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KHDA Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions

Frequently Asked Questions

This resource explains the main requirements of the Directives through a series of FAQs. It does not replace the Policy Framework, UAE law, KHDA requirements or relevant Dubai safeguarding protocols.

Audience: Heads of institutions, senior leaders, governors, Child Protection Coordinators/Designated Safeguarding Leads (CPC/DSLs) and all staff, as well as parents, guardians and custodians, and learners.

Sectors: Early childhood centres (ECCs), schools, higher education institutions (HEIs), and technical or vocational education and training (TVET) institutions, including physical and virtual provision.

How to use this FAQ

Sections A to H explain what institutions must do to meet the Policy Framework's requirements.

Sections I to K explain what parents, guardians and custodians, and learners can expect, how they can help, and how KHDA works with other government entities.

Questions are numbered by section. For example, D5 is the fifth question in Section D. Use the Quick Find table to go straight to the answer you need, and the Key Contacts table for reporting numbers.

These FAQs are for guidance only. The Policy Framework and UAE law take priority.

Key term	Meaning
All sectors	Unless a sector note says otherwise, the answer applies across all sectors (ECC, school, higher education, and TVET settings).
MUST	A MUST directive is mandatory, legally binding, and used by KHDA to determine compliance.
COULD	A COULD statement is optional guidance or an example of a stronger recommended practice. It cannot replace a missing MUST requirement.
Head of institution	Refers to the relevant senior accountable leader, for example, a Manager, CEO, Director, Principal or Chancellor.
Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL)	The Policy Framework uses Child Protection Coordinator/Designated Safeguarding Lead as the lead safeguarding role in Dubai's private educational institutions.
Child Protection Specialist	The person licensed and appointed by the competent authority or relevant entities, responsible for safeguarding children's rights and protection within the bounds of their legal competencies. Responsible for coordinating and managing services for children and their families exposed to neglect and abuse in its various forms. Duties include assessing the needs of children and their families, developing tailored plans to meet those needs, and coordinating promptly and effectively with different service providers.
Parent	Used in these FAQs to include parents, guardians and custodians.

FAQ sections

A. About the Policy Framework: FAQs A1 to A7

B. Leadership, governance and safeguarding roles: FAQs B1 to B8

C. Staff and other adults: FAQs C1 to C4

D. Responding to concerns: FAQs D1 to D10

E. Prevention and specific risks: FAQs E1 to E6

F. Off-site learning, third parties and transport: FAQs F1 and F2

G. Guidance by sector and age: FAQs G1 to G4

H. Monitoring, review and compliance: FAQs H1 and H2

I. Working with parents, guardians and custodians: FAQs I1 to I4

J. Working with learners: FAQs J1 to J7

K. KHDA and other government entities: FAQs K1 to K3

Quick Find

If you need to...	Go to
Understand what the Policy Framework covers and who it applies to	**A1 to A4**
Check which requirements apply from the effective date (Policy Framework publication) and which have a 12-month grace period	**A7**
Check who is accountable and which policies you need	**B1 and B2**
Appoint a Safeguarding Governor	**B3**
Appoint a CPC/DSL and deputies	**B4 to B7**
Set up your safeguarding teams	**B8**
Check training, safer recruitment and staff conduct requirements	**C1 to C4**
Respond to a learner who has told you something worrying	**D2**
Decide how serious a concern is	**D4**
Report a concern to the CDA or KHDA	**D5**
Deal with a concern about a member of staff or another adult	**D6 to D8**
Record a concern or share information	**D9 and D10**
Notify KHDA about absence or manage a missing learner	**E5 and E6**
Plan a trip, placement or internship, or use a third-party provider	**F1 and F2**
Check what applies to learners aged 18 or over	**G4**
Check what must be reviewed and how often	**H1**
Work with parents, guardians and custodians	**I1 to I4**
Help learners share their views and raise concerns	**J3 to J6**
Understand the role of KHDA and other government entities in learner safeguarding and protection	**K1 to K3**

A. About the Policy Framework

Purpose and scope

A1. What is the Policy Framework trying to achieve?

The Policy Framework sets out a single safeguarding and learner protection approach for Dubai's private education sector. It expects institutions to prevent harm, recognise concerns early, respond effectively, report and record concerns, and continually improve their safeguarding systems. Safeguarding is not only about dealing with serious incidents. It includes the everyday systems, culture and practice that keep learners safe.

Sector note: All sectors. The same overall safeguarding model applies across ECCs, schools, HEIs and TVET institutions.

A2. Which institutions must follow the Policy Framework?

All private educational institutions permitted by KHDA must comply with the Policy Framework. This includes early childhood centres, schools, higher education institutions, and technical or vocational education and training institutes. It applies across all phases and modes of provision, including both physical premises and virtual learning environments.

Governance, leadership, staff, specialist and operational teams, parents, and third-party providers all have defined responsibilities. Learners have a voice in keeping their community safe, while the institution retains overall accountability.

Sector note: All sectors, including distance or blended provision.

A3. Which learners are covered by the Policy Framework?

The mandatory safeguarding duties outlined in the Policy Framework apply to all learners enrolled in a KHDA-permitted private educational institution in Dubai.

Sector note: All sectors.

A4. What changes when a learner is aged 18 or over?

The Policy Framework applies to all learners enrolled in Dubai's private educational institutions, without exception. Within this scope, educational institutions and their staff are responsible for ensuring the safety and protection of all learners and for addressing cases that may affect their safety or quality of life. This includes identifying cases requiring intervention, providing support, submitting internal reports, and taking appropriate action when necessary.

Learners aged 18 years and above: The educational institution continues to have responsibilities towards these learners in relation to their safety and protection, while recognising their legal status as adults when applying requirements relating to confidentiality, consent, reporting and referral pathways. They may report any concerns relating to their safety or protection directly to the relevant staff within their educational institution and, where necessary, to the competent authorities outside the institution.

Sector note: HEI and TVET institutions are most likely to use this distinction regularly. Schools and other settings must also apply it where they have learners aged 18 or over.

Status of the Policy Framework and links to other policies and frameworks

A5. What is the difference between a MUST directive and COULD guidance?

