

SAFEGUARDING AND INCIDENT REPORTING POLICY

2025 - 2026

Document Title	Safeguarding & Incident Reporting
Prepared By	Valmiro Fernandes
Approved By	Inderjot Singh
Effective Date	1st August 2025
Last Review Date	18th July 2025
Next Review Date	31st July 2026
Version	1

Small Steps Safeguarding & Incident Reporting Policy

Scope of Policy

The Safeguarding Policy at Small Steps Learning Difficulties Center applies to all students, staff, volunteers, contractors, and visitors. It is designed to address any incidents or concerns that may arise unexpectedly and require additional documentation, internal reporting, or direct communication with parents or guardians. This includes situations that are not routine or foreseeable in nature, such as sudden disclosures made by a student, unplanned behavioral incidents, or health and safety concerns that may place a child at risk. The policy also extends to allegations or concerns involving staff or external individuals that could impact a student's well-being. It ensures that all members of the Small Steps community understand their roles and responsibilities in protecting children and are prepared to act promptly and appropriately in the best interest of each child.

Legal Framework for Safeguarding in the UAE

The safeguarding policy at Small Steps Learning Difficulties Center is grounded in the legal and regulatory framework established by the United Arab Emirates (UAE) to protect the rights, safety, and well-being of all children. Key legislation includes Federal Law No. 3 of 2016, commonly known as Wadeema's Law (Child Rights Law), which outlines comprehensive rights for children and mandates measures to protect them from abuse, neglect, exploitation, and discrimination. Small Steps fully adheres to these national regulations and aligns its practices with international best practices, including guidance from organizations such as NSPCC and UNICEF, to uphold a child-centered, proactive safeguarding culture.

Role Of CDA

The Community Development Authority (CDA) in Dubai serves as the regulatory body overseeing the welfare and protection of vulnerable individuals, including children, across licensed centers such as Small Steps Learning Difficulties Center. As part of our safeguarding framework, CDA plays a critical role in ensuring compliance with child protection laws, licensing standards, and professional conduct requirements. The Authority provides guidance, training mandates, and reporting protocols that all staff must adhere to. In cases of serious safeguarding concerns or incidents, Small Steps is obligated to notify and collaborate with CDA to ensure proper investigation, intervention, and support. The CDA also evaluates and approves key safeguarding documents, supervises the designation and training of the center's safeguarding officer, and ensures that all practices align with the UAE's child protection legislation.

Staff Training

All Small Steps employees are required to complete Safeguarding training. Currently, Small Steps employees have successfully completed the following Safeguarding training courses:

- Principles of Pediatric First Aid
- Safeguarding-Child Protection (Level 1)
- Safeguarding- Child Protection (Level 2)
- Health and Safety (Level 2)

All staff members are required to complete initial safeguarding training upon induction and must participate in regular refresher courses to ensure up-to-date knowledge of child protection procedures and legal obligations.

Refresher Cycle Guidelines

- Initial Training: All new staff must complete Level 1 Safeguarding & Child Protection training within 30 days of joining.
- Annual Refresher (Level 1): All staff are required to undergo refresher training every 12 months.
- Designated Safeguarding Officers (Level 2/3): Must complete advanced safeguarding training and attend refresher training every 2 years or sooner if significant changes in legislation or policy occur.
- Ongoing Updates: Staff will receive updates or mini-training sessions throughout the year when new practices, incidents, or regulatory changes arise.

This cycle ensures that all team members remain vigilant, informed, and prepared to respond to safeguarding concerns effectively.

SSBD DSL: Veronica Lucy Micalizio is the SSBD DSL.

Veronica serves as the Designated Safeguarding Lead (DSL) for Small Steps, ensuring the safety and well-being of all students. In this role, Veronica is responsible for upholding and implementing policies and procedures related to the safeguarding of students. She works closely with the safeguarding leadership team of the school to ensure that all safeguarding measures are effectively enforced and that any concerns are promptly addressed. Her commitment to maintaining a safe and supportive environment is paramount, and she collaborates with staff, students, and families to promote a culture of vigilance and care.

Key responsibilities include:

- Ensuring clinical quality and ethical practice across all programs
- Designing and approving assessment protocols and clinical procedures

- Overseeing curriculum development, program fidelity, and outcome tracking
- Leading the supervision and development of Case Supervisors and Therapists
- Monitoring progress and outcomes through data reviews and classroom observation
- Conducting regular multidisciplinary team reviews and parent meetings
- Guiding inclusion decisions and liaising with school stakeholders
- Managing critical incident response, risk assessments, and safeguarding concerns
- Leading professional development initiatives and staff training.

