

GEMS Drugs and Alcohol Prevention & Management Policy	
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Policy approver:	GEMS Board Risk and Audit Committee
Policy owner:	Risk and Assurance
Policy reviewer:	Risk and Compliance Committee
Relevant related policies:	Code of Conduct (POL/HR008) GEMS Speak Up (Whistleblower) Policy (POLCOM007) Employee Discipline Policy (POL/HR0009). GEMS Safeguarding Policy GEMS Crisis Management Policy GEMS Schools Emergency Response Plans
External Resources	MOE Guide to Drugs Prevention in School Environment KHDA Drug Awareness Guidelines (2025–26) Federal Decree-Law No. 30 of 2021 (Combating Narcotics and Psychotropic Substances)

1 Policy application and purpose

Application

- 1.1 This policy applies to GEMS TopCo Limited (the "**Company**" or "**GEMS**") and its subsidiaries and subsidiary undertakings (together with the Company, the "**Group**", and any of them, a "**Group Company**"), which includes:
- a. All individuals working at all levels and grades, including all teaching staff, corporate office staff, senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, casual workers and agency staff, of the Group, wherever located ("**GEMS Personnel**"); and
- b. All of those individuals or entities who provide services to or engage in business activities for or on behalf of, the Group ("**Other Personnel**").
- 1.2 GEMS Personnel and Other Personnel are referred to collectively in this policy as "**Personnel**".
- 1.3 All students enrolled in any GEMS school, regardless of age, grade level, or curriculum, including those participating in GEMS-organized activities, trips, or events ("**Students**").
- 1.4 If required, any additional policy requirements applicable to specific jurisdictions will be annexed to this policy.

Purpose

- 1.5 This policy establishes a unified framework for preventing, detecting, and managing incidents related to narcotics and psychotropic substances across all GEMS schools and entities.
- 1.6 The policy aims to:
- Protect students, staff, and the wider community from harms associated with substance misuse.
 - Comply with UAE Federal Law No. 14 of 1995 (as amended by Federal Decree-Law No. 30 of 2021).
 - Meet expectations of regulators like KHDA, ADEK, MOE, RAK DOK and SPEA.
 - Ensure consistent, confidential, and lawful handling of related cases.
 - Promote awareness, prevention, and early intervention through education and collaboration.
 - Ensure accountability and reporting through designated channels.

2 Scope

- 2.1 In line with the law and directives of the Ministry of Education (MOE), GEMS follows the national guidelines on drug prevention and intervention applicable to all public and private schools across the UAE.
- 2.2 Accordingly, these measures shall also extend to all GEMS entities including staff and other individuals, such as service providers, School Support Center (SSC), and other corporate offices to ensure a consistent and organization-wide approach to awareness, prevention, and response.

Term	Definition
Drugs / Narcotics / Psychotropic Substances	Any controlled substance prohibited under UAE Federal Law. (Federal Law No. (14) of 1995 regarding combating narcotics and psychotropic substances and its amendments) And as defined in the MOE guidelines: Natural or chemical substances that negatively affect the body's functions, and lead to a state of habituation or addiction to it.
Vaping	The use, possession, promotion, or distribution of electronic cigarettes, vape devices, heated tobacco products, or any similar electronic smoking devices, with or without nicotine, including related liquids, cartridges, or accessories. For the purposes of this policy, vaping is treated as a prohibited substance-related activity and is subject to UAE law and applicable education regulations.
Addiction	As defined in the MOE guidelines: The case resulting from the continuous use of narcotics, such that the person becomes psychologically or physically or both dependent on it. Further, the individual needs to increase dosage from time to time to always get the same effect and becomes unable to perform its daily tasks and duties without the narcotics.
Alcohol	Any beverage containing ethyl alcohol intended for consumption.
Use	Consuming, ingesting, or being under the influence of a prohibited substance.
Distribution / Promotion	Selling, sharing, or encouraging the use of substances.
Paraphernalia	Any equipment that is used to produce, conceal, and consume illicit drugs.
Incident	Any suspected or confirmed case involving possession, use, or influence of a prohibited substance.
Reporting Channels	Designated mechanisms for internal and external reporting as defined in the Policy.

