



مدرسة جيمس متروبول الواحة  
GEMS Metropole School  
AL WAHA

# Guidance for Safer Working Practice for Adults Who Work with Children Students

Approved by:

Jeremy Hallum (Principal)

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## MISSION

Lead, nurture and  
succeed.

## VISION

A sustainable and  
inclusive community  
hub, nurturing future  
leaders.

*Nurturing*  
**LEADERSHIP**

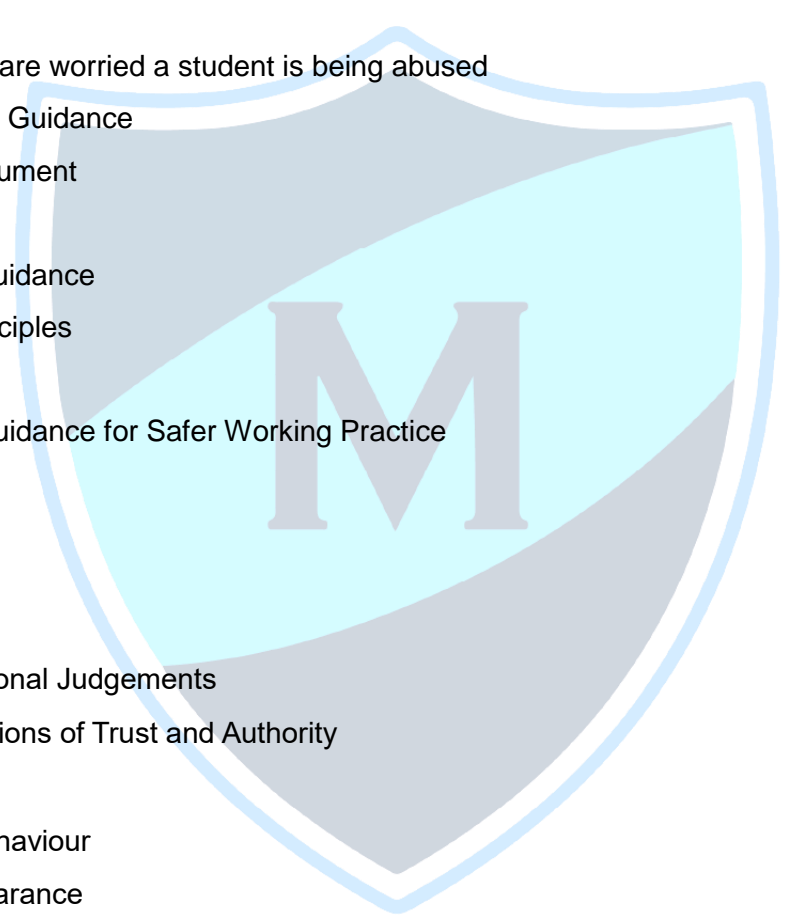


This policy is applied at MTW alongside our school’s vision, mission and values. Alongside the principles of High Performance Learning; VAA and A.C.P. characteristics.

**This guidance has been updated from an original IRSC <sup>1</sup>document - ‘Guidance for Safe Working Practice for the Protection of Children and Adults in Education Settings 2006 commissioned by DfES<sup>2</sup>.**

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For further information and advice, please contact your school's Designated Safeguarding Lead, your Principal or the GEMS Head of Safeguarding and Child Protection.

## 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/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.

Most adults who work with students act professionally and aim to provide a safe and supportive environment which secures well-being and very best outcomes for everyone in their care. However, it is recognised that tensions and misunderstandings can occur, and that the behaviour of adults can give rise to allegations of abuse being made against them. These allegations may be malicious or misplaced and may arise from differing perceptions of the same event. However, when they occur, they are inevitably distressing and difficult for all concerned. Equally, it must be recognised that some allegations will be genuine 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 safer working practices.

Some concerns have been raised about the potential vulnerability of adults when working with students and in response, this document seeks to provide clear advice about what constitutes illegal behaviour and what would be considered as misconduct. This document provides practical guidance for anyone who works with, or on behalf of students regardless of their role, responsibilities, or status. It seeks to ensure that the duty to promote and safeguard the wellbeing 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 /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 work as paid or contracted employees, for example, parent volunteers. 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 and statutory guidance.

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

Everyone working with students should be familiar with local procedures and protocols for safeguarding the welfare of students. Adults have a duty to report any safeguarding, child protection or welfare concerns to the Designated Safeguarding Lead in their school/service and should know who to go to should this person be unavailable. Anyone who is unsure what this means or has any doubts should seek immediate advice from their Designated Safeguarding Lead 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 Manual
- GEMS Safeguarding Statement (updated annually)
- GEMS Safer Recruitment Policy - POLHR0007 □ GEMS Whistleblowing Policy - POLIA001 □  
GEMS Gifts & Hospitality - POLCOM003:
- GEMS Allegations Management 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 on appropriate and 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 clarifying which behaviours constitute safe practice and which behaviours should be avoided
- assist adults working with students to understand safer and responsible working practices and to monitor their own safeguarding standards and practice.
- support managers and employers in setting clear expectations of behaviours and/or codes of practice, in relation to safeguarding, relevant to the services being provided.
- support 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.

