

## SAFEGUARDING POLICY (WS)



# RUGBY SCHOOL DUBAI

|                     |                              |                          |             |
|---------------------|------------------------------|--------------------------|-------------|
| <b>Written by:</b>  | Holly Brown and Kirsty Heard | <b>Date Created</b>      | August 2026 |
| <b>Approved by:</b> | Henry Price                  | <b>Next Review Date:</b> | August 2027 |

I acknowledge that I have read, understood and accepted ownership of this policy document and at the next formal review, the below signatories will replace those named above.

*Henry Price*

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Henry Price

Principal

**Rugby School Dubai**

## **1. Rationale and Purpose:**

This policy provides the whole-school framework for recognising, responding to, recording, reporting and managing safeguarding and student protection concerns. It applies to all students and to all staff, governors, volunteers, contractors, coaches, agency staff, visitors and third-party providers working for or on behalf of RSD.

Safeguarding arrangements apply on site, online, on school transport, during trips and residential, during extracurricular activities and wherever school-arranged provision takes place. The School will safeguard all students irrespective of nationality, gender, faith, culture, ability, additional need or personal circumstance.

RSD recognises that students with SEND, People of Determination, communication needs, health needs or other vulnerabilities may face additional barriers to recognising or reporting harm. Staff must remain alert to these barriers and make appropriate adjustments so that students' wishes and feelings can be heard.

## **2. Policy Statement and Principles:**

Safeguarding and the welfare of students are central to everything we do at Rugby School Dubai (RSD). We recognise safeguarding as a shared responsibility across the whole school community, supported by clear procedures, effective training and an embedded culture of care, professional curiosity and vigilance. Every student has the right to feel safe, to be heard, and to be protected from abuse, neglect, exploitation, maltreatment, and other forms of harm.

The best interests, welfare, and safety of the student are paramount. RSD adopts an 'it could happen here' mindset: concerns are noticed, taken seriously and acted upon. Safeguarding is preventative as well as responsive, and early identification and early support are essential. All adults working with students occupy a position of trust and are expected to maintain clear professional boundaries in person and online.

## **3. Aims:**

- To ensure that the safety, welfare, and best interests of every student are at the heart of the School's safeguarding practice.
- To provide a safe and caring environment in which students feel secure, valued, and confident to seek help.
- To ensure that all members of the school community understand their responsibility to recognise, respond to and report safeguarding concerns promptly.
- To promote a vigilant safeguarding culture in which concerns are taken seriously, acted upon and never assumed to be someone else's responsibility.
- To identify safeguarding concerns and emerging needs at the earliest opportunity so that appropriate support and intervention can be provided.
- To ensure that safeguarding concerns are recorded, reported, monitored, and shared appropriately, in line with school procedures and relevant UAE requirements.
- To ensure that students who may face additional barriers to recognising or reporting harm are appropriately supported and able to have their wishes and feelings heard.
- To maintain clear professional boundaries and a culture in which concerns about the conduct of adults, including low-level concerns, are reported and addressed.
- To work in partnership with parents, Aldar Education, and relevant external agencies to safeguard and promote the welfare of students.
- To promote safeguarding through education, ensuring that students develop the knowledge and confidence to recognise unsafe situations, seek help and stay safe both online and offline.

#### **4. Safeguarding Leadership and Governance:**

##### **Principal and Board of Governors:**

The Principal is accountable for ensuring that safeguarding arrangements are effective, appropriately resourced and embedded across the School.

The Board of Governors, supported by the nominated Safeguarding Governor, provides oversight, scrutiny and challenge of the School's safeguarding arrangements. This includes monitoring and evaluating safeguarding practices and ensuring that policies, procedures, training and reporting arrangements remain effective and compliant. Safeguarding arrangements are reviewed regularly to support continuous improvement.

##### **Designated Safeguarding Leads:**

The Designated Safeguarding Lead (DSL) is a senior member of staff with lead responsibility for safeguarding and student protection. The DSL is supported by Deputy DSLs (DDSL) and the wider safeguarding team, with appropriate cover available whenever students are in the care of the School.

| <b>Name:</b> | <b>Role:</b>       | <b>Email Address:</b>        |
|--------------|--------------------|------------------------------|
| Kirsty Heard | Prep School DSL    | kheard@rugbyschooldubai.ae   |
| Holly Brown  | Senior School DSL  | hbrown@rugbyschooldubai.ae   |
| Thomas Kirby | Prep School DDSL   | tkirby@rugbyschooldubai.ae   |
| Greg Roberts | Senior School DDSL | groberts@rugbyschooldubai.ae |

The DSL manages and coordinates safeguarding referrals and responses; acts as a source of advice and support for staff; maintains secure and accurate records; oversees appropriate information sharing; liaises with the Principal, Aldar Education, parents and relevant external agencies; monitors patterns and emerging risks; and ensures appropriate induction, training and regular safeguarding updates.

