or indicate an unsuitability to work with students.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, media or public authorities. Adults in contact with students should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places outside of work settings.

This means that adults should:

- » Follow the GEMS and school/service's Code of Conduct
- » Be aware that behaviour in their personal lives may impact upon their work with students
- » Be aware that behaviour by themselves, those with whom they have a relationship or association, or others in their personal life, may impact on their work with children
- » Inform the Principal or line manager of any cautions or convictions during their employment including being charged with a criminal offence

This means that adults should not:

- » Behave in a manner which would lead to questions about their suitability to work with students



3.8. Dress and Appearance

Adults should dress appropriately for their role, taking into account any cultural/

religious customs, the work they undertake and conform to the GEMS Code of Conduct and school/service dress code. This also applies to online or virtual work.

Those who dress in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to allegations.

- » Use inappropriate language to or in the presence of students
- » Make, or encourage others to make, unprofessional comments which degrade or humiliate, including sexual comments or comments which might be interpreted as such
- » Engage in the misuse of drugs, alcohol, acts of violence or any other illegal act, including sexual acts, relevant to the country in which they work

This means that adults should:

- » Wear clothing appropriate to their role, promoting a positive and professional image
- » Wear clothing that will not be viewed as offensive, revealing, or sexually provocative
- » Be aware of situations and environments which could lead to clothing distracting, causing embarrassment or giving rise to misunderstanding, e.g. Early Years staff should be mindful of modesty when working on the floor with children etc.
- » Wear clothing which is culturally sensitive and absent of any political, religious or otherwise contentious messages
- » Wear clothing which is appropriate for the tasks undertaken and to the setting e.g. PE, Early Years, Lab coats
- » Encourage all users of the school site to conform to the expectations outlined in GEMS modesty signage



3.9. Gifts, Rewards, Favouritism and Exclusion

All adults should know and adhere to the GEMS policy and their school/ service guidance on rewards including arrangements for the declaration of gifts received and given.

Any reward given to a student should be in accordance with GEMS policy, consistent with the school's behaviour policy and not based on favouritism.

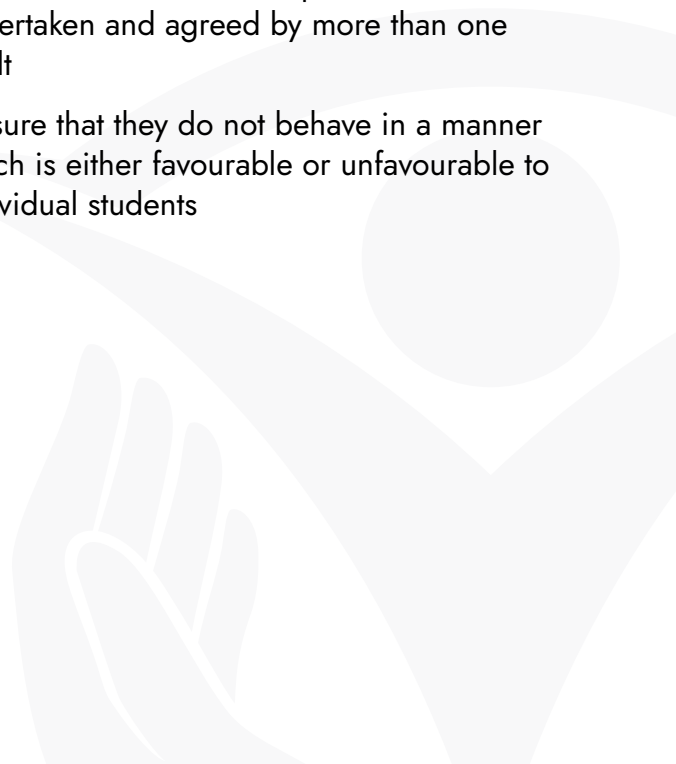
Staff need to take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment. Similarly, it is inadvisable to give personal gifts to individual students or their families which are not in line with the school or service's achievement or rewards policy. This could be interpreted as a gesture either to bribe, groom or be perceived that a favour of some kind is expected in return.

Staff should exercise care when selecting students for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when students are excluded from an activity. Methods of selection and exclusion should always be subject to clear and fair agreed criteria.

There are occasions when students or parents wish to pass small tokens of appreciation to adults. Adults should follow the GEMS Policy on Gifts & Hospitality and if they are in any doubt seek advice from the Principal/line manager.

This means that adults should:

- » Follow the GEMS Gifts & Hospitality Policy and take into account any additional guidance from their school or service
- » Ensure that gifts received are declared and recorded centrally
- » Ensure that the GEMS Anti-bribery and Corruption training has been undertaken
- » Only give gifts to an individual student as part of an agreed reward system clearly laid out in the school or service's achievement, rewards and sanctions/behaviour management policy
- » When giving gifts other than as described above, ensure that these are of insignificant value and given to all students equally and fairly
- » Ensure that all selection processes of students are fair and that wherever practical these are undertaken and agreed by more than one adult
- » Ensure that they do not behave in a manner which is either favourable or unfavourable to individual students





3.10. Infatuations/'Crushes'

An adult, who becomes aware that a student is developing an infatuation/crush either with themselves or on another adult, should report this immediately to the Designated Safeguarding Lead and

record on the GEMS safeguarding case management platform. Early intervention should be taken to prevent escalation and to avoid any hurt, distress or embarrassment for those concerned.