Principals and Designated Safeguarding Leads must know and implement GEMS policies and procedures for managing allegations against staff.

### 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 reasonable person to question their motivation and intentions.
- Adults should work in an open and transparent way.
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- All adults have a responsibility to continually monitor and review their practice and to ensure that they follow the guidance contained in this document.

## 2.4: Definitions

- **Schools:** encompass all types of educational establishments e.g. Early Years settings, Post-16, Service / business units and on and off-site provision.
- **Students /children/ young people:** are interchangeable and refers to someone who has not yet reached their 18<sup>th</sup> 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, (including impairment of their health and development), and ensuring that they grow up in circumstances consistent with the provision of safe and effective care and enables 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. **Any person in charge of, or working with students in any capacity is considered, both legally and morally, to owe the student a duty of care.**

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 which behaviours should be avoided and which are recommended.

Appendix 1 provides a visual framework for understanding how the document fits with safer recruitment and selection procedures and allegations Management/disciplinary proceedings.

It is recommended that schools/services use this guidance to develop and promote safer working practice. They should ensure that all employees and volunteers know it's contents through having access to the document and that employees and volunteers 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 unsuitable or 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

<p><b>1. Introduction</b></p> <p>Staff 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 improper or unprofessional conduct.</p>	<p><b>This means that these guidelines:</b></p> <ul style="list-style-type: none"> <li>• Apply to <b>all</b> adults working or visiting in educational settings whatever their position, role, or responsibilities.</li> <li>• Provide guidance where an individual's suitability to work with students has been called into question.</li> <li>• Complement the work of the GEMS School Support Centre to provide clarity to schools on safer working practice.</li> </ul>
<p><b>2. Unsuitability</b></p> <p>The guidance contained in this document identifies what behaviours are expected of adults who work with students. Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with students or children in any capacity.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• Have a clear understanding of the content of this document.</li> <li>• Discuss any uncertainties or confusion with their Principal, Designated Safeguarding Lead or line manager.</li> <li>• Understand what behaviours may call into question their suitability to continue to work with students.</li> </ul>
<p><b>3. Duty of Care</b></p> <p>Teachers and other education staff are accountable for the ways in which they exercise authority; manage risk; use resources; and safeguard students.</p> <p>All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns. Students have the right to be safe and to be treated with respect and dignity. It follows that trusted adults 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.</p> <p>The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and students and through behaviours by staff that demonstrates integrity, maturity and good judgement. The public, external authorities, employers and parents have legitimate expectations about the nature of professional involvement in the lives of students. When individuals accept a role that</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• Understand their responsibilities, which are part of their employment and/or role, and be aware that sanctions will be applied if these are breached.</li> <li>• Always act, in the student's best interests.</li> <li>• Avoid any conduct which would lead any person to question their motives and intentions.</li> <li>• Take responsibility for their own actions and behaviours including the reporting of any concerns.</li> </ul> <p><b>This means that employers should:</b></p> <ul style="list-style-type: none"> <li>• Foster a culture of openness and support.</li> </ul>

<p>involves working with children and young people, they must understand and acknowledge the responsibilities and trust involved.</p>	<ul style="list-style-type: none"> <li>• <i>Ensure that systems for raising concerns are in place, are communicated to all and are used.</i></li> <li>• <i>Ensure that there are effective recording systems to confirm discussions, decisions and outcomes of any actions taken.</i></li> <li>• <i>Ensure that staff are not placed in situations which render them particularly vulnerable.</i></li> <li>• <i>Ensure that all staff are aware of expectations, policies and</i></li> </ul>
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<p>Employers have a duty of care towards their employees which requires them to provide a safe working environment for staff and guidance about safe working practices. This includes having a duty of care for the well-being of employees and ensuring that employees are treated fairly and reasonably in all circumstances. Staff who are subject to an allegation should therefore be supported and treated fairly in the process.</p> <p>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.</p>	<p><i>procedures.</i></p> <p><b><i>This means that Local Advisory Boards should:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Ensure that appropriate safeguarding and child protection policies and procedures are adopted, implemented and monitored.</i></li> <li>• <i>Ensure that, where services or activities are provided by another provider, that they have appropriate safeguarding policies and procedures in place.</i></li> </ul>
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<p><b>4. Making Professional Judgements</b></p> <p>This guidance cannot provide a complete checklist of what is, or is not appropriate behaviour for adults in all circumstances however it does highlight behaviour which is illegal, inappropriate or inadvisable.</p> <p>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. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students in their charge. Such judgements should always be recorded and shared with the Designated Safeguarding Lead and the Principal.</p> <p><b>Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.</b></p>	<p><b><i>Where no specific guidance exists adults should:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Discuss the circumstances that informed their actions, or their proposed action, with the Designated Safeguarding Lead and where appropriate the Principal. This will help to ensure that the safest practice is employed and reduce the risk of actions being misinterpreted.</i></li> <li>• <i>Always discuss any misunderstanding, accidents or threats with the Principal or Designated Safeguarding Lead.</i></li> <li>• <i>Always record any areas of disagreement about the course of action taken and if necessary refer the matter to GEMS Head of Safeguarding &amp; Child Protection for advice and guidance.</i></li> <li>• <i>Ensure records which confirm decisions, discussions and reasons why actions were taken are kept securely and centrally and recorded immediately on the GEMS Online Reporting system.</i></li> </ul>
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### 5. Power and Positions of Trust and Authority

