حكومة دبي
GOVERNMENT OF DUBAI

DUBAI
Knowledge المعرفة

Institutional Code of Conduct Template



Safe Space implementation resource

Field	Details
Resource title	Institutional Code of Conduct Template
Resource type	Policy template
Policy Framework section	4.4 Professional Conduct and Safe Working Practice, with links to 4.2 Training, 4.3 Safer Recruitment and Suitability of Staff, 4.5 Whistleblowing 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 template supports institutions to establish a clear Code of Conduct for all adults working in, for, or on behalf of the institution. It covers professional standards, safeguarding responsibilities, communication, boundaries, supervision, digital conduct, reporting and annual acknowledgement. This resource is designed to support implementation of the KHDA Policy Framework MUST directives and should not be used to reduce or replace any requirement in the framework.[1]

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

The code should be read together with the institution's safeguarding, allegations management, whistleblowing, safer recruitment, digital safety and information governance arrangements, and does not limit any reporting obligation arising under applicable law, regulation or KHDA requirements.

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.

The policy framework requires the institutional Code of Conduct and Safe Working Practice arrangements to align with relevant national or KHDA professional standards and guidance. KHDA's 2025 staffing guidance requires safeguarding, inclusion, UAE values and professional ethics induction, and a signed Code of Conduct for teachers.[2]

Required implementation standard

- The Code of Conduct must apply across physical and online environments and to all adults who interact with learners.
- The Code must define clear professional standards governing conduct, communication, boundaries and supervision expectations.
- Personal or secretive relationships with learners, sharing private contact details, and use of personal devices or social media for communication with learners must be prohibited. This prohibition includes personal accounts on all social media and messaging platforms (including but not limited to WhatsApp, Telegram, Instagram, Snapchat, TikTok and LinkedIn). Communication with learners must take place only through institutional channels that the institution monitors and can audit.
- Communication and teaching must take place only through institutionally approved devices and platforms.
- Staff must work in visible, open environments wherever practicable, with documented safeguards for closed or one-to-one settings. Unsupervised one-to-one work with learners in settings that cannot be observed by another adult is prohibited unless a documented risk assessment, an alternative safeguard (such as a window, open door, or remote oversight), and a record of the interaction are in place. This applies in physical and online environments.
- All adults must read, acknowledge, and formally confirm compliance on induction at least once every year.
- Concerns about adult conduct or suitability must be reported without delay through approved safeguarding, allegations of management or whistleblowing routes.
- Institutions must maintain arrangements to monitor compliance with the Code, manage breaches consistently, and identify patterns or emerging risks that may require safeguarding intervention.

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

[2] KHDA, Technical Guide for Appointing Teaching Staff in Private Schools in Dubai, 2025, and Administrative Resolution No. (54) of 2025, set requirements relating to appointment, good conduct and professional standards for school staff.

Institution-ready Code of Conduct template

Institutions may adapt the following suggested template wording while retaining all mandatory safeguarding standards.

1. Policy statement

[Institution name] is committed to maintaining a safe, respectful and professional environment where learners are protected from harm and adults understand their responsibilities. This Code of Conduct applies to all employees, governors, owners, contractors, volunteers, visitors, third-party personnel and any other adult who works in, for, or on behalf of the institution and has contact with learners.

2. Scope

- This Code applies during the educational day, extracurricular activities, off-site activities, transport, online learning, digital communication, institutional events, internships, work placements and any situation where the adult represents the institution or has access to learners.
- This Code applies to physical conduct, verbal conduct, written communication, online conduct, social media activity, photography, audio and video, artificial intelligence tools, wearable technologies, digital platforms and any creation, storage, sharing or processing of learner-related information.

3. Core expectations for all adults

Area	Required conduct
Safeguarding responsibility	Act in the best interests of learners, report safeguarding concerns without delay, and never assume someone else will report. All staff must report concerns: there is no discretion to decide not to report on the basis that a concern may be minor or that someone else will report. All concerns must reach the Child Protection Coordinator/Designated Safeguarding Lead (CPC/DSL) without delay.
Professional boundaries	Maintain appropriate adult-to-learner boundaries at all times. Do not form personal, secretive, exclusive, or emotionally dependent relationships with learners. Avoid situations that may create an actual, perceived or potential conflict of interest, dependency, favouritism or misuse of professional position.