MUST indicates that the requirement is mandatory, legally binding and enforceable by KHDA. COULD indicates optional guidance or an example of good practice. An institution cannot use a COULD activity to compensate for failing to meet a MUST requirement.

Sector note: All sectors.

A6. How does this Policy Framework fit with other KHDA frameworks, for example the Inspection Framework and the Inclusive Education Framework?

This Policy Framework sets out the safeguarding and learner protection requirements for all KHDA-permitted private educational institutions. Other KHDA frameworks continue to apply alongside it. Where another framework covers a related area, such as inclusion or quality assurance, institutions must meet the requirements of both frameworks. No other framework can reduce or replace the safeguarding requirements in this Policy Framework.

KHDA quality assurance activities assess how well institutions meet these safeguarding requirements (see FAQ H2). For the related laws and regulations, see Appendix C: Regulations in the Policy Framework.

Sector note: All sectors. Inclusion and quality assurance frameworks differ by sector, but this Policy applies equally to all.

Implementation timelines

A7. Is there a transition period, and what happens to existing policies in the interim?

The Policy Framework applies in two stages. Both are counted from the effective date of the Policy Framework, which is the date on which it is published.

- **Requirements from the effective date:** requirements that protect learners straight away, and that existing UAE law or KHDA rules already require, apply from the effective date. KHDA's compliance processes apply to them from that date.
- **Grace period requirements:** requirements that need new structures, systems, documents, or KHDA guidance must be in place within 12 months of the effective date. Some training requirements have earlier deadlines within the 12 months. These are shown in the table below and in the Training Matrix.

Implementation timeline at a glance:

When	What must be in place	Directive no.
From the effective date	A CPC/DSL and at least two Deputy CPC/DSLs, recorded in governance minutes, with contact details shared with staff, parents and KHDA (see FAQs B5 and B6)	103, 112, 113, 118

When	What must be in place	Directive no.
From the effective date	Reporting and escalation of concerns within the timeframes in Figure 3 of the Policy Framework: high risk without delay, medium risk to CDA within 24 hours, and low risk to KHDA within 72 hours (see FAQ D5)	214 to 219, 221 to 223, 240 to 242
From the effective date	Immediate assessment of the learner's safety; no promises of secrecy, leading questions, own investigation or photographing injuries (see FAQ D2)	196 to 200
From the effective date	Reporting concerns about staff and other adults on the same working day, the reporting hierarchy, interim measures, and the right to go directly to KHDA (see FAQs D6 to D8)	170, 225 to 232
From the effective date	Same-day, secure recording of every concern in a structured electronic case management system, separate from academic files, with access limited to safeguarding staff (see FAQ D9)	206, 246 to 248, 253
From the effective date	Lawful, need-to-know information sharing, recording, and full cooperation with CDA and other authorities (see FAQ D10)	224, 254 to 259
From the effective date	Identity, reference and criminal record checks for every new appointment before the person starts, and action on suitability concerns (see FAQ C3)	146, 149, 151, 158
From the effective date	No private or secretive contact with learners; approved devices and platforms only, no unauthorised gifts (see FAQ C4)	156, 157, 160, 161
From the effective date	Immediate response to a missing learner; schools notify KHDA after five consecutive days of unjustified absence or 10% of a term (see FAQs E5 and E6)	42, 46, 47, 51
From the effective date	Leadership approval, a written risk assessment, consent, and a contactable CPC/DSL or Deputy for each off-site activity approved after the effective date (see FAQ F1)	55 to 57, 235, 236

When	What must be in place	Directive no.
From the effective date, with training within six (6) months	From the effective date, every CPC/DSL and Deputy must have either evidence of equivalent CPC/DSL training completed in the last two years or a documented training plan. Only those with training evidence may take on safeguarding case responsibilities, and at least one must hold responsibility from the effective date. Others must complete Level 3 training that meets KHDA's minimum requirements within six months of the effective date (see FAQs C1 and C2)	135 to 137
From the effective date	A Residential CPC/DSL and deputy in institutions with boarding provision (see FAQ G2)	70
From the effective date	Level 1 Basic Awareness training for every new adult before they start duties, and a CPC/DSL briefing for all staff on who the CPC/DSL and Deputies are and how to report a concern (see FAQ C1)	141, 142
From the effective date	A structured, compliant electronic case management system that tracks every stage of a case (see FAQs D3 and D9)	201, 202, 205, 207, 251
Within nine (9) months	Appointment of an independent Safeguarding Governor within nine months of the effective date, recorded and published, with governance training completed within three months of appointment (see FAQ B3)	82 to 88, 132, 133
Within 12 months	Audit and redrafting of the full policy suite, including substance use and attendance policies, with consultation and board approval (see FAQ B2)	1 to 8, 34, 39
Within 12 months	Tier 1, 2 and 3 safeguarding teams with terms of reference, a written and tested missing-learner protocol, and full boarding arrangements (see FAQs B8, E6 and G2)	45, 52, 69, 71 to 81, 98 to 102, 119 to 127

When	What must be in place	Directive no.
Within three (3) or 12 months	Level 1 training for staff in post who are not yet trained, and Level 2 training for staff in higher-risk settings, within three months of the effective date; other Level 2 training, the first annual code of conduct sign-off for existing staff, suitability checks on existing staff and a single auditable recruitment system within 12 months of the effective date (see FAQs C1 and C3)	134, 139 to 140, 143 to 145, 148, 150, 162
Within 12 months	Safeguarding, digital safety and substance use education in the curriculum, and learner voice arrangements (see FAQs E2-E4 and J3)	17, 21 to 23, 26, 31, 38, 195
Within 12 months	The first termly report to governance in the first full term after the effective date, and the first annual policy and system review by the end of the 12 months (see FAQ H1)	260 to 296

All other MUST directives in the Policy Framework that are not listed above as applying from the effective date must be in place within 12 months of the effective date.

Existing safeguarding policies remain in force during the grace **period until the revised policy suite is approved by the board or governing body. If an existing policy does not yet reflect a** requirement that applies from the effective date, that **requirement takes precedence.**

For how KHDA addresses non-compliance at each stage, see FAQ H2.

Sector note: All sectors.