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 in their care.

A relationship 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 those they care for 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. 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 means that adults should not:***

- *Use their position to gain access to information for their own or others' advantage and/or a family'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.*

### 6. Confidentiality

Members of staff may have access to confidential information about students in order to undertake their every-day responsibilities. In some circumstances staff may be given highly sensitive information. Staff should never use confidential or personal information about a student or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other schools/services). Information must never be used to intimidate, humiliate, or embarrass the student or their family.

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

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

If a student (or their parent or carer) makes a disclosure regarding abuse or neglect, the member of staff should follow the school's safeguarding procedures and report to the Designated Safeguarding Lead without delay. The school should never promise confidentiality to a student or parent, but should give reassurance that the information will be treated sensitively.

If a member of staff is in any doubt about whether to share information or keep it confidential they should seek guidance from the Designated Safeguarding Lead or Principal.

### ***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/GEMS Head of Safeguarding & Child Protection if they are in doubt about sharing information they hold or which has been requested of them.*
- *Know and follow the school's procedures for reporting concerns and/or allegations against staff.*



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

### 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 conduct in order to maintain the confidence and respect of the country authorities, general public, parents, students and those with whom they work.

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, the 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 other than the work setting.

#### ***This means that adults should:***

- *Follow any codes of conduct deemed appropriate by their school/service.*
- *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 in their personal life, may impact on their work with children.*
- *Inform the Principal 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.*
- *Use inappropriate language to or in the presence of students.*
- *Make, or encourage others to make, unprofessional personal comments which degrade or humiliate, including sexual comments or which might be interpreted as such.*

	<ul style="list-style-type: none"> <li>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.</li> </ul>
<p><b>8. Dress and Appearance</b></p> <p>Adults should dress appropriately for their role, taking into account any cultural/religious customs, the work they undertake and conform to the GEMS dress code and Code of Conduct.</p> <p>Those who dress in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegations.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>Wear clothing appropriate to their role and conform to the GEMS Dress Code, promoting a positive and professional image.</li> <li>Wear clothing that will not be viewed as offensive, revealing, or sexually provocative.</li> <li>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.</li> <li>Wear clothing which is culturally sensitive and absent of any political, religious or otherwise contentious slogans</li> <li>Wear clothing which is appropriate for the tasks undertaken and to the setting e.g. PE, Early Years, Lab coats.</li> <li>Encourage all users of the school site to conform to the expectations outlined in the GEMS modesty signage.</li> </ul>

<p><b>9. Gifts, Rewards, Favouritism and Exclusion</b></p> <p>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.</p> <p>Any reward given to a student should be in accordance with the GEMS policy, consistent with the school's behaviour policy and not based on favouritism.</p> <p>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. This could be interpreted as a gesture either to bribe, groom or be perceived that a favour of some kind is expected in return.</p> <p>Staff should exercise care when selecting students for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favoritism 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, fair, agreed criteria.</p> <p>There are occasions when students or parents wish to pass small tokens of appreciation to adults e.g. on special occasions or as a thank-you - this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. Staff should follow the GEMS Policy on Gifts &amp; Hospitality if in any doubt and/or seek advice from the Principal.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>Follow the GEMS policy on the giving and receiving of gifts – POLCOM003: Gifts &amp; Hospitality and take into account any additional guidance from their school or Service Business Unit.</li> <li>Ensure that gifts received or given in situations which may be misconstrued are declared and recorded centrally.</li> <li>Ensure that the GEMS Anti-bribery and corruption training has been undertaken.</li> <li>Only give gifts to an individual student as part of an agreed reward system clearly laid out in the school's rewards and sanctions/behaviour management policy e.g. giving a book voucher or stationery item for receiving a certificate for outstanding progress etc.</li> <li>When giving gifts other than as above, ensure that these are of insignificant value and given to all students equally e.g. end of year thank you gift to a class.</li> <li>Ensure that all selection processes of students are fair and that wherever practical these are undertaken and agreed by more than one member of staff.</li> <li>Ensure that they do not behave in a manner which is either favourable or unfavourable to individual students.</li> </ul>
<p><b>10. Infatuations/'Crushes'</b></p> <p>An adult, who becomes aware that a student is developing an infatuation either with themselves or on another adult, should report this immediately to the Designated Safeguarding Lead. Early intervention should be taken to prevent escalation and to avoid any hurt, distress or embarrassment for those concerned.</p> <p>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 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.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>Report and record any incidents or indications (verbal, written or physical) that suggest a student may be infatuated with a member of staff.</li> <li>Always maintain professional boundaries.</li> </ul> <p><b>This means that the Designated Safeguarding Lead/Principal should ensure that:</b></p> <ul style="list-style-type: none"> <li>A plan including risk management is put in place to reduce risk.</li> </ul>
<p>If an infatuation 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.</p>	

