

Safeguarding and Child Protection Policy



Document References

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Responsible for the document: School Psychologists

Approved by: LFJM Board of Governors, on the proposal of Thomas Dentinger, Director

Original language of writing: English

Lycée Français Jean Mermoz (LFJM, "the School") is committed to keeping every child in its care safe. This policy sets out how the School prevents harm, how it identifies and responds to concerns, and who is responsible at each stage. It is reviewed every year by the Board of Governors, and sooner if legislation or practice requires it.

Introduction and scope

This policy applies on both the North and South campuses, from Petite Section to Terminale. For the purposes of this policy, a child is anyone under the age of 18.

It applies to every adult who works with pupils on behalf of the School, on site, during trips and online:

- all staff, whatever their role or contract;
- volunteers and parent chaperones;
- contractors and external providers, including transport, academy, swimming and extracurricular partners.



Every adult at LFJM shares a duty to keep children safe. Staff must maintain an attitude of **"it could happen here"**, act in the best interests of the child when in doubt, and report any concern, however small, without delay.



This policy should be read alongside the School Rules (Règlement intérieur), the Digital Use Policy, the Health Policy, the Chaperone Policy, the Staff Disciplinary Policy and the staff Code of Conduct.

Definitions

Safeguarding means protecting children from maltreatment, whether at home, at school, in the community or online, preventing harm to their physical and mental health and development, and acting early so that every child can grow up safely and achieve the best outcomes.

Child protection is one part of safeguarding. It refers to the action taken to protect a specific child who is suffering, or is likely to suffer, significant harm.

There is no absolute threshold for **significant harm**. The Designated Safeguarding Leads consider in particular:

- the nature and extent of the harm;
- its duration and frequency;
- the degree of premeditation;
- any threat or coercion.

A single serious event may be enough, but significant harm more often results from an accumulation of incidents over time.

Legal framework

This policy is based on:

- the United Nations Convention on the Rights of the Child (UNCRC);
- UAE Federal Law No. 3 of 2016 on Child Rights (Wadeema Law);
- Cabinet Resolution No. 52 of 2018 on the implementing regulation of the Wadeema Law;
- the National Child Protection Policy in Educational Institutions in the United Arab Emirates (2022);
- the requirements of the Knowledge and Human Development Authority (KHDA) for private schools in Dubai.

As a school in the AEF network, LFJM also takes account of the child protection principles of the French education system, including the PHARE anti-bullying programme.



Duty to report

Article 42 of the Wadeema Law requires every person, and in particular teachers and anyone responsible for the care or education of children, to report any threat to a child's safety or physical, psychological, moral or mental wellbeing. This duty is individual: no internal procedure can prevent a member of staff from fulfilling it.

Prevention

The School takes all reasonable measures to reduce the risk of harm by:

- appointing trained Designated Safeguarding Leads for each phase and campus;
- following safer recruitment practice for all staff and adults working with pupils;
- training all staff on this policy and on their individual responsibilities;
- adopting a zero-tolerance approach to abuse;
- building a culture in which children feel listened to, respected and able to speak up;
- teaching pupils how to stay safe, including online, through moral and civic education (EMC), age-appropriate personal safety and wellbeing education and the PHARE programme;
- ensuring that every pupil knows which adults they can talk to, in school and beyond;
- reviewing safeguarding practice regularly and reporting on it to the Board of Governors.

Roles and responsibilities

All staff

Every member of staff must:

- read and understand this policy and the Code of Conduct;
- complete the safeguarding training required for their role;
- know who the Designated Safeguarding Leads are and how to contact them;
- report any concern about a child, or about the conduct of an adult towards a child, immediately;
- never investigate a concern themselves or decide whether abuse has taken place.

Children may not feel ready or able to disclose abuse, and some may not recognise their experience as harmful. Professional curiosity is therefore expected at all times.

Designated Safeguarding Leads (DSL)

Each phase has a Designated Safeguarding Lead, who is a member of the senior leadership team. The DSL:

- receives and assesses all concerns for their phase;
- decides on the appropriate response, using the tier system set out in the appendix;
- leads the work with the pupil, the family and internal support staff;
- makes or coordinates referrals to external authorities;
- keeps safeguarding records secure and confidential;
- monitors pupils about whom there are concerns;
- ensures that staff in their phase are trained and know how to report.



