



SCS
Child Safety Manual

Santiago Christian School
Santiago, Dominican Republic

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EMPLOYEE CODE OF CONDUCT FOR CHILD SAFETY

Introduction

The welfare and safety of children are paramount in SCS's policies and procedures. SCS's intent is to provide a safe and loving environment in which children are nurtured and cared for in a way that allows them to learn and grow in order to become all they are capable of being. This includes valuing them, regarding them positively, and treating them with the respect and care they deserve as bearers of God's image. Jesus demonstrated great care for children and warned against those who fail to protect children from sin: "whoever causes one of these little ones who believe in me to sin, it would be better for him to have a great millstone fastened around his neck and to be drowned in the depth of the sea" (Matt. 18:6). The Bible is clear that adults are called to protect children from harm and abuse.

Having a common set of expectations will also serve to protect adults interacting with children from invalid reports of inappropriate behavior. By putting these guidelines into place, an adult's interaction with a child is much more transparent to others and less likely to be interpreted incorrectly. Adults (including board members, employees and volunteers) assume the full burden of setting and maintaining clear, appropriate boundaries in all interaction with children.

The definitions and guidelines below take into consideration international definitions of child sexual, physical, and emotional abuse and neglect. In light of our multinational workforce, we have modeled our policies on the International Society for the Prevention of Child Abuse and Neglect (ISPCAN) definitions and standards and the United Nations Convention on the Rights of the Child (UNCRC) definitions and standards. ISPCAN is the only multidisciplinary international organization that brings together a worldwide cross-section of committed professionals to work towards the prevention and treatment of child abuse, neglect and exploitation globally. Built on varied legal systems and cultural traditions, the UNCRC is a universally agreed upon set of non-negotiable standards and obligations. These basic standards set minimum freedoms that should be respected by governments. UNICEF's mission is to uphold this standard. 192 of the 195 countries in the world today are UN members.

SCS has a commitment and obligation to abide by local law. With regard to the treatment of children, where local law is more prescriptive or strict than the guidelines here, then local law must be followed.

All SCS staff, faculty and administrators are mandated to report incidences of abuse and neglect. All SCS employees are also required to report suspicion of abuse or neglect. All possible cases of abuse or neglect will be taken seriously, including reports of incidents that occurred in the past.

Our intent is not to be overly prescriptive in how parents raise their children. However, these guidelines need to be succinct and clear and use language that is generally understood by speakers of English and is consistent with other networks and external bodies that are also seeking the best for children. We assume that each person will use good judgment in applying these guidelines in their family and/or work setting.

The most effective way to prevent abuse of children is to be vigilant. By being vigilant in adhering to the following standards for interaction with children, we hope to protect children from abuse.

Definition of child abuse

Santiago Christian School adheres to the Article 396 of the Dominican law 136-03 in the definition and sanctions for child abuse. SCS also adheres to the guidelines of the Child Safety Protection Network.

Child abuse is the treatment of a child under the age of 18, often in the context of a relationship of responsibility, trust, or power that endangers or impairs the health or welfare of a child.

Child-to-child cases: Should both the victim and the alleged offender be under the age of 18, it will typically be considered abuse if there are three or more years' difference between the children or there is a difference in responsibility, trust, or power between them. If there is less than three years' age difference and there is not a significant difference in responsibility, trust, or power between them, what would normally be defined as abuse will be considered inappropriate behavior, with an action plan put in place to address the behaviors of concern and their effects. Because of these and other variables, child-to-child cases will be judged on a case-by-case basis. Child-to-child abuse includes all types of abuse defined below.

Types of abuse

SEXUAL ABUSE

Sexual abuse is the involvement of a child in sexual activity with an adult or another child (as defined above) which includes but is not limited to:

Verbal: Remarks which include sexual threats, solicitation, sexually explicit language (whether in person, on the telephone, or via text messaging or the internet), or any verbal expression with the intent to arouse or stimulate.

Visual: Indecent exposure, showing or taking pornographic material, or the showing of unclothed persons, any sexual activity or simulated sexual activity.

Physical touching: Physical contact with a person's clothed or unclothed genitals, buttocks, or in the case of a female, breast, or causing a child to perform any of these acts. Holding or kissing for the purpose of sexual gratification.

PHYSICAL ABUSE

Physical abuse is any act that results in a non-accidental physical injury. Examples of such acts include, but are not limited to slapping, punching, beating, kicking, biting, shaking, burning, holding under water, pulling hair, holding against one's will, covering the mouth, etc.

