



TECHNICAL GUIDE ON THE DEREGISTRATION OF EDUCATIONAL STAFF

CONTENTS

1. PURPOSE	3
2. SCOPE	3
3. CODE OF CONDUCT FOR EDUCATION STAFF	4
4. POSSIBLE GROUNDS FOR DEREGISTRATION	5
4.1 Disciplinary policies and procedures in educational institutions.....	5
4.2 Institutional dismissal followed by KHDA Deregistration	5
5. VIOLATIONS LIKELY TO RESULT IN DISMISSAL AND DEREGISTRATION ON FIRST OFFENCE	6
5.1 Criminal conviction	6
6. VIOLATIONS LIKELY TO RESULT IN A WARNING, UNLESS OF SIGNIFICANT GRAVITY OR REPEATED	7
6.1 Inappropriate conduct in the use of technology, social and communication media	7
6.2 Disrespectful, threatening, dishonest or defamatory conduct.....	7
6.3 Culturally inappropriate behaviour	7
7. DEREGISTRATION PROCESSES	8
7.1 Safer Recruitment: Employer accountability and pre-emptive notification/Deregistration.....	8
7.2 Consistent monitoring	8
7.3 Reporting and Investigation.....	9
7.4 Review and Owner's Decision	9
7.5 KHDA Deregistration Committee.....	10
7.6 Appeals.....	11
8. BEFORE AND AFTER DEREGISTRATION	11
8.1 Pre-Deregistration Requirements	11
9. CONSEQUENCES OF DEREGISTRATION	12
10. REVIEW AND AMENDMENTS	12
APPENDIX 1	13
APPENDIX 2	16
APPENDIX 3	19

1. PURPOSE

This technical guide outlines clear criteria for the deregistration¹ of leaders, managers, lecturers, teachers, and other staff members working in Dubai's private education sector.

Following an internal investigation, if an educational institution issues a formal warning or dismisses a staff member, the incident must be reported immediately to the Knowledge and Human Development Authority (KHDA). Upon receiving the report, KHDA will review the case. As a result of this review, the individual in question may be added to the KHDA Deregistration List, which could prevent them from being approved to work in any other private education setting in Dubai.

The primary aim of this technical guide is to maintain the highest standards of behaviour, professionalism, cultural sensitivity, and safety across Dubai's education sector. It seeks to achieve this in a manner that is fair, structured, and transparent for all parties involved.

2. SCOPE

This guide applies to all staff employed in privately owned educational institutions² regulated by KHDA, covering both full-time and part-time employees. It encompasses all sectors under KHDA's oversight, including early childhood centres, private schools, universities, vocational centres and training institutes.

¹ Deregistration refers to the entry of the name and details of a formerly employed staff member in any education setting on a list preventing them from subsequent employment in Dubai private education, so long as they remain on this list.

² Going forward, the term educational institutions will be used to refer to all educational settings, including early childhood centres, private schools, private universities, vocational centres and training institutes regulated by KHDA.

3. CODE OF CONDUCT FOR EDUCATION STAFF

It is recognised that many institutions will already have their own bespoke staff code of conduct, perhaps linked to their published disciplinary policy. However, for the purposes of consistency, this technical guide is underpinned by the UAE Code of Conduct for educational staff.³

Category	Description
▶ Values	Encourage positive values in students, safeguarding against unacceptable ideas, promoting tolerance and acceptance of others.
▶ Due Regard	Respect the UAE's development, Emirati culture, and traditions; participate in national activities; and uphold Islamic values.
▶ Protection	Commit to protecting children from neglect, exploitation, bullying, and abuse.
▶ Confidentiality	Avoid disclosing confidential information about students and families outside of safeguarding policy contexts; refrain from spreading false news or rumours.
▶ Demeanour	Demonstrate exemplary behaviour when dealing with parents and the community.
▶ Diversity	Respect cultural, religious, and ethnic diversity; avoid offensive behaviour or remarks against colleagues and the institution.
▶ Sobriety	Refrain from using, possessing, or being under the influence of unauthorised substances, including smoking, in the workplace.
▶ Decorum	Avoid discussing or promoting socially unacceptable behaviours in the UAE, such as gender identity, inebriation, and premarital or same-sex relationships.
▶ Integrity	Maintain appropriate conduct in real life and on social media, ensure political neutrality, and uphold the expected behaviour of an education setting employee in the UAE. Follow any institutional dress code, which must meet UAE/Dubai standards. Use technology (including AI) legally, ethically and transparently in the workplace, respecting privacy and rights, and notably, not using AI to replace human judgment in student-related matters.