If the relevant DSL is unavailable, staff contact another DSL on the same campus without delay. If no DSL is available, they contact the School Psychologist.

Support staff

The School Psychologists and the medical team support the DSLs. They help assess concerns, support pupils and staff, and contribute to the team around the child. They do not take decisions on cases in place of the DSL.

Responsible for the document

The School Psychologists maintain this policy: preparing the annual review, keeping training records up to date and coordinating awareness sessions for staff and families.

Heads of Campus

The Head of each campus is responsible for safeguarding on their campus. The Head of Campus:

- is notified of every concern reported on the campus, and is informed immediately of all Tier 1 cases, for which they agree the next steps with the relevant DSL;
- decides, with the DSL, on referrals to external authorities;
- liaises with the KHDA and other authorities on safeguarding matters concerning the campus;
- ensures that staff on the campus are trained and that safeguarding procedures are applied;
- keeps the Director informed of Tier 1 cases and referrals.

The Director

The Director:

- oversees safeguarding across both campuses and ensures that the Heads of Campus and the DSLs have the time, training and resources their role requires;
- ensures that safer recruitment procedures are applied;
- reports to the Board of Governors on safeguarding.

Governance

The Board of Governors is collectively responsible for safeguarding at LFJM. It appoints a Board Member Responsible for Safeguarding, who provides independent oversight and challenge and works with the Director and the DSLs on the annual review. Safeguarding is discussed at Board meetings, and the Board approves this policy every year.

The safeguarding team

On each campus, the DSLs, the School Psychologists and the medical team meet at least once a term under the Head of Campus to review open cases, moderate tiers and identify trends. The Director and the Board Member Responsible for Safeguarding receive a summary of this review.

Stéphanie García Senín

DSL Secondary — North Campus

Bertrand Mari

DSL Elementary — North Campus

Mathilde Villeneuve

DSL Maternelle — North Campus

Benoit Le Gac

DSL Secondary — South Campus

Aurélie Afflard

DSL Primary — South Campus

Jean-Claude Croisé

Board Member Responsible for Safeguarding



This list is updated at the start of each school year.

Training

All adults working with pupils receive training appropriate to their role before they start working with children, and this training is kept up to date.

DSLs and Director

Advanced safeguarding leadership training **Every 2 years**

School Psychologists and medical team

Advanced safeguarding training **Every 2 years**

Board Member Responsible for Safeguarding

Advanced safeguarding training **Every 2 years**

All staff

Safeguarding and child protection training **Annually**

Board of Governors

Safeguarding governance training **Annually**

Contractors and external providers (transport, academies, swimming, extracurricular)

Safeguarding training under the provider's responsibility, and a briefing on the School's arrangements

Annually

New staff

Safeguarding induction **Before working with children**

Volunteers and parent chaperones

Safeguarding briefing **Before each activity or school year**

The School keeps a record of training completed by every member of staff.



Staff and volunteers must feel able to raise concerns about poor or unsafe practice by colleagues. Such concerns are treated seriously, confidentially and without detriment to the person raising them.

Safer recruitment

LFJM verifies the identity, qualifications, employment history and suitability of every candidate before appointment. In particular, the School:

- requires a police certificate of good conduct from Dubai for residents, and from the candidate's home country and every country of residence in recent years;
- obtains references, including from the most recent employer;
- explores any unexplained gaps in employment;
- addresses safeguarding at interview.

Contractors and external providers are responsible for the vetting and safeguarding training of their own staff. Before any of their staff work with pupils, the provider confirms in writing that each person has passed checks equivalent to those above and has received safeguarding training, and undertakes to apply this policy. These obligations are part of the contract. The School may refuse access to any person for whom this confirmation has not been provided.

Types and signs of abuse

Abuse and neglect are forms of maltreatment. A child may be harmed by someone inflicting harm or by someone failing to prevent it, within the family, at school, in the community or online, by an adult or by another child.