The Employee Code of Conduct for Child Safety includes, but is not limited to, the following expectations of staff.

Prevention within the work situation

In any situation with children, we should use as many of these safeguards as possible with a minimum of at least one. This will reduce risk and demonstrate professionalism and wisdom resulting in healthy interaction with children.

Visibility

All work with children should be planned in a way that minimizes risks as far as possible. This includes being visible to other adults when working with children.

This can be accomplished by planning activities in areas where other adults are present and at a time when other activities are occurring. It can also be accomplished by installing windows in all classrooms and other rooms occupied by children or by keeping doors open. Windows in doors should be kept uncovered.

Overcoming Isolation

At least two unrelated adults should be present in group work with children. An adequate number of adults should supervise youth events, especially overnight activities.

Isolation can also be overcome by avoiding being alone with one child. For example, take two or more children to the bathroom together, rather than only one; drop off siblings last in a carpool or take your own child along when providing rides, or employ the principles of visibility (explained above) or accountability (explained below).

Accountability

All staff are expected to interact with children in a mature, capable, safe, caring, and responsible manner, with a high level of accountability. All staff are responsible for giving and accepting feedback from others in order to maintain a high level of professionalism and integrity in interactions with children.

When ministry to a child involves one-on-one contact, the following procedures should be followed, as applicable:

- Always be accountable to other adults regarding your interactions with children.
- Parents and/or supervisors are to be notified beforehand of any activities with children, for example, before transporting a child, keeping a child after school, a youth activity, or when tutoring a child. Seek written permission ahead of time when you initially begin working with students in situations in which you may need to provide transport.
- Counseling or other necessarily confidential meetings with children should be done in a place where the adult and child are visible to others such as in an office with a window in the door and only when another adult is in close vicinity, aware that the meeting is occurring, and willing to stay in the vicinity until it is completed.
- In an emergency situation, such as needing to transport a child alone or supervise a child alone, find an additional person to be involved if at all possible, or notify a parent or supervisor if a parent cannot be reached.

Balancing Power and Control

When working with children, balance the age, size, strength, power, and authority between staff and children to help to lower risk. This can be done by such things as sending two same-age children to the bathroom together with an adolescent or adult helper, dropping off siblings last in a carpool, or having a friend play in the room while talking to a student after school, or inviting two or more students to your home to work on a project.

Supervision

Supervision also reduces risk. Program administrators should periodically and randomly inspect classrooms, offices, work areas and other areas where children and adults are together.

Differential Treatment

Adults should avoid favoring or showing differential treatment to particular children to the exclusion of and in the presence of others, or excluding children in a derogatory or embarrassing way in the presence of others.

Adult-child interactions

Technology

Technology should be used appropriately to protect children from abuse and exploitation. For example, filters can be used to prevent individuals from showing inappropriate internet content to children.

Discipline

Discipline should be used to teach and correct rather than punish. Our intention here is to clarify which actions are more likely to approach physical or emotional abuse than they are to be good, healthy forms of discipline. The following actions may involve abuse and are to be avoided: derogatory name-calling, ridicule, humiliation or shaming, publicly singling out a child for negative treatment or exclusion, yelling at (loud speech that harms by bringing emotional degradation) or belittling a child or other forms of hostile or rejecting treatment. Other behaviors to be avoided include: hitting (including slapping) or any behavior that assaults a child. Also, to be avoided are pushing or holding a child against their will outside the goals of protecting them from danger, providing them medical care or keeping them from harming themselves or others. Physical discipline by parents of their own children, such as spanking or paddling, is not considered abuse as long as it is reasonable, not done in anger, and causes no bodily injury to the child.

Touch

Because healthy, caring touch is valuable to children but unhealthy touch is abusive, the following guidelines apply:

- Touch should be in response to the need of the child and not the need of the adult.
- Touch should be open rather than secretive. For example, a hug in the context of a group is very different from a hug behind closed doors.
- Touch should be age-appropriate and generally initiated by the child rather than the adult. It should be with the child's permission and resistance from the child should be respected.
- Touch should always communicate respect for the child. Adults should avoid doing things of a personal nature for children that they are able to do for themselves, including dressing, bathing, etc.

The following signs of affection are generally appropriate: verbal praise, side hugs, or shoulder to shoulder hugs. For smaller children, touching their hands, faces, shoulders and arms, arms around their shoulders (when culturally appropriate), hugs, or holding them when others are present.