<p><b>11. Social Contact Outside of the Workplace</b></p> <p>It is recognised that staff 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.</p> <p>Staff 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 staff member’s own family.</p> <p>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 member of staff should exercise her/his professional judgement in making a response.</p> <p>Some staff 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 and where necessary refer the parent to the appropriate support agency.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• Have no secret social contact with students or their parents</li> <li>• Consider the appropriateness of any social contact according to their role and nature of their work</li> <li>• Inform senior colleagues of any planned social contact with students or parents e.g. an event or trip as part of a reward linked to the school behaviour policy.</li> <li>• Advise senior management of any social contact they have with a student or a parent with whom they work, which could give rise to concern</li> <li>• Report and record any situation, which may place a student at risk or which may compromise the school/service or their own professional standing.</li> <li>• Understand that some communications may be called into question and need to be justified.</li> <li>• Inform DSL/Principal of any relationship with a parent where this extends beyond the usual parent/professional relationship.</li> <li>• Inform DSL/Principal of any requests or arrangements where parents wish to use their services outside of the workplace e.g. babysitting.</li> </ul>
<p><b>12. Communication with Children (including the use of technology)</b> 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. Online risks are posed more by behaviours and values than the technology itself.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• Follow the GEMS Acceptable Use Policy (AUP) – POLIT008 and specific school/service AUP.</li> <li>• Ensure that their use of technologies could not bring GEMS into disrepute.</li> <li>• Ensure that personal social networking sites are set at private and</li> </ul>



<p>Adults must ensure that they establish safe and responsible online behaviours.</p> <p>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 all staff should sign their acceptance and understanding of the school AUP.</p> <p>Communication between students and adults, by whatever method, should take place within clear and explicit professional boundaries using approved, monitored systems. This includes the wider use of technology such as mobile phones text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs.</p> <p>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.</p> <p>Adults should ensure that all communications are transparent and open to scrutiny and avoid any communication which could be interpreted as 'grooming behaviour' where the sole purpose is to gain the trust of a student, and manipulate that relationship so abuse/gratification of the adult can take place.</p> <p>Adults should not give their personal contact details to students including email, 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. The student should be firmly and politely informed that this is not acceptable and their parents informed.</p> <p>Communications between an adult and a student outside of agreed/approved protocols including e-mail, Whatsapp, text, social media and / or internet based web sites may lead to disciplinary and/or criminal investigations.</p>	<p><i>students are never listed as approved contacts.</i></p> <ul style="list-style-type: none"> <li>• <i>Avoid contacting a student directly but rather do so through the parent.</i></li> <li>• <i>Immediately inform the Designated Safeguarding Lead if a student attempts to contact or correspond with them through personal channels, do not respond directly to the student.</i></li> </ul> <p><b><i>This means that schools should:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Wherever possible, provide school devices such as cameras and mobile phones rather than expecting staff to use their own e.g. on educational visits, sports events etc.</i></li> </ul> <p><b><i>This means that adults should not:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Create and use Whatsapp groups to contact students for whatever purpose including sports teams organisation, study groups etc. Instead use an alternative which is approved by the Principal/SLT e.g. closed Twitter group to keep parents informed on residential visits etc.</i></li> <li>• <i>Discuss or share data relating to students/parents/carers in staff social media groups.</i></li> <li>• <i>Seek to make contact with or respond to contact from students outside of the purposes of their work.</i></li> <li>• <i>Never use or access social networking sites of students.</i></li> <li>• <i>Never give their personal contact details to students, including their mobile telephone number.</i></li> <li>• <i>Not use internet or web-based communication channels to send personal messages to a student.</i></li> </ul>
<p><b>13. Physical Contact</b></p> <p>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</p>	<p><b><i>This means that adults should:</i></b></p> <ul style="list-style-type: none"> <li>• <i>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.</i></li> <li>• <i>Never touch a student in a way which may be considered indecent.</i></li> </ul>



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 who will record and notify the Principal/GEMS Head of Safeguarding & Child Protection.