DDSLs: Each SSBD Supervisor is a DDSL.

All Case Supervisors at Small Steps are experienced professionals in the field of ABA, holding or pursuing BCBA/IBA/QBA/QASP-S credentials. They play a central role in clinical case management and act as the Deputy Designated Safeguarding Leads (DDSLs) within Small Steps and the school.

Key responsibilities include:

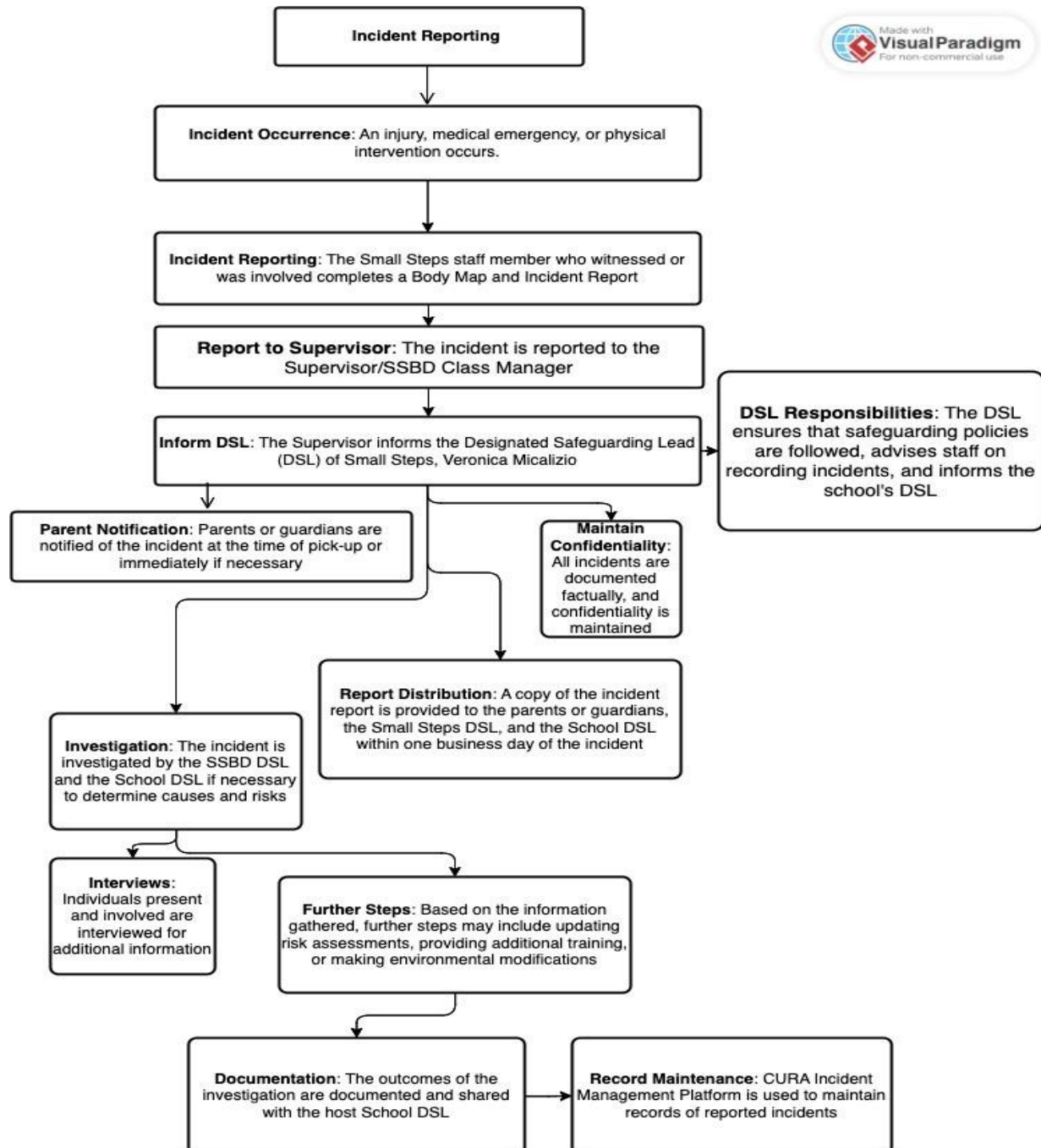
- Developing and updating individualized ABA programs and skill acquisition plans
- Conducting curriculum-based and functional assessments
- Training and supervising Behaviour Therapists, ensuring treatment integrity
- Monitoring student progress and adjusting interventions based on data
- Collaborating with families, school teams, and inclusion coordinators
- Managing mainstream inclusion schedules and transition plans
- Providing parent and caregiver training, including behavior support strategies
- Coordinating student transitions between SSBD and mainstream classrooms
- Supporting safeguarding procedures and promoting child welfare within the school