The following behaviors are inappropriate or may be perceived as inappropriate and should not be engaged in: touching buttocks, chests, genital areas, or thighs except to keep infants or young children

clean or healthy; showing affection in isolated areas or when alone with a child; sleeping with a child not your own or lying on a bed with a child not your own; flirtatious or seductive looks; any form of affection that is unwanted by the child; sexually-suggestive or explicit language, showing sexually-suggestive pictures or videos or playing sexually-suggestive games with a child; any behavior that could be interpreted as sexual in nature.

Adults should monitor each other in the area of physical contact, helping each other by pointing out anything that could be misinterpreted.

Verbal Interaction

Adults should use words to support and encourage a child, such as praise, positive reinforcement, and appropriate jokes. Inappropriate verbal interaction includes the following: shaming, belittling, humiliating, name calling, using harsh language that may frighten, threaten or humiliate the child, cursing, or making derogatory remarks about the child, their family, and/or their place of origin. Inappropriate verbal interaction also includes inappropriate comments that relate to physique or body development, telling derogatory or sexual jokes, making sexually suggestive comments, telling inappropriate secrets, or inappropriately discussing sexual encounters or desires with children.

Monitoring Child-to-Child Behavior

The following actions may involve abuse or inappropriate behavior of one child to another and are to be avoided: bullying, hazing, derogatory name-calling, ridicule or humiliation, publicly singling out another child for negative treatment or exclusion, child-to-child inappropriate sexual touch, inappropriate sexually explicit language, showing of sexually explicit images, hitting, slapping, pushing, holding against their will, or otherwise assaulting another child.

Permissions for use of photographs/videos of students

As an institutional standard in SCS, students, teachers and administrative staff in general are not allowed to use, distribute or “upload” photos and/or videos on their personal social networks (Facebook, Twitter, Whatsapp, Instagram, etc.) of students in the facilities or activities of the school without prior written authorization from the Administration. In order to protect privacy and foster professionalism, only the school’s Advancement office may authorize the publishing of student photos and post/share/distribute photos of students for official school purposes. At registration, parents indicate whether they choose to give the school permission to use photos and/or videos of their children for official purposes.

SCS also suggests that school families handle with caution and discretion the use of images of students that could be taken in school activities before placing them on social networks. Remember that, by law, everyone must respect the right to the protection of the image of minors. Teachers and staff may take photos of students for use in the classroom. Staff may submit photos to designated Advancement office staff for official school use. Teachers and staff are not authorized to share photos of students with parents under any circumstances. Parents may take photos at school events, but teachers and staff should look for opportunities to remind parents not to publish or share photos of other people’s children without the parents’ express consent.

As established in Article 26 of the Code of Children and Adolescents: “It is forbidden to have or disseminate, by any means, the image and data of children and adolescents in a way that may affect

their physical development, moral, psychological and intellectual, his honor and reputation, or that constitute arbitrary or illegal interference in his private life and family privacy or that may stigmatize his conduct or behavior." Paragraph: "Violation of the prohibitions indicated in the preceding articles shall be sanctioned in the manner provided by article 411 of this Code."

Acknowledgement statement

The following acknowledgment is to be signed upon hire and updated when revised:

I declare that I have not engaged in sexual abuse, physical abuse, a pattern of emotional abuse, or neglect of a child. If I have engaged in any of these abusive actions, they have been reported to the SCS board and director and I have either successfully concluded the required follow-up or am engaged actively in it. Further, I have never been the subject of a complaint, disciplinary action, or dismissal by an employer, church, ministry, or other volunteer organization following an allegation of any such acts. Nor have I been the subject of an investigation of such acts by civil authorities. If I have been the subject of an allegation of such acts, regardless of the outcome of the allegation, I have notified the director.

I understand my responsibility to report abuse and other inappropriate conduct toward a child to the director or principal of my area of assignment who will take appropriate actions.

I understand SCS takes allegations of child abuse seriously and that abuse in any form will not be tolerated. I understand that SCS will cooperate with civil authorities in the investigation of any report of abuse.

I acknowledge that I have read the above, agree to abide by it and attend SCS's annual in-service training in Child Safety Awareness and Prevention.

SCREENING PROCESS

The first and most effective means of preventing child abuse is screening out potential abusers before they come to the school. All personnel, staff, teachers, volunteers, and other members of the community whose potential employment or volunteer service involves direct contact with, and/or the potential for unmonitored access to children will be given thorough reference and background checks, including review of criminal and sexual offender records. Likewise, contractors, vendors and service providers will provide evidence that a background check was completed on any individual sent by the contractor to provide onsite services.

