

SAFEGUARDING AND INCIDENT REPORTING POLICY

2026 – 2027

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Scope of Policy

Small Steps Learning Difficulties Centre LLC (“Small Steps”) is a social care service provider licensed by the Community Development Authority (CDA), Dubai, and operates within the activities, professional categories, conditions, and service scope authorised by its current CDA licence and applicable requirements. This policy applies to all students, staff, volunteers, contractors, and visitors. It covers safeguarding concerns and incidents requiring documentation, internal reporting, parent or guardian communication, or escalation to relevant authorities, including disclosures, behavioural incidents, health and safety concerns, and allegations involving staff or external individuals. All members of the Small Steps community must understand their safeguarding responsibilities and act promptly in the best interests of each child.

Legal Framework for Safeguarding in the UAE

Purpose: This policy sets out how Small Steps prevents, identifies, records, reports, and responds to safeguarding concerns and incidents. It supports timely action, clear accountability, confidential record-keeping, and coordination with host schools, the CDA, and other relevant authorities.

The safeguarding policy at Small Steps is grounded in the legal and regulatory framework established by the United Arab Emirates (UAE) to protect the rights, safety, and well-being of children. Key legislation includes Federal Law No. 3 of 2016, commonly known as Wadeema’s Law (Child Rights Law), which establishes children’s rights and measures to protect them from abuse, neglect, exploitation, and discrimination. Small Steps adheres to applicable national legislation, CDA requirements, and recognised safeguarding practice to maintain a child-centred and proactive safeguarding culture.

- 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.

Small Steps DSL: Veronica Lucy Micalizio is the Designated Safeguarding Lead (DSL) for Small Steps. She is responsible for implementing this policy, providing safeguarding guidance to staff, maintaining liaison with host-school safeguarding teams, overseeing the management of concerns and records, and ensuring that appropriate action and escalation take place. She works with staff, students, families, schools, and relevant authorities to support a vigilant and child-centred safeguarding culture.

DDSLs: Each Small Steps Case Supervisor acts as a Deputy Designated Safeguarding Lead (DDSL). DDSLs support the DSL by receiving and documenting concerns, advising staff on immediate safeguarding actions, maintaining confidentiality, liaising with the host school's safeguarding team, and deputising for the DSL when required. Their safeguarding responsibilities apply alongside, but are distinct from, their clinical case-management duties.

Incident Reporting

A general incident report must be completed when an injury, medical emergency, physical intervention, or other notable event requires documentation or parent or guardian notification. The Small Steps staff member who witnessed or was directly involved in the incident must inform the relevant Supervisor/DDSL and complete the required Incident Report promptly.

1. Incident Reporting: Following an injury, medical emergency, physical intervention, or other reportable event, the Small Steps staff member who witnessed or was involved in the incident must complete the required Incident Report and, where relevant, a Body Map. The record must include the location, date, and time; the context and sequence of events; the individuals involved; actions taken; any injury or medical response; and any use of Positive Handling Procedures. Information must be factual, objective, and completed as soon as practicable.

2. The Supervisor/DDSL must review the report, ensure the required documentation is complete, record the incident on CURA, and inform the Small Steps DSL. Where an incident involves harm or imminent danger, the Supervisor/DDSL must also report it immediately to the school DDSL.

3. CURA Recording: The Supervisor/DDSL is responsible for recording general incidents on the CURA Safeguarding Platform, classifying the record appropriately, and ensuring that the Small Steps DSL is informed. CURA records must be factual, timely, confidential, and accessible only to authorised safeguarding personnel.

School Holidays and Summer Camps Procedure

To maintain continuity of essential ABA-based interventions, Small Steps may provide services during term breaks and summer and winter holidays. Safeguarding responsibilities continue outside the school term, and students must have access to appropriate support and reporting pathways during holiday provision.

- The school will provide Small Steps 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 during term time, ensuring consistent protection and support for all students.

Off-Duty Handover Procedure

In the event of a prolonged absence of the D/DSL due to holiday, sick leave, or another reason, the following procedure will ensure continuity of safeguarding:

- The D/DSL will nominate a deputy or alternate person to assume the D/DSL role and responsibilities during the absence.
- The D/DSL will inform Small Steps staff, the school's Head of Inclusion, and the school D/DSL of the nominated person's name and contact details before the absence begins, where practicable.
- The D/DSL will ensure that the nominated person has access to all relevant safeguarding records, policies, and guidance.
- Where possible, the D/DSL will maintain regular contact with the nominated person and provide support and advice as needed.
- On returning, the D/DSL will resume their duties and receive a handover report from the nominated person.
- The nominated D/DSL will maintain communication with the school DSL as required and in accordance with this policy.
- Any safeguarding incidents will be reported in accordance with this policy, and records will be retained in line with the applicable requirements.

Suspensions of Abuse or Neglect

Where there is a safeguarding concern or reasonable cause to suspect abuse or neglect, the staff member must escalate the concern directly to the school DDSL or DSL within the same working day and before leaving the school premises. The concern must not be delayed while awaiting complete information. Small Steps staff must provide factual records and relevant information but must not conduct an investigation.

Reporting:

- a. When a child reports harm, abuse, neglect, or self-harm, or when a staff member has a safeguarding concern, the staff member must make an immediate factual record and escalate the concern to the school DDSL or DSL within the same working day and before leaving the school premises.
- b. Staff must follow the directions of the school DDSL or DSL, maintain strict confidentiality, and preserve all relevant factual information.
- c. Only the school DSL may determine whether an investigation is required and conduct or direct that investigation. Small Steps staff, the Small Steps DSL, and Small Steps DDSLs must not interview individuals or investigate the concern.
- d. Where an injury or bruising is observed, the child must be referred to the school nurse, the injury must be recorded, and the information must be provided to the school DDSL or DSL without delay.

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

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.

Safer Recruitment Training

All recruitment panels at Small Steps must include at least one member who has completed recognised safer-recruitment training relevant to education or social care, with refresher training completed at the interval required by Small Steps or the training provider. This requirement applies to senior leaders involved in selection and ensures that safeguarding considerations are integrated throughout recruitment.

Records Retention

At Small Steps, accurate and confidential record-keeping supports student safety, accountability, and continuity of safeguarding action. Safeguarding documentation, including incident reports, disclosures, referrals, parent communications, and risk assessments, must be stored securely in accordance with local regulatory requirements and internal data-protection procedures. Records will be retained for at least seven years from the date of creation or until the student reaches the age of 21, whichever is longer, unless the CDA or another competent authority directs otherwise. Access is restricted to authorised personnel, and records must be factual, timely, accurate, and reviewed in line with applicable requirements.

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

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