Incident Reporting

Small Steps is unable to predict all situations that may arise that may require additional documentation or parent notification. If any notable situation occurs pertaining to an injury, medical emergency, or physical intervention required, an incident report will be completed by the Small Steps staff who witnessed or was involved in the incident.

1. **Incident Reporting:** In the event of an injury, medical emergency, or when physical intervention is required, a Body Map and Incident Report shall be completed by the Small Steps staff member who witnessed or was involved in the incident; This includes documenting detailed information beyond the location, date, and time of the incident, such as the context, the individuals involved, and the sequence of events leading to the incident. Interventions which require use of Positive Handling Procedures should also be reported.
2. The Incident will be reported to the Supervisor who are each a Deputy Designated Safeguarding Lead (DDSL) and can deputize for the DSL in case of absence.
3. The Supervisor will in turn inform the Designated Safeguarding Lead (DSL) of Small Steps (Veronica Micalizio, Program Director).
 - a. The **Designated Safeguarding Lead** is responsible for ensuring that SSBD's safeguarding policies are followed by all staff members. They are tasked with creating and enforcing the company's safeguarding policy, training staff to recognize signs of abuse and neglect, maintaining accurate child protection records, maintaining ongoing communication and collaboration of the host School, and informing the School D/DSL of any incidents which occur within the SSBD classroom, and/or affect a student of SSBD while in mainstream classes.
 - b. The DSL is the main point of contact for any safeguarding or child protection concerns within SSBD. The DSL also advises staff on recording incidents and takes initial steps to inform the school's DDSL or DSL.
 - c. The incident report is reviewed by the DSL of SSBD, and by the host School D/DSL if required.
 - d. Individuals present and involve are interviewed to gain any additional information.
 - e. Investigation is carried out by the School D/DSL if deemed necessary by the school, in order to determine the causes, risks, and to put in place additional measures to ensure such incidents do not re-occur. Investigation of the incident involves a systematic approach to ensure all aspects of the incident are thoroughly examined and documented.
 - f. Further steps are taken based on the information gathered; this may include updating the individual student Risk Assessment providing additional training to staff; or applying reasonable environmental modifications.

4. SSBD uses *CURA Safeguarding Platform* to maintain records of reported incidents within Small Steps. CURA's Safeguarding software provides real-time visibility through interactive dashboards and reports, in order to expediate the existing incident management processes. It helps to ensure confidentiality, create a safer workplace, and better manage risks by enabling the reporting, classification, and management of incidents. All data entered into CURA is securely stored, with access restricted to authorized safeguarding personnel only.



Suspensions of Abuse or Neglect

Where there is cause to suspect child abuse or neglect, it is the responsibility of the staff member to report their suspicions to the Designated Safeguarding Lead of Small Steps, who in turn will report it to the Designated Safeguarding Lead of the School. All staff, faculty and administrators are mandated to report incidences of abuse and neglect. All reports of abuse and neglect must be made to the counselor within 24 hours for immediate response.

Reporting:

- a. When a child reports abuse or self-harm or there is reasonable cause to believe that abuse or neglect is occurring, the staff will report and follow advice from the Small Steps DSL within 24 hours.
- b. The DSL will advise the staff to record the incident and will take initial steps to inform the D/DSL of the school. In all cases, follow
- c. -up activities will be conducted in a manner that ensures that information is documented factually, and that strict confidentiality is maintained.
- d. In cases of observed injury/bruising, the child will be referred to the school nurse. The injury will be recorded, and information provided to the school-based response team.