The Office of Human Resources is responsible for initiating and evaluating the applicants for positions that require background checks. The elements of the comprehensive background check will include:

- A written application and a “statement of suitability” requiring a signature stating that the applicant knows of no reason or prior circumstance that would preclude him/her from working safely with minor children
- A personal interview
- Credential check depending on position being sought
- Reference checks
- Criminal history background check (local, state, multi-state, national, international options depending on where the applicant is coming from and the position being sought)
- Sex offender registry check

The school also reserves the right to conduct background screening for all employees and volunteers at any time after employment or volunteer service has begun. Any misrepresentations, falsifications, or material omissions in the information provided by the individual, whenever discovered, may result in disqualification from, or termination of employment or volunteer service with the organization.

If a check indicates that the applicant has an adult criminal record it must be reviewed by the school and placed into one of the following three categories:

- Permanent Disqualification: permanently disqualified from working with children because of the particular criminal offense
- Presumptive Disqualification: before a determination can be made the school can review additional information and consider:
 - The relevance of the criminal offense to the nature of the employment or volunteer service being sought;
 - The nature of the work to be performed;
 - The seriousness and specific circumstances of the offense;
 - The age of the candidate at the time of the offense;
 - The number of offenses;
 - The length of time since the offense occurred;
 - Whether the applicant has pending charges;
 - Any relevant evidence of rehabilitation or lack thereof;
 - Any other relevant information, including information submitted by the candidate or requested by the hiring authority.
- Discretionary Disqualification: infraction is minor enough that hiring decision can be left to the discretion of the school.

[Child safety training](#)

All those listed in the “screening process” section above must also participate in in-person or approved online child safety training before being allowed to work on campus or work with students. Materials currently approved include SCS’s on-campus health office training, recorded SCS health office training in Spanish, and the Second Step online training curriculum. Viewing of the recorded SCS training in Spanish must be observed by an employee approved through the Office of Human Resources. For those who complete the Second Step training, successful assessment results must be presented to the Office of Human Resources.

[Child safety clearance roster](#)

All those listed in the “screening process” section above are to be included on a child safety clearance roster, which is maintained by the Office of Human Resources. This roster includes columns for (1) name, (2) background check received, (3) training received, and (4) approved for work with children. An individual may be checked as “Approved” only if a background check is on file and training was received. Staff members should be conscientious of individuals they observe working with children and should inquire in the Office of Human Resources as to the clearance status of new individuals who they find to be working with SCS children.

EDUCATION & TRAINING

Teaching Students: Curriculum Modules for Student Education

Research shows that personal safety/abuse prevention programs for children are successful when they are based on the most current research in prevention education and are rigorously evaluated; begin as early as pre-Kindergarten; use developmentally sequenced materials; utilize active, systematic and specific skills training; have multiple program components such as classroom training combined with parental involvement; use interactive instructional techniques that provide children multiple opportunities to observe the desired behavior, model the behavior and get feedback; and are instituted as a comprehensive part of the child's education - being repeated many times during the school year, and instituted over several years of instruction.

In its most effective form, sex abuse prevention education teaches children about "safe" and "unsafe" touches in a safety-based, developmentally sequenced curriculum. In order to provide children with adequate tools to resist the overtures of potential offenders, children must have the following information:

- The accurate names of private body parts
- Rules-based instructions regarding what to do if someone touches them in a way that is harmful. (Say "No", get away, tell a grown up)
- Assurances that they (children) get to say whether a touch is "unwanted" or not.
- Assistance in identifying the safe adults in their lives
- Reminders that they can always talk to parents or another trusted adult about anything
- That they should continue to tell about harmful, unwanted, unsafe, or bad touches until they are believed.
- That abuse is never their fault.

Sex abuse prevention education is "preventive" in nature. It is not intended – nor does it claim – to educate children about sex, sexuality, the sexual functions of private parts, or human love relationships. It is intended to teach children about their rights to assert limits over what happens to their bodies and to give them the tools necessary to communicate effectively if someone violates those boundaries. In short, sex abuse prevention education teaches children how to prevent themselves from being victims of criminal behavior.

Modules for PreK through 5th Grade:

At each grade level there are 6 major concepts/big ideas that are suggested for exploration. The nature of these conceptual understandings is developmental and spiraling in that with each year the level of depth of understanding increases. Each lesson focuses on a developmentally appropriate exploration of a concept.