#### **5. Responsibilities of all Adults:**

All adults working with or on behalf of RSD have a personal responsibility to safeguard and promote the welfare of students. They must remain alert to possible abuse, neglect, exploitation or other harm, know the School's safeguarding procedures, and report concerns promptly. No member of staff should assume that somebody else will act.

Adults must maintain professional boundaries, challenge inappropriate language or behaviour, and report concerns about the conduct of another adult, including adult conduct concerns or a 'nagging doubt'.

#### **6. Recognising Safeguarding Concerns:**

Staff are not expected to investigate or diagnose abuse. Their responsibility is to be professionally curious: notice changes, listen carefully, consider context, record what they know and report it. Safeguarding concerns are rarely isolated, and staff should consider patterns, changes over time and overlapping risks.

Safeguarding concerns may include: physical abuse; emotional or psychological abuse; sexual abuse; neglect; child-on-child abuse; bullying and cyberbullying; harmful sexual behaviour; online abuse and grooming; sexual or criminal exploitation; domestic abuse; radicalisation and extremism; self-harm or suicidal ideation; persistent or unexplained absence; or any action or omission that places a student's health, safety, dignity or development at risk.



## **7. Students who may be Particularly Vulnerable:**

Students who may be particularly vulnerable include: students of determination, students with communication difficulties, children experiencing parental separation or parental absence, children with poor attendance, children who have or are experiencing domestic abuse, and children new to the UAE.

RSD recognises that some students may not feel ready or know how to tell someone that they are being harmed, may not recognise their experience as harmful, or may find communication difficult. Staff must avoid assuming that changes in behaviour, mood, injury or communication are simply explained by a student's SEND, disability or health condition.

Particular attention should be given to isolation, bullying, communication barriers and difficulties understanding or reporting online and offline risk. Reasonable adjustments and appropriate communication support will be used so that students' wishes and feelings can be heard, and early support should be considered whenever emerging concerns or unmet needs are identified.

## **8. Responding to a Disclosure or Concern:**

If a student makes a disclosure, the adult should listen calmly, give the student their full attention and reassure them that they have done the right thing by speaking. The adult **must not** promise confidentiality; instead, they should explain that the information will need to be shared with people who can help keep the student safe.

Staff **must not** investigate, interrogate, ask leading questions, ask the student to repeat their account unnecessarily or make promises about the outcome. Only minimal open questions should be used where clarification is essential.

The concern must be recorded promptly, accurately, and factually, using the student's own words wherever possible, and reported immediately to the DSL/DDSL. Urgent concerns must be reported verbally as well as recorded on CPOMS. If there is an immediate danger or medical emergency, immediate assistance should be secured first and the DSL/Principal informed as soon as possible.

Do not delay because you are unsure whether a concern is 'serious enough'. The safeguarding team will assess the information and determine the next action.

## **9. Recording, Monitoring and Information Sharing:**

RSD uses CPOMS as its secure safeguarding platform. Safeguarding records must be timely, factual, clear and distinguish observation from opinion. Records should show the concern, follow-up, actions taken, decisions made, and, where appropriate, the rationale for those decisions.

Access to safeguarding information is restricted to those who need it for safeguarding or legal/regulatory purposes. Safeguarding information must not be discussed in corridors, social spaces, informal messaging groups or with unauthorised colleagues or third parties.

Information may be shared without consent where this is necessary to protect a student, prevent serious harm, or meet legal and regulatory duties. Safeguarding records transferred to another school will be handled separately and securely and, where required, directly with an appropriate safeguarding lead.

## **10. Child-on-Child Abuse:**

RSD recognises that students can abuse other students and that such harm may occur in school, outside school or online. The absence of reports does not mean that abuse is not happening. The School therefore adopts a zero-tolerance approach to child-on-child abuse.

