



NEST ACADEMY
OF MANAGEMENT EDUCATION

SAFEGUARDING DUBAI POLICY

TABLE OF CONTENTS

1. Introduction	3
2. Scope.....	3
3. Safeguarding Procedure for Staff.....	5
4. Bullying and Harrassment	6
5. Data Protection and Record Keeping	6
6. Information Sharing and Confidentiality	7
7. Definition of Abuse and Neglect.....	8
8. Allegations made against Member of Staff.....	9

INTRODUCTION

Nest Academy recognises that it has a statutory duty to report disclosures of allegations of abuse. It also has a moral duty to promote and safeguard the welfare of its students. This includes helping to protect them from situations in which they are abused. The Policy addresses all aspects of Safeguarding within the work of the Academy. For the purposes of this Policy the term “the Academy” is deemed to include all members of its staff, governors and student body.

SCOPE

The Academy is safeguarding against abuse by:

- Establishing a safe learning environment in which all students can learn and develop.
- Developing and using safe recruitment procedures and to ensure that any Academy member who has substantial contact with vulnerable adults will be checked for relevant criminal convictions whenever appropriate and possible within the constraints of legislation.
- An enhanced disclosure check will normally be required. A satisfactory check will need to be received by the Academy before an individual commences work in a post which requires such a check or before a student is involved in activity required (in the opinion of either the Academy or relevant third parties) such a check. Only exceptionally where a check had been requested, but not yet received, might an individual be allowed to start when a satisfactory risk assessment had been conducted.
- Ensuring that all staff applicants are required to complete and sign an application form.
- Seeking references for all staff applicants.
- Helping to equip students and staff with information and awareness to keep themselves safe.
- Maintaining clear procedures to identify and report suspected cases of abuse.
- Ensuring all staff are aware of these procedures and trained in their use as appropriate.
- Ensuring all students involved in work placements are aware of safeguarding procedures and notification channels.
- Providing appropriate support to students who have been abused.

The Academy will appoint a Designated Safeguarding Officer who will be responsible for:

- Implementing and promoting this Policy;
- Updating the Policy annually.
- Ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of students;
- Acting as the main contact within the Academy for the protection of its members;
- Ensuring that appropriate Academy members are provided with information, advice and training on the protection of adults in a vulnerable situation;
- Establishing and maintaining contacts with our partners which include the Police, Children's Safeguarding Board, Social Services.
- Maintaining confidential records of relevant cases and action taken.
- Ensuring that all members of staff are clear of their own roles and responsibilities when reporting any suspected case of abuse.
- In case of absence of the designated safeguarding officer, the Campus Co-Ordinator on duty who has been the nominated safeguarding officer and will absorb her responsibilities.

Premises

No child (deemed under the age of 16 years) is allowed at any campus unless the visit has been sanctioned by the Campus Manager at the relevant campus. If sanctioned by the appropriate Campus Manager the following rules will apply:

- Parents are to sign in their child/ren at the campus reception area at the start and end of the visit
- Parents are solely responsible for their child/ren whilst on the premises
- Parents must not leave their child/ren alone at any time
- Restricted rights of way on campus rules will apply
- Parents must make an appointment with the relevant member of staff they are visiting and wait in the reception area to be seen
- Children must not be allowed free access to any areas at the campuses
- Any member of staff observing unaccompanied children must report it to the main reception immediately.

SAFEGUARDING PROCEDURE FOR STAFF

If a student discloses information to a member of staff that abuse is taking place they should be acknowledged, taken seriously and listened to.