3 Definitions

- 3.1 The following terms are provided to ensure clarity and consistency in understanding the scope of this policy. These definitions are aligned with relevant UAE federal laws, MOE Guide to Drugs Prevention in School Environment and Parent's Guide to Drugs Prevention, and GEMS internal standards and should be used as reference points when interpreting or implementing the provisions of this policy.

4 Central Policy Statements

- 4.1 To navigate this issue responsibly, GEMS will be guided by the following:
- Any possession, use, or distribution of illegal drugs or alcohol on school grounds or during GEMS events is strictly prohibited with zero-tolerance.
 - Proactive education, awareness, and staff vigilance are key to reducing incidents.
 - Student-centered response protocols will prioritize care, family engagement, and escalation as appropriate.
 - Communications and interventions must align with local laws and social norms.
 - Well-structured communication will be provided through designated channels and immediate action planning.

5 Incident Management and Reporting (Drug and Alcohol)

In the event of a suspected case of drug or alcohol possession or use, GEMS will follow a structured, step-by-step escalation process to ensure a swift, safe, and compliant response. (See also Appendix 1)

A similar structured approach should also be adopted for any suspicious activity, possession, or incident occurring within GEMS facilities, including the School Support Centre (SSC), service entities, or other corporate offices, to ensure consistency and compliance across the entire organization. Such cases will be primarily coordinated by the HSE and Security teams, in consultation with the Risk & Assurance Division where necessary.

5.1 Early Identification and Initial Response for Emergency

- When a suspected case of drug or alcohol possession or use arises, the priority should be student safety, with appropriate safeguarding-led information sharing in accordance with this Policy and regulatory requirements
- The discovering staff member must immediately inform the School Medical Clinic and Designated Safeguarding Lead (DSL) and also Where necessary, security may be notified solely to support immediate safety measures such as managing crowd control, securing an area, or preventing unauthorised access, and not for clinical or safeguarding assessment purposes.
- The student/individual should be discreetly escorted to the school clinic for a health assessment by the school nurse and doctor.
- If the student/individual is showing symptoms of serious illness, unconsciousness, or suspected overdose, emergency services must be called immediately for paramedic support and transfer to a government hospital for

stabilization and testing.

- No staff member is authorized to perform, request, or collect any drug or alcohol test on school premises. Testing is the sole responsibility of authorized government health facilities.

5.2 Handling Possessions and Securing Evidence

- In case of reasonable suspicion against a student, staff are permitted to conduct a search of students' bag or belongings. However, the following guidelines should be followed:
 - Consent must be taken from parent or guardian prior to conducting a search.
 - Search must be conducted in the presence of at least one more staff member, preferably someone in a role of responsibility e.g. member of school leadership team and designated safeguarding lead etc.
 - Force must never be used under any circumstances.
 - All elements of the search must be documented afterwards. The record must be retained for at least 1 year.
- In cases of reasonable suspicion involving an adult (including staff members, contractors, or visitors), any request to inspect personal belongings must be conducted in a respectful and proportionate manner and, as a general rule, only with the informed consent of the individual concerned.
- Such requests may be initiated by the School Principal or an authorised senior leader in consultation with HR and safeguarding representatives where appropriate. Security personnel may provide support solely for safety or access control purposes and must not conduct investigative searches.
- Where an adult is unconscious or there is an immediate risk to health and safety, a limited inspection may be undertaken strictly for the purpose of supporting urgent medical intervention.
- If consent is refused, or where circumstances may involve potential legal or criminal implications, the matter should be escalated in accordance with safeguarding procedures and, where required, referred to the appropriate authorities. All actions must comply with applicable UAE laws and internal safeguarding, HR, and disciplinary policies.
- If a suspicious substance or paraphernalia is discovered:
 - The item must be placed in a sealed, labelled evidence bag, handled by Security, and kept securely until further instruction.
 - Under no circumstance should school staff dispose of or transport the substance independently.
 - Parents must be informed immediately, and that the incident must be recorded and reported on the same day through the Safeguarding Guard system.

