



American International School of Zagreb

Safeguarding

**Policy and Procedures
AISZ Handbook
2021-2023**

Overview

Child safeguarding is the action that adults and organizations take to prevent and protect children from harm and to support them in the unfortunate event that abuse or injury does take place. It involves all aspects of the school community, from building security, to wellness programs to intervention around child abuse.

The AISZ Child Safeguarding Policy seeks to protect the student, the family and the AISZ community and acknowledges that students can only learn when they feel safe and are free from harm. It ensures that the right to protection and access to confidential support systems is available to all students.

The American International School of Zagreb respects, and is fully supportive of, the individual differences which make up our community and the world at large. We recognise diversity as an asset to our school. We honor the tenants and ideals reflected in the diversity statements of both the European Union and the Republic of Croatia (link these). These differences include but are not limited to heritage and ethnicity, gender, spiritual beliefs, sexual orientation, identity, socio-economic status, learning styles, personal perspectives and abilities.

AISZ promotes the values of respect, integrity, compassion and responsibility. Child safeguarding is embedded in the core values and mission of our school. The AISZ Strategic Plan Initiative 4 states that the school will be a place that nurtures “psychological balance and emotional and physical wellness” and Strategic Student Impact Goal 2 guarantees that every student is known, advocated for and supported.

There are three main elements to our Child Safeguarding policy and procedures

- **Prevention** through the creation of a positive school atmosphere and the teaching and pastoral support offered to students.
- **Protection** by following agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to Child Safeguarding concerns.
- **Support** for students who may have been abused.

The American International School of Zagreb endorses the United Nations Convention on the Rights of the Child (UNCRC), of which our host country, Croatia, is a signatory and seeks to be a safe haven for students who may be experiencing abuse or neglect in any aspect of their lives. The principal UNCRC articles, relevant to AISZ, include:

Article 3: *The best interests of the child must be a top priority in all decisions and actions that affect children.*

Article 19: *[Governments] must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them*

Article 39: *Children who have experienced neglect, abuse, exploitation, torture or who are victims of war must receive special support to help them recover their health, dignity, self--respect and social life.*

Definitions of Child Abuse and Neglect

AISZ uses the World Health Organization's (WHO's) definition of abuse and neglect:

“Child abuse or maltreatment constitutes all forms of physical and/or emotional ill--treatment, sexual abuse, neglect or negligent treatment, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”

For the purposes of this document a CHILD is defined as being any person under the age of 18 or any person enrolled at AISZ as a full--time student, even if that person has reached his/her 18 birthday.

Definition of harm (from NSPCC):

- “Harm” is the “ill treatment or the impairment of the health or development of the child”
- Seeing or hearing the ill-treatment of another person is also a form of harm
- Harm can be determined “significant” by “comparing a child's health and development with what might be reasonably expected of a similar child”.
- Although there is no absolute criteria for determining whether or not harm is “significant”, local authorities such as social services, police, education and health agencies work with family members to assess the child, and a decision is made based on their professional judgment using the gathered evidence.

Possible Signs of Abuse may include:

- The pupil's behavior stands out from the group as either being extreme model behavior or extremely challenging behavior
- Or there is a sudden change in the pupil's behavior
- The pupil asks to drop subjects or becomes disconnected socially, emotionally or academically
- The pupil's development may be delayed
- The pupil loses or gains weight
- The pupil is reluctant to go home

Behavioral indicators in and of themselves do not constitute abuse or neglect. Together with other indicators, such as family dynamics, they may warrant a referral.

Physical Abuse

Physical Abuse

- Physical Abuse refers to “deliberately inflicted injury” CARR, p.899 that are cruel or inhumane regardless of observable injury. Such acts may include, but are not limited to, instances of extreme discipline demonstrating a disregard of a child’s pain and/or mental suffering; and/or
- Creating a substantial risk of physical harm to a child’s bodily functioning; and/or
- Assaulting or criminally mistreating a child as defined by either the criminal code or school policy; and/or
- Engaging in actions or omissions resulting in injury to, or creating a substantial risk to the physical or mental health or development of a child; and/or
- Failing to take reasonable steps to prevent the occurrence of any of the above.
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POSSIBLE INDICATORS OF PHYSICAL ABUSE

- skin bruising, burns, disfigurement, impairment of physical or emotional health, or loss or impairment of any bodily function
- Bruises of different ages (various colors)
- Injuries reflecting shape of article used (electric cord, belt, buckle, ping pong paddle, hand)
- Injuries that regularly appear after absence or vacation
- Unexplained burns, especially to soles, palms, back, or buttocks
- Burns with a pattern from an electric burner, iron, or cigarette
- Rope burns on arms, legs, neck, or torso
- Injuries inconsistent with information offered by the child
- Immersion burns with a distinct boundary line
- Unexplained laceration, abrasions, or fractures
- Might be signs of change in behavior, weight loss, malnutrition, anxiety
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Neglect and Emotional Abuse