B. Leadership, governance and safeguarding roles

Accountability and policies

B1. Who is ultimately accountable for safeguarding?

The educational institution remains accountable for implementing the Policy Framework. The head of the institution holds executive accountability for safeguarding and is directly accountable to KHDA for compliance. Specific tasks may be carried out by the Child Protection Coordinator/Designated Safeguarding Lead, deputies, staff or third-party providers, but overall institutional accountability cannot be delegated. However, safeguarding is considered everyone's responsibility.

Sector note: All sectors. Titles may differ by sector, for example Principal, Manager, Director, CEO, or Chancellor.

B2. What safeguarding policies does an institution need?

Institutions must maintain a legally compliant suite of safeguarding, health and safety, and wellbeing policies. At a minimum, written policies must cover safeguarding and learner protection, anti-bullying, attendance, behaviour, critical incident and emergency planning, digital safety, extracurricular activities, health and safety, inclusion, safer recruitment, and whistleblowing. Intimate care is required where relevant for younger learners or learners who need personal or health care support. Please see the Policy Framework for the full list of essential policies. Policies must be approved by the board or governing body after consultation, and staff, parents and learners must be consulted when key policies are developed and reviewed. New learners, parents, staff and third-party service providers must also be made aware of the UAE's ethical and societal values.

Sector note: ECCs should pay particular attention to intimate care and age-appropriate procedures. Schools should ensure that all activities throughout the day, from drop-off and transport to extracurricular activities, are covered by the school policy suite. HEIs and TVET institutions should adapt the same policy areas to adult and workplace-learning contexts, informed by the institution's context and risk profile.

Governance

B3. Does every institution need a Safeguarding Governor?

Yes, the Policy Framework requires a Safeguarding Governor to be appointed at board, governing body or owner level, and recorded in governance minutes. The role provides independent oversight and challenge, so the Safeguarding Governor must not hold an operational safeguarding role or a senior executive position. This means the Safeguarding Governor cannot be the Owner, the head of the institution (or equivalent, such as the Manager, CEO, Director, Principal or Chancellor), the CPC/DSL or a Deputy. The Safeguarding Governor must not make operational safeguarding decisions in individual cases. Their name and role must be published in publicly accessible institutional materials. Safeguarding must be a standing agenda item at every board or governing body meeting, and the Safeguarding Governor must meet regularly with the CPC/DSL. The Safeguarding Governor must complete safeguarding governance training within three months of appointment, and undertake refresher training at least every two years.

Timing: The Safeguarding Governor must be appointed within nine months of the effective date to ensure that governance training is completed within the 12-month grace period (see FAQ A7).

Sector note: All sectors. The governance structure may look different, but the independent safeguarding oversight role is still required.

The CPC/DSL and Deputies

B4. Can the head of institution also be the CPC/DSL?

No, the Policy Framework separates executive accountability from operational safeguarding decision-making. The head of the institution is accountable for the overall safeguarding system, but cannot hold the CPC/DSL role, nor can the Manager, Principal, CEO, Chancellor, Owner, Governor or Trustee, Counsellor, or HR Lead. The same restriction applies to Deputy CPC/DSLs. People in these positions can provide input, but must not hold or exercise safeguarding decision-making authority.

Sector note: All sectors.

B5. Does every institution need a CPC/DSL?

Yes, each institution must designate one CPC/DSL, formally record the appointment in governance minutes, clearly define the role and authority, and provide sufficient time and resources for the role. The role may be assigned to an existing staff member and does not require a dedicated position. The CPC/DSL leads and coordinates the safeguarding system and case management, and must be consulted on institutional decisions that may affect learner safety. The CPC/DSL's role and professional contact details must be shared with learners, parents, staff and KHDA, and updated promptly when they change.

Timing: The CPC/DSL must be in place from the effective date (see FAQ A7).

Sector note: All sectors.

B6. How many Deputy CPC/DSLs are required?

The Policy Framework requires at least two deputies. They must be trained to the same core safeguarding level as the CPC/DSL, complete this training before taking on safeguarding case responsibilities, and be able to assume full safeguarding responsibility when the CPC/DSL is absent or unavailable. Smaller institutions may need people to hold more than one safeguarding-related role, but reporting lines, accountability and conflict-of-interest rules must remain clear.

Timing: At least two Deputies must be in place from the effective date, each with evidence of equivalent CPC/DSL training completed within the past two years, or with a documented training plan. Only those with evidence of training take on safeguarding case responsibilities (see FAQ A7).

Sector note: Particularly relevant to small ECCs and training institutes and smaller HEIs.

B7. Does the CPC/DSL have to be available all day?

The institution must ensure access to the CPC/DSL or an authorised Deputy during all operational hours, including extra-curricular activities and off-site provision. The purpose is continuity: staff and learners must be able to reach a trained safeguarding decision-maker whenever the institution is responsible for learners.

Sector note: All sectors. HEI/TVET should include evening, weekend, or placement activities where these are part of normal provision.

Safeguarding teams

B8. What are Tier 1, Tier 2 and Tier 3 safeguarding teams?

Tier 1 is the Core Safeguarding Team, led by the CPC/DSL and supported by deputies. It coordinates cases and the safeguarding system. Tier 2 is a multi-disciplinary team that brings in relevant expertise such as health, counselling, inclusion, pastoral, digital or operational staff to support safeguarding. Tier 3 is the extended safeguarding team, which looks at system-wide risks, trends, policies and institutional improvement. Each tier needs clear terms of reference and must record its discussions, decisions and actions. Tier 3 must provide safeguarding assurance reports to governance at least once a term.

Sector note: All sectors. Membership should reflect the roles that actually exist within the institution.

C. Staff and other adults

Training

C1. Which safeguarding training is mandatory?