5.3 Reporting to Authorities

5.3.1 Internal Notification

- The Principal in collaboration with the school Medical Team and DSL must escalate the situation to the Risk and Assurance Division (Central Safeguarding Team and Medical Directorate)
- All students and staff who are suspected of drug or alcohol consumption should be assessed by the School Clinic.

5.3.2 External Notification (KHDA / MOE / Police)

- The Risk & Assurance Division, in collaboration with Compliance and Legal, will assess whether external reporting obligations apply and coordinate engagement with relevant authorities where required.
- Confirmed possession, or any positive test result obtained through authorised hospitals or medical providers will be reported to KHDA by the School Principal in coordination with the Medical Team and Risk & Assurance representatives, in line with safeguarding and regulatory requirements. The school does not conduct drug testing internally.
- As a general principle, the school does not directly involve law enforcement unless instructed by KHDA or another relevant regulator. Where a positive test result or confirmed possession is established, the decision to escalate the matter to the police will be determined on a case-by-case basis, depending on the nature and circumstances of the incident, and in line with regulatory guidance.

5.4 Medical Testing and Verification

- All clinical tests must be conducted by government hospitals.
- Medical team must maintain full confidentiality and retain all health data securely. (**confidentiality** here refers to the obligation to protect all student and staff health information from unauthorized access, use, disclosure, or loss, and to ensure such information is shared strictly on a need-to-know basis and in compliance with applicable data protection laws and internal policies)

5.5 Record-Keeping and Disciplinary Actions

- All reports, evidence logs, and correspondence must be stored confidentially by the school management and reported directly through Guard. (Guard for safeguarding elements, and HSE Guard for Health and Safety related elements and contractor D&A incidents)
- Where the case involves a student, disciplinary measures will follow the GEMS Student Code of Conduct and relevant regulatory guidelines. Any decision on suspension, exclusion, or reinstatement will be made by the Principal in consultation with the Designate Safeguarding Lead, and Risk & Assurance Division, ensuring that safeguarding, wellbeing, and educational continuity remain the primary considerations and Regulatory approval should be sought.
- Where the case involves a staff member, the matter will be referred to Human Resources and handled in line with the Employee Discipline Policy (POL/HR0009) and Code of Conduct (P OL/HR008). An internal investigation will be initiated by Compliance Department. Appropriate disciplinary actions may include formal warning, suspension, or termination of employment, depending on the severity of the violation and the outcome of the investigation.
- Where the case involves a contractor, consultant, or third-party personnel engaged, the matter will be managed in coordination with the relevant contract

owner and Procurement function, in line with the terms of the applicable contract, the Supplier Code of Conduct, and this Policy. Immediate actions may include removal of the individual from Company premises or activities, suspension of services, or termination of the contract, depending on the severity of the breach. The Compliance Department will oversee the assessment and ensure appropriate escalation and reporting, including notification to the contracting entity and relevant authorities where required.

5.6 Post-Incident Management

- The DSL and School Counsellor must provide emotional support and counselling to the student in line with the Team Around the Child (TAC) approach with a proper Risk Assessment.
- School will engage the parents or guardians in all discussions and follow-up actions.
- Upon completion of treatment, the student's reintegration plan will be developed collaboratively between the Medical Team, DSL, counsellor, teachers, and parents to support academic and emotional recovery.
- Disciplinary actions, including suspension or expulsion, will be considered only where proportionate to the circumstances and after appropriate educational, safeguarding, and rehabilitative interventions have been explored. Such measures shall be applied in line with applicable regulatory frameworks, and where required, guidance, notification, or approval from KHDA or other relevant authorities will be sought.