Neglect	Emotional Abuse
<p>Neglect is a failure to provide for a child’s basic needs within their own environment:</p> <ul style="list-style-type: none"> ● Physical Neglect (e.g., failure to provide necessary food, clothing or shelter, or lack of appropriate supervision—this would include failure to provide proper adult guardianship such as leaving children unsupervised at home for any extended period of time. ● Medical Neglect (e.g., failure to provide necessary medical or mental health treatment); and/or ● Emotional Neglect (e.g., a pattern of actions, such as: inattention to a child’s emotional needs, failure to provide for psychological needs (such as protection and intellectual stimulation, and social interaction) age appropriate limit setting, discipline (alcohol use), and opportunities for autonomy and independence, 	<ul style="list-style-type: none"> ● punishment for minor misdemeanors ● punishment for positive behaviors (smiling, problem solving) ● criticism, ridicule, humiliation and threats ● rejection, discouragement of attachment and exclusion from family life ● blocking of the development of appropriate peer relationships ● corruption through drug use, prostitution or theft ● attitudinal corruption through encouraging prejudicial hatred ● Consistent withholding of love and/or attention as a form of punishment.
<p><i>By themselves, these signs do not prove abuse or neglect. But they do tell us we need to know more about the child's or youth's circumstances. They can be the result of phenomena such as divorce, separation, death of a significant person or the arrival of a new sibling.</i></p>	
<p>POSSIBLE INDICATORS of NEGLECT:</p> <ul style="list-style-type: none"> ● Child is unwashed or hungry ● Parents are uninterested in child’s academic performance ● Parents do not respond to repeated communications from the school ● Child does not want to go home ● Both parents or legal guardians are absent from the home without providing adequate age-appropriate supervision. ● Parents cannot be reached in the case of emergency 	<p>POSSIBLE INDICATORS of EMOTIONAL ABUSE:</p> <ul style="list-style-type: none"> ● bedwetting and/or diarrhea ● frequent psychosomatic complaints, headaches, nausea, abdominal pains ● mental or emotional development lags ● behaviors inappropriate for age ● fear of failure, overly high standards, reluctance to play ● fears consequences of actions, often leading to lying ● extreme withdrawal or aggressiveness, mood swings ● overly compliant, too well-mannered ● excessive neatness and cleanliness ● extreme attention-seeking behaviors ● poor peer relationships ● severe depression, may be suicidal ● runaway attempts ● violence is a subject for art or writing ● complains of social isolation ● forbidden contact with other children

Sexual Abuse

Sexual Abuse

Sexual abuse is committing or allowing to be committed any sexual offense against a child as defined either by the criminal code of the host country or school policy or intentionally touching, either directly or through clothing the genitals anus or breast of a child for other than hygiene or child care purposes. It also includes non-contact sexual gratification involving a child such as having the him/her view sexually explicit images, exchanging sexually explicit texts, or other forms of sexual dialogue with a child

- Sexual abuse has some different characteristics of child abuse that warrant special attention.
- The planning, referred to as Grooming, often results in victims accepting the blame, responsibility, guilt and shame for the sexual behavior of the offender.
- Sexual abuse requires far more secrecy than other forms of child abuse, so is more difficult to report.
- Many victims, through the process of grooming, are taught that the sex is a form of love, so tend to love their offender and often present as happy and well-adjusted children with no negative symptoms because of their perception of being loved.
- Working with the sexual offender cannot be done by school counselors.

POSSIBLE INDICATORS of SEXUAL ABUSE:

- Sexual knowledge, behavior, or use of language not appropriate to age level
- Unusual interpersonal relationship patterns
- Venereal disease in a child of any age
- Evidence of physical trauma or bleeding to the oral, genital, or anal areas
- Difficulty in walking or sitting
- Refusing to change into PE clothes, fear of bathrooms
- Child running away from home and not giving any specific complaint
- Not wanting to be alone with an individual
- Pregnancy, especially at a young age
- Extremely protective parenting

Systems to support school-wide safeguarding

In order to prevent abuse, protect children and respond to concerns, AISZ has developed key structures to ensure child safeguarding is at the forefront of every school operation/function. The following is a description of the teams and roles developed to protect children at AISZ:

Safeguarding Response Team - To address safeguarding concerns that are reported in a timely manner:

The whole team is comprised of:

- Designated Safeguarding Lead - DSL
 - School Director
- Designated Safeguarding Officers - DSO
 - Counselors, Doctor, Principals, Business Manager (in cases involving Staff)

Some responses may only require divisional representatives to be present.

Safeguarding Committee: To identify and set safeguarding agenda and priorities, to move the school forward and to review data and respond to trends and patterns.