Where possible, physical contact should be avoided altogether, particularly with older students. Adults should model and encourage students to ask permission of one another before initiating physical contact e.g. holding hands or initiating a hug if someone feels sad and any interactions should be appropriate to the laws and cultural expectations of the country and community.

In circumstances eg 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 individual may associate physical contact with negative experiences. Staff should recognise that these students may seek out inappropriate physical contact. If this happens, staff should sensitively deter the student by helping them to understand the importance of personal boundaries. The member of staff should report any incidents to the Designated Safeguarding Lead.

Physical contact, which occurs regularly with a student will raise questions unless the justification for this is part of a formally agreed manual handling plan or Healthcare plan (for example in relation to students with SEND or physical disabilities). In these circumstances any such contact should be the subject of an agreed and open school policy and individual plan which involves, and is regularly reviewed, by the parents, school staff including medical staff 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.

- 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.
- 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.
- Make staff aware of UAE legislation regarding physical contact including the Executive Council Resolution No 2 for Private Schools of Dubai.

<p>If a member of staff e.g. LSA is expected to regularly support a child physically as part of a plan, they are recommended to undertake the GEMS RoSPA Manual Handling training (for further details contact the GEMS HSE Dept.)</p> <p>Where feasible, staff working with SEND students should seek the student's permission before initiating contact. Staff 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.</p>	
<p><b>14. Other activities that require Physical Contact</b></p> <p>Some adults who work in certain settings, for example sports, drama or outdoor activities or teach subjects such as PE or music, will have to initiate 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 e.g. securing a young child into a 3-point booster seat on a bus. Such activities should be carried out in accordance with existing policies including the GEMS Safeguarding in Physical Education policy, Individual Behaviour Plans for SEND students and relevant codes of conduct.</p> <p>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.</p> <p>Guidance and protocols around safe and appropriate physical contact are provided by services; for example sports, arts, transport or the school employing school/service. These should be understood and applied consistently. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the Service Designated Safeguarding Lead immediately.</p> <p>It is good practice if all parties clearly understand at 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</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• <i>Treat students with dignity and respect and avoid contact with intimate parts of the body.</i></li> <li>• <i>Always explain to a student the reason why contact is necessary and what form that contact will take.</i></li> <li>• <i>Seek consent of parents where a student is unable to give consent because of a disability.</i></li> <li>• <i>Consider alternatives, where it is anticipated that a student might misinterpret any such contact e.g. swimming instruction.</i></li> <li>• <i>Be familiar with, and follow, recommended guidance and protocols.</i></li> <li>• <i>Conduct activities where they can be seen by others.</i></li> <li>• <i>Be aware of gender, additional needs, cultural or religious issues that may need to be considered prior to initiating physical contact.</i></li> </ul> <p><b>This means that schools/services should:</b></p> <ul style="list-style-type: none"> <li>• <i>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.</i></li> <li>• <i>Ensure that staff are made aware of, and implement this guidance and that safe practice is promoted and monitored through supervision and training.</i></li> </ul>



contact may also prevent allegations of misconduct or abuse arising.

requirements and ensure bullying does not occur. This supervision should be appropriate to the 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.

Students should be encouraged to act as independently as possible and to undertake as much of their own personal care as is possible and practical. 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.

*remain in the room where students' needs require this eg to manage behaviour etc.*

***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 for personal use.*

### 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 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.

#### **This means that adults should:**

- Try to defuse situations before they escalate e.g. by distraction
- Follow the school/service's behaviour management policy.
- Keep parents informed of any sanctions or behaviour management techniques used as part of the school behaviour policy.
- Be mindful of their actions towards students who have experienced previous abuse e.g. bullying or emotional 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 e.g. running in front of a car.
- Use verbal cues or physical gestures that could be interpreted as threatening, this includes swearing, cursing, screaming and shouting.

#### **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 staff on positive behaviour management strategies.

### 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

#### **This means the adult should:**

- Consider how to offer comfort and reassurance to a distressed student and do it in an age-appropriate way e.g. supporting the separation from a parent in the Early Years.
- 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 e.g. be open and notify the DSL if you have physically comforted a child in a one to one situation.