6 Vaping and Electronic Smoking Devices

6.1. Vaping and Electronic Smoking Devices

- In line with KHDA regulations, Ministry of Education guidance, and applicable UAE federal and local laws, vaping and the use, possession, promotion, or distribution of electronic cigarettes or similar devices is strictly prohibited for students, staff, and visitors on school premises, during school transport, and at all school-related activities or events.
- Vaping-related incidents shall be managed under this Drugs and Alcohol Prevention & Management Policy, using the same safeguarding-led, student-centred, and legally compliant approach applied to drugs and alcohol cases.
- Vaping should be explicitly addressed within the Behaviour Policy, Student Handbooks, and school communications, and will be reinforced through assemblies and awareness sessions.
- All vaping incidents must be recorded internally and reported to KHDA through the designated safeguarding channels, in line with regulatory expectations.
- Schools should maintain evidence of compliance through internal audits, documentation, and regular reviews to ensure ongoing readiness for KHDA compliance checks.
- GEMS schools will adopt preventive education, early identification, graduated response measures, and regulatory reporting mechanisms to address vaping risks effectively, while prioritising student wellbeing, confidentiality, and compliance.

- Staff should be trained at least annually to recognise early signs of vaping, supported by confidence assessments and refresher training where needed.

7 Roles and Responsibilities *(Based on SIRAJ Guidelines)*

7.1 Medical Team and School Clinics

- Acting as the first responders in any suspected case of drug or alcohol use, ensuring the immediate safety and stabilization of the student or individual involved.
- Conducting an initial medical assessment to determine the level of consciousness, vital signs, and any visible symptoms of intoxication or distress.
- Activating emergency medical services without delay when there are signs of serious illness, unconsciousness, or suspected overdose.
- Coordinating the transfer of the student or individual to an authorized government hospital for clinical testing, diagnosis, and treatment as required.
- Maintaining detailed medical documentation, including assessment notes, referral records, and communications with external health authorities, ensuring confidentiality in line with GEMS data protection and health information standards.
- Ensuring that no samples are collected for drug or alcohol testing on school premises, in accordance with UAE law, and that any official testing is completed only by authorized government facilities.
- Advising school leadership and safeguarding teams on medical findings, potential health implications, and recommended next steps for care and monitoring.
- Participating in post-incident reviews with Safeguarding, HSE, and other Risk & Assurance teams to improve first-response procedures and strengthen medical preparedness across all GEMS entities.
- Overseeing the control and secure management of prescription and restricted medications at schools, maintaining an up-to-date register, monitoring usage, and ensuring that all medicines are stored, dispensed, and disposed of in line with regulatory requirements.
- Must not prescribe controlled or semi-controlled medications in the school in line with the regulations.

7.2 Health, Safety and Environment (HSE)

- Collaborating with the Risk & Assurance, Safeguarding, and Medical Directorate to ensure an integrated, multidisciplinary approach to prevention and incident management.
- Supporting school leadership with the proper documentation and reporting of all health and safety aspects of incidents in the HSE Guard system.
- Contributing to post-incident debriefs and root cause analyses with school and service entity teams, helping to identify lessons learned and preventive improvements to school or facility safety protocols.

- Providing expert guidance to school and service entity leadership on maintaining compliance with UAE health and safety regulations, including those issued by MOE, KHDA, and other competent authorities.
- Reviewing and updating School Emergency Response Plan templates based on incident trends and outcomes of internal reviews.