The following definitions are based on the National Child Protection Policy in Educational Institutions (2022):

- **Physical abuse:** causing physical harm or injury to a child, or failing to prevent it.
- **Sexual abuse:** forcing, enticing or encouraging a child to take part in sexual activities, whether or not the child is aware of what is happening, including acts without physical contact such as exposure to or production of sexual images.
- **Psychological abuse:** any treatment that seriously or lastingly harms a child's emotional wellbeing and development.
- **Neglect:** the failure of parents or carers to meet a child's basic physical, emotional or educational needs, or to protect the child from danger.

LFJM also recognises **affluent neglect:** a situation in which a child's material needs are met but their emotional needs, supervision or care are persistently neglected.

Possible signs



These are possible signs only. They do not prove that abuse has taken place, and there may be other explanations. They must nevertheless be reported.

Physical signs may include:

- unexplained or repeated injuries;
- bruises in unusual places;
- marks of slapping, biting or gripping;
- signs of self-harm;
- poor hygiene;
- marked changes in weight.

Behavioural signs may include:

- a worrying comment by the child;
- a marked change in behaviour;
- withdrawal or isolation;
- unusual sexualised behaviour or knowledge for the child's age;
- eating or sleeping difficulties;
- repeated absence;
- unexplained gifts, money or new possessions;
- a relationship with a significantly older person;
- regression, such as thumb-sucking in an older child;
- a reluctance to change for PE or swimming;
- "frozen watchfulness";
- any general deterioration in wellbeing.



If a child needs urgent medical treatment, it must be sought immediately, in line with the Health Policy.

Reporting a concern

How to report

Any member of staff who has a concern about a child must report it on the same day using the **Child Protection Record of Concern** form (*Signalement interne*), accessible from EduKa. The DSL for the pupil's phase and the Head of Campus are notified; where the Head of Campus is also the DSL, the School Psychologist is notified instead. The DSL handles the report. If the DSL is unavailable, the other person notified takes it over the same day. The content of the report remains in EduKa, with access restricted to the safeguarding team. No member of staff should leave the School at the end of the day with a concern that has not been reported.



If a concern involves a DSL, or a DSL has a personal connection to the pupil, it is reported directly to the Head of Campus, or to the Director where the Head of Campus is the DSL concerned.



Within the School, safeguarding information is never exchanged by email or through messaging applications.



Immediate danger

If a child may be in immediate danger, telephone the DSL straight away and complete the form afterwards. If the DSL cannot be reached, contact another DSL on the campus, then the School Psychologist.

Visitors and contractors who have a concern contact the campus leadership directly.

Concerns raised by parents

Parents who are concerned about a child, whether their own or another pupil, contact the Head of Campus or the relevant DSL.



Parents must never approach, question or speak to another pupil about a concern, including a pupil they believe to have harmed their own child. All concerns are dealt with through the School.

Responding to a disclosure

If a child discloses abuse, the adult should:

- listen calmly, without showing shock or disbelief;
- let the child speak freely and accept what they say;
- reassure the child that they were right to speak and that it is not their fault;
- ask questions only to clarify, never leading questions;
- not criticise the person the child has named;
- report to the DSL without delay.



Never promise a child to keep the conversation secret. Explain who will need to be told and why.

Detailed guidance is given in the appendix.

Recording

The record must be made as soon as possible, in the child's own words wherever possible. It includes the date, time and place, the people present, the questions asked, and anything observed, such as words, behaviour or visible injuries. It records facts, not interpretations. Any personal notes are destroyed once the form has been submitted.



Staff, including the medical team, must never photograph a child's injuries. Injuries are described in writing and their position is shown on a body diagram. Photographic evidence is a matter for the police or external medical professionals.

Action by the DSL

The DSL assesses each concern and allocates it a tier, as defined in the appendix. For Tier 3 and Tier 2 concerns, the DSL works with the pupil, the family and the relevant staff (psychologist, medical team, CPE or class teacher) to put appropriate support in place.

Tier 1 cases are discussed immediately with the Head of Campus, who agrees the next steps with the DSL, which may include a referral to external authorities. If a child is at risk of immediate serious harm, the case is escalated to Tier 1 straight away.