Institutions must meet the training requirements set out in Section 4.2 of the Policy. The requirements for each role are:

- **All adults in the institution, including governors, third-party providers, volunteers and visiting HQ staff:** Level 1 Basic Awareness before they start duties, then at least once a year, with a short refresher briefing at least once a term.
- **Safeguarding Governor:** Level 2 Safeguarding Governor training within three months of appointment, followed by a refresher at least every two years.
- **Other governors and the head of the institution:** Level 2 Governance Orientation on appointment, followed by a refresher every two years.
- **Head of the institution, senior leaders, and pastoral and middle leaders:** Level 2 Applied Safeguarding for Leaders on appointment, followed by a refresher every two years. This includes heads of year, phase or section, pastoral, inclusion and attendance leads, boarding house leads, ECC room or section leaders, and HE and TVET programme and student services leads.
- **CPC/DSL and deputies:** Level 3 CPC/DSL training before they take on safeguarding cases, followed by a refresher at least every two years and an annual role update.
- **Staff involved in recruitment:** Level 2 Safer Recruitment before sitting on a recruitment panel, followed by a refresher every two years. Every recruitment panel must include at least one person who has completed this training in the past two years.

- **Anyone who manages allegations against staff:** Level 2 Managing Allegations on appointment, followed by a refresher every two years. This includes HR, the Chair of Governors or Owner, the Safeguarding Governor, the head of the institution, senior leaders and the CPC/DSL.
- **Staff in higher-risk contexts:** Level 2 Role-Specific Safeguarding for Higher-Risk Settings before starting work in the setting, followed by a refresher every two years (see the sector note).

KHDA sets minimum requirements for this training, including content, duration, delivery, frequency and evidence. These are set out in the Safeguarding Training Matrix on Safe Space, which KHDA will update as needed. Institutions must keep records of all training completed, including refresher dates.

Timing: New staff complete Level 1 before starting duties, and staff appointed to a role after the effective date complete the training for that role at the point shown above. Staff in post who have not had safeguarding training in the last 12 months complete Level 1 within 3 months of the effective date; others complete it at their next annual training. Staff in post in higher-risk settings complete their Level 2 training within 3 months of the effective date. Staff in post complete the Governance Orientation, Applied Safeguarding for Leaders, Safer Recruitment and Managing Allegations training modules relevant to their responsibilities within 12 months of the effective date. From the effective date, the CPC/DSL briefs all staff on reporting routes. The phasing table in the Training Matrix sets out the timing for each course (see FAQ A7).

Sector note: All sectors. Higher-risk contexts named in the Policy Framework include boarding, off-site provision, sport, transport, digital environments and one-to-one settings.

C2. How can institutions make sure their training meets KHDA's requirements?

Institutions use the Safeguarding Training Matrix on Safe Space to plan and provide their training. It sets KHDA's minimum requirements for each course. Institutions are responsible for making sure the training they use meets these requirements and must keep evidence of this. KHDA may review this evidence through its quality assurance activities.

Sector note: All sectors. KHDA may set different training requirements by sector or role (see FAQ C1).

Safer recruitment

C3. What does safer recruitment require?

Safer recruitment applies to all adults who may have access to learners, in physical and virtual environments, including employees, contractors, volunteers, governors, visitors and third-party personnel. Recruitment must include transparent selection processes, identity and right-to-work checks, references and criminal record clearance (including the UAE Good Conduct Certificate where appropriate). These checks must be completed satisfactorily before appointment. Recruitment decisions and checks must be recorded in a single auditable system. Suitability must be monitored throughout employment.

Timing: These checks apply to all new appointments from the effective date. Checks for existing staff and the single auditable system must be completed within 12 months of the effective date (see FAQ A7).

Sector note: All sectors. Sector-specific employment regulations may add further requirements, but the safeguarding standard in this Policy Framework still applies.

Conduct and professional boundaries

C4. What professional boundaries are required?

Institutions must have clear conduct and safe working rules for both physical and online environments. Personal or secretive relationships with learners are prohibited. Staff must not use private contact details, personal devices, or personal social media to communicate with learners. Communication and teaching must use institutionally approved devices and platforms. One-to-one or closed settings require documented safeguards and supervision arrangements. Staff must not accept unauthorised gifts or show preferential treatment. All adults must read and sign the code of conduct on induction and at least annually.

Sector note: All sectors. HEIs and TVET institutions should not assume adult learners remove the need for professional boundaries.

D. Responding to concerns

Recognising and responding

D1. Does a member of staff need proof before reporting a concern?

No, proof or certainty is not required. Staff must report a safeguarding concern when there is reasonable suspicion or information that causes concern. Staff must not investigate first or wait until they are sure. Every adult is personally responsible for reporting. Do not assume someone else has already reported a concern, and report repeated or continuing concerns even if a report has already been made. Failure to report can lead to legal, professional or disciplinary consequences.

Sector note: All sectors.

D2. How should staff respond when a learner discloses abuse or neglect?

Respond calmly, listen carefully, take the learner seriously, and explain in simple language what will happen next. Immediately assess the learner's safety and put protective measures in place where needed. Report the concern without delay. Staff must not promise secrecy, express shock, disbelief, blame or distress, make the learner feel ashamed or responsible, ask leading questions, seek unnecessary detail, investigate independently, share information outside authorised safeguarding channels, or photograph or film injuries.

Sector note: All sectors. The language and communication method should be appropriate to the learner's age, language, culture, and needs.

Managing the concern

D3. What should happen after a concern is reported to the CPC/DSL?

The concern must be entered into the institution's structured electronic case management system. The CPC/DSL and/or Core Safeguarding Team must promptly triage the concern, assess risk, decide the response, record the rationale, track any referral or escalation, monitor the learner, review whether the intervention is working, and formally close the case only when there is a recorded reason and any follow-up arrangements are clear. Case decisions must not be made in isolation. Each case record must show the threshold level applied, the decision taken, who took it and why.

Sector note: All sectors.

D4. How do the low, medium and high safeguarding thresholds work?

The thresholds help the safeguarding team assess the seriousness and urgency of a concern. High risk means there is a significant and immediate threat and urgent protective action is required. Medium risk means there is no immediate threat, but there is a meaningful risk of harm if the situation does not improve. Low risk means concerns are limited at that point but still require support, monitoring and review. The examples in the Policy Framework are illustrative, so professional judgement and the learner's full context must always be considered. The threshold level, decision and rationale must be recorded for every case. Cultural considerations can inform the assessment, but must not introduce bias or lower safeguarding standards.

Sector note: All sectors. For learners aged 18 or over, the risk assessment still applies, but consent, confidentiality and referral rules must also be considered.

