حكومة دبي
GOVERNMENT OF DUBAI

DUBAI
Knowledge المعرفة

Adult Suitability Concern Management Protocol



Safe Space implementation resource

Field	Details
Resource title	Adult Suitability Concern Management Protocol
Resource type	Protocol exemplar
Policy Framework section	4.3 Safer Recruitment and Suitability of Staff, 4.4 Professional Conduct and Safe Working Practice, and 5.3.4 Reporting allegations against staff
Relevant MUST directives	Section 4 Enabling Mechanisms for Safeguarding (Directives 82 to 178) Section 5 Safeguarding Processes for Managing Concerns (Directives 179 to 260) Section 6 Safeguarding Rigour (Directives 261 to 297)
Version	1.0
Review	Reviewed annually, and sooner following changes to United Arab Emirates (UAE) legislation or the Knowledge and Human Development Authority (KHDA) Policy Framework.

This document aligns with the KHDA Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions (2026).

Source, basis and scope

This protocol supports institutions to manage concerns about the suitability of an adult who works in, for or on behalf of the institution. It covers employees, contractors, volunteers, governors, visitors, third-party personnel, and others with access to learners. It is intended for concerns that may indicate risk to learners, unsafe practice, professional boundary concerns, conduct concerns or failures in safer recruitment or suitability checks. This resource supports implementation of the KHDA Policy Framework MUST directives and should not be used to reduce or replace any requirement in the framework.[1]

The content is written for all KHDA-permitted private educational institutions unless a sector adaptation box states otherwise. Institutions must adapt role names, contact details, and operational arrangements to their approved structure without weakening the safeguarding standard.

Who should use this resource

- Head of Institution and senior leaders
- Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) and Deputy CPC/DSLs
- Human resources (HR) and safer recruitment leads
- Governance and Safeguarding Governor
- Line managers, contract managers and third-party provider leads

Required implementation standard

Institutions must treat adult suitability as an ongoing safeguarding responsibility, not only a pre-employment recruitment check. Institutions must assess concerns promptly, record them securely, manage them through the appropriate safeguarding and HR routes, and escalate them where the allegation or concern meets the staff allegation threshold or suggests risk to learners.[2]

Institutions must implement this protocol in full and must not reduce or replace any requirement set out in the framework.

[1] KHDA, Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions (2026).

[2] KHDA, Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions (2026).

Step-by-step implementation guidance

1. Receive the concern through safeguarding, whistleblowing, HR, line management, learners, parents' complaints, provider feedback, regulator investigation or another reporting route.
2. Record the concern on the same working day in the appropriate secure safeguarding or staff suitability record, with factual information, date, time and source.
3. Do not investigate informally, interview learners repeatedly, delete records, delay reporting or alert the adult in a way that could compromise learner safety.
4. The CPC/DSL and head of institution, or alternative reporting route where there is a conflict of interest, should triage the concern to determine whether it is a safeguarding allegation, professional conduct concern, recruitment suitability issue or HR matter with safeguarding implications. A safeguarding allegation is a concern indicating that an adult may have harmed or posed a risk of harming a learner. A conduct concern relates to professional standards but does not directly indicate learner risk. These categories require different escalation thresholds and external referral routes and must not be conflated at triage.
5. Implement proportionate interim safeguarding measures where required, including supervision changes, temporary removal from learner-facing duties, provider restrictions or, where these are not sufficient to protect learners, suspension under the applicable employment procedures. Where there is an immediate safeguarding risk to learners, remove the staff member from all learner-facing duties immediately and do not wait for the outcome of triage, investigation, or the HR process. This measure is not a disciplinary suspension and does not predetermine the outcome of any investigation.
6. Escalate staff allegations and safeguarding concerns through the policy reporting hierarchy and KHDA route where required, and to Dubai Police, where a crime may have been committed. The decision to refer to Dubai Police is made by the Head of Institution, not by HR. Where the Head of Institution is the subject of the allegation, the referral is made by the Chair of the Board or Governing Body.

Police referral when a criminal offence may have been committed: where the concern involves conduct that may constitute a criminal offence (including assault, abuse, exploitation or possession of harmful material), the Head of Institution (or the Chair of the Board or Governing Body where the Head of Institution is the subject), advised by the CPC/DSL, must refer the matter to Dubai Police in addition to any KHDA notification. Do not delay this referral pending an internal investigation. Record the timing and content of the police referral.

Maintain strict confidentiality regarding the allegation or concern. The details of an allegation must not be disclosed to the subject of the allegation until Dubai Police and/or KHDA have confirmed that it is safe to do so. Premature disclosure may compromise a police investigation, alert the subject to destroy evidence or place learners at greater risk of harm.

7. Engage HR only in a way that supports, and does not override, safeguarding decision-making.
8. Record decisions, rationale, risk assessment, actions, communications, outcomes and learning. Conclude and record the outcome even where the adult resigns or leaves before the process ends, using the outcome categories in the Managing Allegations Against Staff, Procedures and Protocol (substantiated, unsubstantiated, unfounded, or malicious or vexatious). Retain adult suitability records for a minimum of five years from the date the concern is concluded or the adult leaves the institution, whichever is later, and for longer where a legal process or KHDA requirement makes this necessary.

   Voluntary departure or resignation: where a staff member resigns, retires or otherwise leaves employment while a suitability concern is under investigation or has been raised, the investigation must continue to conclusion. The institution must not allow a concern to lapse or be closed merely because the individual has left. KHDA must be notified of the departure and the ongoing concern, and a full outcome record must be completed and held on the individual's file.