Where a staff member's conduct appears to have violated any aspect of this code, the educational institution is expected to carry out a thorough investigation in accordance with its own policies, including its Staff Disciplinary Policy.

Consequences following such investigations will depend on the severity of the incident(s).⁴

³ Based on the UAE Code of Conduct for Education Staff 2021 – with the addition of the last section here- 'integrity'

⁴ It is expected that all institutions will routinely implement training, guidance and support in safe, ethical and morally robust conduct for all staff – both upon induction and in an ongoing basis. This would include equal opportunities, child protection and safeguarding training where appropriate.

4. POSSIBLE GROUNDS FOR DEREGISTRATION⁵

4.1 Disciplinary policies and procedures in educational institutions

All institutions must implement a Staff Disciplinary policy, which is regularly reviewed and approved by the relevant governing board.⁶ Authorised governance must ensure that, when invoked, the policy is fully compliant with the UAE Labour Law. The policy must strike a balance between fairness and rigour, protecting the community while ensuring a transparent and just process for staff members who are under investigation for violating the code or involved in a criminal matter. [Appendix 3](#) provides essential guidance on what should be incorporated in a Staff Disciplinary Policy, along with its associated protocols and procedures.

It is expected that prior to initiating the disciplinary policy and procedures, institution leaders and governance may have already addressed the concern by conducting an investigation in line with other relevant policies. These may include safeguarding, complaints handling, allegations against staff members, stakeholder feedback, complaints, or whistleblowing procedures. Throughout this process, it is essential to ensure proper follow-up and adherence to due process. The specific policy invoked will typically depend on how the concern was initially raised—for example, through a parental or student complaint, a safeguarding disclosure, or an anonymous whistleblowing report.

In all cases, disciplinary policy and procedures should only be invoked when there is sufficient concern or evidence to suggest a serious violation. However, if there is any possibility of a formal warning or dismissal, the policy must be implemented and followed without exception.

Following a formal disciplinary investigation, even when a breach of conduct or policy by a staff member is confirmed, dismissal is not always the most appropriate course of action. In most workplace disciplinary cases, alternative measures such as verbal warnings or first, second, or final written warnings are issued. These are often accompanied by mentoring or retraining to help prevent future violations. Additionally, institutions are encouraged to review their internal practices to identify and address any factors that may have contributed to the issue. This approach aims to foster improvement and accountability while maintaining fairness and proportionality.

4.2 Institutional dismissal followed by KHDA Deregistration

Typically, deregistration will only be considered following the dismissal of a staff member from an educational institution. However, if a formal warning has been issued, KHDA reserves the right to review the investigative evidence gathered by the institution and to take appropriate action accordingly.

⁵ The inclusion of the dismissed member of staff on a deregistration list prevents them from obtaining KHDA approval for subsequent employment in the Dubai private education sector.

⁶ Governing Board/Executive Board/Owners – the overarching governance of the institution

When deregistration is being considered, KHDA will conduct a thorough review of the investigation findings before adding the staff member to the Deregistration List.

Furthermore, in rare but specific circumstances, where a staff member is dismissed by an institution, this may not result in deregistration, and the individual may be able to begin again in another educational institution in accordance with the administrative decision governing the appointment of educational staff.

While each matter is assessed individually, the following considerations outline violations that are more or less likely to lead to deregistration.

5. VIOLATIONS LIKELY TO RESULT IN DISMISSAL AND DEREGISTRATION ON FIRST OFFENCE

5.1 Criminal conviction

All criminal convictions⁷, that directly affect a staff member's ability to perform their duties with integrity or pose an unacceptable risk in an educational setting are among the violations that will result in both dismissal and deregistration.