- As soon as it becomes clear that the student is talking about a situation of abuse, they should be gently stopped and informed that if they continue, the staff member has a legal obligation to pass information on to the Safeguarding Officer. **Staff cannot and must not promise confidentiality to a student.**
- It is important not to ask too many questions; staff must not under any circumstances investigate any accusations. As soon as it is possible, staff should document the factual details of what has been said using a Safeguarding Form. This form should be emailed to the designated Safeguarding Officer (SO) immediately.
- Staff must contact the SO as soon as possible, but certainly the same day, to explain the situation and pass on the written notes. The SO will outline the action that needs to be taken so that this can be explained to the student. It may be appropriate for the SO to meet the student.
- Staff must not take any further action themselves or disclose any information to anyone else. This includes contacting outside agencies.
- As far as possible, the wishes and views of the student will be taken into account.
- If a member of staff has suspicions that a student is suffering abuse they must discuss these concerns with the SO where possible and not take any independent action.
- All contact with outside agencies regarding safeguarding issues of abuse must be conducted by the SO.
- If the student suffering abuse is over 18 but we are aware that there may be siblings or children under 18 who may be at risk the SO must be informed.
- The Academy will liaise with the Police and support them with enquiries in relation to the safeguarding and well-being of the students.

Allegations of a student abusing another student

If a student has been accused of being involved as an abuser within a child abuse allegation, the SO must be contacted as soon as possible. The SO will contact the Police immediately as this is a criminal act and a view needs to be taken as to if a prosecution will take place. In this instance both party next

of kin is informed and it is likely that the accused student will be suspended immediately. If they are not suspended a risk assessment will need to take place immediately so that a judgement can be made as to that individual's range of activity within the Academy, prior to the outcome of any investigation being known.

Allegations of abuse against a member of staff

Any allegations of abuse made against a member of the Academy staff should be immediately reported to the Centre Head.

BULLING AND HARRASMENT

- The Academy is committed to ensuring that students are entitled to receive education and training free from threat, oppression, or abuse. The student disciplinary process reinforces the view that bullying and harassment are unacceptable and inconsistent with Academy objectives.
- All staff will set a good example to students and promote mutual co-operation and respect within the Academy community and make plain the Academy's attitude towards bullying and harassment.
- The Academy will provide specialist advice and guidance on bullying and harassment during the Academy Induction period and through its tutorial provision.
- Any incidents of bullying will be reported to the relevant Campus Manager who may seek advice from the SO. Staff will act, without delay and positively; when bullying or harassment of any kind are reported or observed. The Academy's student disciplinary procedure will be instigated as appropriate.

DATA PROTECTION AND RECORD KEEPING

Confidential records will be kept for all students regarding any alleged or suspected abuse. Individuals should report any such suspicions or any disclosed safeguarding issues using the pink Safeguarding Form available from the Campus Reception area. No records of situations of alleged or suspected abuse must be kept in curriculum or public areas in the Academy. Any information about individuals will be kept confidential and stored electronically with password protection.

INFORMATION SHARING AND CONFIDENTIALITY

The Academy acts appropriately with regard to confidentiality whilst still complying with stated duties of cooperation and integrated working between the Academy and appropriate external agencies, including the Police while acting in the best welfare interests of our students. Confidential information will not be shared without prior consent except in specific circumstances where the Academy's legal duties prevent this. Information will be used by the SO in connection with their duties. At times this may include disclosure to other relevant professionals such as the Police. This information will only be shared, on a need-to-know basis, after confirming the identity/authority of the person concerned. When receiving phone calls requesting information about students, the following protocols must be followed:

1. If a student is over the age of 18, no information may be shared with any party.
2. If a student is under the age of 18 (or over the age of 18 and a vulnerable adult), the following information must be requested from the caller:
 - Name
 - Date of birth of student
 - Student's home address
 - Contact telephone number of the caller Once this information is gained, the details of the query will be passed to the student directly and the student will choose if they wish to respond.

When a request for student information is made in person, the following protocols must be followed:

1. If a student is over the age of 18, no information may be shared with any party.
2. If a student is under the age of 18 (or over the age of 18 and a vulnerable adult), the following information must be requested from the visitor:
 - Details of the visitor are to be taken and the Academy staff to contact the student.
 - Administrator/receptionist/student advisor to pass the visitors details to the student
 - The student will then make the decision as to whether or not they will meet with the visitor.