All concerns must be reported to the DSL/DDSL without delay. The needs and safety of the student who may have been harmed, the student alleged to have caused harm, and any other students potentially affected will be considered. Risk assessment, support, parental engagement, and external referral will be determined according to the circumstances, with attention to contextual factors such as peer groups, transport, trips, residentials (where students stay overnight), and online environments.

Harmful behaviour must never be normalised or dismissed as banter, 'just having a laugh', or part of growing up.

### 11. Concerns and Allegations about Adults

Any concern that an adult working with or on behalf of RSD may have harmed a student, may pose a risk of harm, may have breached professional boundaries, or may be unsuitable to work with students must be reported immediately. Staff **must not** investigate the matter themselves.

| Concern:                                                              | Reporting Procedure:                                                                              |
|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| Concern about a member of staff, volunteer, contractor or other adult | Report through the School's designated allegations procedure to the Principal/DSL, as applicable. |
| Concern about the DSL                                                 | Report to the Principal.                                                                          |
| Concern about the Principal                                           | Report through the designated Aldar Education/Board escalation route.                             |

Resignation, dismissal, expiry of contract, or cessation of services does not prevent a safeguarding matter from being followed through. RSD will liaise with Aldar Education and relevant UAE/Dubai authorities and make required referrals where applicable.

### 12. Low Level Concerns and Safer Working Practice:

RSD promotes an open culture in which staff are expected to share concerns about adult behaviour even when the concern appears small or does not meet the threshold for a formal allegation. A low-level concern may be no more than a sense of unease or 'nagging doubt' that behaviour is inconsistent with the Staff Code of Conduct or expected professional boundaries.

Examples may include over-familiarity, favouritism, inappropriate one-to-one situations, inappropriate language, unauthorised photographs or contact, or conduct that could reasonably be misinterpreted. Staff are also encouraged to self-report where they recognise that their own conduct may have fallen below expected standards.

Adult conduct concerns will be recorded and reviewed so that patterns of concerning or inappropriate behaviour can be identified and rectified. Where a concern meets, or may meet, the threshold for a formal allegation or external referral, it will be escalated appropriately.

### 13. Online Safety, Filtering and Monitoring:

Online safety is integral to safeguarding. RSD will maintain appropriate filtering and monitoring arrangements via Zscaler and internal firewalls, review their effectiveness and educate students about safe and responsible digital behaviour. Staff must

remain alert to risks including cyberbullying, grooming, exploitation, harmful content, image sharing, radicalisation and unsafe contact through social media or messaging platforms.

Filtering and monitoring are safeguards, not substitutes for education, supervision and professional vigilance. Concerns arising from online activity must be reported through the same safeguarding procedures as concerns arising offline.

#### **14. Visitors, Contractors, and Third-Party Providers:**

Visitors and third parties are part of the School's safeguarding culture and must follow RSD sign-in, identification, supervision, and conduct requirements. Visitor identification must be clearly displayed while on-site. Personal contact or social media details must not be requested from or shared with students, and images or video of students may only be taken with appropriate school permission.

Visitors should avoid one-to-one situations with students, use designated adult facilities, and maintain respectful professional conduct. If a visitor becomes concerned about a student, they should listen without investigating, write down what they have heard or observed, and pass the concern to a member of staff or the DSL immediately.

Where a third-party provider is involved in school-arranged provision, RSD will seek appropriate safeguarding assurance and establish clear arrangements for reporting concerns.

#### **15. Safer Recruitment and Safeguarding Culture:**

RSD will use appropriate safer recruitment, vetting, identity, qualification, reference and suitability checks in accordance with UAE, KHDA and Aldar Education requirements. Staff involved in recruitment will receive appropriate safer recruitment guidance or training.

All new staff and volunteers will receive safeguarding induction before or at the start of their work with students. Safeguarding will remain visible through regular updates, staff briefings, training, audits, and review of emerging risks. Staff must be able to raise concerns about poor or unsafe practice without fear of retaliation and should use the School's whistleblowing arrangements where appropriate.

#### **16. Safeguarding through the Curriculum and Student Voice:**

Students will be taught, in an age-appropriate and culturally informed way, how to recognise unsafe situations, seek help, build healthy relationships and stay safe online and offline. Students will know that they can speak to any trusted adult and that their concerns will be taken seriously.