5.2 Highly unprofessional behaviour or unsafe conduct

KHDA may consider deregistration in situations involving serious professional misconduct or unsafe behaviour, even where no formal criminal proceedings have taken place. This includes situations where an institution, following a full and fair investigation, has determined that a staff member poses a significant risk to students or the wider school community and has taken the decision to dismiss them.

Such conduct may involve behaviour that reflects a serious breach of professional standards, such as safeguarding concerns, breaches of confidentiality, or acts that undermine trust and integrity.

Where a school has reached a substantiated finding of this nature, KHDA will treat it as a valid trigger for considering deregistration. Examples of relevant violations are provided in Appendix 1.

⁷ The inability of the member of staff to obtain Dubai Police clearance will prevent them from securing a position in another educational institution.

6. VIOLATIONS LIKELY TO RESULT IN A WARNING, UNLESS OF SIGNIFICANT GRAVITY⁸ OR REPEATED

If an institution conducts a disciplinary investigation and decides not to dismiss a staff member, choosing instead to issue a first or final warning, KHDA will not add the individual to the deregistration list unless it conducts its own full, formal investigation, including a review of the institution's investigation and based on legal advice.

However, the institution must report all instances where a formal warning is issued, within 24 hours of the warning being issued, and providing full details of the investigation.

Furthermore, if a staff member repeatedly commits a non-criminal violation of the code of conduct over a prolonged period, the institution may, following legal advice and due process, decide to dismiss the staff member.

In such instances, following any subsequent and unsuccessful appeal (if one is sought), KHDA will first review the evidence from the institution's investigation, conduct any necessary further investigation, and consider deregistration.

The categories of violation more likely to result in a warning rather than dismissal, unless of significant gravity or repeated, are as follows:

6.1 Inappropriate conduct in the use of technology, social and communication media

Behaviours that involve the misuse of digital and communication platforms, such as posting or sharing discriminatory, provocative, or otherwise potentially harmful content. It may also cover inappropriate online interactions with others, including minors, whether work-related or non-work-related, breaches of data privacy, misuse of school-owned technology, or the misapplication of artificial intelligence applications or other technology tools.

6.2 Disrespectful, threatening, dishonest or defamatory conduct

Behaviours (verbal, written or through other media) that involve aggressive, threatening or bullying behaviour, deceit, falsification of information, potentially libellous or slanderous communication, or spreading provocative, false or potentially harmful statements about individuals or the organisation.

6.3 Culturally inappropriate behaviour

Actions or language that disrespects UAE cultural norms, the code of conduct or values within the workplace or wider community. Including behaviours that potentially highlight sensitivity to diverse cultural backgrounds, use of foul language, harmful gossip, public inebriation, discourtesy, offensive jokes or stereotypes.

⁸ Determined by the institution, following their disciplinary policy and where appropriate, their own legal advice – KHDA reserving the right to launch a subsequent investigation as indicated earlier.

7. DEREGISTRATION PROCESSES

7.1 Safer Recruitment: Employer accountability and pre-emptive notification/Deregistration

The responsibility for conducting thorough due diligence prior to appointing staff rests with the employer/owner. For staff members other than those in the senior leadership team, this duty may be delegated to the head⁹ of the organisation, perhaps in association with a human resources department in larger settings.

During the pre-recruitment due diligence processes, if any prior or potential disciplinary issues are uncovered, the employer may decide to terminate the recruitment process, particularly if the candidate or their agent failed to disclose this information. Such details may surface, for example, through references, whistleblowers, or online sources such as social media or press releases.

In such situations, the institution's Board (or governing body) is required to inform KHDA of the candidate's identity and the reasons for disqualifying them from appointment. In straightforward cases—for example, where the candidate has a criminal record, either in the UAE or abroad—KHDA may take pre-emptive action by deregistering the individual from future applications, particularly in serious instances. This would involve adding the individual to the Deregistration List, thereby preventing them from working in private education settings in Dubai.

7.2 Consistent monitoring

For all contracted staff, the head of the institution, in collaboration with other leaders and the Board, is responsible for addressing any inappropriate conduct, both within and beyond the institution. They must respond promptly and appropriately to any findings, reports, or whistleblowing related to suspicious, alleged inappropriate, or criminal behaviour.