7.3 Central Safeguarding Team (CST)

- Serving as the policy and practice authority for all safeguarding matters related to substance use prevention, detection, and response.
- Developing and standardizing training content for all staff, ensuring full alignment with regulators.
- Setting organizational standards and best practices for managing substance-related cases and ensuring consistent, child-centered approaches across all GEMS entities.
- Providing expert advisory, guidance, and quality assurance on complex or sensitive safeguarding cases involving suspected drug or alcohol use.
- Collaborating with the Risk & Assurance, HSE, and Medical Directorate to ensure an integrated, multidisciplinary approach to prevention and incident management.
- Reviewing and updating safeguarding procedures and training materials periodically to reflect evolving risks, new regulations, and lessons learned from internal and external case reviews.
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7.4 School Management in Collaboration with Central Safeguarding Teams and Medical Directorate

- Assessing and mitigating immediate safety risks to students, staff, and responders, including securing the affected area and ensuring no secondary hazards.
- Coordinating with the Medical Team and Safecor Security to maintain an effective response chain, ensuring that all first-response actions are aligned with the School's Emergency Response Plan and Crisis Management Policy.
- Liaising with external emergency services and authorities, including paramedics, police, and civil defense, when required, and ensuring that all information is relayed accurately through authorized channels.
- Conducting awareness activities in coordination with relevant authorities on the following topics:
 - The harms of narcotics, psychotropic substances, and smoking.
 - Reasons for falling into narcotics and psychotropic substances abuse.
 - Laws and procedures under UAE law for combating narcotics and psychotropic substances.
 - The importance of physical exercise and healthy nutrition.

- Developing students' life skills, such as:
 - Decision-making and problem-solving skills.
 - Social skills (choosing good friends).
 - Skills for utilizing leisure time.
 - Skills for coping with life pressures.
- Monitoring and following up on attempts to promote narcotics, psychotropic substances, or cigarettes within or around the school.
- Offering support to students at risk of drugs abuse by addressing surrounding risk factors and providing education services.
- Coordinating with relevant authorities and organizations to provide training opportunities for teaching and administrative staff in the areas of:
 - Student guidance.
 - Combating smoking and narcotics and psychotropic substances abuse.
- Building effective relationships with parents to address issues surrounding students.
- Instilling moral values in students.
- Supporting students in community participation and volunteer work

7.5 School Principals

- Providing a safe and supportive environment for students.
- Clarifying and reviewing the roles and responsibilities assigned to teachers, psychological and social specialists (counsellors) related to the prevention of narcotics and psychotropic substances abuse.
- Ensuring that teachers and specialists fulfil their responsibilities and roles related to the prevention of narcotics and psychotropic substances abuse, such as attending and evaluating awareness activities that are implemented.
- Clarifying the duties and responsibilities of parents in protecting their children from the risks associated with narcotics, psychotropic substances, and substance abuse.
- Coordinating with relevant authorities, such as health, security, and social authorities to provide necessary services for students, such as awareness, assessment, treatment, and training for the administrative and educational staff.
- Monitoring the enforcement of school policies and regulations related to the prevention of narcotics and psychotropic substances abuse.

7.6 Designated Safeguarding Lead (DSL) and Counsellors (Social Specialists as defined by MOE)

The psychological and social specialists at schools work as a single team to prevent students from abuse of narcotics. Their roles and responsibilities include the following:

- Enhancing prevention of the risk of abusing narcotics and psychotropic substances use by:
 - Identifying and assessing students who have risk factors that may increase the likelihood of drugs abuse using age-appropriate assessment methodologies. Some surrounding risk factors for students include poor academic performance, absenteeism and truancy, negative peer influence, smoking, non-compliance with school rules and regulations, and family disintegration.
 - Developing a clear and well-studied plan to support students with behavioral problems or risk factors, aimed at modifying their behaviors by involving teachers and parents if necessary. The plan should include counseling sessions for students to address their surrounding circumstances and enhance their coping skills, as well as refer students to external programs if needed.
 - Raising awareness among teachers, students, and parents about narcotics and psychotropic substances and their health risks and indicators of abuse using various methods such as workshops.
 - Assisting in educating parents on the necessary skills to prevent their children from narcotics and psychotropic substances abuse through workshops or individual meetings.
 - Contributing to equipping students with the skills necessary to refuse narcotics and psychotropic substances.
- Providing the necessary support in cases of student' narcotics and psychotropic substances abuse based on the established code of conduct through:
 - Assisting in referring the student to necessary services such as health, psychological, and social support services.
 - Following up on the student who is abusing substances during and after the treatment phase to support his recovery and identify all his needs, especially academic needs.
 - Developing a clear and systematic plan to enhance the reintegration of the student into the school educational environment, ensuring their success and reducing the likelihood of relapse in partnership with treatment and rehabilitation centers in collaboration with the social specialist.
 - Consulting with relevant external agencies to provide optimal services for the student, such as treatment and rehabilitation centers, social centers, and health centers.
 - Providing necessary support to parents and involving them in some school therapy sessions in collaboration with the social specialist.

7.7 Safecor (Security)

- Acting as the primary on-site security responders in all suspected or confirmed cases of drug or alcohol possession or use, ensuring the immediate safety and containment of the area.
- Securing the scene to prevent disturbance or tampering with potential evidence until the arrival of authorized personnel.
- Managing the custody and documentation of any seized items in coordination with the Designated Safeguarding Lead (DSL) and Principal ensuring adherence to GEMS evidence-handling protocols.
- Cooperating fully with law-enforcement authorities including local police and relevant regulatory bodies and when directed, facilitating safe handover of evidence or information as required under UAE law.
- Maintaining incident logs and ensuring that all actions taken by the security team are recorded, timestamped, and aligned with internal reporting requirements.
- Safeguarding the privacy and wellbeing of students, staff, and witnesses during the intervention process, ensuring that all procedures are conducted discreetly and respectfully.
- Supporting post-incident reviews by providing statements, CCTV records, and other relevant materials to assist investigations and continuous improvement efforts.

7.8 Risk and Assurance Division

- Receiving and reviewing all incident reports related to suspected or confirmed cases of drug or alcohol possession, use, or distribution across all GEMS entities.
- Ensuring full compliance with this policy, UAE Federal Law, and relevant GEMS governance and reporting standards.
- Coordinating with the Compliance Department to track and follow up on any regulatory or procedural changes issued by authorities, ensuring that GEMS policies, procedures, and training materials remain up to date and aligned.
- Reporting significant cases and systemic findings to the Risk & Compliance Committee (RCC) and the Board Risk & Audit Committee (RAC) for oversight and strategic action.
- Liaising with regulatory and external authorities including KHDA, ADEK, SPEA, DHA, MOE, RAK DOK etc. and law enforcement where required or directed by senior management.
- Monitoring, analysing, and reporting data trends to identify areas for improvement, inform prevention strategies, and support continuous enhancement of the Group's risk and safeguarding frameworks.
- Collaborating with the Safeguarding, HSE, and Medical Directorate to ensure an integrated and transparent approach to incident management, root cause analysis, and preventive measures.

7.9 Legal

- Providing strategic legal guidance on drug and alcohol-related incidents, in collaboration with the Compliance function, to ensure full alignment with UAE Federal Law, Emirate-level regulatory requirements, and GEMS governance standards.
- Representing and safeguarding the organization’s legal interests in any investigations, regulatory engagements, or legal proceedings, including coordination with external counsel and competent authorities where required.
- Reviewing incident handling, communications, and documentation to ensure legal defensibility, appropriate evidence management, and mitigation of organizational liability risks, working closely with Risk & Assurance and Compliance teams where necessary.

