حكومة دبي
GOVERNMENT OF DUBAI

DUBAI
Knowledge المعرفة

Model Safeguarding and Learner Protection Policy Template



Safe Space implementation resource

Field	Details
Resource title	Model Safeguarding and Learner Protection Policy Template
Resource type	Policy template
Policy Framework section	3.1 Policies and Procedures
Relevant MUST directives	Section 3 Safeguarding Foundations (Directives 1 to 81) Section 4 Enabling Mechanisms for Safeguarding (Directives 82 to 178) Section 5 Safeguarding Processes for Managing Concerns (Directives 179 to 259) 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 KHDA's Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions (2026).

Source, basis and scope

This model policy template supports institutions in creating a safeguarding and learner protection policy that sits at the head of the safeguarding policy suite and aligns institutional practice with the KHDA Policy Framework. 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.

Federal Law No. (3) of 2016 (Wadeema Law) makes reporting mandatory for educators and any individuals entrusted with the protection, care or education of a child (Article 42(2)). The KHDA Policy Framework requires all adults to report safeguarding concerns to the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) or an authorised Deputy (Directive 223) and to take personal responsibility for doing so (Directive 240). This policy must therefore make the duty to report the internal route to the CPC/DSL and the routes for direct escalation clear to every adult working in, for, or on behalf of the institution. International good practice has been consulted, but the KHDA Policy Framework and UAE law determine compliance.[2,3]

Required implementation standard

- The institution must develop, implement, and communicate a legally compliant suite of safeguarding, health and safety, and wellbeing policies aligned with UAE laws and regulatory requirements, relevant protocols adopted in the Emirate of Dubai, and KHDA guidance.
- The safeguarding policy must be formally approved by the Board or Governing Body (or equivalent in smaller institutions), following consultation with the institution's stakeholders' associations, including the parents' association.
- The safeguarding policy must reflect the safeguarding processes in Section 5 of the policy framework.
- The policy must be implemented consistently across all areas of institutional provision.
- The policy must be accessible and communicated to staff, parents, guardians or custodians, and learners in culturally appropriate and accessible formats.
- The policy must be reviewed in accordance with Section 6 and informed by consultation with staff, parents, guardians or custodians, and learners.

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

[2] NSPCC Learning provides recognised best practice on writing child protection policies and procedures, including the need for clear reporting routes, role responsibilities and review arrangements.

[3] UNICEF, Convention on the Rights of the Child, and WHO global standards on child protection provide internationally recognised best practice for child protection policies, staff responsibilities and reporting obligations.

Institution-ready policy template: suggested core headings for adaptation to context

Required heading	Minimum content to include
Policy statement	Commitment to safeguarding, learner protection, learner wellbeing, learner voice, dignity, inclusion and compliance with the KHDA Policy Framework.
Purpose and scope	Application to all KHDA-permitted provisions, all learners enrolled in the institution, and all adults working in, for, or on behalf of the institution. For learners under 18, all statutory requirements and procedures relating to children apply under Federal Law No. (3) of 2016 (Wadeema Law), including mandatory referral to the Community Development Authority (CDA) and notification of parents, guardians or custodians. For learners aged 18 and above, the institution's safeguarding responsibilities continue, while recognising their legal status as adults when applying requirements on confidentiality, consent, reporting and referral. These learners may report concerns directly to relevant staff and, where necessary, to the competent authorities (KHDA Policy Framework Section 1.2).
Legal and regulatory basis	Reference the instruments listed in Appendix C of the KHDA Policy Framework, including Federal Law No. (3) of 2016 (Wadeema Law) and its Executive Regulations (Cabinet Resolution No. (52) of 2018), Federal Decree-Law No. (45) of 2021 on the Protection of Personal Data, Federal Decree-Law No. (26) of 2025 on Child Digital Safety, the National Child Protection Policy in Educational Institutions, relevant frameworks, guidelines and protocols adopted in the Emirate of Dubai, the KHDA Policy Framework and relevant institutional policies.
Definitions	Use definitions from the Policy Framework Appendix A, including child (any person who has not yet reached 18 years of age), learner (any individual accessing education or training in a KHDA-licensed institution), safeguarding, learner protection, abuse, neglect, Child Protection Coordinator (CPC)/ Designated Safeguarding Lead (DSL), disclosure, information sharing and duty to report.