Adults should make every effort to ensure that their own behaviour cannot be brought into question and does not appear to encourage the infatuation. They should be aware that infatuations/crushes carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach.

If an infatuation/crush is developing or developed, a plan should be put in place to manage the situation. This should involve the relevant parties and be regularly monitored and reviewed.

This means that adults should:

- » Report and record any incidents or indications (verbal, written or physical) that suggest a student may be infatuated or have a crush on an adult
- » Always maintain professional boundaries

This means that the Designated Safeguarding Lead/Principal/line manager should ensure that:

- » A plan including risk management is put in place to manage the situation and reduce risk





3.11. Social Contact Outside of the Workplace

It is recognised that adults may have genuine friendships and social contact with parents of students, independent of the professional relationship. There will be occasions when there are social contacts between students and staff; for example, the parent and teacher are part of the same social circle. These contacts, however, will be easily recognised and openly acknowledged.

Adults should, however, also be aware that professionals who harm children often seek to establish relationships and

contact outside of the workplace in order to 'groom' the adult and child to create opportunities to abuse or radicalise. This can also apply to social contacts made through outside interests or through the adult's own family.

Adults should not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. If a student or parent seeks to establish social contact, or if this occurs coincidentally, the adult should exercise professional judgement in making a response.

Some adults, as part of their professional role e.g. Counsellors, Inclusion staff, may be required to directly support a parent. If

that parent comes to depend upon the staff member or seeks support outside of their professional role, this should be discussed with DSL/Principal/line manager and where necessary signpost the parent to the appropriate support agency.

This means that adults should:

- » Have no secret social contact with students or their parents
- » Consider the appropriateness of any social contact according to their role and nature of their work
- » Inform DSL/Principal/line manager of any planned social contact with students or parents
- » Advise DSL/Principal/line manager of any social contact they have with a student or a parent with whom they work, which could give rise to concern
- » Report and record any situation, which may place a student at risk or which may compromise the school/service or their own professional standing.
- » Understand that some communications may be called into question and need to be justified.
- » Inform DSL/Principal/line manager of any relationship with a parent where this extends beyond the usual parent/professional relationship.
- » Inform DSL/Principal/line manager of any requests or arrangements where parents wish to use their services outside of the workplace



3.12. Communication with Children (including the use of technology)

In order to make best use of the many educational and social benefits of new technologies, students need opportunities to use and explore the digital world.

Adults must ensure that they establish safe and responsible online behaviours.

This means working to local and national guidelines on acceptable use policies which detail how new and emerging technologies may be used. Clear agreement by all parties about acceptable and responsible use is essential and where applicable, all adults should sign their acceptance and understanding of the school's acceptable use policy in line with the GEMS Acceptable Use Policy.

Communication between students and adults, by whatever method, should take place within clear and explicit professional boundaries using approved, monitored systems and devices. This includes the wider use of technology such as mobile phones messaging platforms, e-mails, digital cameras, videos, webcams, websites and blogs.

Adults should not share any personal information with a student, nor should they request, or respond to any personal information from a student, other than that which might be appropriate as part of their professional role.

Adults should ensure that all communications are transparent and avoid any communication which could be interpreted as 'grooming behaviour'; where the purpose is to gain the trust of a student

This means that adults should:

- » Follow the GEMS Acceptable Use Policy (AUP) and specific school/service AUP
- » Ensure that their use of technologies does not bring GEMS into disrepute
- » Ensure that personal social networking sites are set at private and students are never listed as contacts or 'friends'
- » Only contact a student through official school/service channels
- » Immediately inform the Designated Safeguarding Lead/line manager if a student attempts to contact or correspond with them through personal channels

This means that schools/services should:

- » Wherever applicable to the adult's role or activity, provide school/service owned devices such as cameras and mobile phones rather than expecting staff to use their own devices

This means that adults should not:

- » Create and use WhatsApp groups to contact students for whatever purpose including sports teams/organisations, study groups
- » Discuss or share data relating to students/parents/carers in social media groups
- » Seek to make contact with or respond to contact from students outside of approved organisational platforms
- » Use or access social networking sites of students



and manipulate the relationship so abuse/gratification for the adult can take place.

Adults should not give their personal contact details to students including e-mail, home or mobile telephone numbers or details of web-based identities. If students locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter immediately to the Designated Safeguarding Lead/line manager. The student should be firmly and politely informed that this is not acceptable, and their parents informed.

Communications between an adult and a student outside of agreed/approved protocols including e-mail, WhatsApp, text messages, social media and / or internet-based web sites may lead to disciplinary and/or criminal investigations.

3.13. Physical Contact

It is not possible to be specific about the appropriateness of each physical contact since an action that is appropriate with one student, in one set of circumstances, may be inappropriate in another, or with a different student.

However, physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority.

If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported to the Designated Safeguarding Lead/line manager and recorded on the GEMS safeguarding case management platform – Guard.

- » Give their personal contact details to students, including their mobile telephone number
- » Use internet or web-based communication channels to send personal messages to a student

This means that adults should:

- » Be aware that even well-intentioned physical contact may be misunderstood by a student, an observer or by anyone to whom this action is described
- » Never touch a student in a way which may be considered indecent
- » Always be prepared to report and explain actions and accept that all physical contact is open to scrutiny
- » Not indulge in rough and tumble play e.g. rolling, sliding, climbing, and laying on students or other adults
- » Always encourage students, where possible, to undertake self-care tasks independently e.g. dressing/undressing, using the shattaf etc.