Communication	Communicate with learners only through approved institutional systems, devices and platforms. Do not use personal phone numbers, private messaging, personal email or personal social media for learner communication.
One-to-one and closed settings	Use visible, open and accountable environments wherever practicable. Where privacy is required, document the safeguard, location and reason, and keep the interaction proportionate to the purpose.
Physical contact and physical intervention	Use only necessary, appropriate and proportionate physical contact linked to care, safety, instruction or emergency response, and in line with institutional policy. Physical intervention may be used only to prevent imminent harm to a learner or others (for example, to separate learners who are fighting or to prevent a learner from harming themselves). It must use the minimum force necessary, must never be used as a disciplinary measure, and must be recorded in writing and reported to the CPC/DSL on the same day.
Gifts and favouritism	Do not solicit or accept unauthorised gifts, give personal gifts, show favouritism, or create dependence or special access for any learner.
Digital conduct	Do not use personal or unapproved AI tools, applications or digital platforms to process, upload, analyse or store learner information where this is not authorised by the institution.
Confidentiality	Respect privacy but never allow confidentiality to prevent safeguarding reporting or protective action. Share safeguarding information only where authorised, necessary, proportionate and in the learner's best interests, and in accordance with applicable safeguarding, privacy and information-sharing requirements.
Whistleblowing	Raise concerns about unsafe practices, adult conduct or institutional failure through the whistleblowing route if ordinary reporting routes are unavailable, compromised or ineffective. See the Whistleblowing Policy Template for the full procedure.
Cooperation	Cooperate fully with safeguarding, human resources (HR), regulatory or statutory processes and provide accurate information when required.

4. Specific prohibited conduct

- Personal or secretive relationships with learners: Legitimate personal connections, such as parent-to-parent friendships, must be declared. Relationships or interactions with learners must never be concealed or kept secret.
- Private communication with learners using personal devices, personal accounts or private social media (including LinkedIn).
- Meeting learners outside institutional arrangements unless formally authorised and risk assessed.
- Transporting a learner alone without written authorisation and documented safeguards, except where emergency action is necessary to protect safety.
- Taking, storing or sharing photographs, videos or recordings of learners other than in accordance with institutional procedures, safeguarding requirements and approved authorisation processes.
- Photographing a learner's injuries: Injuries must be recorded on a body map in line with safeguarding procedures.
- Using humiliating, threatening, discriminatory, sexualised, coercive or degrading language or behaviour.
- Using counselling, wellbeing intervention, isolation or exclusion as a disciplinary threat or punishment
- Failing to report a safeguarding concern, adult conduct concern or suspected breach of this Code.
- Breach of this Code may result in safeguarding referral, disciplinary action and, where applicable, referral to KHDA, Dubai Police or other regulatory authorities. Refer to the Adult Suitability Concern Management Protocol for the complete management procedure.
- Any concern regarding the behaviour, suitability, professionalism or conduct of an adult working in, for, or on behalf of the institution must be considered for safeguarding implications and, where appropriate, managed through safeguarding and allegations procedures in addition to any HR process.

5. Higher-risk activities requiring additional safeguards

Activity	Required safeguards
Sports, swimming and performing arts	Clear supervision ratios, monitored standard operating procedures, changing arrangements, visibility, physical contact guidance, image-use controls, and role-specific safeguarding training.
One-to-one teaching, counselling, mentoring or therapy	Approved location, risk assessment, visibility or documented alternative safeguard, clear records, professional purpose and CPC/DSL oversight where safeguarding risk is indicated.
Transport and off-site activities	Risk assessment, approved adult supervision, clear handover, emergency contacts, safeguarding phone or communication route, and reporting procedure.
Online learning and digital platforms	Approved platforms only, no private recording or personal contact, appropriate monitoring and clear reporting routes for digital concerns.
Medical, intimate care or personal support	Dignity, consent as appropriate, authorised staff, written care plans, privacy balanced with safeguards, and accurate records.

6. Annual acknowledgement wording

I confirm that I have read and understood [Institution name] Code of Conduct and Safe Working Practice expectations. I understand that I am personally responsible for following this Code, reporting safeguarding concerns, maintaining professional boundaries, and raising any concern about adult conduct, unsafe practice or institutional failure. I understand that breach of this Code may lead to safeguarding, disciplinary, regulatory or legal action. I will notify my line manager or the head of the institution immediately of any change in my circumstances that may affect my suitability to work with learners, including any criminal investigation, arrest, charge, caution or conviction, any formal disciplinary matter at another institution, or any conflict of interest in relation to a learner or a learner's family.

Step-by-step implementation guidance for institutions

1. Insert institution name, role coverage, reporting contacts and links to related policies.
2. Map the Code to safeguarding, HR, disciplinary, allegations, boarding (where appropriate), whistleblowing, digital safety, transport and off-site policies.
3. Approve the Code through leadership and governance and formally ratify.
4. Brief all adults before duties commence and at least once annually.
5. Require signed acknowledgement on induction and annually thereafter.
6. Annual declarations, supervision arrangements, conduct concerns, allegations, whistleblowing reports, safeguarding audits and lessons learned reviews, and implement corrective actions where gaps are identified.
7. Review higher-risk activities and ensure role-specific safe working practice is documented.