Where a legally appointed guardian is responsible for the learner's care or decision-making, the applicable guardianship arrangements must also be followed.

Reporting outside the institution

D5. What are the external reporting and escalation expectations?

The CPC/DSL must escalate concerns using the reporting routes and timeframes set out in Section 5.3.3 and Figure 3 of the Policy Framework. High-level concerns involving immediate risk of harm must be referred without delay to the appropriate statutory authority or emergency service, e.g. the Community Development Authority (CDA) Child Protection Hotline (800988), Dubai Police (999), or Ambulance (998), and KHDA must be informed. Medium-level concerns must be escalated to the Community Development Authority (CDA) within 24 hours, through the CDA Child Protection Hotline (800988), and KHDA must be informed. Low-level concerns must be reported to KHDA within 72 hours, by telephone (8005432), through the , or by email (info@khda.gov.ae). Parents, guardians or custodians should be informed of any referral, but this must not delay the report or cause further harm to the learner. Institutions must cooperate fully with any investigation by a child protection specialist or relevant authority.

Sector note: Learners aged 18 or over are adults by law. This means they should be asked for their consent before any information about them is shared or before they are referred to an outside agency, and their wishes should be respected. The CDA child protection processes apply only to learners under 18. Information may still be shared without consent if there is a risk of harm to the learner or to others.

Concerns about adults

D6. What if the concern is about a member of staff or another adult?

Concerns or allegations about staff or another adult must be reported without delay and no later than the same working day, normally to the CPC/DSL. The Policy Framework's reporting hierarchy provides alternative routes where the usual reporting line is involved in the concern. Interim safeguarding measures, including removal from duties or suspension, may be used where necessary to protect learners while the concern is assessed or investigated. External providers and third parties must be informed that they can report directly to KHDA or the relevant authorities.

Sector note: All sectors. This includes employees, contractors, third parties, volunteers, parents, and other adults in positions of trust.

D7. What if the concern is about the CPC/DSL or head of the institution?

The normal route must not be used if doing so would create a conflict of interest. The Policy Framework's reporting hierarchy routes a concern about a member of staff to the CPC/DSL; a concern about the CPC/DSL or a deputy to the head of the institution; a concern about the head of the institution to the Chair of Governors/Trustees or Owner; and a concern involving a sole owner or another conflict of interest to KHDA or the relevant authorities.

Sector note: All sectors. Institutions should make these alternative routes visible before any concern arises.

D8. What if internal safeguarding or whistleblowing channels are blocked or unsafe?

Staff must be informed that they can escalate safeguarding concerns directly to KHDA or the relevant authorities if internal routes are unavailable, compromised, ineffective, or unsafe. Whistleblowing procedures support this but do not replace the normal duty to report a safeguarding concern. Anyone who raises a concern in good faith must be protected from retaliation, and anonymous concerns must be taken seriously.

Sector note: All sectors.

Records and information sharing

D9. What must be recorded, how quickly, and how must records be kept?

All safeguarding concerns must be recorded in the electronic case management system on the same day they arise and updated after each action or decision. Records must be factual, objective, dated, attributable to the author, and maintained in a clear chronology. They must include the learner's own words where relevant, decisions and rationale, actions and who took them, referrals, confirmations, and follow-up. Safeguarding records must be kept securely, separately from academic or administrative files, with access limited to authorised safeguarding staff.

Timing: Same-day recording in a structured, compliant electronic case management system applies from the effective date (see FAQ A7).

Sector note: All sectors, including concerns arising in boarding, placements, transport, off-site activities, and third-party provision.

D10. When can safeguarding information be shared?

Safeguarding information must only be shared on a need-to-know basis, when lawful, proportionate and in the learner's best interests. Consent must be sought where appropriate and safe, but it is not required where there is a risk of harm. Each decision to share information must be recorded, including what was shared, with whom, when, why and who authorised it.

Sector note: All sectors, including concerns arising in boarding, placements, transport, off-site activities, and third-party provision.

E. Prevention and specific risks

Wellbeing and counselling

E1. When does a wellbeing or counselling concern become a safeguarding concern?

Wellbeing support must not replace safeguarding action. If information from counselling, wellbeing or mental health support indicates a risk of harm, it must be recognised and managed in accordance with the safeguarding procedures in Section 5. Counselling cannot be used as a disciplinary measure, and third-party wellbeing providers must meet safer recruitment, suitability and licensing requirements. Counselling must be delivered by qualified, licensed professionals, and counsellors and CPC/DSLs must receive regular professional supervision. Learners must have access to private, confidential spaces for support, including when support is provided remotely.

Sector note: All sectors. ECC provision should be age- and developmentally appropriate; HEIs and TVET institutions must also observe adult confidentiality and consent where the learner is 18 or over.

Digital safety

E2. What does digital safety include?

Digital safety includes cyberbullying, harmful or age-inappropriate content, unsafe contact, online grooming, misuse of technology and artificial intelligence, manipulated content, digital coercion, social media risks and other emerging harms. Institutions must apply appropriate filtering, monitoring and safety controls to their digital environment and provide age- and culturally appropriate digital safety education. Digital safeguarding concerns must be reported through the normal safeguarding route. Institutions must also provide parents, guardians or custodians with information to support digital safety outside the education institution.

Sector note: All sectors, including fully online and blended provision. The controls should be proportionate to the technology and age profile of the learners.

Bullying and substance use

E3. How should bullying concerns be managed?

Bullying, including cyberbullying, must be prevented, identified and addressed through clear institutional arrangements. Staff must respond promptly to bullying and report concerns to the CPC/DSL for review.

Sector note: All sectors. Education and prevention should be age and culturally appropriate.

E4. How should substance use concerns be managed?

Every institution needs a written substance use policy that suits the age and stage of its learners. The policy should explain how the institution prevents substance use, how staff respond, and how concerns are escalated. All educational premises must be smoke-free.