Where possible, physical contact should be avoided altogether.

In circumstances e.g. bereavement or if a child falls in the playground, there may be a reason to have physical contact however, not all students will feel comfortable with this. This should be recognised and be in response to the child's needs at the time, limited in duration and appropriate to their age and stage of development. Consent should always be asked for from the student.

Extra caution is required where it is known that a student has suffered previous abuse or neglect as the child may associate physical contact with negative experiences. Adults should recognise that these students may seek out inappropriate physical contact. If this happens, adults should sensitively deter the student by helping them to understand the importance of personal boundaries. The adult should report any incidents to the Designated Safeguarding Lead/line manager and self-report on Guard.

Physical contact, which occurs regularly with a student will raise questions unless the justification for this is part of a formally agreed support plan or Intimate Care Plan. In these circumstances any such contact should be the subject of an agreed school policy. A risk assessment must be completed with actions recorded as part of the students individual support plan which involves, and is regularly reviewed, by the parents, school staff including medical staff, Inclusion team and where possible, the student. Any arrangements should be understood and agreed by all concerned, justified in terms of the student's needs, consistently applied, monitored and documented.

- » Ensure if comfort needs to be offered it is provided in a developmentally/age-appropriate manner
- » Be transparent in any actions and always report to the DSL when and how comfort was offered to a distressed student
- » Be aware of cultural or religious views about touching and be sensitive to issues of gender
- » Understand that physical contact can be easily misinterpreted
- » Always explain to the student the reason why contact is necessary and what form it will take. Where possible be in a visible area with glass panels or have another adult within speaking distance

This means that schools/services should:

- » Ensure they have a system in place for recording physical contact incidents and the means by which this information and outcomes can be easily accessed by relevant senior management
- » Ensure that any planned potential physical intervention for SEND students is documented in the Individual Education/Behaviour Plan, in consultation with parents, school medical staff, teacher, Inclusion Lead and where possible, the student
- » Be explicit about what physical contact is appropriate for adults working in their setting
- » Provide staff, on a "need to know" basis, with relevant information about vulnerable students in their care



If an adult is expected to regularly support a child physically as part of a plan, appropriate training should be undertaken to perform such duties. Where feasible, adults working with SEND students should seek the student's permission before initiating contact. Adults should listen, observe and take note of the student's reaction or feelings and – so far as is possible - use a level of contact and/or form of communication which is acceptable to the student for the minimum time necessary.

Any sexual activity between an adult and a child is a criminal offence and will always be a matter for Police action.

All adults should undertake appropriate training so that they are fully aware of behaviours that may constitute grooming and their responsibility to always share any concerns about the behaviour of a colleague to the DSL/Principal/Line Manager which could indicate that a student is being groomed.

3.14. Other activities that require Physical Contact

Some adults who work in certain settings, for example sports, drama or outdoor activities or teach subjects such as PE or music, may at times, have some physical contact with students, for example, to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support an individual so they can perform an activity safely or prevent injury. Such activities should be carried out in accordance with existing policies including the, individual support plans for SEND students and relevant codes of conduct.

- » Where intimate care is needed, ensure the Intimate Care Policy/Plan is used and agreed upon by school staff working with the student, parent and student where appropriate will take.
- » Where possible be in a visible area with glass panels or have another adult within speaking distance

This means that adults should:

- » Treat students with dignity and respect and avoid contact with intimate parts of the body
- » Always explain to a student the reason why contact is necessary and what form that contact will take
- » Seek consent of parents where a student is unable to give consent because of a SEND
- » Consider alternatives, where it is anticipated that a student might misinterpret any such contact e.g. swimming instruction.



Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. The extent of the contact should be made clear and should be undertaken with the permission of the student. Contact should be relevant to a student's age or understanding and adults should remain sensitive to any discomfort expressed verbally or non-verbally by the student and respond accordingly.

All adults should clearly understand from the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers, students informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

3.15. Intimate Care

Where possible, intimate care should be avoided, however, some job responsibilities necessitate intimate physical contact with students, for example providing intimate care for students or guiding students with toileting.

It is the expectation of GEMS that any child who requires support with intimate care follows the Intimate Care Policy which includes, 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, the student where appropriate, and the school/service setting. The views of the student should be actively sought, wherever possible, when

- » Be familiar with, and follow, recommended guidance and protocols
- » Conduct activities where they can be seen by others
- » Be aware of gender, SEND, cultural or religious issues that may need to be considered prior to initiating physical contact

This means that schools/services should:

- » Have in place up to date guidance and protocols on appropriate physical contact that promote safe practice and include clear expectations of behaviour and conduct including any specific policies from third parties e.g. Hamilton Aquatics, ESM etc.
- » Ensure that adults are made aware of, and implement this guidance and that safe practice is promoted and monitored through supervision and training

This means that adults should:

- » Adhere to the GEMS Intimate Care Policy
- » Update intimate care plans in writing where appropriate, e.g. because there are changes to adults providing support etc.
- » Ensure that student's privacy and dignity is maintained during undressing and dressing during the intimate care procedure, following the Intimate Care Plan.
- » Ensure that sufficient age-appropriate changes of clean clothing are available as provided by parent
- » Make other adults aware of the task being undertaken as a witness



drawing up and reviewing formal arrangements. As with all individual arrangements for intimate care, agreements between the student, parents/carers and the school/ service must be recorded.