The scope and sequence of conceptual understandings is organized in the following framework in the Second Step curriculum:

| Grade | Lesson 1 | Lesson 2 | Lesson 3 | Lesson 4 | Lesson 5 | Lesson 6 |
|---------|-----------------------|---------------------------|-----------------------------|-----------------------------|-------------------------|-------------------------|
| PreK | Ways to stay safe | The always ask first rule | Safe and unsafe touches | The touching rule | Practicing staying safe | Reviewing safety skills |
| Kinder | Ways to stay safe | The always ask first rule | Safe and unsafe touches | The touching rule | Practicing staying safe | Reviewing safety skills |
| Grade 1 | Ways to stay safe | The always ask first rule | Safe and unsafe touches | The touching rule | Practicing staying safe | Reviewing safety skills |
| Grade 2 | Ways to stay safe | The always ask first rule | Safe and unsafe touches | The touching rule | Practicing staying safe | Reviewing safety skills |
| Grade 3 | Ways to stay safe | The always ask first rule | Safe and unsafe touches | The touching rule | Practicing staying safe | Reviewing safety skills |
| Grade 4 | Keeping yourself safe | Always ask first | Unsafe and unwanted touches | The private body parts rule | Practicing staying safe | Reviewing safety skills |
| Grade 5 | Keeping yourself safe | Always ask first | Unsafe and unwanted touches | The private body parts rule | Practicing staying safe | Reviewing safety skills |

Middle and High School Modules:

The scope and sequence of conceptual understandings is organized in the following framework for secondary students in health classes.

Middle School Health (HealthSmart curriculum):

- Being emotionally healthy
- Qualities of healthy relationships
- Taking care of sexual health
- Feelings and relationships
- Resisting sexual pressure

High School Health (HealthSmart curriculum):

- Building healthy relationships
- Taking care of your sexual health
- Resisting sexual pressure
- Setting goals to protect sexual health

Parent Education

Child protection at school is a partnership with parents. Parent education can be achieved in several ways: Before beginning the student lessons, conduct a gathering to inform the parents and encourage them to participate in their children's education by reading the parent letters and, for elementary students, to complete the homework together with their child. These sessions could be special parent meetings (can include Child Protection Team members), morning coffees, or formal parent education classes.

Concepts to include in advocacy and training of parents:

- Promoting parent support and buy-in can be achieved through the annual distribution of school policy to all families during the admission process and to returning families annually.
- Emphasize to parents that this is a PREVENTION program Understanding of specific policies and procedures of the school
- Train in awareness of the issue:
 - Signs and symptoms of abuse
 - Statistics of incidence and prevalence
 - Awareness of risks to which students are exposed – globally and locally
 - Vulnerabilities of international school students growing up in international communities
 - How to talk with your children – prevention strategies and empowering children
 - Handling disclosure and reporting as a parent
- Inform parents of community resources for parents and to be used by school (especially domestic violence issues)
- Provide parents with a list of resources, including for domestic violence needs.
- Provide parents with information for how to keep safe and keep their children safe.

Training School Personnel

Child Protection training of school personnel should place the emphasis on prevention and be connected to the concept of “ready to learn” – safe and secure children lead to better learning and better outcomes.

Content of training for all instructional staff (faculty, administrators, teacher assistants)

- Understanding of specific policies and procedures of the school
- Train in awareness of the issue
 - Signs and symptoms of abuse: knowledge of grooming behaviors
 - Statistics of incidence and prevalence
 - Developmental levels of children, with a focus on sexual development – what to expect at different age levels
- Training to focus on handling of disclosure and reporting
- Review of the lesson plans and how, when, by whom to present them
- Depending on time and depth of content, suggested strategies include
 - Presentation
 - Interactive teaching with assessment
 - Role play and simulations of disclosure
 - Practice, practice, practice

Content for training of non-instructional staff:**Board Members**

- The Board will have one designated member to serve as a contact for child protection issues
- Policy of school and procedures for implementation
- Implementation of Child Protection Program
- All parent training sessions

Administrators (in addition to training for instructional staff)

- Implementation of policy at their area of control
- Code of conduct development
- Accountability
- Teacher implication – due diligence
- References, hiring practices

Counselors/Psychologists (in addition to training for instructional staff)

- Case management – how to handle range of issues from uncertainty of reporter to direct disclosure to working with personnel involved in the case
- Specific reporting of concerns
- Cases of abuse

Support Staff, After School Activity Staff and Coaches Outside of School Awareness Meeting

- Instructional staff content above
- Code of conduct
- Behavioral expectations – refer sample behavior policies that will protect teachers from false allegations
- How to access help