DEFINITIONS OF ABUSE AND NEGLECT

Physical Abuse - May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child or vulnerable adult.

Sexual Abuse - Forcing or enticing a child or young person to take part in sexual activities, whether or not the child or vulnerable adult is aware of what is happening. The activities may involve:

- Physical contact including; unexplained injury or refusal to explain or discuss them.
- Abuse of power for the purpose of the sexual gratification of the abuser.
- Encouraging vulnerable adults to behave in sexually inappropriate ways.
- Inability of the child to consent.

Emotional Abuse - The persistent emotional ill-treatment of a vulnerable adult to cause severe and persistent adverse effects on their emotional development. It may involve:

- Conveying to vulnerable adults that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of the other person.
- Age or developmentally inappropriate expectations being imposed on vulnerable adults.
- Causing vulnerable adults frequently to feel frightened or in danger.
- The exploitation or corruption of vulnerable adults. Some level of emotional abuse is involved in all types of ill-treatment of a vulnerable adult, though it may occur alone.

Neglect - The persistent failure to meet a child's or vulnerable adult's physical and psychological needs, likely to result in the serious impairment of their health or development. It may involve:

- Failing to provide adequate food, shelter and clothing.
- Failing to provide a child from physical harm or danger.
- Failing to ensure access to appropriate medical care or treatment.
- Neglect of a child's or vulnerable adult's basic emotional needs e) Failure to ensure satisfactory education.

Financial Abuse - This includes theft, fraud, exploitation, the misuse of possessions and pressure applied in relation to financial transactions.

Discriminatory Abuse - This is based on a person's disability and includes making hurtful comments and harassing them.

ALLEGATIONS MADE AGAINST A MEMBER OF STAFF

Safeguarding enquiries by the Police are not to be confused with internal disciplinary enquiries by the Academy.

- The Academy may be able to use the outcome of external agency enquiries as part of its own procedures.
- The Academy will hold in abeyance its own enquiries while the formal Police investigations proceed.
- The Police may act independently of the Academy particularly where the allegation is unconnected to the member of staff's professional life.
- The Police may wish to interview other members of staff to enable them to gather the evidence.
- Any internal enquiries will conform to the Academy Staff Disciplinary Procedures.

Suspension of Staff

Suspension of staff member(s) should not be automatic. Suspension can only be carried out by the Senior Management Team (SMT). Suspension may be carried out at any stage of the investigation. It is a neutral, not disciplinary, act and will be on full pay. Consideration should be given to alternatives e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties. Suspension should only occur for a good reason, for example;

- Where a child or vulnerable adult is at risk.
- Where the allegations are potentially sufficiently serious, to justify dismissal, on the grounds of gross misconduct.
- Where necessary for the good and efficient conduct of the investigation.

Prior to suspension the SMT will interview the member of staff. This should only occur once approval has been sought from the appropriate Local Safeguarding Guidelines. If the Police are engaged in an investigation the officer in charge of the case should be consulted. The interview is not

intended to establish a member of staff's innocence or guilt, but given the opportunity for the member of staff to make representations about possible suspension. The member of staff will be given time at the meeting to consider any information given to him/her and prepare a response. The suspended member of staff should be given appropriate support during the period of suspension. He/she will be provided with information and developments in the case at regular intervals. The suspension will remain under review in accordance with Nest Academy's Staff Disciplinary policy

Allegations without Foundation

- False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Dubai Policy Child Protection in order that other agencies may act upon the information.
- In consultation with the SO and /or the nominated colleague, the SMT shall:
 - Inform a member of staff against whom the allegation is made, orally and in writing, that no further disciplinary or safeguarding action will be taken
 - Inform the student that the allegation has been made to the individual in question and once investigated the outcome reached.
 - Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

Records

For safeguarding matters relating to staff members only: It is important that documents relating to an investigation are retained in the Human Resources Department, in a secure place, together with a written record of the outcome. If disciplinary action is taken, details will be retained on the member of staff's personal file, in accordance with the Academy disciplinary procedure.