Any changes to the intimate care plan should be made in writing and without delay, even if the change in arrangements is temporary.

The nature, circumstances and context of such contact should be part of a formally agreed plan, which is regularly reviewed. The additional vulnerabilities that may arise from a physical or learning disability should be taken into account and be recorded as part of the Intimate Care Plan. The emotional responses of any student to intimate care should be carefully and sensitively observed, and any concerns shared with senior managers and parents/carers.

All students have the right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, age and maturity should be encouraged to act as independently as possible. When assistance is required particularly with younger children, this should normally be undertaken with another appropriate adult in the vicinity who is aware of the task to be undertaken and that they are visible and/or audible.

Students are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of intimate care.

There are occasions where there will be a need for an appropriate level of supervision in order to safeguard students, satisfy health and safety requirements and ensure bullying does not occur. This supervision should be appropriate to the

- » Explain to the student what is happening or about to happen and remember to ask permission before washing etc.
- » Consult with senior leader and parents/carers where any variation from agreed procedure/ care plan is necessary
- » Record the justification for any variations to the agreed procedure/care plan and share this information with parents
- » Ensure that any changes to the agreed Intimate Care Plan are discussed, agreed and recorded
- » Where possible, avoid physical contact when students are in a state of undress. Consider the age and developmental stage of students and encourage self-care skills
- » When assistance is required, be vocal about what you are doing and be in the presence of another adult where possible. Always seek permission from the student before helping
- » Avoid any visually intrusive behaviour e.g. looking over cubicle doors to check progress
- » Where there are changing rooms knock and announce the intention of entering
- » Ensure that when moving around the campus, sensitivity is exercised to protect students' privacy e.g. Front of House staff taking tours for new parents through by the swimming pool, MSO taking maintenance teams for facilities check after school hours
- » Always consider the supervision needs of the students and only remain in the room where students' needs require this



needs, culture, gender and age of the students concerned and sensitive to the potential for embarrassment.

Adults need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the students with whom they work.

3.16. Behaviour Management

The use of corporal punishment is unacceptable to GEMS in any circumstance; and it is unlawful in schools in the UAE and in many countries in which GEMS

operates. All students must be treated with respect and dignity even in circumstances where they display difficult or challenging behaviour.

Adults should not use any form of negative verbal, physical or emotional communication to punish a student, correct a behaviour

or achieve a desired behaviour. Any sanctions or rewards used should be part of a behaviour management policy which is publicised and regularly reviewed.

The duty of care which applies to all adults and school/service working with students requires that reasonable measures are taken to prevent individuals being harmed.

- » Verbal communication: The use of shouting, sarcasm, demeaning or insensitive comments towards students is not acceptable in any situation.
- » Physical force: Under no circumstances should physical force or intervention be used as a

This means that adults should not:

- » Change in the same place as students
- » Shower or bathe with students
- » Assist with any personal care task which a student can undertake by themselves
- » Use student bathrooms

This means that adults should:

- » Try to defuse situations before they escalate
- » Follow the school/service's behaviour management policy
- » Keep parents informed of any sanctions or behaviour management techniques used as part of the school/service's behaviour policy
- » Be mindful of their actions towards students who have experienced previous abuse
- » Behave as a role model through using positive verbal, physical and emotional communication
- » Seek support from their line manager when they encounter difficult behavioural challenges in any engagement with students

This means that adults should not:

- » Use physical force as a form of punishment, this includes tugging, banging the table, pulling clothing or body etc.
- » Shout at students except as a warning in an emergency/safety situation
- » Use verbal cues or physical gestures that could be interpreted as threatening, this includes swearing, screaming and shouting



form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence and directly contravenes the Executive Council Resolution no 2 (2017) (59) for Private Schools in Dubai.

- » Parental consent does not permit staff to use corporal punishment.

3.17. Students in Distress

There may be occasions when a distressed student needs comfort and reassurance and this may involve physical contact. Young children, in particular, may need immediate physical comfort, for example after a fall, separation from parent etc. Adults should use their professional judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries. Any contact should be open and never secretive.

Adults should not initiate hugging or contact and should not assume that all children seek physical comfort if they are distressed but seek permission from the child.

Where an adult has a particular concern about the need to provide this type of care and reassurance, or is concerned that an action may be misinterpreted, this should be reported to the Designated Safeguarding Lead/line manager without delay.

This means that schools/services should:

- » Have in place appropriate behaviour management policies that preserve the rights, respect and dignity of students including those with challenging behaviour
- » Regularly train and update adults on positive behaviour management strategies

This means the adult should:

- » Consider how to offer comfort and reassurance to a distressed student and do it in an age-appropriate way
- » Be vigilant when offering reassurance in a one-to-one situation and offer verbal reassurance as an alternative
- » Follow professional guidance and the GEMS Code of Conduct
- » Never touch a student in a way which may be considered indecent
- » Record and report situations which may give rise to concern from either party
- » Not assume that all students seek physical comfort if they are distressed, and respect this



3.18. One-to-One Working

Adults working in one-to-one situations with students, E.g. therapists, counsellors etc. can be more vulnerable to allegations and complaints. One-to-one situations also have the potential to make students more vulnerable to harm by those who seek to exploit their position of trust.