Staff must report suspected substance use to the CPC/DSL. They should not investigate it themselves. The CPC/DSL must always assess the following:

- any substance use or possession by a learner under 18
- any use, possession or supply of illegal or controlled substances, at any age
- anyone supplying any substance to a learner under 18
- any substance use, including misuse of medication, that suggests a risk of harm, dependency, coercion or exploitation, or a risk of harm to others

The CPC/DSL determines whether the concern is low, medium or high (see FAQ D4). They then follow the reporting routes and timeframes outlined in FAQ D5 and Figure 3 in the Policy Framework. This is the same process used for all other safeguarding concerns. If a learner is in immediate danger, call Dubai Police (999) or an ambulance (998) straight away.

Sector note: All sectors. Education and prevention should be age and culturally appropriate. For learners aged 18 or over, consent and confidentiality apply as set out in FAQs D5 and G3, unless there is a risk of harm to the learner or others. Concerns involving illegal or controlled substances are referred to Dubai Police or other competent authorities where the law requires it. Other tobacco or vaping use by learners aged 18 or over is managed through the institution's substance use policy and the smoke-free requirement, unless it meets one of the points listed above.

Attendance and missing learners

E5. What are the attendance requirements?

Every institution needs a written attendance policy that suits its sector, the way it delivers learning, and the age of its learners. Institutions must keep reliable attendance records, follow up on unexplained or repeated absence, and analyse patterns.

Schools must notify KHDA when a learner reaches either of these thresholds:

- five consecutive days of unjustified absence; or
- sporadic absences that add up to 10% of the total days in a term.

All other institutions set their own absence thresholds in their attendance policy. When a learner reaches the institution's threshold, the CPC/DSL reviews the absence. If it may indicate a safeguarding concern, the CPC/DSL escalates it using FAQ D5 and Figure 3.

In every sector, any attendance concern that suggests a learner may be at risk must be reported to the CPC/DSL straight away. Staff do not need to wait until a threshold is reached. Institutions may set a lower, individual threshold for a learner with known vulnerabilities.

For learners under 18, follow up attendance concerns with parents, guardians or custodians.

For learners aged 18 or over, speak to the learner directly. Involve their family with the learner's agreement, or where there is a risk of harm to the learner or others. If a legally appointed guardian makes decisions for the learner, follow those arrangements. If the learner cannot be contacted after reasonable attempts, or there are concerns about coercion, exploitation or their ability to make an informed decision, report this to the CPC/DSL, who decides what protective action is needed. If contacting the family could put the learner at greater risk, the CPC/DSL decides on other ways to keep them safe.

Record all contact and any agreed actions.

- **Sector note: ECCs**: set thresholds against the days each child is enrolled to attend. For example, for a child enrolled three days a week, count absence against those three days.
- **HE and TVET:** set thresholds that suit semesters, modules, credit hours, and evening, part-time or distance learning. The school thresholds of five days and 10% do not apply.

E6. What must a missing-learner protocol include?

Institutions also need a written missing-learner protocol for any learner who becomes unaccounted for during the educational day, with immediate action, defined escalation and documented follow-up. Missing-learner incidents must be reported to the CPC/DSL, senior leaders, parents, guardians or custodians, and relevant authorities, and the protocol must be tested and reviewed periodically. Staff must also escalate repeated or concerning patterns of temporary absence, such as frequent visits to the bathroom or clinic, to the CPC/DSL.

Sector note: All sectors.

F. Off-site learning, third parties and transport

F1. What safeguarding duties apply to trips, placements, internships and other off-site learning?

The institution maintains safeguarding accountability when learning takes place off-site. Every activity requires leadership approval and a documented risk assessment covering supervision and ratios, transport, medical needs, learner vulnerabilities, accessibility, professional boundaries, sleeping arrangements where relevant, and emergency procedures at a minimum. Under-18s require parent/guardian/custodian consent; informed consent must be obtained from learners aged 18 or over. Work placements and internships require written agreements with host organisations. A CPC/DSL or Deputy must be contactable, and a dedicated safeguarding phone or emergency communication channel is required for off-site activities. Staff leading off-site activities must be trained in safeguarding, first aid and emergency procedures. This means the Level 2 Higher-Risk Settings training and a first aid certificate, completed before leading an activity, or within 3 months of the effective date for staff already in post (see FAQ C1). All concerns, including near misses, must be reported and recorded. For international programmes, pre-departure planning must cover local laws, emergency and evacuation procedures, communication with parents and KHDA, and checks on host organisations.

Sector note: Especially important for HEIs and TVET institutions because internships and work placements may be a routine part of provision. It also applies to school trips, sports, residential visits and international programmes.

F2. Can an institution delegate safeguarding responsibility to a third-party provider or transport company?

No, the institution remains accountable. Before using a third-party provider or transport service, institutions must complete due diligence, including checks on licensing, staff background and suitability, safeguarding policies, insurance, safeguarding competence, and health and safety compliance. Transport to and from the institution is part of the institution's duty of care. Institutions must maintain an approved register of external providers, and providers must continue to meet safeguarding requirements throughout the engagement. Responsibility cannot be transferred through a waiver or contract.

Sector note: All sectors. HEIs and TVET institutions using placement hosts, training partners, or outsourced services should treat them as part of the safeguarding system, not as separate from it.

G. Guidance by sector and age

G1. What should early childhood centres pay particular attention to?

ECCs are subject to the same mandatory safeguarding structure as other institutions, but practice must be appropriate for very young learners. Key areas include age-appropriate communication and disclosure routes, close supervision and missing-learner procedures, intimate care where required, safe physical environments, parent/guardian engagement, staff suitability, and recognising non-verbal or developmental signs of harm. The Policy Framework requires safeguarding responses and wellbeing provision to reflect the learner's age, stage and needs.

Sector note: ECC-specific emphasis. These are not separate lower standards; they are the same safeguarding duties applied to younger learners.

G2. What should schools pay particular attention to?

Most school learners are under 18, so the child-specific legal and referral requirements in the Policy Framework will usually apply. Schools should have strong attendance and missing-learner systems, safeguarding education in the curriculum, anti-bullying and digital safety arrangements, safer recruitment, clear adult conduct rules, off-site activity procedures, and reliable escalation to the CPC/DSL. Schools must also ensure that all staff understand their personal duty to report concerns. Schools with boarding provision must also appoint a Residential CPC/DSL and deputy from the effective date, and put out-of-hours supervision, visitor controls and regular boarding risk assessments in place within 12 months of the effective date (see FAQ A7). The Residential CPC/DSL and deputy follow the same Level 3 training timing as other CPC/DSLs, and boarding staff already in post complete Level 2 Higher-Risk Settings training within 3 months of the effective date.