If KHDA requests a disciplinary investigation, the institution must conduct it promptly and thoroughly and report the outcome to KHDA within whichever is shorter: the institution's own policy timelines or the timeframe specified by KHDA, even if no misconduct is established¹⁰.

For health and safety, safeguarding and child protection issues, the institution must always follow its own relevant policies and procedures¹¹, before initiating a disciplinary investigation, ensuring full compliance with KHDA and UAE child protection regulations.

The following process outlines KHDA's requirements regarding reporting and acting upon concerns about staff conduct, including behaviours that might lead to dismissal and subsequent deregistration of the staff member.

⁹ The 'head' of the organisation is the one accountable for standards in the institution; the leader required to authorise a full investigation into an alleged violation of a code of conduct by a member of staff (e.g., principal, headteacher, superintendent, centre manager, vice chancellor etc.,)

¹⁰ For staff already appointed, this investigation should be in line with the institution's disciplinary policy.

¹¹ Policies which, in turn, must be fully compliant with the Dubai Safeguarding Directive- once published.

7.3 Reporting and Investigation

If a complaint is made directly to KHDA by a parent, student, community member, or through anonymised whistleblowing, KHDA will direct the institution to invoke its governor-approved disciplinary policy and conduct a full investigation into the staff member involved.

In so doing, and in accordance with the institution's disciplinary policy, the institution may place the staff member on administrative leave, pending the outcome of the investigation.

All reported misconduct by a staff member, received from another staff member, parent or governor, must be reported immediately to the institution's administration. If an investigation is initiated, the Board must then report the matter directly and immediately to KHDA. Any concerns relating to a safeguarding (child protection) issue must be prioritised and reported immediately to the institution's named designated Safeguarding Lead.

The investigation must be conducted in accordance with the institution's disciplinary policy and procedures, with KHDA kept informed of all developments. In most instances, KHDA will require the institution's Board to complete all stages of its own disciplinary process, including any appeals, before intervening.

If the reported violation involves the Head of the institution, KHDA must be notified of the proposed acting head within 24 hours of launching the disciplinary investigation.

It is expected that the institution provides adequate support and supervision for the staff member under investigation, particularly if they are placed on administrative leave. This support and supervision should be clearly outlined and incorporated into the institution's relevant disciplinary policies and procedures.

7.4 Review and Owner's Decision

Institution Review Panel: An internal panel should review the investigation findings in line with the institution's disciplinary policy. For some later-stage disciplinary investigations or appeals, the panel should normally include at least one independent member who is not part of the institution's leadership or governance.

Decision: The review panel will determine, based on the evidence, whether the staff member should be:

- ▶ Reinstated with no further action required.
- ▶ Issued with a formal verbal or written warning, in line with the institution's disciplinary policy¹².
- ▶ Dismissed (with KHDA immediately notified to then consider the matter for deregistration).

¹² KHDA to be notified of the nature of the formal warning (within 24 hours of it being issued), the decision behind it and the required interventions being put in place to mitigate the likelihood of repetition (training, counselling, coaching etc.). KHDA will reserve the right to audit the implementation and impacts of these mitigations through evidence-based audits.

Only one disciplinary penalty may be imposed for any single violation, in accordance with Federal Decree-Law No. (33) of 2021 Regarding the Regulation of Employment Relationships, and its amendments.

Presentation of Investigation Evidence: In instances of dismissal, if any subsequent appeal is unsuccessful, Board representatives will be required to meet with KHDA. If a warning is issued instead, KHDA must also be notified.

Within five working days of this meeting, the Board must provide KHDA with all relevant, unredacted documentation, including the applied disciplinary policy, to support a potential deregistration decision.

7.5 KHDA Deregistration Committee

Once KHDA has been made aware of the dismissal (or formal warning) of a staff member, they will arrange a confidential meeting with appropriate members of the institution's Board and the Head of the institution (unless (s)he is the staff member in question).

During this meeting:

- The investigation findings will be reviewed.
- The Board representatives must submit all unredacted documentation related to the dismissal, including written statements, meeting summaries, and relevant correspondence.
- The school must also outline its internal appeal process and confirm the status of any ongoing appeal. KHDA will not proceed with deregistration until the appeal process is concluded.