9. Review patterns of adult conduct concerns both termly and annually to identify systemic risks, training needs or recruitment weaknesses.
10. Where an investigation concludes with no finding against the adult, manage reinstatement through a structured return-to-duties process: conduct a risk assessment, develop a communication plan, provide CPC/DSL oversight, and review the adult's support needs. Reinstatement must be formally documented and must not take place without CPC/DSL and head of institution’s sign-off.
11. Inform KHDA without delay where an allegation is substantiated, where a staff member is dismissed or resigns while a safeguarding concern is under investigation, or where a formal warning is issued for conduct with safeguarding implications. KHDA decides whether the de-registration process in the KHDA Technical Guide for Appointing Teaching Staff in Private Schools in Dubai applies; the institution does not make that judgement itself.

Roles and responsibilities

Role	Responsibility
Governance	Ensure adult suitability systems are monitored and that patterns of concern, recruitment compliance and allegations data are reviewed without involvement in operational case decisions.

Head of Institution	Hold executive accountability for appropriate interim safeguards, reporting and documenting processes, HR coordination, informing KHDA and institutional learning.
CPC/DSL	Advise on safeguarding risk, threshold, learner protection, external escalation and case recording.
HR or safer recruitment lead	Provide recruitment records, contract information and procedural advice while respecting safeguarding confidentiality and CPC/DSL authority.
Line manager	Report concerns promptly and avoid informal resolution where safeguarding risk may exist.
Third-party provider lead	Cooperate with information requests, remove or restrict personnel where required and report relevant concerns immediately.
All staff	Report concerns about adult conduct, suitability or unsafe practice through safeguarding or whistleblowing routes without delay.

What good practice looks like:

- Adult suitability concerns are recorded and reviewed as safeguarding intelligence, even where no allegation threshold is met.
- The CPC/DSL, Head of Institution and HR understand their distinct roles.
- Interim safeguards are proportionate and documented.
- Concerns about contractors and provider staff are managed with the same safeguarding seriousness as concerns about employees.
- Once every term, review identifies patterns such as repeated boundary concerns, poor supervision or weak induction.

Common compliance weaknesses or implementation risks

- Treating adult suitability as simply an HR issue.
- Allowing a conflicted senior leader to control the reporting route.
- Failing to follow through on concerns and allowing unsuitable adults to resign voluntarily.
- Failing to record low-level or cumulative conduct concerns.

- Failure to report significant suitability concerns to KHDA or Dubai Police, where a crime may have been committed.
- Not applying interim safeguards while a concern is being assessed.
- Permitting a third-party provider to investigate learner safeguarding concerns without institutional oversight.
- Failure to review patterns that indicate an unsafe culture or weak recruitment.

Evidence to retain for audit, inspection or KHDA review

- Initial concern record.
- Adult suitability triage record.
- Risk assessment and interim safeguarding measures.
- Recruitment and vetting records.
- Code of Conduct acknowledgement.
- External escalation records, where applicable.
- HR and safeguarding decision logs.
- Outcome and learning review.
- Termly and annual anonymised trend reports.

Suggested review frequency

Review the protocol annually, after any significant staff allegation or adult suitability concern, and whenever KHDA, UAE law, recruitment guidance or institutional procedures change.

Minimum compliance self-check

Question	Yes / No / Evidence
Are adult suitability concerns reported and recorded through secure routes?	
Is the CPC/DSL involved where there may be a risk to a learner?	
Are HR and safeguarding responsibilities separated but coordinated?	
Are interim safeguarding measures documented?	
Are third-party and contractor concerns included?	
Are patterns reviewed and reported to governance in anonymised form?	
Is there a record of the ultimate outcome of any investigations (for example, termination or report to the regulator)?	

Sector adaptation notes

Sector	Adaptation
Early childhood centres	Adapt language for young children and ensure parents, guardians or custodians understand routes.
Schools	Apply as written with age-appropriate learner communication.
Higher education institutions	Adapt for learners aged 18 and over, including consent, adult confidentiality and internal safeguarding support.
Training and vocational institutes	Apply to work-based, adult learning and employer-linked contexts where learners are within scope.

Template: Suggested adult suitability triage record

Field	Record
Name or role of adult	
Relationship to institution	Employee / contractor / volunteer / governor / visitor / provider staff / other
Concern reported by	
Date and time received	
Nature of concern	
Learner risk indicated	Yes / No / Not yet known
Immediate safeguards required	
Threshold or route	Adult suitability / staff allegation / HR conduct / whistleblowing / safeguarding concern
Decision and rationale	
External escalation required	
Review date	
Outcome	

References

KHDA. Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions, 2026. Knowledge and Human Development Authority, Dubai.

Federal Law No. (3) of 2016 on Child Rights Law (Wadeema), as amended.

Cabinet Resolution No. (52) of 2018 concerning the Executive Regulation of Federal Law No. (3) of 2016 on Child Rights Law.

National Child Protection Policy in Educational Institutions. 2019.

NSPCC Learning. Safeguarding and child protection guidance.

KHDA. Technical Guide for Appointing Teaching Staff in Private Schools in Dubai.

Administrative Resolution No. (54) of 2025 Concerning the Requirements and Procedures for the Appointment of School Staff in Private Schools in the Emirate of Dubai.

International Taskforce on Child Protection. Safer Recruitment Checklist, 2024.