Sector note: School-specific emphasis. Where a school has learners aged 18 or above, adult consent and confidentiality requirements must also be considered.

G3. What should HEIs and TVET institutions pay particular attention to?

HEIs and TVET institutions must meet the same safeguarding requirements as all other sectors. This includes governance, safeguarding leadership, training, safer recruitment, reporting, recording and assurance.

The main difference is that many of their learners are adults by law.

For learners under 18, institutions apply the same child protection processes as schools.

For learners aged 18 or over, institutions must still spot concerns, offer support, and use their internal safeguarding procedures. However, because these learners are adults:

- they should usually be asked for their consent before any information about them is shared
- parents, guardians or custodians should not be involved without the learner's consent
- external referrals should normally be made with the learner's agreement, unless there is a risk of harm to them or to others.

Institutions should also take extra care with internships and work placements, third-party providers, distance learning, one-to-one situations, and any setting where older learners support or work alongside younger learners.

Sector note: Emphasis on HEIs and TVET institutions. If an HEI or TVET institution has learners under 18, the child-specific statutory processes apply to those learners.

G4. Where can I find what applies to learners aged 18 or over?

The Policy Framework applies to all learners, including those aged 18 or over. These learners are adults by law, so some requirements apply differently. The following FAQs explain what is different:

- FAQ A4: what changes when a learner is aged 18 or over
- FAQ D4: risk assessment, guardianship, confidentiality and referral
- FAQ D5: consent before sharing information or referring to an outside agency
- FAQ E1: confidentiality and consent in counselling and wellbeing support
- FAQ E4: managing substance use concerns
- FAQ E5: following up attendance concerns
- FAQ F1: informed consent for off-site activities
- FAQ G3: HEIs and TVET institutions
- FAQ I4: sharing information with parents
- FAQ J5: how learners aged 18 or over can raise a concern

Sector note: Most relevant to HEIs and TVET institutions. Schools and other settings must also apply these requirements where they have learners aged 18 or above.

H. Monitoring, review and compliance

H1. What ongoing monitoring and review does KHDA expect?

Safeguarding is not a once-a-year compliance exercise. Institutions must monitor policy implementation, training, safer recruitment, case management, reporting, information sharing, support services and safeguarding outcomes. Training compliance must be reviewed at least termly. CPC/DSLs and deputies must take part in peer supervision or reflective practice at least termly, and governance must receive termly safeguarding information. The safeguarding policy must be reviewed annually (led by the CPC/DSL and approved by the board or governing body). A comprehensive safeguarding system review must take place annually, and learning from incidents, reviews and monitoring must be reflected in documented improvement actions with named responsibilities and timelines. Institutions must also conduct learning reviews after significant incidents, and governors must review whistleblowing arrangements at least every two years.

Minimum review cycle at a glance:

When	What must happen
At least termly	Review training compliance. CPC/DSLs and deputies take part in peer supervision or reflective practice. Governance receives safeguarding information.
Annually	Review the safeguarding policy (led by the CPC/DSL and approved by the board or governing body). Conduct a comprehensive safeguarding system review.
At least every two years	Governors review whistleblowing arrangements.
After a significant incident	Carry out a learning review.
Ongoing	Turn learning from incidents, reviews and monitoring into documented improvement actions with named responsibilities and timelines.

Timing: The first termly governance report is due in the first full term after the effective date, and the first annual policy and system review by the end of the 12-month grace period (see FAQ A7).

Sector note: All sectors. The evidence may look different by sector, but every institution needs a clear audit trail showing how it knows safeguarding arrangements are working.

H2. What happens if an institution does not comply with the Policy Framework?

Compliance with all MUST directives in the Policy Framework is mandatory and legally binding under KHDA's regulatory authority. Non-compliance is addressed through KHDA's established regulatory and enforcement processes:

- **Regulatory action and sanctions:** Failure to comply may result in formal compliance notices, administrative penalties, restrictions on permit renewals, or regulatory sanctions under the relevant Executive Resolutions.
- **Staff deregistration and professional misconduct:** Neglecting or ignoring safeguarding concerns, failing to comply with safeguarding policy requirements, or failing to report incidents constitute severe professional misconduct. This may result in disciplinary action by the employer, including dismissal, reporting to external law enforcement, and inclusion on the KHDA Deregistration List.
- **Evaluation impact:** Non-compliance directly affects the evaluation of institutional leadership, governance, and provision during KHDA quality assurance activities.

Timing: KHDA's compliance processes apply from the effective date to the requirements listed as applying from that date, and to other grace-period requirements once the 12-month grace period ends. During the grace period, KHDA quality assurance activities review institutions' progress towards the grace-period requirements (see FAQ A7).

Sector note: All sectors. Quality assurance processes differ by sector, but the safeguarding requirements are the same.

I. Working with parents, guardians and custodians

I1. What can parents expect from the institution?

Every KHDA-permitted institution must:

- make its safeguarding policies easy to find and understand, and share them with parents.
- consult parents when developing and reviewing key safeguarding policies.
- inform parents who the CPC/DSL and Deputies are, how to contact them, and when this changes.
- share its staff code of conduct with parents.
- give parents guidance to support digital safety at home.
- follow up promptly with parents regarding attendance concerns for learners under 18.
- obtain parental consent for off-site activities for learners under 18.
- inform parents when a concern has been referred to an external authority, provided this does not delay the report or put the learner at further risk.

Sector note: All sectors. For learners aged 18 or over, see FAQ I4.

I2. What is expected of parents?

Under Wadeema's Law, parents have a legal duty to keep their children safe and to report any threat to their safety. In relation to the institution, parents are expected to:

- read the institution's safeguarding policies and code of conduct.
- know who the CPC/DSL is and how to contact them.
- inform the institution about anything that may affect their child's safety or wellbeing, such as changes at home, health or learning support needs or concerns about behaviour.
- keep their contact details up to date.
- support the institution's work on digital safety, attendance and wellbeing.
- work with the institution when a concern is raised, even if this is difficult.