The School will create opportunities to listen to student voice and will consider students' wishes and feelings in safeguarding decisions. Safeguarding education will be reviewed in response to emerging risks and the needs of the RSD community.

#### **17. Working with Parents and External Agencies:**

RSD seeks open and constructive partnerships with parents and carers. Parents will normally be involved when safeguarding concerns arise; however, the School may seek advice, share information or make a referral without prior parental notification, where doing so is necessary to protect a student, avoid increasing risk or prevent an investigation from being compromised, as directed by the competent authority.

Where necessary, RSD will work with Aldar Education and relevant UAE/Dubai authorities and specialist services, including KHDA and the appropriate child protection, social care, police, health or emergency services.

#### **18. Training, Monitoring and Review:**

All staff will complete safeguarding training at induction and thereafter in line with RSD and Aldar Education expectations, including relevant online safety training. DSL and DDSL knowledge and skills will be maintained through appropriate role-specific training and regular updates.

The DSL will review safeguarding data, CPOMS records, patterns of concern, low-level concerns, training completion, and emerging risks to inform improvement. The Principal and Board will receive appropriate safeguarding assurance and oversight information.

This policy will be reviewed at least annually and sooner following significant incidents or changes to UAE law, KHDA requirements, Aldar Education policy, or relevant good practice.

#### **19. Related Policies and Procedures:**

- Aldar Education Safeguarding and Student Protection Policy
- Staff Code of Conduct and Safer Working Practice
- Behaviour Policy
- Anti-Bullying Policy
- Online / Digital Safety and Acceptable Use procedures
- Safer Recruitment procedures
- Whistleblowing procedure
- Health and Safety and Site Security procedures
- Attendance procedures
- Inclusion / SEND procedures
- Trips, Visits and Residential procedures
- Visitor and Contractor procedures
- Managing Allegations / Low-Level Concerns procedures

#### **20. Legislative, Regulatory and Good Practice Framework:**

This policy is grounded in UAE legislation, Dubai regulatory requirements and Aldar Education policy. Rugby School Dubai is committed to meeting all applicable statutory and regulatory requirements relating to the safeguarding and protection of students in the United Arab Emirates.

The School also draws upon recognised international and British safeguarding practice to support and strengthen its safeguarding culture. In particular, RSD has regard to the principles and good practice contained within the UK Department for Education's Keeping Children Safe in Education (KCSIE) 2026, including expectations relating to safeguarding culture, designated safeguarding leadership, safer recruitment, child-on-child abuse, allegations and low-level concerns, online safety, filtering and monitoring, and the responsibility of all adults to safeguard students.

KCSIE is statutory guidance for schools and colleges in England and is therefore used by RSD as a good-practice benchmark rather than as a statutory requirement in the UAE. Where there is any difference between UK guidance and UAE legislation, KHDA requirements or Aldar Education policy, the applicable UAE and local requirements will take precedence.

This policy should therefore be read within the context of:

- United Nations Convention on the Rights of the Child;
- UAE Federal Law No. 3 of 2016 on Child Rights (Wadeema's Law);
- Federal Decree Law No. 18 of 2020 on Private Education;
- National Child Protection Policy in Educational Institutions in the UAE;



- National Policy for the Prevention of Bullying in Educational Institutions;
- Dubai Inclusive Education Policy Framework;
- Relevant KHDA Guidance;
- Technical Guide on the Deregistration of Educational Staff;
- Guide for Appointing Teaching Staff;
- Aldar Education Safeguarding and Student Protection Policy; and
- Keeping Children Safe in Education 2026 (UK Department for Education), as a benchmark for British safeguarding good practice.



### Appendix A - Immediate Safeguarding Response

|   |              |                                                                                              |
|---|--------------|----------------------------------------------------------------------------------------------|
| 1 | NOTICE       | A concern, disclosure, observation, pattern or allegation arises.                            |
| 2 | PROTECT      | Address immediate safety or medical needs. <b>Do not</b> investigate.                        |
| 3 | LISTEN       | Stay calm, take the student seriously, and <b>do not</b> promise confidentiality.            |
| 4 | REPORT       | Tell the DSL/DDSL immediately; urgent concerns <b>must</b> be verbal.                        |
| 5 | RECORD       | Make a factual CPOMS entry promptly using the student's own words where possible.            |
| 6 | ACT & REVIEW | DSL/DDSL assesses risk, records decisions, coordinates support and escalates where required. |