If the appeal is denied and the staff member is formally dismissed, this will trigger a KHDA Deregistration Committee review. The Committee will assess the available evidence and determine whether to recommend deregistration to the Director General. Any decision to deregister (or not) a dismissed staff member must be approved by the Director General, who will be the signatory for any subsequent deregistration letter.

The staff member will be notified of their dismissal by the Board of the institution, and in the event of subsequent deregistration, by a letter from KHDA.

In complex matters where KHDA is not satisfied with the rigour or fairness of the institution-led processes, KHDA reserves the right to conduct its own full investigation, regardless of the outcome of the institution's initial investigation.

If alleged criminal activity is cited at any stage, KHDA must be informed and will automatically involve the police, prior to considering a deregistration notice. For non-criminal safeguarding matters, the Community Development Authority (CDA) will be involved.

7.6 Appeals

Right to Appeal: The staff member has the right to appeal a termination decision with the institution, as per UAE Labour Law. Depending on the disciplinary policy of the education institution, KHDA may become involved in the latter stages of the appeal process for a dismissal. In such cases, this Deregistration Policy will not come into effect unless a final decision is made to terminate the staff member.

If a final dismissal decision results in a deregistration decision by KHDA, the staff member may appeal this by submitting a written request to KHDA within 30 days of notification. An independent committee appointed by KHDA will review the appeal. The staff member will be notified in writing of the committee's final and binding decision within 60 days of the appeal submission.

8. BEFORE AND AFTER DEREGISTRATION

8.1 Pre-Deregistration Requirements

Before making a final decision to deregister a staff member, KHDA must ensure that:

- The school has thoroughly followed its disciplinary policies and procedures in alignment with this Technical Guide and Federal Decree-Law No. (33) of 2021 on the Regulation of Labour Relations, along with its amendments.
- All relevant evidence and facts have been carefully reviewed and documented, with any exculpatory or mitigating information included in the investigation file.
- The staff member has received an official written notice clearly outlining the proposed reasons for deregistration, including supporting facts.
- The staff member has been given no fewer than five (5) working days to submit a written response before any final decision is taken.

Where there is clear evidence of a violation or breach of government instructions and directives by the institution, KHDA has the right to issue an immediate deregistration for the relevant staff.

8.2 Deregistration Database Management

KHDA is responsible for maintaining a centralised and regularly updated database of all staff who have been deregistered in accordance with this Technical Guide. The database must include the following information:

- Full name, contact details, and Emirates ID number
- Date of the deregistration decision
- Reasons for deregistration and a summary of the supporting evidence
- References to all supporting documents (e.g., reports, investigation findings, and other relevant materials)

9. CONSEQUENCES OF DEREGISTRATION

The staff member's name will be included on a KHDA-held list of deregistered education staff, which prevents future employment in any KHDA-regulated education institution.¹³

KHDA will immediately revoke the individual's Appointment Notice, in accordance with the administrative decision governing the appointment of educational staff in private schools and early childhood centres.

10. REVIEW AND AMENDMENTS

This policy will be reviewed biennially by KHDA to ensure its effectiveness and compliance with current laws and educational standards. Amendments will be made as necessary.

¹³ In all instances of criminal conviction, the inability of the staff member to obtain a Dubai Police clearance should, in any event, prevent them from securing a position at another institution.

APPENDIX 1

A list of violation types that are likely to lead to Deregistration on the first offence

[non-exhaustive]

[This is offered as a guide to Governance, who, when invoking their disciplinary policy, should always seek their own independent legal advice if in doubt as to the most appropriate action to take in any particular situation.]

Criminal Conviction

Any criminal **conviction** that is pertinent to the staff member's ability to perform their professional duties with integrity, **or** which renders them too high a risk to work in an education setting.