Every school/service should consider one-to-one situations when drawing up their policies. It is not realistic to state that one-to-one situations should never take place. It is however, where there is a need, agreed with a senior manager for an adult to be alone with a student, certain procedures and explicit safeguards must be in place. Adults should be offered training and guidance in the use of any areas of the workplace which may place themselves or students in vulnerable situations and a risk assessment should be undertaken.

Risk assessments should include the specific reason, nature and implications of one-to-one work e.g. peripatetic music teaching or counselling. These assessments should take into account the individual needs of the student and the individual adult, explore alternatives to one-to-one work and any arrangements should be reviewed on a regular basis.

Where adults are expected to work one to one with a pupil on a virtual platform, clear expectations should be set out for all of those involved that are reflective of safeguarding policies and procedures.

This means that adults should:

- » Ensure that when lone working is an integral part of their role, full and appropriate risk assessments have been conducted and agreed E.g. Counsellors, Music teachers, etc.
- » Do not meet with a student in remote, secluded areas. –Ensure that doors are open or have glass panels which are unobstructed
- » Always inform other colleagues and/or parents/carers about the contact(s)
- » beforehand, assessing the need to have them present or close by
- » Avoid the use of 'engaged' or equivalent signs wherever possible. As such signs may create an opportunity for secrecy or the interpretation of secrecy
- » Always report any situation where a student becomes distressed or angry whilst in a one-to-one situation to the Designated Safeguarding Lead/line manager
- » Carefully consider the needs and circumstances of the student when in one-to-one situations
- » Always look for alternatives to working on a one-to-one basis and where possible use rooms with glass vision panels

Ensure prior to any online learning, there are clear expectations of behaviour and conduct of all parties that have been agreed in advance



3.19. Educational Visits

Staff organising educational visits should follow the GEMS Offsite Educational Trips and Visits Policy in conjunction with Emirate/country-specific legislation and regulatory requirements.

Adults should take particular care when supervising students on trips and outings, where the setting is less formal than the usual workplace. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and that it cannot be interpreted as seeking to establish an inappropriate relationship

or friendship. Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Adults should never share a room with students. Students, adults and parents should be informed of these prior to the start of the trip.

In all circumstances, those organising trips and outings must pay careful attention to ensuring safe adult/student ratios and a suitable gender mix of staff. Effective risk assessments must be undertaken prior to any visits, which should include potential risks to adults, students and others and

the steps taken to mitigate the risk.

GEMS requires adults to keep colleagues/employers aware of their whereabouts whilst involved in activities outside the usual workplace such as residential visits at home or abroad.

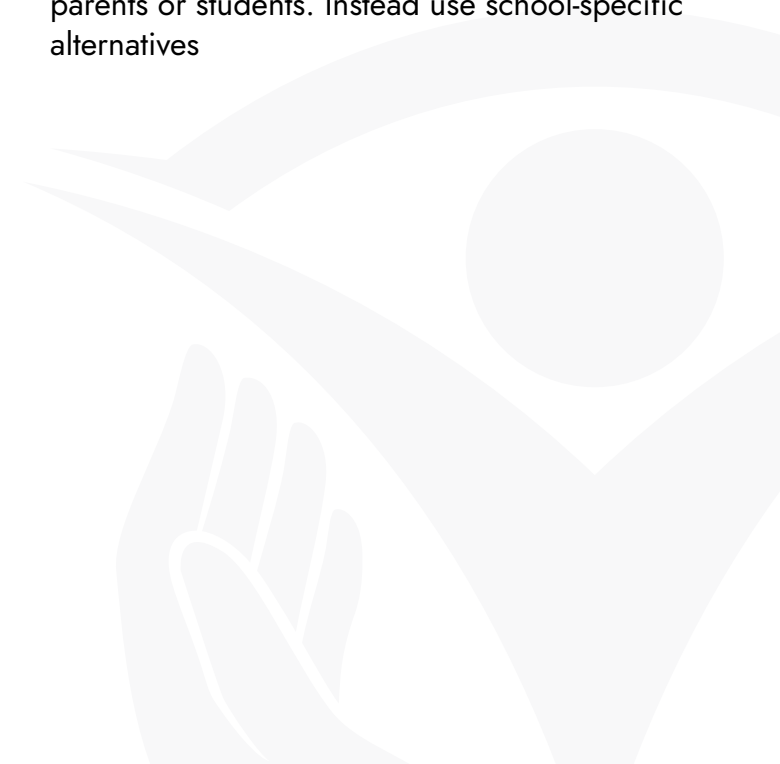
Arrangements should be in place for regular updates and emergency contact.

This means that adults should:

- » Follow the GEMS Offsite Educational Trips and Visits Policy
- » Undertake risk assessments in line with GEMS policy
- » Have written parental consent for any activities taking place
- » Ensure that their behaviour remains professional at all times and follows all guidance in the GEMS Offsite Educational Trips and Visits Policy

This means that adults should not:

- » Share beds or bedrooms with a student
- » Allow bystanders to photograph students whilst on educational visits
- » Share their personal mobile number with parents or students. Instead use school-specific alternatives





3.20. First Aid and Medication

GEMS requires schools to have an adequate number of qualified first aiders. Schools should ensure that there are a sufficient number of trained adults to comply with any regulatory ratios of first aiders to students/staff. Parents should be informed when first aid has been administered in line with school/service policies.