Pupils whose situation is being monitored are flagged in EduKa, visible only to the safeguarding team. Where other staff need to know, the DSL informs them; they then check with the DSL before any contact with the pupil's family.

Timescales

A decision to refer depends on the nature of the concern, not on how long it has been monitored. The following timescales apply:

- The DSL assesses every concern within one school day of it being reported.
- If a child is in immediate danger, action is taken the same day, without any period of monitoring.
- Where a child discloses physical or sexual abuse, or shows visible signs of it, the DSL and the Head of Campus decide on a referral within the day. No meeting is held with the family about the concern before that decision.
- Where there is a concern without a disclosure, the School may meet the family to discuss the child's wellbeing, without reporting anything the child has said. The DSL then sets a monitoring plan with a review date no more than six weeks later. At that date, the concern is closed, kept under review or escalated.
- Any recurrence or new indicator after a meeting with the family moves the case to Tier 1.



A child's denial does not close a concern. Where a child has expressed fear of physical punishment at home, no contact is made with the family, even about behaviour or schoolwork, without the agreement of the DSL.

Informing parents

Parents are normally informed of concerns about their child and involved in the response.



What parents should know

UAE law requires all school staff to pass on any information that gives rise to a concern about a child's welfare. The School will normally discuss a concern with the parents first, including before any referral to the authorities, unless this would place the child at greater risk or cause undue delay. A concern passed on in good faith may later prove unfounded: the DSLs act in accordance with the law and in the best interests of every child.



The DSL will not inform parents where doing so could place the child at risk or compromise an enquiry. In such cases, the DSL acts on the advice of the competent authorities.

If a member of staff feels that a child's situation is not improving, they must raise it again with the DSL. A concern should always lead to help for the child.

Referral to external authorities

The School refers safeguarding and child protection concerns to the competent authorities as required by UAE law. The decision to refer is taken by the DSL in agreement with the Head of Campus.

Referral channel



In line with the procedure agreed between the KHDA and the Community Development Authority (CDA), child protection referrals are not sent directly to the CDA. They are sent to the KHDA, using the form provided by the KHDA, on School letterhead and signed by the Head of Campus. The KHDA then refers the case to the CDA.

Where a child is in immediate danger or a criminal offence is suspected, Dubai Police are contacted directly. This never prevents any member of staff from fulfilling their own duty to report under the Wadeema Law.



Any suspected abuse on site or during a school-related activity, including trips, extracurricular activities and transport, is notified to the KHDA.

Allegations against adults

Any concern that an adult working with pupils has harmed a child, may have committed an offence against a child, or has behaved in a way that suggests they may pose a risk to children must be reported immediately:

- to the Head of Campus, who informs the Director;
- to the Director, if the allegation concerns a Head of Campus;
- to the Board Member Responsible for Safeguarding, if the allegation concerns the Director.



Staff must not investigate or discuss the allegation with the person concerned.

Allegations are handled under the School's internal procedure for managing allegations and, where relevant, the Staff Disciplinary Policy. The procedure guarantees:

- protection of the child;
- a fair and prompt process for the adult concerned;
- strict confidentiality;
- referral to the KHDA and the police where required.

Placing the adult on administrative leave is not automatic: it is decided according to the risk.

Low-level concerns

Any behaviour by an adult towards pupils that is inconsistent with the Code of Conduct must be reported to the Head of Campus, even if it does not meet the threshold of an allegation. Examples include being over-familiar, favouring a pupil, contacting pupils outside professional channels or making inappropriate comments. These concerns are recorded confidentially so that any pattern can be identified and addressed early.



The resignation or departure of the person concerned does not end the procedure, and no agreement can prevent a report to the authorities. Where a person is found unsuitable to work with children, the School informs the KHDA and the relevant authorities of the person's country, including the AEFÉ for staff from the French education system.

Child-on-child abuse

Children can harm other children, at any age, in school, outside school or online. This may include:

- bullying and cyberbullying;
- physical violence;
- sexual harassment or violence;
- sharing intimate images;
- coercion;
- initiation rituals.