Contracted Staff

- Develop overall context of school's management of the issue within school policy and procedures
- Code of conduct
- Behavioral expectations – refer sample behavior policies that will protect teachers from false allegations
- How to access help

Delivery of Training Sessions

- Director
 - Ensures training takes place and adequate resources are available to support the program
 - Is public advocate for the program and implementation endorses internal personnel in their roles
- Implemented by child protection officer, counselors/psychologists, and administrators for each division
- Consultant should be used when necessary to bring CP team to a trainer-of-teachers model
 - Counselors network to support program implementation at schools
 - Counselors specific to their expertise and role as defined by school
 - Online training where appropriate, support differentiated objectives of different groups
 - Combine with in-person training whenever possible

Frequency of Training

- Awareness level training should be once a year
- Skill training specific to job description – to be determined by needs of individual personnel – minimally once a year

CHILD PROTECTION TEAMS: ROLES & RESPONSIBILITIES

1. The Child Protection Team (CPT)

The CPT will consist of:

- Child Protection Officer (designated member who leads the team)
- School Psychologist
- Counselors
- School Doctor/Nurse
- Principals from each division
- Director
- Someone who can provide a combination of corporate (school) historical memory and school and local expertise.

The role of a school-based Child Protection Team (CPT) is to ensure that there is a comprehensive Child Protection Program (CPP) in place at the school and to annually monitor the effectiveness of the program. Specific tasks include:

- Ensure a comprehensive Child Protection Program is in place for school
- Work within the school's existing structures to ensure development and adoption of a Child Protection curriculum that will meet the needs of the school
- Ensure that child protection curriculum is taught and assessed annually
- Support teachers and counselors in implementing Child Protection Curriculum
- Ensure/guide Professional Development for training for all staff including teachers and volunteers regarding the Child Protection Program
- Ensure/guide parent education programs to support understanding of the objectives and goals of the CPP policy and curriculum
- Ensure systems are in place and monitored to educate and involve all school volunteers in the child protection program
- Serve as a resource group in working with cases requiring child protection - assist reporting and follow-up disclosures to the multidisciplinary team or where appropriate

The school-based child protection team should meet at least twice annually. The first meeting is to plan for the school year. Preparation planning items for the successful teaching of personal safety lessons include:

- Discuss readiness of the teachers to teach personal safety
- Plan for the parent meeting to introduce the topic and any letters to parents
- Preparation/familiarization/inventory of the personal safety materials including forms to use
- Review curriculum
- Review personal safety protocols and guidelines
- Schedule future school-based support team meetings

The second school-based support team meeting will be conducted when all the trainings/lessons are completed. The team will assess implementation and make recommendations for implementation for the next school year. The team will also assess teacher readiness and qualifications, including which teachers may need additional training.

CHILD PROTECTION PROGRAM ANNUAL CALENDAR OF ACTIVITIES

| Time Line | Activity | Responsibility |
|-----------|--|---|
| August | Inform Board staff students and parents about school Child Protection Program | Director |
| | Inform new families of school Child Protection Program | Admissions Office, counselor |
| | Convene Child Protection Team – orient new members | Assistant Director |
| | Review data from previous school year- develop implementation plans for current year | Child Protection Team |
| September | Implement annual plan | Child Protection Team, principals |
| | Train all staff on details of program, individual responsibilities and how to manage disclosure | Principals, Child Protection Officer, Counselors, Director |
| | Provided required training to volunteers and other service providers as required by policy | Child Protection Office in cooperation with Human Resources |
| | Teach lessons to students | Teachers, counselors |
| | Inform parents in writing and hold parent workshops | Counselors, principals |
| | Ensure all staff, volunteers and contracted service providers sign code of conduct | Principals, supervisors |
| October | Continue lessons within curriculum plan | Teachers, counselors |
| | Ensure lessons have been taught | Principals |
| November | Convene Child Protection Team to review implementation | Director |
| | Review hiring practices to ensure: background screening, criminal history check, reference check includes discussion of child protection history; ensure code of conduct signed when hired | Director, H.R. Director, Principals |
| | Review/review curriculum and recommend resources as needed | Principals, teachers |
| January | Convene Child Protection Team - Update and review activities of first semester; make recommendations for areas of need. | Principals, counselors |
| As needed | Convene Response Team | Case manager, usually counselor or principal |

2. The Response Team

The Response Team will consist of:

- Counselor (as case manager)
- School psychologist
- School doctor/nurse
- Division level principal
- Other personnel as designated by the Child Protection Officer

When there is allegation of abuse, the school will endorse a Response Team to respond to that specific allegation. The purpose of this ad hoc team is to manage cases of abuse. It is essential for the Response Team to recognize the limitations of their expertise and to involve local resources or other consultant expertise as necessary. The team will gather needed information to determine what the next steps are: handled by the school, referred to outside support services, and/or reported to authorities.