Some students may need medication during school hours. In circumstances where students need medication regularly, a health care plan should be drawn up

to ensure the safety and protection of students and staff. This will be led by the school medical team. With the permission of parents, students should be encouraged to self-administer medication or treatment including for example, any ointment, sun cream or use of inhalers.

If a member of staff is concerned or uncertain about the amount or type of medication being given to a student, this should be discussed with the school doctor and Designated Safeguarding Lead at the earliest opportunity.

Only trained first aiders and medical staff should administer first aid and wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Only clinic staff should administer medication.

This means that adults should:

- » Adhere to the school/service's policy for administering first aid or medication and always refer to the school clinic
- » Comply with all relevant legislation issued by the Health Authority if they are a trained medical professional
- » Comply with the necessary reporting requirements
- » Make other adults aware of the task being undertaken
- » Explain to the student what is happening
- » Always act in the student's best interests
- » Follow any health plan which is in place
- » Always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities including educational visits
- » Report and record any administration of first aid or medication, particularly on educational visits
- » Not photograph any injury or physical conditions

This means that schools/services should:

- » Ensure adults understand the extent and limitations of their role in applying basic care and hygiene tasks for minor abrasions and understand when an injury requires more experienced intervention



3.21. Use of technology for online / virtual teaching

All settings should review their online safety and acceptable use policies and amend these if necessary, ensuring that all adults involved in virtual teaching or the use of technology to contact students are briefed on best practice and any temporary changes to policy/procedures.

When selecting a platform for online/virtual teaching, settings should satisfy themselves that the provider has an appropriate level of security. Adults should use school devices and contact students only via the student's school email address/log in. This ensures that the setting's filtering and monitoring software is enabled.

In deciding whether to provide virtual or online learning for students, senior leaders should take into account issues such as accessibility within the family home; the mental health and wellbeing of children including screen time; the potential for inappropriate behaviour by adults or students; adult access to the technology required, etc. Virtual lessons should be timetabled, and senior

- » Ensure there are trained and named individuals to undertake first aid responsibilities and they are sufficient to comply with any regulatory ratios of first aiders to students/adults
- » Ensure training is regularly monitored and updated
- » Always ensure that arrangements are in place to obtain parental consent for the administration of first aid or medication

This means that senior leaders should:

- » Ensure that all relevant adults have been briefed and understand the policies and the standards of conduct expected of them
- » Have clearly defined operating times for virtual learning
- » Consider the impact that virtual teaching may have on students and their parents/ carers/ siblings
- » Determine whether there are alternatives to virtual teaching in 'real time' – e.g., using audio only, pre-recorded lessons, existing online resources
- » Be aware of the virtual learning timetable and ensure they have the capacity to join a range of lessons
- » Adhere to any advice published by regulators

This means that adults should:

- » Adhere to their establishment's policy
- » Be appropriately dressed



staff, DSL and/or heads of department should be able to drop in to any virtual lesson at any time – the online version of entering a classroom.

Adults engaging in online learning should display the same standards of dress and conduct that they would in school; they should also role model this to students and parents. The following points should be considered:

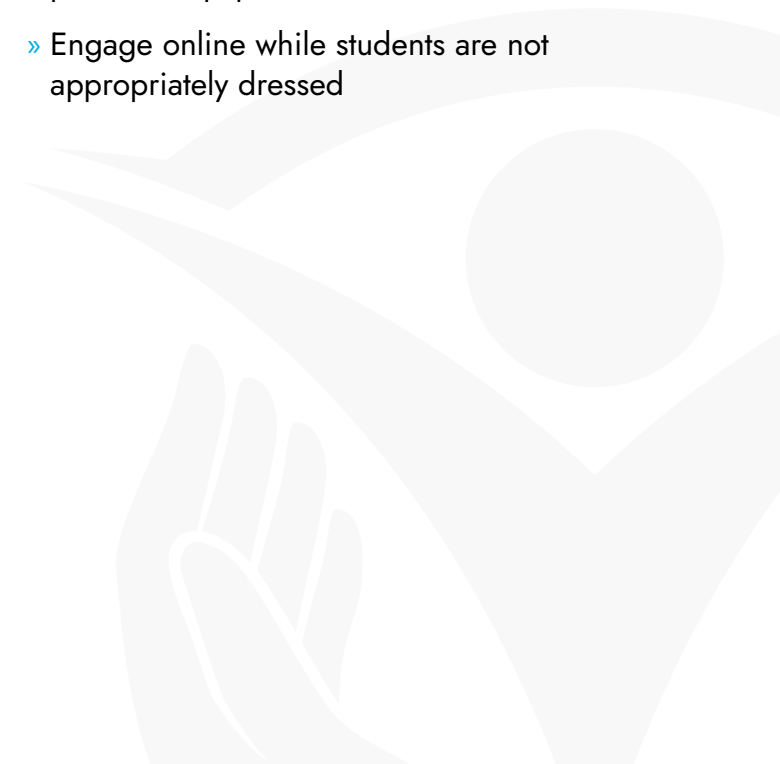
- » think about the background; photos, artwork, identifying features, mirrors – ideally the backing should be nondescript
- » adults and students should be in living / communal areas – no bedrooms
- » adults and students should be appropriately dressed
- » filters at a student's home may be set at a threshold which is different to the school
- » resources/videos must be age appropriate – the student may not have support immediately to hand at home if they feel distressed or anxious about the content

It is the responsibility of the adult to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the student and/or parent immediately and end the online interaction if necessary. Recording lessons does not prevent abuse. If adults wish to record the lesson, they are teaching, consideration should be given to data protection issues; e.g., whether parental/students consent is needed and retention/storage. If an adult believes that a student or parent is recording the interaction, the lesson should be brought to an end or that student should be logged out immediately. Adult, parent and student AUPs should clearly state the standards of conduct required.