LFJM applies a zero-tolerance approach. Such behaviour is never dismissed as "banter" or "part of growing up". Every report is taken seriously and passed to the DSL.

The DSL distinguishes child-on-child abuse from ordinary conflict or misbehaviour, which is handled under the School Rules, taking into account:

- the frequency, nature and severity of the incidents;
- any imbalance of age, power or authority;
- any coercion;
- whether the act could be criminal.

The School assesses the needs of every pupil involved. It protects and supports the victim, including by separating pupils where necessary, and also supports the pupil responsible.

Sharing of intimate images

The creation or sharing of sexual images by pupils, including images manipulated or generated by artificial intelligence, is always treated as a safeguarding concern.



Staff must never view, copy, print, forward or delete such images. If an image is on a device, the device is taken directly to the DSL without being opened. Viewing or sharing images of minors may itself constitute an offence under UAE law.

The DSL assesses whether the incident is limited to pupils of a similar age with no aggravating factor, or whether it involves an adult, coercion, threats, extortion or wide circulation. In the latter case, a referral is made to the competent authorities. In all cases, parents are involved and the School acts to limit any further circulation of the images.

Online safety

Many safeguarding risks have an online dimension. The School considers four areas of risk:

- **Content:** exposure to illegal, inappropriate or harmful material.
- **Contact:** harmful interaction with others, including grooming.
- **Conduct:** behaviour that causes harm, such as sharing explicit images or online bullying.
- **Commerce:** scams, gambling and inappropriate advertising.

These risks include those linked to generative artificial intelligence, such as deepfakes and manipulated or AI-generated images of real people.

School networks and devices are filtered and monitored, and the DSLs are informed of any safeguarding concern this raises. Pupils and staff receive online safety education appropriate to their age and role, in line with the Digital Use Policy.

Absence and children missing education

Repeated or prolonged absence can be a sign that a child is at risk. Attendance is monitored daily, and any pattern of concern is reported to the DSL.

Where a pupil has been absent for five consecutive school days without explanation, the School takes all reasonable steps to contact the family, including calls to all known contacts, emails and contact with the schools of any siblings. If the pupil's whereabouts cannot be established, the DSL is informed and a referral is made to the competent authorities.

Supporting children

A child who is abused, or who witnesses abuse, may lose self-esteem, feel guilt or shame, and show behaviour ranging from apparent normality to aggression or withdrawal. School may be the only stable place in that child's life. The School supports these pupils through a caring and safe environment, close follow-up by the safeguarding team and cooperation with external services.

Pupils with additional vulnerabilities

Pupils with special educational needs or disabilities, including People of Determination, may be more vulnerable to abuse and less able to express it.



Staff must never attribute a possible sign of abuse to a child's need or disability without reporting it. This applies in particular to signs relating to communication, toileting, physical injuries or unusual attachments.

Mental health

Mental health difficulties can be a sign that a child has suffered or is at risk of abuse or neglect. Staff are not expected to diagnose, but they report any concern. The School works in partnership with parents, who are encouraged to share any concern about their child's wellbeing so that appropriate support can be put in place.

Self-harm and suicidal thoughts

Any sign or mention of self-harm or suicidal thoughts, including when made jokingly, is reported to the DSL immediately. The DSL assesses the situation with the School Psychologist and contacts the family, unless doing so would place the pupil at risk.



If a pupil's life may be in danger, the DSL is alerted by telephone at once and emergency services are called if necessary. The pupil is never left alone.

Where the pupil's safety requires it, the Head of Campus may decide that the pupil continues learning remotely until the School receives the opinion of a mental health professional licensed by the Dubai Health Authority (DHA) confirming that the pupil can safely return. The School Psychologist works with the external professional to support the pupil's return.

Change of school

When a pupil about whom there have been concerns leaves LFJM, the DSL transfers the safeguarding file securely and confidentially to the new school.

Staff conduct

Professional relationships

Staff must keep their relationships with pupils professional at all times, in person and online.

- One-to-one meetings with a pupil take place in a visible setting, with the door open or in a glazed room.
- Staff must not share personal contact details with pupils, contact them through personal accounts or connect with them on social media.
- Staff must not take photographs of pupils on personal devices.
- Staff must never drive a pupil alone in their own vehicle.