8 Ensuring full Training Awareness and Review

- 8.1** Annual training shall be provided to all school staff on early detection, reporting, and response protocols related to drug and alcohol prevention.
- 8.2** Training records shall be maintained in line with regulatory requirements and include evidence of pre-defined processes, communication materials and trainings such as:
- Prevention Awareness Sessions (e.g. Addictive Behaviours)
 - Level 1,2 and 3 Safeguarding Trainings
 - External workshops delivered in collaboration with relevant authorities (e.g. Dubai Police, DHA).
 - Communication shared with staff and parents
- 8.3** Designated Safeguarding Leads (DSLs), counsellors, and academic advisors shall receive required 3 training and participate in TAC (Team Around the Child) processes to strengthen early intervention mechanisms.

9 Non-Compliance to Policy

- 9.1** The Group will make this policy available on the Company’s intranet for all Personnel. It will also be provided to all Other Personnel upon their initial engagement with the Group if they are not provided with access to the Intranet.
- 9.2** All Personnel who suspect or become aware of any non-compliance with this policy have an obligation to report this promptly. Reporting can be made via the following routes:
- a. for GEMS Personnel, to the respective line manager and Designated Safeguarding Leads.
 - b. to the Compliance Department (compliance@gemseducation.com); or
 - c. through the Group’s anonymous Speak Up hotline (contact details provided below), in accordance with the Group’s **GEMS Speak Up (Whistleblower) Policy POLCOM007**.

Channel	Details
Toll free number	80004440408 (UAE) / 00800101094 (Qatar)
Email address	speakup@gemseducation.com
Website	https://gems.speakup.report/speakup
Website QR Code	
GEMS Group Organization Code	128626 <i>(Remember: Using the correct organization code helps us receive and address your concern promptly and confidentially)</i>
QR Code for the Speak Up Application Available on iOS and Android.	

Investigation of reports of non-compliance

- 9.3** Reported allegations of non-compliance with this policy will be considered and, if appropriate, investigated by the Company.
- 9.4** Unless otherwise directed by the GEMS Board or Board Risk & Audit Committee, the Chief Risk and Assurance Officer (in conjunction with the Compliance department, Legal department or any other department, as required) is responsible for initiating and overseeing any investigation into reports of non-compliance with this policy.
- 9.5** GEMS Internal Audit Department shall, at periodic intervals, make arrangements for an audit of compliance with the internal control systems and procedures governed by this policy. The results of such audits shall be reported to the Risk & Audit Committee of the GEMS Board.

Appendix 1 – Flowchart: Incident Management and Reporting

Main Step	Details	Responsible
Detection of Suspected Use	Any staff identifies suspected possession/use. Prioritise safety and discreet handling.	All Staff
Immediate Notification	Inform School Medical Clinic, Designated Safeguarding Lead (DSL), and Security if required.	Discovering Staff
Medical Assessment	Escort individual to clinic for assessment by nurse/doctor. Call emergency services if severe symptoms.	Medical Team
Safeguarding Response	Ensure safeguarding-led information sharing and student wellbeing approach.	DSL / Safeguarding Team
Parent Notification & Recording	Inform parents immediately; record incident in Guard systems.	School Leadership / DSL
Search of Possessions	In the event of reasonable suspicion. Different protocol applies to students and adults.	Authorized individual as defined in section 5.2
Secure Evidence	If substance found, secure in labelled evidence bag. Do not dispose or transport independently.	Security (Safecor)
Internal Escalation	Principal escalates to Risk & Assurance Division, Central Safeguarding, and Medical Directorate.	Principal / Risk & Assurance
External Reporting Assessment	Assess need for KHDA/MOE/police notification; coordinate with Compliance & Legal.	Risk & Assurance / Legal / Compliance
Medical Testing	Testing conducted only by authorised government hospitals.	Government Health Facilities
Disciplinary Process	Apply Student Code of Conduct or Employee Discipline Policy as relevant.	Principal / HR / Compliance
Post-Incident Support	Counselling, TAC approach, reintegration planning, parental engagement.	DSL / Counsellor / Medical Team
Monitoring & Reporting	Trend analysis, committee reporting (RCC, RAC), continuous improvement.	Risk & Assurance Division