Guiding principles	Reflect SPARK: safeguarding, protection, accountability, responsibility and knowledge, and how the institution supports these. Confidentiality and privacy must be respected; however, confidentiality must not be relied upon to prevent appropriate reporting, information sharing or escalation where safeguarding concerns exist.
Safeguarding structure	Name the safeguarding governor, head of institution, CPC/DSL, Deputies, core safeguarding team, tier 2 and tier 3 arrangements.
Recognising concerns	Explain signs, indicators, cumulative concerns, vulnerability and the standard that evidence is not required to report.
Responding to concerns	Set out immediate safety assessment, calm response, respect for the learner's privacy, no promise of absolute confidentiality or secrecy as information may need to be shared through approved safeguarding channels, no leading questions, no independent investigation, working in the best interest of learners, and prohibit photographing of injuries.
Reporting and escalation	Set out internal reporting route to CPC/DSL, escalation thresholds, KHDA notification routes and emergency/statutory reporting obligations, and circumstances where information may be shared with competent authorities, child protection authorities, law enforcement agencies, healthcare professionals or other relevant bodies for safeguarding purposes, in line with the policy framework. Make clear that every adult has a personal duty to report that cannot be delegated (Directive 240). All adults report concerns without delay to the CPC/DSL or an authorised Deputy, including repeated or continuing concerns (Directive 222); one appropriate reporting route is sufficient (Directive 223). The CPC/DSL escalates in line with the risk thresholds and Figure 3 of the policy: high-level concerns immediately to the Community Development Authority (CDA) and/or Dubai Police or Ambulance, and medium-level concerns to the CDA within 24 hours, informing KHDA in each case (Directives 216, 218 and 219). Staff must be aware of their right and duty to escalate directly to KHDA or the relevant authorities where internal processes are ineffective or obstructed (Directive 225).
Failure to report	State that every adult must take personal responsibility for reporting and must not rely on others or assume a concern has already been reported. Failure to report suspected or confirmed abuse or neglect is a serious safeguarding breach and may result in legal, professional or disciplinary consequences, including referral to relevant authorities or professional bodies (KHDA Policy Framework Section 5.3.6, Directives 240 to 244).

Recording and information sharing

Require same-day recording, factual chronology, secure storage, restricted access, approved retention periods, secure disposal and lawful, proportionate information sharing.

Staff must understand when consent should be sought and when information must be shared without it. All safeguarding information sharing must be lawful, secure, proportionate and in the learner's best interests (Directive 255). Staff must share safeguarding information where necessary to protect the learner's safety, wellbeing, education or health (Directive 256).

Learners under 18: Consent is not a precondition for reporting. Concerns are reported to the CPC/DSL, who escalates them in line with the risk thresholds, including referral to the Community Development Authority (CDA) (Wadeema Law Article 42; Directives 216, 218 and 219). Parents, guardians, or custodians are informed of any referral, without delaying the report (Directive 221).

Learners aged 18 and above: Consent should be sought where appropriate and safe, respecting the learner's legal status as an adult (Section 1.2). Consent is not required where there is a risk of harm (Directive 258).

In all cases: Information is shared on a strictly need-to-know basis, limited to what is necessary and proportionate (Directive 257). The CPC/DSL records what was shared, the rationale, the recipient, the date and time, and who authorised it (Directive 258). Any breach of safeguarding information or records is reported to the CPC/DSL without delay (Directive 259). The identity of a person who reports a concern must not be disclosed without their approval (Wadeema Law Article 44).