Physical contact

Inappropriate physical contact is forbidden. Appropriate contact includes:

- comforting a distressed child, for example with a hand on the shoulder;
- guiding a pupil or securing their attention;
- in PE, swimming or music, physical support limited to teaching a technique or preventing injury, after explaining it to the pupil;
- restraining a pupil to prevent them from harming themselves or others, using the minimum force necessary.



Any use of restraint must be reported to the DSL the same day.

Intimate care

In maternelle and for pupils who need it, intimate care is provided only by designated staff, with respect for the child's dignity and privacy. The child is encouraged to do as much as possible for themselves, and another adult is always aware that care is being given. Any concern arising during intimate care is reported to the DSL.

Trips and activities

Staff apply the School's rules on supervision, safety and security during trips and activities. They avoid situations that could make bullying or abuse between pupils more likely. Any accident or incident is recorded and reported to the medical team.

- On overnight trips, adults and pupils always sleep in separate rooms.
- During a trip, a member of staff who needs to speak to a pupil one-to-one informs a colleague first.

Medicines

Only the medical team may advise on or administer medicines, in line with the Health Policy.

Staff wellbeing

Dealing with a safeguarding concern can be difficult. The child remains the priority, but staff affected by a case can seek support from the DSL or the School Psychologists.

Site security and visitors

All visitors sign in on arrival and wear a visible visitor badge throughout their time on site. Contractors who have not received safeguarding training, for example for urgent works, are accompanied at all

times by the facilities or security team. Wherever possible, works are carried out when pupils are not on site.



Video surveillance footage may be viewed by the DSLs and the Head of Campus when dealing with a safeguarding concern. It is never shared with parents or other third parties, other than the competent authorities.

Records and confidentiality

Safeguarding records are kept in a restricted section of the pupil's record in EduKa, separate from the academic file and accessible only to the DSLs, the senior leadership team, the School Psychologists and the medical team. Each action is recorded as it happens; entries are never altered, and any correction is made by a new entry. The original report is kept on file. Information is shared only where necessary to protect a child.



Information about a pupil's situation, and any measures taken, is never shared with the family of another pupil, even when several pupils are involved in the same incident.



When asked about a situation by a colleague or a parent who does not need to know, staff simply answer: **"A concern has been raised and is being dealt with in line with the School's procedures."**

Appendix: safeguarding tiers

Tier 1 **Weekly to fortnightly**

The child is suffering, or is at risk of suffering, significant harm. External referral is made or actively considered. The Head of Campus is informed.

Tier 2 **Regular, as set by the DSL**

Serious concern requiring an in-school support plan and consistent monitoring.

Tier 3 **As required**

Low-level or emerging concern.

Record only **Reviewed termly**

Historic concern, or insufficient information to allocate a tier. The record remains on file.

Tiers are reviewed each term by the safeguarding team and may be raised or lowered as a case develops. When a concern no longer requires monitoring, the DSL closes the case; the record remains on file.

Appendix: how to respond to a child who wants to talk

Do

Stay calm and listen.

Accept what the child says, however unlikely it sounds.

Let the child speak at their own pace.

Explain that you must tell someone who can help.

Remember the child may have been threatened or bribed not to tell.

Record the child's own words as soon as possible.

Offer comfort with words rather than touch.

If the child changes or withdraws what they said, do not insist: record it.

Make sure that you, or the DSL, come back to the child before the end of the day.

Don't say

"Why didn't you tell anyone before?"

"I can't believe it!" or "Are you sure?"

"Why? How? Who? When? Where?" in quick succession.

"I promise I won't tell anyone."

"This is shocking."

Any question that suggests an answer.

Helpful things to say

"Thank you for telling me."

"It's not your fault."

"You did the right thing."

"I'm going to help you, and this is what will happen next."

Afterwards, report to the DSL without delay and seek support for yourself if needed.

*En cas de divergence entre les versions française et anglaise, la version dans la langue de rédaction originale prévaut.
In case of discrepancy between the French and English versions, the version in the original language of writing shall prevail.*