<p>that an action may be misinterpreted, this should be reported to the Designated Safeguarding Lead without delay.</p>	<ul style="list-style-type: none"> <li>• <i>Not assume that all students seek physical comfort if they are distressed and respect that.</i></li> </ul>
<p><b>18. Sexual Conduct</b> Any sexual activity between an adult and a child is a criminal offence and will always be a matter for Police action.</p> <p>Sex outside of marriage is illegal in some countries in which GEMS operates. Sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts but may also include non-contact activities, such as causing students to engage in or watch sexual activity or the production of pornographic material.</p> <p>There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a student, and manipulate that relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favour upon a student might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.</p> <p>All staff should undertake appropriate training so that they are fully aware of behaviours that may constitute grooming and their legal and moral responsibility to always share any concerns about the behaviour of a colleague to the DSL/Principal which could indicate that a student is being groomed.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• <i>Ensure that their relationships with students clearly take place within the boundaries of a respectful professional relationship</i></li> <li>• <i>Avoid any form of touching or making of comments which are, or maybe seen to be indecent.</i></li> <li>• <i>Take care that their language and/or conduct does not give rise to comment or speculation as attitudes, demeanour and language all require care and thought, particularly when members of staff are dealing with adolescent boys and girls</i></li> </ul> <p><b>This means that adults should not:</b></p> <ul style="list-style-type: none"> <li>• <i>Have any form of sexual contact with a student.</i></li> <li>• <i>Have any form of communication with a student which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, social media, phone calls, texts, physical contact.</i></li> <li>• <i>Make sexual remarks to, or about, a student.</i></li> <li>• <i>Discuss sexual matters with or in the presence of students other than within agreed curriculum content or as part of their job role e.g. Science teacher, Clinic staff.</i></li> </ul>



<p><b>19. One to One Situations</b></p> <p>Adults working in one to one situations with students including visiting staff 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.</p> <p>Every school 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.</p> <p>Risk assessments should include the specific nature and implications of one to one work e.g. peripatetic music teaching, counselling. These assessments should take into account the individual needs of the student and the individual worker, explore alternatives to one to one work and any arrangements should be reviewed on a regular basis.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• <i>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</i></li> <li>• <i>Avoid meeting with a student in remote, secluded areas.</i></li> <li>• <i>Always inform other colleagues and/or parents/carers about the contact(s) beforehand, assessing the need to have them present or close by.</i></li> <li>• <i>Avoid use of 'engaged' or equivalent signs wherever possible. As such signs may create an opportunity for secrecy or the interpretation of secrecy.</i></li> <li>• <i>Always report any situation where a student becomes distressed or angry whilst in a one to one situation to the Designated Safeguarding Lead.</i></li> <li>• <i>Carefully consider the needs and circumstances of the student when in one to one situations.</i></li> <li>• <i>Always look for alternatives to working on a one to one basis and where possible use rooms with glass vision panels.</i></li> </ul>
<p><b>20. Educational Visits</b></p> <p>Staff organizing educational visits should use GEMS guidance in conjunction with Emirate/country-specific legislation and regulatory requirements.</p> <p>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.</p> <p>Students, adults and parents should be informed of these prior to the start of the trip.</p>	<p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• <i>Follow the guidance contained in the GEMS Educational Visits Toolkit.</i></li> <li>• <i>Undertake risk assessments in line with the GEMS policy.</i></li> <li>• <i>Have written parental consent for any activities taking place.</i></li> <li>• <i>Ensure that their behaviour remains professional at all times and follows all guidance in the GEMS Trips Toolkit.</i></li> </ul> <p><b>This means that adults should not:</b></p> <ul style="list-style-type: none"> <li>• <i>Share beds or bedrooms with a student.</i></li> <li>• <i>Allow bystanders to photograph students whilst on educational visits.</i></li> <li>• <i>Share their personal mobile number with parents in order to share updates. Instead use school-specific alternatives such as school twitter feed or school communicator for this purpose.</i></li> </ul>

<p>In all circumstances, those organising trips and outings must pay careful attention to ensuring safe staff/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 staff, students and others and the steps taken to mitigate the risk.</p> <p>GEMS requires members of staff 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.</p>	
<p><b>21. First Aid and Medication</b></p> <p>Many countries in which GEMS operates require schools to have an adequate number of qualified first-aiders. Schools should ensure that <i>there are sufficient to comply with any regulatory ratios of first aiders to students/staff.</i> Parents should be informed when first aid has been administered in line with school/service policies.</p> <p>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.</p> <p>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.</p> <p>Only trained first aiders and medical staff should administer first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Only clinic staff should administer medication.</p>	<p><b><i>This means that adults should:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Adhere to the school/service's policy for administering first aid or medication and always refer to the school clinic.</i></li> <li>• <i>Comply with all relevant legislation issued by the Health Authority if they are a trained medical professional.</i></li> <li>• <i>Comply with the necessary reporting requirements.</i></li> <li>• <i>Make other adults aware of the task being undertaken. □ Explain to the student what is happening.</i></li> <li>• <i>Always act and be seen to act in the student's best interests</i></li> <li>• <i>Follow any health plan which is in place</i></li> <li>• <i>Always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities including educational visits.</i></li> <li>• <i>Report and record any administration of first aid or medication, particularly on educational visits</i></li> <li>• <i>Not photograph any injury, physical conditions e.g. unexplained rash.</i></li> </ul> <p><b><i>This means that schools/services should:</i></b></p> <ul style="list-style-type: none"> <li>• <i>Ensure staff 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</i></li> <li>• <i>Ensure there are trained and named individuals to undertake first aid responsibilities and there are sufficient to comply with any regulatory ratios of first aiders to students/staff.</i></li> <li>• <i>Ensure training is regularly monitored and updated</i></li> <li>• <i>Always ensure that arrangements are in place to obtain parental consent for the administration of first aid or medication</i></li> </ul>