Physical abuse: may involve hitting, punching, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating, hair pulling or otherwise causing intentional physical harm to a child. (These symptoms could also indicate harm to self, such as cutting and suicidal ideation). Signs of physical abuse (including but not limited to):

- Bruises, burns, sprains, dislocations, bites, cuts, Improbable excuses given to explain injuries
- Injuries that have not received medical attention
- Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc. Repeated urinary infections or unexplained stomach pains
- Refusal to discuss injuries
- Withdrawal from physical contact
- Fear of returning home or of parents being contacted
- Showing wariness or distrust of adults
- Self-destructive tendencies
- Being aggressive towards others
- Being very passive and compliant
- Chronic running away

Emotional abuse: the persistent emotional ill-treatment of a child to cause severe and adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved; that they are inadequate or valued only if they meet the needs of another person; age or developmentally inappropriate expectations being imposed on children; causing children frequently to feel frightened; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may also occur alone.

Signs of emotional abuse (Including but not limited to):

- Physical, mental and emotional development is delayed
- Highly anxious behavior
- Showing delayed speech or sudden speech disorder
- Fear of new situations
- Low self-esteem
- Inappropriate emotional responses to painful situations Extremes of passivity or aggression
- Drug or alcohol abuse
- Chronic running away
- Compulsive stealing
- Obsessions or phobias
- Sudden under-achievement or lack of concentration Attention-seeking behavior
- Persistent tiredness
- Lying

Sexual abuse: involves forcing or enticing a child to take part in sexual activities, regardless of whether the child is aware of what is happening. The activities may involve physical contact, including penetrative (i.e. rape) or non-penetrative acts. They may include non-contact activities, such as involving children in the production or viewing of pornographic material or encouraging children to behave in sexually inappropriate ways. Children involved in commercial sex work are victims of sexual abuse, whether they perceive themselves as victims or not.

Signs of sexual abuse (Including but not limited to):

- Pain or irritation to the genital area Vaginal or penile discharge.
- Difficulty with urination Infection, bleeding, STDs.
- Fear of people or places Aggression.
- Regressive behaviors, bed-wetting or stranger anxiety Excessive masturbation.
- Sexually provocative behavior.
- Stomach pains or discomfort walking or sitting.
- Being unusually quiet and withdrawn or unusually aggressive.

- Suffering from what seem to be physical ailments that can't be explained medically.
- Showing fear or distrust of a particular adult.
- Mentioning receiving special attention from an adult or a new “secret” friendship with an adult or young person.
- Refusal to continue with school or usual social activities.
- Age-inappropriate sexualized behavior or language.

Neglect: the persistent failure to meet a child's basic physical or physiological needs, likely to result in serious impairment of the child's health or development.

Grooming: when a person engages in predatory conduct to prepare a child or young person for sexual activity at a later time. Grooming can include communicating and/or attempting to befriend or establish a relationship or other emotional connection with the child or their parent/carer. Young people are often 'groomed' before they are sexually abused. At first, they may be tricked into thinking they are in a safe and normal relationship so they may not know it's happening or may feel they have no choice but to be abused. It may be hard to identify when someone is being groomed until after they have been sexually abused, because grooming behavior can sometimes look like 'normal' caring behavior, however, this is not always the case.

Examples of grooming behavior may include:

- Giving gifts or special attention to a child or young person, or their parent or carer, making the child or young person feel special and/or indebted to an adult.
- Making close physical contact sexual, such as inappropriate tickling and wrestling/play fighting.
- Openly or pretending to accidentally expose the victim to nudity, sexual material and sexual acts (this is classified as child sexual abuse but can also be a precursor to physical sexual assault).
- Controlling a child or young person through threats, force or use of authority making the child or young person fearful to report unwanted behavior.
- Groomers may rely on mobile phones, social media and the internet to interact with children in inappropriate ways and will often ask the child to keep their relationship a secret. The grooming process may continue for months before the offender arranges a physical meeting.

Bullying: unwanted, aggressive behavior that involves a real or perceived power imbalance. The behavior is repeated, or has the potential to be repeated, over time. The bully intends to hurt, embarrass, or intimidate the victim.

- **Physical bullying** can include: hitting, kicking, punching, pushing, throwing objects, stopping someone from doing something, damaging someone's property, tripping, slapping, and spitting.
- **Emotional bullying** can include: humiliating another student; making nasty or threatening comments; spreading rumors/talking about others behind their back; stealing someone's property; name-calling; excluding an individual; persuading others to exclude another student; intentionally hurting someone's feelings; ganging up against another student.
- **Cyberbullying** can include: text messaging bullying; picture/video-clip via mobile phone cameras; phone call bullying via mobile phones; email bullying; chatroom bullying; bullying through instant messaging; bullying via websites.

This policy ensures that all incidents are documented and communicated effectively, maintaining transparency and accountability within Small Steps.