Data Protection and Confidentiality

The institution shall handle safeguarding information in accordance with applicable laws, including Federal Decree-Law No. (45) of 2021 on the Protection of Personal Data and Federal Decree-Law No. (26) of 2025 on Child Digital Safety, confidentiality obligations and institutional policies relating to data protection and records management.

Personal information, including safeguarding, health, wellbeing, and disability-related information, shall only be collected, used, disclosed, accessed and retained where necessary for safeguarding, learner protection, child protection, educational, legal, regulatory or welfare purposes, or as otherwise required or permitted by law.

Access to safeguarding information shall be limited to authorised individuals on a strict need-to-know basis.

Wherever reasonably practicable, information used for monitoring, governance, reporting, and policy review purposes should be anonymised, pseudonymised or aggregated.

Allegations against staff	Set out same working day reporting, hierarchy, interim safeguards, documented investigation and direct escalation routes where internal routes are unsafe or compromised.
Training and induction	Set out safeguarding induction for all staff, third parties and adults in contact with learners. Also, set out annual training, CPC/DSL training, governor training, leadership training, and safer recruitment training.
Safer recruitment and conduct	Link to safer recruitment, suitability, Code of Conduct, safe working practice, whistleblowing and adult conduct concerns procedures.
Monitoring and review	Set out termly governance reports, annual review, case audits, safeguarding learning reviews, and improvement actions.

Step-by-step implementation guidance

1. Map every MUST directive to a section of the institutional safeguarding policy framework or a linked procedure.
2. Confirm that the safeguarding structure and named roles are current, approved, and published.
3. Insert the institution's internal reporting route, including CPC/DSL and Deputy contacts, operational cover, and escalation arrangements.
4. Align the policy with related policies, including anti-bullying, attendance, digital safety, offsite provision, safer recruitment, conduct, allegations, records and whistleblowing, aligned with the KHDA Policy Framework.
5. Consult staff, parents, guardians, or custodians, and learners in accessible and culturally appropriate ways.
6. Obtain approval from the Board or Governing Body and record it in the minutes.
7. Communicate the policy to staff, learners and families, including accessible learner-facing versions where appropriate.
8. Review the policy annually and after any legal, KHDA or significant safeguarding practice change.

Sector adaptation box

Sector	Adaptation required
Early childhood centres	Include intimate care, safe handover, collection, non-verbal concerns, parent communication, staff ratios and younger learner voice.
Schools	Include age-phase safeguarding, attendance, bullying, digital safety, trips, transport, extracurricular provision, clinic and counselling. Address learners who turn 18 while still enrolled, applying the provisions for learners aged 18 and above.
Higher education institutions	Clarify safeguarding duties applicable to learners aged 18 and above, including the relationship between safeguarding obligations, learner autonomy, confidentiality, information sharing and consent. The policy should explain circumstances in which concerns must be escalated, or information must be disclosed to protect a learner or another person from harm, or to comply with legal or regulatory requirements. Include residences, clubs, placements, online learning, and student support.
Training and vocational institutes	Include short-course learners, mixed-age groups, workplace placements, employer liaison, attendance and third-party safeguarding arrangements.

Roles and responsibilities

Role	Required responsibilities
Board or Governing Body	Approve the relevant policy or protocol where required, receive assurance that it is implemented, and avoid operational decision-making in individual safeguarding cases.
Safeguarding Governor	Provide independent safeguarding oversight, review implementation evidence and challenge gaps without managing individual cases.
Head of Institution or equivalent	Hold executive accountability for implementation, resourcing, communication, monitoring and compliance with the Policy Framework.