The school-based Response Team will meet based on need. This includes when a teacher brings a concern to the team or whenever a child discloses. The team will look at school policy and the nature of the abuse in order to determine the next step for action, whether it be handled by the school or reported immediately to authorities.

Discussion can be guided by the following information:

- Nature and extent of the suspected abuse
- Information on previous injuries or background data
- Identity of alleged abuser (if known) – or self-harm

The gathered information will classify the case as Category A, B, or C.

| Category A: Most cases will be handled by school counselors | Category B: Some cases may be referred to outside resources: | Category C: Cases reported for investigation |
|---|--|--|
| Student relationships with peers Parenting skills related to disciplining children at home Student-parent relationships Mental health issues such as depression, low self-esteem, grieving | Mental health issues such as depression, psychosis, dissociation, suicide ideation | Severe and ongoing physical, emotional and sexual abuse or neglect |

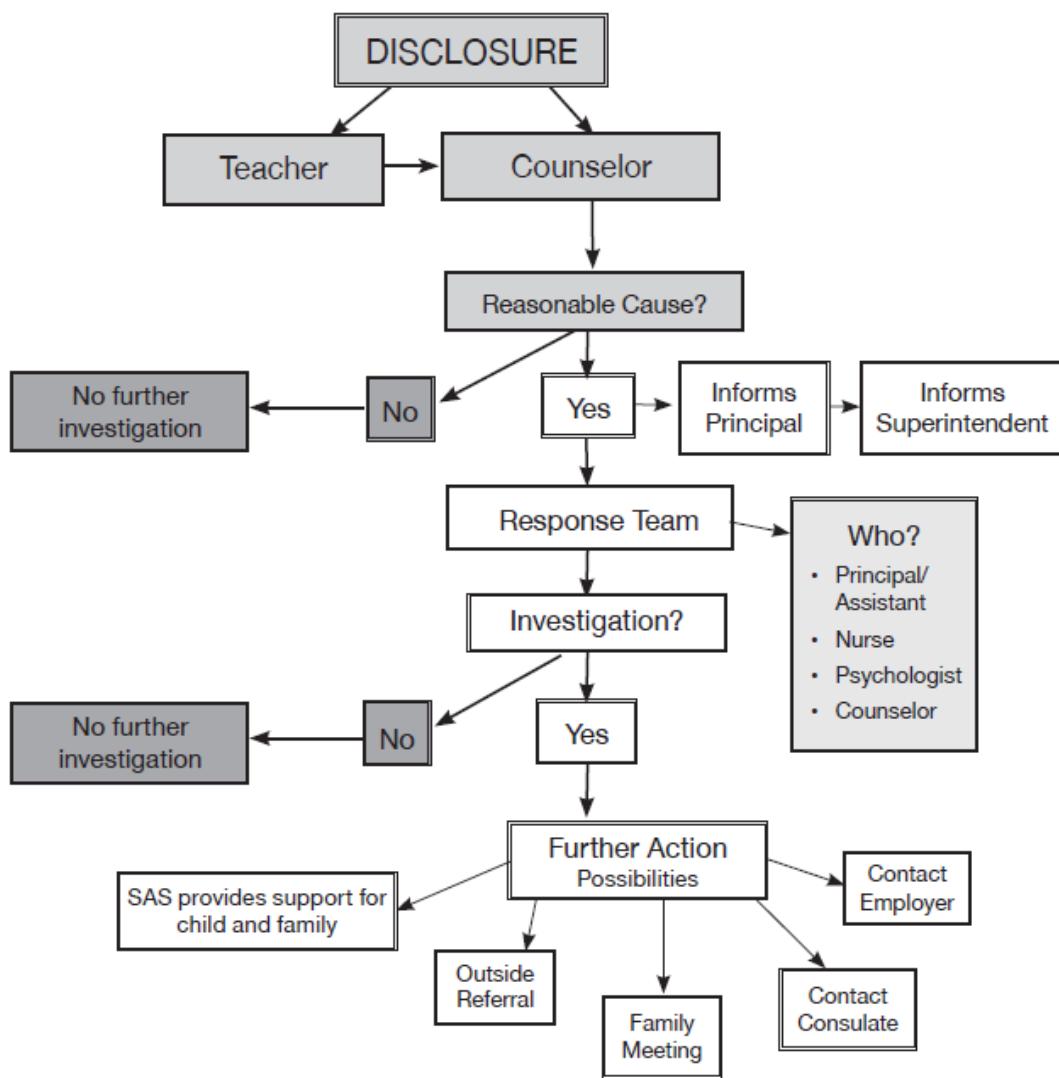
PROCEDURES FOR REPORTING CASES OF SUSPECTED ABUSE

When suspected abuse or neglect are reported

Where there is cause to suspect child abuse or neglect, it is the responsibility of the staff member to report their suspicions to the division counselor. In all cases, the principal will be notified. It is the responsibility of the principal to inform the director of the suspected case of child abuse or neglect.

All SCS staff, faculty and administrators are mandated to report incidences of abuse and neglect. All SCS employees are also required to report suspicion of abuse or neglect. All possible cases of abuse or neglect will be taken seriously, including reports of incidents that occurred in the past. All reports of abuse and neglect must be made to the counselor within 24 hours for immediate response.

Model flow chart for reporting cases of suspected abuse (sample from Shanghai American School):



Procedures for reporting suspected cases of abuse, neglect:

Step 1

When a child reports abuse or there is reasonable cause to believe that abuse is occurring, the teacher must submit a written report using the Child Safety Report Form (found on SharePoint) to the grade level counselor within 24 hours. The counselor will take initial steps to gather information regarding the reported incident, and the division principal will form a response team as needed to address the report. The response team will include the school Doctor/nurse, counselor, psychologist, and other individuals as the principal sees fit.

In all cases, follow up activities will be conducted in a manner that ensures that information is documented factually, and that strict confidentiality is maintained. All members of the response team who participate in gathering information about the case should submit a written report to the counselor managing the case on the response team. The following procedure will be used:

- 1) Interview staff members as necessary and document information relative to the case.
- 2) Consult with school personnel to review the child's history in the school.
- 3) Report status of case to the Director.
- 4) Determine the course of follow-up actions.

Step 2