Criminal convictions which are most likely to align with the above statement might include:

Convictions for:

Crimes Against Persons

E.g.,

- ▶ Trafficking of adults or minors
- ▶ Sexual offences, abuse, exploitation, or grooming of minors
- ▶ Sexual offences, abuse, or any form of exploitation against adults
- ▶ Assault or battery, including threats toward minors
- ▶ Domestic violence
- ▶ Harassment or stalking

Crimes Against Public Safety and Order

E.g.,

- ▶ National security offences
- ▶ Illegal possession of weapons
- ▶ Cybercrimes (e.g., hacking, distributing illegal content)
- ▶ Possession, use, or distribution of illegal drugs
- ▶ Driving or being in public under the influence of alcohol or drugs
- ▶ Indecent, aggressive or threatening behaviour in public

Crimes Against Property or Finances

E.g.,

- ▶ Fraud or financial crimes affecting the school/ECC or wider community
- ▶ Theft
- ▶ Bribery or corruption
- ▶ Forgery or identity theft
- ▶ Animal abuse

Crimes Against Moral Conduct or Affecting Reputation

E.g.,

- ▶ Defamation or slander
- ▶ Blasphemy
- ▶ Adultery
- ▶ Illegal surveillance or recording
- ▶ Distributing materials that constitute a criminal offence in the UAE

Highly unprofessional behaviour or unsafe conduct

- I. Situations where *deregistration* should be *considered* in circumstances of serious professional misconduct or unsafe behaviour, even when no formal criminal proceedings have been initiated. This includes instances where, following a fair and thorough investigation, an institution determines that a staff member poses a significant risk to students or the wider school community and decides to terminate their employment. Such behaviour may constitute a serious breach of professional standards, for example, safeguarding failures, breaches of confidentiality, or actions that compromise trust and professional integrity.
- II. Complex matters: Even when an institution has *not* dismissed a staff member, having reviewed the institution's investigatory documentation, KHDA reserves the right to conduct its own full investigation, after legal advice. Based on the findings of the investigation, KHDA may take action that could lead to deregistration.

Highly unprofessional behaviour might include:

Child Protection and Safety Violations

E.g.,

- ▶ Attempting or engaging in inappropriate relationships with students or minors
- ▶ Neglecting to report known or reported situations of child neglect, or serious concerns affecting student wellbeing

- ▶ Failure to follow safeguarding protocols or violating requirements outlined in the Dubai Safeguarding Directive¹⁴
- ▶ Failure to protect children or vulnerable adults from bullying, abuse, access to inappropriate materials, or any form of exploitation
- ▶ Significant breach of health and safety standards, in or outside the setting, putting oneself or others at risk

Professional Integrity and Ethics Violations

E.g.,

- ▶ Deliberate falsification of qualifications, experience, or important information
- ▶ Misrepresentation or exaggeration on applications or during the hiring process
- ▶ Engaging in behaviours violating professional ethical standards (e.g., physical assault, bullying, persistent dishonesty, exploitation, repeated disrespectful conduct)

Compliance and Policy Adherence Violations

E.g.,

- ▶ Inappropriate or repeated misuse of technology, including accessing or distributing unauthorised or culturally inappropriate materials
- ▶ Serious breach of data protection, confidentiality, or privacy
- ▶ Serious breach of key policies (equality, inclusion, non-discrimination)
- ▶ Teaching or discussing culturally, politically, or religiously sensitive topics

Workplace Standards and Conduct Violations

E.g.,

- ▶ Use of illegal substances or any substance impairing ability during work hours
- ▶ Persistent negligent work standards, lateness, or absence

Property and Asset Violations

E.g.,

- ▶ Theft or damage to institutional or theft of intellectual property
- ▶ Financial exploitation of a person or the unauthorised embezzlement of funds

¹⁴ Once the Dubai Safeguarding Directive is formally enacted

APPENDIX 2

A list of violation sub-types that are more likely to lead to a verbal or written warning under the education institution's disciplinary policy, on first offence¹⁵

[This is offered as a guide to governance, who, when invoking their disciplinary policy, should always seek their own independent legal advice if in doubt as to the most appropriate action to take in any particular situation.]

Inappropriate Conduct in the Use of Social and Communication Media

[Whether within the institution or beyond it]

Inappropriate Content

Posting, sharing, and/or endorsing content on social media and other online communication platforms¹⁶ that could be deemed inappropriate for a professional educator, and in particular, that which risks insulting or violating UAE cultural norms and expectations.

Including, but not limited to political stances or extreme activism, inappropriate imagery or other forms of content, insults or (implied) threats.

However, anti-government content, content at risk of severely damaging the reputation of others, media posted without permission, nudity, politically/religiously highly sensitive or violent content would fall into one of the aforementioned categories for deregistration.