CPC/DSL	Lead operational safeguarding implementation, triage concerns, coordinate case management, maintain safeguarding records securely, oversee information sharing decisions, and ensure compliance with applicable safeguarding, confidentiality and data protection requirements. Advise staff and escalate concerns in line with the Policy Framework.
Deputy CPC/DSL	Act with delegated authority when required, support case review, maintain continuity, and follow approved reporting and recording procedures.
All staff and adults working with learners	Understand the expectations relevant to their role, report concerns without delay, follow the institution's procedures and avoid independent investigation.
Third parties, contractors and volunteers	Comply with institutional safeguarding expectations, report concerns without delay through the institution's reporting route and cooperate with relevant checks, supervision and incident management.
Learners and parents, guardians or custodians	Receive accessible information about safeguarding expectations, reporting routes and support arrangements, with learner voice considered where appropriate.

What good practice looks like

- The policy is concise, readable and clearly linked to local procedures.
- Staff can recognise what might be a safeguarding concern and explain what to do if they have a concern.
- Governance approval and review are evidenced.
- Learners and families can access age-appropriate reporting information.
- Policy review is informed by safeguarding data, case learning, context, and stakeholder feedback.
- Information sharing decisions are documented, proportionate, risk-based, and focused on the best interests of the learner.
- Safeguarding records are securely maintained with appropriate access controls and retention arrangements.

Common compliance weaknesses or implementation risks

- The policy is copied from another jurisdiction and does not reflect Dubai requirements or context.
- Related policies conflict with the safeguarding policy framework.
- Reporting routes are out of date or dependent on one person.

- MUST directives are omitted or treated as optional.
- The policy is approved but not implemented, trained or monitored.
- The policy is generic and not reviewed and updated regularly.
- Inappropriate handling of safeguarding information, including excessive disclosure, over-retention of records, or inadequate access controls.
- Misunderstanding of consent and information-sharing requirements, leading to safeguarding or compliance risks.

Evidence to retain for audit, inspection or KHDA review

- Approved safeguarding policy and version control.
- Board or Governing Body meeting minutes confirming approval.
- Directive mapping document.
- Communication records to staff, learners and families, any child-friendly versions or multi-language versions.
- Training records and staff acknowledgements.
- Safeguarding role descriptions and contact publications.
- Annual review records and action logs.
- Information sharing decision records and records retention schedule.

Suggested review frequency

Review annually as a minimum, and sooner after legislative or KHDA updates, significant incidents, safeguarding learning reviews, major structural changes or identified compliance gaps.

Minimum compliance self-check

Question	Evidence expected
Does the policy map to all relevant MUST directives?	Directive mapping and reviewed policy.
Has the policy been formally approved by the governing body?	Board or Governing Body minutes.
Has the policy been informed by stakeholder feedback including learners?	Survey data, consultation feedback.
Are reporting routes clear and current?	Published contacts and staff briefing records.
Is implementation monitored?	Training, case audit, and governance reports.

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. UAE Legislation Portal. https://uaelegislation.gov.ae/en/legislations/1176

Cabinet Resolution No. (52) of 2018 concerning the Executive Regulations of Federal Law No. (3) of 2016 on Child Rights Law, Wadeema. UAE Legislation Portal. https://uaelegislation.gov.ae/en/legislations/1177

Federal Decree-Law No. (45) of 2021 on the Protection of Personal Data. UAE Government Portal. https://u.ae/en/about-the-uae/digital-uae/data/data-protection-laws

Federal Decree-Law No. (26) of 2025 on Child Digital Safety, as listed in Appendix C of the KHDA Policy.

National Child Protection Policy in Educational Institutions in the UAE, 2019. UAE Legislation Portal. https://uaelegislation.gov.ae/en/policy/details/lsy-s-lotny-lhm-y-ltfl-fy-lm-ss-t-ltaalymy

United Nations. Convention on the Rights of the Child (1989). https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child

UNICEF. Child protection. https://www.unicef.org/child-protection

World Health Organization. Responding to children and adolescents who have been sexually abused: WHO clinical guidelines. https://www.who.int/publications/i/item/9789241550147