Roles and responsibilities

Role	Required responsibilities
Board or Governing Body	Approve and scrutinise the Code, review assurance data, and ensure safeguarding governance remains independent from operational case decisions.
Head of Institution	Implement the Code, ensure all adults receive it, and act where conduct or suitability concerns arise.
CPC/DSL	Advise on safeguarding standards, professional boundaries, staff conduct concerns and links to allegations or safeguarding procedures.

Deputy CPC/DSL	Support implementation and response to conduct concerns where delegated or where the CPC/DSL is unavailable.
HR and safer recruitment staff	Ensure recruitment, induction, contracts, records, annual declarations and suitability monitoring reflect the Code.
All staff and adults	Read, understand, sign, follow and report concerns or breaches.
Third-party providers and volunteers	Receive, sign and comply with the Code or equivalent contractual safeguarding expectations before contact with learners.
Learners and parents, guardians or custodians	Receive accessible information about expected adult conduct and how to raise concerns.

Sector adaptation box

Sector	Adaptation
Early childhood centres	Include intimate care, toileting, feeding, sleep supervision, physical comfort, parent handover and images of young children.
Schools	Include sports, trips, buses, online learning, tutoring, counselling, examinations, boarding where relevant and extracurricular activities.
Higher education, training and vocational institutes	Clarify professional boundaries with learners aged 18 to 21, including adult status, power imbalance, placements, internships, private communication and dual relationships.

What good practice looks like

- Adults can explain professional boundaries using practical examples from their role.
- The Code is integrated into recruitment, induction, supervision, appraisal, disciplinary and safeguarding systems.
- Learners know what adult conduct should look like and how to raise concerns safely.
- Higher-risk activities have additional written safeguards and role-specific training.
- Staff conduct data is reviewed for patterns and prevention.

Common compliance weaknesses or implementation risks

- The Code exists but is not signed, trained or monitored.
- Third-party adults and volunteers work with learners without receiving conduct expectations.
- Private messaging or social media contact is tolerated informally.
- One-to-one work lacks visibility, risk assessment or recording.
- Concerns about adult behaviour are treated only as HR issues and not screened for safeguarding risk.
- Staff are aware of conduct expectations but cannot identify safeguarding reporting routes.
- Conduct concerns are managed solely through disciplinary procedures without safeguarding review.
- Digital communications, AI tools or online platforms are used without appropriate safeguards or oversight.

Evidence to retain for audit, inspection or KHDA review

- Approved Code of Conduct and Safe Working Practice guidance.
- Board or governance approval minutes.
- Signed induction and annual acknowledgement records for all adults.
- Training records covering professional boundaries and safe working practice.
- Contracts or service agreements requiring third-party compliance.
- Records of conduct concerns, allegations, whistleblowing and suitability actions.
- Monitoring reports showing review of patterns, higher-risk activities and improvements.

Suggested review frequency

Review annually, after any staff conduct concern, allegation, safeguarding learning review, KHDA update, legal change or change in institutional provision.

Minimum compliance self-check

Question	Evidence expected
Does the Code apply to every adult who can access learners?	Scope statement, staff lists, contractor and volunteer records.
Are private communication and personal social media contact with learners prohibited?	Code wording, training records, digital communication policy, mobile phone policy monitoring records.
Are signed acknowledgements current?	Induction and annual declaration records.
Are higher-risk activities covered by written safe working practice?	Risk assessments, activity protocols, training records.
Are conduct concerns reviewed through safeguarding as well as HR?	Allegations records, CPC/DSL consultation notes, case audit.

References

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

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National Child Protection Policy in Educational Institutions in the UAE, 2019. UAE Government Portal. https://u.ae/en/about-the-uae/strategies-initiatives-and-awards/policies/social-affairs/national-child-protection-policy-in-educational-institutions-in-the-uae

KHDA. Technical Guide for Appointing Teaching Staff in Private Schools in Dubai, 2025. https://web.khda.gov.ae/KHDA/media/KHDA/Technical_Guide_for_Appointing_Teaching_Staff_En.pdf

KHDA. 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. https://web.khda.gov.ae/getattachment/f3b4c9d7-7ad5-4773-8533-afe76e46549f/Admin-Resolution-No-54-of-2025-Concerning-the-Requirements-and-Procedures-for-the-Appointment-of-School-Staff.pdf.aspx?lang=en-GB