School Holidays and Summer Camps Procedure

To provide continuity and maintenance of essential ABA-based interventions, SSBD offers services during the Term breaks, Summer, and Winter Holidays. The responsibility for safeguarding and promoting the welfare of students extends beyond the school Term. During the school holidays, it remains crucial to ensure that students have access to appropriate support and guidance.

- The school will provide SSBD with the names of the designated person(s) on duty during each week of all holidays.
- Any safeguarding concerns that arise during these camps will be reported to the named designated person(s).
- The same safeguarding processes and protocols will be followed during the holidays as they are during the Term time, ensuring consistent protection and support for all students.

Off-Duty Handover Procedure

In the case of the prolonged absence of the D/DSL due to holiday, sick leave, or other absence, the following procedure is in place to ensure continuity of Safeguarding:

- The D/DSL will nominate a deputy or an alternate person who will assume the role and responsibilities of the D/DSL during their absence.
- The D/DSL will inform the SSBD staff, the School Head of Inclusion, and the School D/DSL of the name and contact details of the nominated person.

- The D/DSL will also ensure that the nominated person has access to all the relevant safeguarding records, policies, and guidance.
- The D/DSL will maintain regular contact, where possible, with the nominated person and provide support and advice as needed.
- Upon their return, the D/DSL will resume their duties and receive a handover report from the nominated person.
- The nominated D/DSL will maintain ongoing communication with the school DSL as required and as previously outlined in this policy.
- Any Safeguarding incidents will be reported as per the policy and records will be kept in accordance with the guidelines.

Safer Recruitment Training

All recruitment panels at SSBD include at least one member who has completed the NSPCC-accredited Safer Recruitment in Education and Skills training, with refresher training required every two years. This applies to all senior leaders involved in the selection process, ensuring that safeguarding considerations are central at every stage.

Records Retention

At Small Steps Learning Difficulties Center, accurate and confidential record-keeping is essential to ensure the safety, accountability, and well-being of all students. All safeguarding-related documentation—including incident reports, disclosures, referrals, parent communications, and risk assessments—shall be securely stored in compliance with local regulatory requirements and internal data protection protocols. Records will be retained for a minimum of seven years from the date of creation or until the student reaches the age of 21, whichever is longer, unless otherwise directed by the Community Development Authority (CDA) or other relevant authorities. Access to safeguarding records is strictly limited to authorized personnel. All records must be factual, timely, and reviewed regularly to ensure relevance, accuracy, and compliance with applicable laws and best practice standards.

Resources:

https://www.childwelfare.gov/pubs/factsheets/long_term_consequences.cfm

<https://www.who.int/news-room/fact-sheets/detail/child-maltreatment>

Linked Policies:

Health and Safety Policy

Safer Recruitment Policy

HR Policy

Whistleblowing Policy

Data Protection and Confidentiality Policy

Social Media and Acceptable Use Policy (AUP)

Complaints Policy

Training and CPD Policy

Privacy, Confidentiality, and Intellectual Property Rights (IPR) Statement

This document and all associated materials are the exclusive property of Small Steps Learning Difficulties Center LLC (“Small Steps”) and are protected under the applicable laws of the United Arab Emirates, including but not limited to copyright, intellectual property, data protection, and contractual confidentiality obligations.

The contents of this document—whether in whole or in part—may include proprietary frameworks, clinical methodologies, internal policies, operational protocols, assessment tools, training content, or client-related information. All such content is considered confidential and is intended solely for authorised use by employees, contractors, partners, or stakeholders of Small Steps in connection with their official duties or approved collaborations.

Strictly prohibited actions include, but are not limited to:

Copying, reproducing, or modifying the material without prior written authorisation;

Distributing, sharing, or disclosing the content to unauthorised third parties;

Using the document or its contents for commercial purposes or in a manner that could prejudice the interests of Small Steps or its clients; Removing this statement or any identifying information from the document.

All recipients are required to respect the confidentiality of information contained herein and to handle any personal or sensitive data in accordance with UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL), as well as Small Steps' internal policies on data protection and safeguarding.

By accessing or utilising this document, you expressly acknowledge and agree to uphold these obligations and recognise the intellectual and proprietary rights of Small Steps Learning Difficulties Center LLC.

If you have received this document in error, or if you are unsure of your authorisation to view or use its contents, you must immediately notify our Data Protection Officer by calling +971-52-854-6200 or emailing info@smallstepsbd.com.