## 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 enrollment/re-enrollment 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 these will be stored and who will have access to them.

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

When using a photograph this guidance should be followed:  if the photograph is used, avoid naming the student

- if the student is named, avoid using their photograph
- schools 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.
- GEMS do not use past images of students for any marketing or communications purposes. New images are taken each year to ensure that images have the correct permissions and reflect current students.

### ***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*
- *Be able to justify images of students in their possession*
- *Avoid making images in one to one situations or which show a single student with no surrounding context*
- *Ensure the student understands why the images are being taken and has agreed to the activity and that they are appropriately dressed.  Only use equipment provided or authorised by the school.*
- *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:***

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

**23. Exposure to inappropriate images and internet usage**

Staff 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 abuse images). Adults who access and possess links to such websites will be viewed as a significant and potential threat to students.

Accessing child 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 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. 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 referral to the GEMS Head of Safeguarding & Child Protection should be made for advice and guidance.

**This means that adults 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 accident to any inappropriate sites.
- Ensure that any films or material shown to students are age and culturally appropriate.
- Notify the Designated Safeguarding Lead immediately of any concerns regarding the possession or exposure to inappropriate images either by adults or students.

**This means that schools/services should**

- 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 both adults and students about appropriate usage.

**24. The Use of Personal Living Space**

No child or young person 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. e.g. to discuss reports with or without parents, academic reviews, tutorials, pastoral care or counselling.