All such content could have been made publicly visible through poorly disguised attempted anonymity and/or circulated via direct messaging to an individual or group.

Threatening Behaviour, Cyberbullying and Harassment

Engaging in face-to-face or online harassment, or any form of potentially threatening conduct towards another.

Where this involves child protection, it becomes a safeguarding issue and is more likely to result in dismissal and deregistration.

¹⁵ Depending on the gravity of the violation

¹⁶ Including email, texts, and commonly used messengers – direct and private

Privacy Violations and Breach of Confidentiality

Sharing confidential or sensitive information about the institution, its students, parents, colleagues or any other stakeholder, without explicit consent; or failing to keep confidential materials secure.

Plagiarism and the inappropriate use of artificial intelligence

Copying or rephrasing someone else's work without proper citation and presenting it as one's own, submitting wholly AI-generated content as original work, using AI to complete assignments without required permission, and failing to disclose the use of AI assistance when required by academic integrity policies.

Disrespectful, Threatening, Dishonest and Defamatory Conduct

Disrespectful or Threatening Behaviour

Any act—whether verbal, written, or via media—that involves disrespectful or threatening language or behaviour, expressed in anger, but without an actual attempt to cause or causing physical harm.

This category also includes bullying and cyberbullying.

Dishonesty

Any act of deceit or dishonesty, such as falsifying student records, experience, failure to report misconduct, misleading others, or unauthorised use of student or staff information.

Gossip and Falsehoods

Making false, and potentially libellous or slanderous statements about colleagues, students, parents, the institution or any other individuals, the institution or other businesses/community groups.

Professional Reputation

Engaging in behaviour that risks damaging the professional reputation of the institution or its affiliates through defamatory statements or actions.

Culturally Inappropriate Behaviour

Disrespect for Local Customs and Traditions

Engaging in behaviours or making statements that, although not explicit, imply disrespect for the UAE and/or Dubai, Emirati, or broader Arabic or Islamic cultural or religious norms, values, and traditions.

Including, but not limited to, persistent dress code violations, gambling (off- and online), inappropriate hand gestures, inappropriate physical contact, public shows of affection, and persistent use of foul language.

Cultural Sensitivity

Persistently failing to demonstrate cultural sensitivity and to model cultural norms in the institution or the wider community, e.g., being publicly inebriated, discourteous in conduct or not standing in silence during the national anthem.

Physical Promotion of Inappropriate Materials

Distributing or promoting materials that are culturally offensive to the local community, including books, audio-visual media, speeches, presentations and classroom content that contradict the cultural values and national religion of the UAE.

APPENDIX 3

Institutional Disciplinary Policies and Procedures

As indicated earlier, it is KHDA's expectation that all institutions implement a board-approved set of staff disciplinary policies and procedures.

These policies and procedures should be reviewed and updated regularly to ensure consistent alignment with UAE Labour Law and international best practices. The updated policy should be made available to all staff.

Prior to the invocation of a disciplinary policy and associated procedures, the institution must ensure that it is likely to gather sufficient evidence that a violation has occurred.

To confirm this, it is likely that leaders or boards will have conducted a preliminary investigation through policies such as 'complaints', 'safeguarding¹⁷', 'health and safety', 'whistleblowing', 'capability' etc.,

The application of the disciplinary policy, which carries the risk of dismissal (and perhaps subsequent deregistration), should be considered as a final investigatory step, if deemed necessary.

The following outlines KHDA's minimum expectations for the content and implementation of these policies, based on international best practices:

1. Clear Code of Conduct

- ▶ **Expectations of Conduct:** Clearly define the expected professional behaviours, including respect for colleagues, adherence to institutional values, and a commitment to student welfare.
- ▶ Ensure that the institution's internal code, if in place, fully incorporates all elements of the Code of Conduct for Educators included in these guidelines.
- ▶ **Prohibited Conduct:** Specify behaviours that constitute misconduct (likely to lead to warnings on a first offence) and gross misconduct (more likely to lead to dismissal on a first offence).
- ▶ **Deregistration:** Ensure that staff are aware of the risks of deregistration by KHDA, especially in the event that they are dismissed following a violation of this code and a full investigation.