Based on acquired information, a plan of action will be developed by the Response Team to assist the child and family. Actions that may take place are:

- Discussions between the child and counselor in order to gain more information. Depending upon the age of the child, these discussions may include drawing pictures and playing with dolls to elicit more information as to what may have occurred.
- In-class observations of the child by the teacher, counselor, or administrator.
- Meetings with the family to present the school's concerns.
- Referral of the student and family to external professional counseling.

In cases of suspected abuse or where outside authority is deemed necessary, the Response Team may pursue further investigation and possible actions:

- Consultation with local child welfare authorities.
- Consultation with the school attorney or other attorney.
- Consultation with local authorities.
- Consultation with the embassy/consulate of the country of the involved family.

The director and other designated members of the Response Team will report to and interact with outside agencies.

In the event that the abuse or neglect allegation involves a staff or faculty member of SCS, the administration will follow school policy pursuant to ethical professional behavior and local laws that apply.

Step 3:

Subsequent to a reported and/or substantiated case of child abuse or neglect:

- The counselor will maintain contact with the child and family to provide support and guidance as appropriate.
- The counselor will provide the child's teachers and the principal with ongoing support.
- The counselor will provide resource materials and strategies for teacher use.
- The counselor will maintain contact with outside therapists to update the progress of the child in school.

Record keeping:

All documentation of the investigation will be kept in the child's confidential child protection records, which are kept in a secure location maintained by the Child Protection Officer. Records sent to schools to which the student may transfer will be flagged to let the receiving school know there is a confidential file for the child. SCS will make every attempt to share this information to protect the child. All child safety documentation for a case will be kept for at least ten years after the student leaves the school. After ten years, the case file may be trimmed by the Child Protection Officer to retain only the most relevant information to preserve the historical record of the case in case any future investigation may occur.

Most cases of suspected abuse or neglect will be handled by school counselors, such as those involving:

- Student relationships with peers.
- Parenting skills related to disciplining children at home.
- Student-parent relationships.
- Mental health issues such as depression, low self-esteem, grieving.

Some cases will be referred to outside resources, for example:

- Mental health issues such as depression, psychosis, dissociation, suicide ideation.

Cases reported for investigation and outside resources:

- Severe and ongoing physical abuse or neglect.
- Sexual abuse and incest.

In cases when families do not stop the abuse or concerns remain about the safety of the child, reports could be made to:

- Child welfare officials.
- Local authorities.
- The embassy/consulate (if the child has a foreign passport).