Sector note: All sectors. Close partnership with parents is especially important in ECCs, where very young learners may not be able to explain what has happened to them.

I3. How should a parent raise a safeguarding concern?

If parents are worried about their child's safety, wellbeing or happiness, they should speak to the institution as soon as possible. Let parents know that they can speak to their child's teacher or any member of staff they trust, or contact the CPC/DSL directly. They do not need proof or certainty. The institution will listen, record the concern and determine what support or action is needed.

If parents are not satisfied with how their concern has been handled, they can contact KHDA on 8005432, through the , or by email at info@khda.gov.ae. If a learner is in immediate danger, they should call 999.

Sector note: All sectors. For concerns about the conduct of a member of staff or another adult, see FAQ D6.

I4. Why might the institution not share every detail with parents?

Safeguarding information should be shared only with those who need to know it to keep a learner safe. In most cases, parents should be informed when a concern involves their child. Sometimes the institution must act first, for example, when telling parents immediately could put the learner at greater risk of harm or affect an investigation by the CDA or Dubai Police. This is about putting the learner's safety first, not about excluding parents.

Sector note: For learners aged 18 or over, the institution will usually need the learner's agreement before sharing information with parents, unless there is a risk of harm to the learner or others.

J. Working with learners

What learners can expect and what is expected of them

J1. What can learners expect from their institution?

Every learner has the right to feel safe, respected and listened to. Learners can expect their institution to teach them how to stay safe, including online, to provide safe ways to share their views and concerns, and to tell them who the CPC/DSL is. FAQ J3 sets out the institution's requirements on learner voice and reporting routes.

Sector note: All sectors. How this is done must suit the learner's age, from very young learners in ECCs to adult learners in HEIs and TVET institutions.

J2. What is expected of learners?

In a way that suits their age and stage, learners are expected to:

- treat others with kindness and respect, in person and online.
- follow the institution's rules on behaviour, digital safety and conduct.
- tell a trusted adult if they are worried about themselves or someone else.
- not keep a secret if someone is being harmed, even if asked to do so.
- take part in learner councils, surveys and other ways to share their views.

Learners are never responsible for keeping themselves or others safe. That responsibility belongs to the adults around them, but learners who speak up help adults act sooner.

Sector note: All sectors. Expectations for ECC learners are limited to simple, age-appropriate messages, such as telling a grown-up if something feels wrong.

Learner voice and raising concerns

J3. What does the Policy Framework require when it comes to learner voice and reporting routes?

Learners must have safe, age-appropriate ways to express concerns about safety and wellbeing without stigma, reprisal or negative consequences, in line with prevailing social traditions and norms. Learner views must be recorded and used to inform safeguarding decisions. Institutions need structured ways for learners to contribute to safeguarding and wellbeing, and must give feedback, where appropriate, on how learner views have been considered. Safeguarding arrangements must also provide multiple, clear, and accessible reporting routes, taking account of age, language, culture and additional needs.

Sector note: All sectors. Reporting methods should look different for a young child in an ECC and an adult learner in HE or TVET.

J4. How can learners under 18 raise a concern?

Learners under 18 can tell any trusted adult at their institution, such as a teacher, counsellor or the Child Protection Coordinator/Designated Safeguarding Lead. Institutions must provide several clear ways to raise a concern, suited to the learner's age, language, culture and needs, and must ensure learners know who the CPC/DSL is. Learners must be able to speak up without fear of getting into trouble. Anyone, including a learner, can also contact the CDA Child Protection Hotline on 800988, or call 999 in an emergency.

Sector note: All sectors. Very young learners or those with additional needs may show a concern through their behaviour rather than in words, so staff must watch for non-verbal signs.

J5. How can learners aged 18 or over raise a concern?

Learners aged 18 or over can report any concerns about their safety or protection directly to the relevant staff at their institution. Where necessary, they can also report to the competent authorities outside the institution.

Sector note: Most relevant to HEIs and TVET institutions.

J6. What should a learner do if they are concerned about a friend?

Tell a trusted adult at the institution, such as a teacher, counsellor or the CPC/DSL, as soon as possible. Learners do not need to be certain that something is wrong. They should not try to deal with it on their own or promise to keep it secret.

Sector note: All sectors.

Older learners supporting younger learners

J7. What is expected of older learners who support or work with younger learners?

Older learners who mentor, coach or work alongside younger learners, for example during placements, must follow the institution's code of conduct. The institution must provide them with guidance on how to behave safely, recognise when a younger learner may be at risk, and raise a concern.

Sector note: Most relevant to schools, HEIs and TVET institutions.

K. KHDA and other government entities

K1. Which government entities does KHDA work with on safeguarding?

KHDA works with the Community Development Authority (CDA), which leads child protection in Dubai, as well as Dubai Police and other relevant federal and Dubai government entities. This work complies with Wadeema's Law and all relevant laws and regulations.

Sector note: All sectors.

K2. What is KHDA's role when a safeguarding concern is reported?

KHDA sets and enforces safeguarding standards across the private education sector. It does not investigate individual child protection cases. That is the statutory role of the CDA and, where a crime may have been committed, of Dubai Police. When concerns are reported to KHDA, the authority may:

- ask the institution for information.
- require the institution to take protective action.
- decide whether further escalation is needed.
- coordinate with or refer to the relevant authorities.
- take regulatory action where safeguarding requirements are not met.

FAQ D5 explains what institutions must report to the CDA and KHDA, and when.

Sector note: All sectors.

K3. Will KHDA share information about a learner with other government entities?

Information is shared only where it is lawful and necessary to protect a learner. It is shared securely, on a need-to-know basis, and in line with UAE law. It is not shared for any other purpose.

Sector note: All sectors.

Final implementation reminder

The Policy Framework is designed as a whole-institution safeguarding system. Institutions should not treat the CPC/DSL as the only person responsible for safeguarding. Governance, leadership, staff, specialist and operational teams, parents, and third-party providers all have defined responsibilities, while the institution retains overall accountability.

For implementation, institutions should use these FAQs alongside the full Policy Framework, their sector-specific legal and regulatory requirements, and any additional tools, templates, training or technical guidance provided by KHDA.