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

**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.

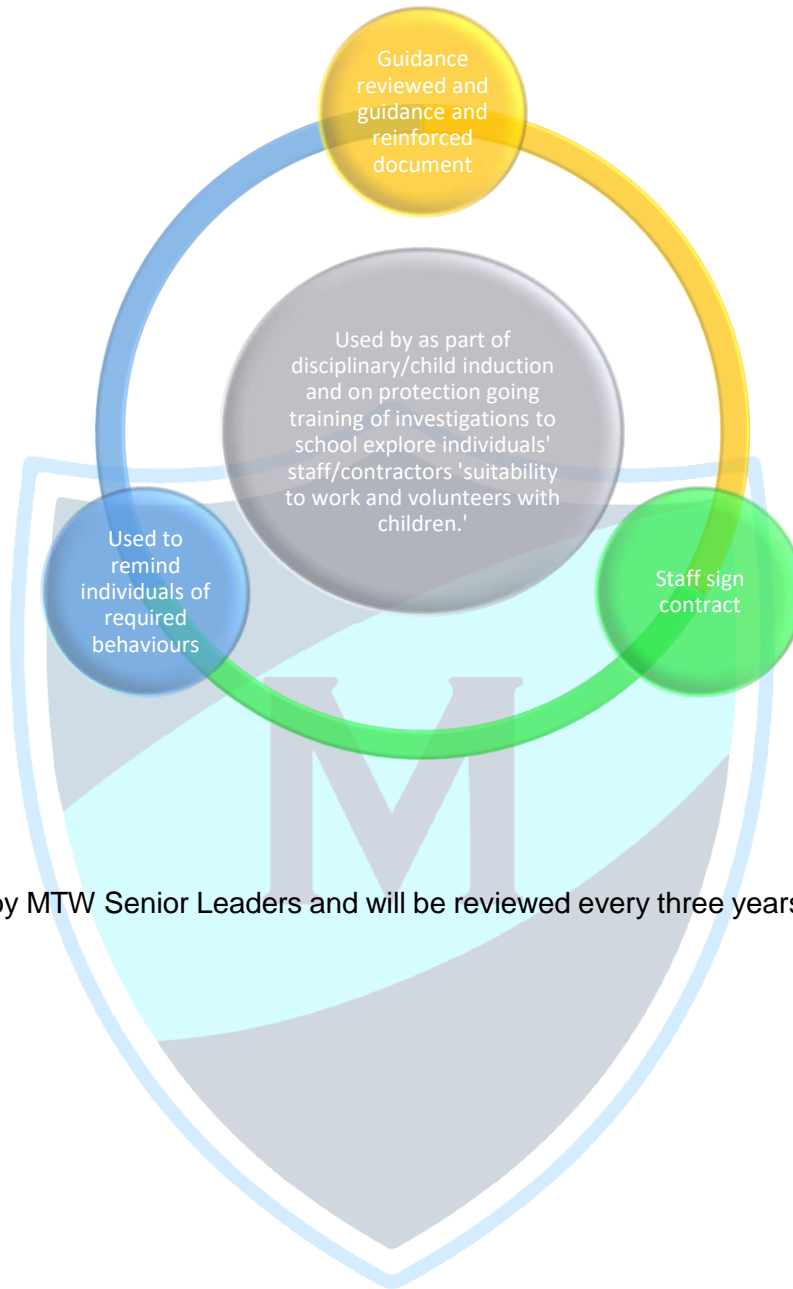


<p>them. Neither should they be asked to do so by friends or family of that adult.</p>	
<p><b>25. Curriculum</b></p> <p>Many areas of the curriculum can include or raise subject matter that can support students to make informed choices about keeping themselves and others safe. Whilst this is important, staff should be aware of the cultural sensitivities and laws of the countries in which they work.</p> <p>Staff should ensure that curriculum materials relate clearly to the learning outcomes identified in the lesson plan.</p> <p>It 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 e.g. religion, sexual contact, same sex relationships.</p> <p>Responding to student’s questions requires careful judgment and staff should take guidance from the DSL.</p>	<p><b>This means that staff should:</b></p> <ul style="list-style-type: none"> <li>• Have clear lesson plans and schemes of work.</li> <li>• Take care when encouraging students to use self-expression, not to overstep personal and professional boundaries e.g. drama groups.</li> <li>• 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.</li> </ul> <p><b>This means that staff should not:</b></p> <ul style="list-style-type: none"> <li>• Enter into or encourage inappropriate discussions which may offend or harm others.</li> <li>• Express any prejudicial views.</li> <li>• Attempt to influence or impose their personal values, attitudes or beliefs on students.</li> </ul>
<p><b>26. Whistleblowing</b></p> <p>Whistle blowing 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.</p> <p>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 not to do so may result in charges of serious neglect on their part when the welfare of children may be at risk.</p>	<p><b>This means that schools/services should:</b></p> <ul style="list-style-type: none"> <li>• Ensure they have appropriate whistle-blowing policies in place.</li> <li>• Ensure that the whistle blowing policy is known by all.</li> <li>• Ensure that they have clear procedures for responding to allegations against persons working in or on behalf of the school.</li> <li>• Ensure staff know how to escalate concerns if they believe that safeguarding arrangements are not effective or a student(s) is not being protected.</li> </ul> <p><b>This means that adults should:</b></p> <ul style="list-style-type: none"> <li>• 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 then report to GEMS Head of Safeguarding &amp; Child Protection.</li> </ul>



	<ul style="list-style-type: none"> <li>Follow GEMS whistleblowing procedures including the use of Speak Out/complaints procedures where appropriate.</li> </ul>
<p><b>27. Sharing Concerns and Recording Incidents</b></p> <p>In the event of any allegation being made regarding safeguarding or child protection, information should be clearly and promptly recorded and reported to the Designated Safeguarding Lead and/or Principal/Service Lead without delay. They will notify the GEMS Head of Safeguarding through the GEMS Online Reporting system (Phoenix HSE) or in cases of emergency, directly by telephone.</p> <p>Individuals should be aware of their school/service's safe guarding/child protection procedures, including procedures for dealing with allegations against adults. All allegations must be taken seriously and properly investigated in accordance with GEMS procedures and local law.</p> <p>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.</p> <p>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. GEMS has a secure central online system (Phoenix HSE) for recording all concerns which should be used to record, monitor and track effective interventions and outcomes for students.</p>	<p><b>This means that adults:</b></p> <ul style="list-style-type: none"> <li>Should be familiar with their school/service's system for recording concerns and how to escalate those concerns where appropriate.</li> <li>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.</li> </ul> <p><b>This means that schools/services:</b></p> <ul style="list-style-type: none"> <li>Should have an effective, transparent and accessible system for recording and managing concerns raised by any individual, regarding adults' conduct and any allegations against adults.</li> </ul>

**APPENDIX 1: This generic document can be used to support safer recruitment and selection practices, induction and on-going training programmes and where necessary, disciplinary and child protection procedures**



**Monitoring and review**

This policy is monitored by MTW Senior Leaders and will be reviewed every three years or earlier if necessary.