- » Ensure that a senior member of staff is aware that the online lesson/meeting is taking place and for what purpose
- » Avoid one to one situations – request that a parent is present in the room for the duration, or ask a colleague or member of SLT to join the session
- » Only record a lesson or online meetings with a student where this has been agreed with a senior member of staff, and the student and/or their parent/carer have given appropriate consent to do so.

This means that adults should not:

- » Contact students outside the operating times defined by senior leaders
- » Take or record images of students
- » Record virtual lessons or meetings using personal equipment
- » Engage online while students are not appropriately dressed





If an adult needs to contact a student or parent by phone and they do not have access to a work phone, they should discuss this with a senior member of staff.

3.22. Photography, Videos and Other Images

Working with students may involve the taking or recording of images particularly to capture learning or school events.

Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and wellbeing of students. Informed written consent from parents or carers and agreement, where possible, from the student, should always be sought before an image is taken for any purpose. This is most effectively done at enrolment/re-enrolment each year.

Careful consideration should be given as to how activities involving the taking of images are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken especially if it is to be used for any publicity purposes or published in the media, or on the internet. There also needs to be an agreement as to whether the images will be destroyed or retained for further use; where they will be stored and who will have access to them.

Adults need to remain sensitive to any student who appears uncomfortable, for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings.

This means that adults should:

- » Be clear about the purpose of the activity and about what will happen to the images when the activity is concluded
- » Avoid taking images which show a single student with no surrounding context
- » Ensure the student understands why the images are being taken, has agreed to the activity and that they are appropriately dressed
- » Only use equipment provided or authorised by the school/service
- » Report any concerns about any inappropriate or intrusive photographs found
- » Always ensure they have parental permission to take and/or display photographs e.g. annual disclaimer signed by parents

This means that adults should not:

- » Take images using their personal devices
- » Display or distribute images of students unless they have written consent to do so from parents/carers
- » Use images which may cause distress
- » Take images 'in secret', or in situations that may be construed as being secretive
- » Take or share any images that are or could be construed as sexual, this includes images of students who are not fully clothed



This is particularly relevant to students who may have been previously abused in a manner that involved images and may feel threatened by the use of photography, filming etc.

It is inappropriate for adults to take photographs of students on their personal devices or for their personal use. When using a photograph this guidance should be followed:

- » if the photograph is used, avoid using the student's full name
- » schools/services should establish whether the image will be retained for further use
- » images should be securely stored and used only by those authorised to do so.

3.23. Exposure to inappropriate images and internet usage

Adults should take extreme care to ensure that students are not exposed, through any medium, to inappropriate or indecent images.

There are no circumstances that will justify adults making, downloading, possessing or sharing indecent/ pornographic images of students (child sexual abuse images). Adults who access and possess links to such websites will be viewed as a significant and potential threat to students.

Accessing child sexual abuse images, whether using the school's or personal equipment (on or off the premises), is illegal. Any suspicion that an adult or student has accessed, downloaded or shared such images will result in an immediate referral to the Police.

Adults should not use equipment belonging to their school/service to access pornography

- » Take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse)
- » Make audio recordings of a child's disclosure

This means that adults should not:

- » Use equipment belonging to their school/ service to access adult pornography or any material that could put the reputation of GEMS at risk; neither should personal equipment containing these images or links to them be brought into the workplace.
- » View or delete any indecent images that are found at school or on school equipment as this could jeopardise any necessary criminal action and potentially risk prosecution.

This means that schools/services should:

- » Follow their school/service's guidance on the use of IT equipment and Acceptable Use Policy
- » Ensure that students are not exposed to unsuitable material on the internet
- » Report any access whether deliberate or by



or any material that could put the reputation of GEMS at risk; neither should personal equipment containing these images or links to them be brought into the workplace. This will raise serious concerns about the suitability of the adult to continue to work with students.

If indecent images of children are discovered at school or on school equipment an immediate referral should be made to the DSL/Principal. The images/equipment should be secured and there should be no attempt to view or delete the images as this could jeopardise any necessary criminal action and potentially risk prosecution. An immediate notification to GEMS Corporate Head of Safeguarding and Child Protection should be made for advice and guidance.

3.24. The Use of Personal Living Space

No student should be in or invited into the home of an adult who works professionally with them.

It is not appropriate for any school/ service to expect or request that private accommodation be used for work with or to meet with students.

The school Principal should always ensure that appropriate workspace is found in the school to undertake any relevant activities including meetings outside of the normal school day.