¹⁷ A policy fully aligned with the Dubai Safeguarding Directive – once published

2. Preventive Measures and Training

- ▶ **Mandatory Training:** Require periodic training on topics such as safeguarding, confidentiality, appropriate use of technology and social media, bullying and discrimination etc., to reinforce expectations and ensure staff are well informed and compliant.
- ▶ **Proactive Monitoring and Feedback:** Implement regular check-ins with supervisors and HR to provide constructive feedback, reducing the risk of minor issues escalating into disciplinary actions.

3. Fair and Transparent Disciplinary Process

- ▶ **Investigation Protocol:** Outline clear, step-by-step procedures for investigations, ensuring neutrality and objectivity. This should include timelines, evidence gathering, and witness statements to guarantee a thorough and fair process.
- ▶ **Due Process Rights:** Ensure the staff member under investigation is granted the right to be informed of the allegations, to respond to them, and to appeal decisions. Clearly define the timelines for each step to ensure transparency and fairness throughout the process.

4. Support and Supervision for Staff Under Investigation

- ▶ **Access to support and supervision:** Offer support such as counselling, a designated support officer, or other representation to promote the well-being of the staff member during the investigation process.
- ▶ **Temporary adjustments to duties:** If needed, consider supervised duty modifications or temporary reassignments to maintain workplace cohesion and staff morale, while ensuring the investigation proceeds without disruption.
- ▶ **Administrative Leave:** Ensure the staff member under investigation understands the reasons for being placed on administrative leave, clarifying that this does not imply guilt, and that they have access to appropriate support throughout the process.

5. Discipline Framework

- ▶ **Tiered Consequences:** Establish escalating responses based on the severity and frequency of offences. This should include warnings, retraining, probation, suspension, and dismissal, where warranted, ensuring that consequences are proportional to the severity of the violation.
 - Only one disciplinary penalty may be imposed for a single violation, in accordance with the applicable provisions of Federal Decree-Law No. (33) of 2021 on the Regulation of Employment Relationships and its amendments.
- ▶ **Restorative Options:** Where appropriate, offer alternatives such as mediation or retraining to support a constructive resolution, helping staff to learn from their mistakes and encouraging positive behavioural change.

6. Confidentiality and Privacy

- ▶ **Confidential Handling:** Ensure all aspects of the disciplinary process are handled confidentially, with clear protocols for storing and sharing information securely to prevent unauthorised access or disclosure.
- ▶ **Privacy Protection:** Implement safeguards to protect the identities of all parties involved, ensuring that access to information is limited to those who need to know in order to maintain privacy and prevent unnecessary exposure.

7. Clear Communication Channels

- ▶ **Designated Points of Contact:** Provide clear and accessible contacts for HR, personal representatives, or designated officers to answer procedural questions and address concerns, ensuring that staff have support throughout the process.
- ▶ **Regular Updates to Involved Parties:** Maintain transparency by regularly updating all parties on the progress of the matter, while respecting confidentiality requirements and ensuring that sensitive information is shared appropriately.

8. Regular Training and Awareness Programmes

- ▶ **Policy Education:** Conduct orientation and refresher sessions to ensure all staff understand the policies, their rights, and their responsibilities within the disciplinary framework, ensuring clarity and consistency.
- ▶ **Ethics and Compliance Training:** Provide regular sessions focusing on ethical conduct, compliance standards, and best practices to prevent misconduct, fostering a culture of integrity and accountability across the institution.

9. Annual Review and Reporting

- ▶ **Policy Review Cycle:** Set an annual schedule to review disciplinary policies, incorporating feedback from staff and board recommendations.
- ▶ **Data-Driven Improvements:** Analyse outcomes of disciplinary matters to identify trends, areas for improvement, and any recurring issues, using this data to adjust policies and enhance the effectiveness of the disciplinary process moving forward.

10. Documentation and Record-Keeping

- ▶ **Secure Records:** Maintain detailed, secure records of disciplinary actions, ensuring all documentation is accurate and accessible only to authorised personnel.
- ▶ **Transparency in Documentation:** Ensure that all records are complete, accurately reflecting the process, decisions, and communications with the involved staff throughout the disciplinary process.