Under no circumstances should students assist with chores or tasks in the home of an adult who works with them. Neither should they be asked to do so by friends or family of that adult.

accident to any inappropriate sites

- » Ensure that any films or material shown to students are age and culturally appropriate, and meet the requirements of the curriculum as outlined by Regulators
- » Notify the Designated Safeguarding Lead immediately of any concerns regarding the possession or exposure to inappropriate images either by adults or students
- » Have clear e-safety policies in place about access to and use of the internet
- » Have filters in place to prevent access to inappropriate sites
- » Make guidance available to parents and students about appropriate usage

This means that adults should:

- » Be open and honest in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations particularly where friends' children may be students in their own school
- » Refuse any request for their accommodation to be used as an additional resource for the school or school/service even with the agreement/encouragement of a parent
- » Maintain appropriate personal and professional boundaries
- » Refrain from asking students to undertake personal jobs or errands



3.25. Curriculum

Many areas of the curriculum can include or raise subject matter that can support students to make informed choices about keeping themselves and others safe. Whilst this is important, adults should be aware of the cultural sensitivities and laws of the countries in which they work.

Adults should ensure that curriculum materials relate clearly to the learning outcomes identified in the lesson plan and understand that they may need to procure approval from the regulator.

Staff should highlight particular areas of risk and sensitivity that may lead to unplanned questions or discussions that could be potentially inappropriate due to age and stage or culture or illegal in some countries in which GEMS operates

Responding to student's questions requires careful judgment and staff should take guidance from the DSL/Principal and follow the GEMS Safeguarding Policy.

Where part of the school curriculum allows for student-led projects, staff should be mindful of safeguarding considerations in the topic chosen and the methodology used. For example, students often choose topics with which they have had personal experience; this may indicate a previously unknown safeguarding issue or may raise concerns about the re-traumatisation of the student. Student projects are often conducted using questionnaires with peers; these should be checked for appropriateness to ensure the student respondents are not distressed by the questions asked and that any disclosures received through these questionnaires are picked up by the school's Designated Safeguarding Lead.

This means that adults should:

- » Have clear lesson plans and schemes of work
- » Take care when encouraging students to use self-expression, not to overstep personal and professional boundaries
- » Be able to justify all curriculum materials and relate these to effective lesson planning to support students to make informed decisions about how to keep themselves and others safe

This means that adults should not:

- » Enter into or encourage inappropriate discussions which may offend or harm others
- » Express any prejudicial views
- » Attempt to influence or impose their personal values, attitudes or beliefs on students





Other methodologies which might raise concerns include: students visiting unknown adults, alone, to interview them; conducting social experiments on peers or young children without parental consent; or accessing age-inappropriate content online.

3.26. Whistleblowing

Whistleblowing is the mechanism by which adults can voice their concerns, made in good faith without fear of repercussion.

GEMS has a Speak Out programme centrally available where adults who use the whistleblowing procedure are reassured that their rights are protected.

Adults should acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of students may be at risk. They should also be aware that failing to do so may result in charges of negligence on their part when the welfare of children may be at risk.

3.27. Sharing and Recording Concerns

In the event of any allegation being made regarding safeguarding or child protection, information should be clearly and promptly recorded on Guard, and reported to the Designated Safeguarding Lead and/or Principal/Service Lead without delay. The GEMS Employee

This means that schools/services should:

- » Ensure they have shared GEMS Whistleblowing Policy with staff
- » Ensure that they have clear procedures for responding to allegations against persons working in or on behalf of the school
- » Ensure staff know how to escalate concerns if they believe that safeguarding arrangements are not effective, or a student(s) is not being protected

This means that adults should:

- » Report any behaviour by adults or students that raises concern regardless of the source to the DSL/Principal. If the concern relates to the Principal, the report should be made to the GEMS Corporate Head of Safeguarding and Child Protection
- » Follow GEMS whistleblowing procedures including the use of Speak Out/complaints procedures where appropriate

This means that adults:

- » Should be familiar with the GEMS Employee Discipline Policy
- » Should be familiar with Guard, the GEMS safeguarding case management platform and how to escalate concerns



Discipline Policy will be followed. The GEMS Corporate Head of Safeguarding and Child Protection will be notified by DSL/Principal.

Individuals should be aware of their school/ services' safeguarding/child protection procedures, including procedures for dealing with allegations against adults. All allegations must be taken seriously and properly investigated in accordance with GEMS policies and procedures and local law.

Adults should always feel able to discuss with their line manager any difficulties or problems that may affect their relationship with students so that appropriate support can be provided, or action can be taken.

It is essential that accurate and comprehensive records are maintained wherever concerns are raised about safeguarding, including concerns regarding the conduct or actions of adults working with or on behalf of students. Guard, the GEMS safeguarding case management platform is a secure central online system for recording all concerns which is used to report, record and monitor safeguarding concerns and actions.

There is a duty to report (including self-reporting) any incident in which an adult has or may have behaved in a way that is inconsistent with the organisation's staff code of conduct including inappropriate behaviours inside, outside of work or online. Adults should recognise their individual responsibility to raise any concerns regarding behaviour or conduct (including low level concerns) that falls short of the principles outlined in this document and the setting's staff behaviour policy. It is crucial that any

- » Should take responsibility for recording any incident, and passing on that information where they have concerns about any matter concerning the welfare of an individual

This means that schools/services:

- » Should embed the use of Guard, the GEMS safeguarding case management platform to report, record and manage all safeguarding concerns





such concerns are shared responsibly and with the right person, recorded and dealt with appropriately. Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard children and promote welfare.