The Committee is comprised of:

Director, Counselors, Outside consultant(s), Principals, Doctor, Facilities Manager, Business Manager, Tech Director, Admissions, Curriculum coordinator, Athletics Director

The Committee will meet quarterly. Follow up meetings may require additional or only specific representatives to be present, task depending.

As a recognised school affiliated with the Department of Overseas Schools, the RSO from the US embassy is connected to all safeguarding procedures and policies. The representative meets with the director and committee twice annually for program and policy review and audit.

Policies to support School Wide Safeguarding

There are several school-wide policies that address and/or support our safeguarding efforts. They include the following:

- Diversity
- Handbook - anti bullying, code of conduct and dismissal, attendance, drug/alcohol use
- Tech responsible use
- Safe Recruitment Policy - Employee screening and code of conduct through Human Resources
- Adult Report Policy
- Emergency Response Procedures
- Field Trip
- Admissions - photography, child wellness covenant, medical information
- Guardianship: From the Community Handbook p. 13 - Should parents / legal guardian leave the country for any reason, the responsibility for informing the school of all appropriate contact details lies with the parent or guardian. **Temporary Change of Guardian Forms** are available from AISZ. These forms are expected to be completed prior to parents / guardians leaving the country. AISZ requires the appropriate contact details of the legal guardians of the student in Zagreb.

(AISZ defines Caretaker as follows: An adult designated to make any and all legal, financial, social and medical decisions for the child in the parents' or guardians' absence.)

Employees are expected to review these policies upon hire and annually thereafter.

Safer Recruitment

AISZ will work with the Recruitment Agencies to ensure that the reference checks and background screening undertaken by such agencies compliments AISZ's own recruitment protocols. Background checks will be carried out for all local staff and for those expatriate staff who are not able to provide a police clearance certificate or there are concerns about the reliability of such certificates.

AISZ's Safer Recruitment Protocols are summarized below:

- All job postings include a statement that emphasizes our commitment to safeguarding.
- Candidates will complete a specific AISZ job application to ensure consistency in the data we are collecting from potential employees.
- Human Resources (HR) reviews and flags any gaps in employment history and will discuss them with the applicant.
- Interviews include at least 2 questions designed to assess a candidate's understanding of child safeguarding and appropriateness to work with children.
- Reference checks will include questions asking about suitability to work with children and safeguarding concerns.
- HR obtains certified copies of education certificates.
- Candidates complete a "statement of suitability" disclosing any past safeguarding issues.
- Background checks including a global identification check, a criminal check, global sanctions check and adverse media search (done by HireRight) must be complete before staff permitted to be alone with children
- Candidates who have a criminal record or about whom there have been some concerns about their suitability to work with children are not offered a position.

Upon hire:

- All candidates provide attestation that they have read and understand the AISZ child safeguarding policy and procedure and Employee Code of Conduct.
- New staff participates in safeguarding training for new employees
- AISZ keeps employment records to document any safeguarding concerns

Single Central Registry (SCR)

The AISZ HR department will maintain a central record of staff training, hiring information, background checks and staff disciplinary proceedings. Locating this information in a central place ensures that any patterns of concern are more easily identified.

Training and Review

This policy will be reviewed and revised annually during administrative orientation to reflect policy and staff changes as needed.

All adults who are regularly on AISZ's campuses will be expected to undergo appropriate training on a regular basis. No adult should be alone with a child until appropriate training has been completed.

Faculty

Annually During Orientation (August)

- o General Duty of Care
- o Understanding Child Safeguarding, types and symptoms of abuse, how to handle disclosures
- o AISZ Child Safeguarding Policies and Procedures, how to report concerns,
- o Adult Code of Conduct

On orientation of new staff and every three years following:

- o TES/EduCare - Safeguarding and Duty of Care online training certificate - ***Child Protection for International Schools (5 hours)***

Administrative Staff in charge of hiring - Principles, Director, HR, Business Manager

- o TES/EduCare - Safeguarding and Duty of Care online training certificate - ***Child Protection for International Schools (5 hours)***

Staff: Security, Maintenance, Kitchen Transport (in home language)

Annually:

- General Duty of Care: AISZ Child Safeguarding Policies and Procedures, how to report concerns, Code of Conduct

Others - volunteers, outside providers, student teachers, supply staff (as hired/needed)

- o General Duty of Care: AISZ Child Safeguarding Policies and Procedures, how to report concerns, Code of Conduct

Curriculum

AISZ has adopted the *The Second Step Child Protection Unit* developed by the **Committee for Children** as the basis for delivering age--appropriate curriculum for Grades Pre Kindergarten to 5, delivered annually. For other grade levels, age--appropriate curriculum has been developed as part of the mentor and advisory programs using the International School Counselor Association Standards (ISCA) standards. This curriculum is based on empowering students with three ways to protect themselves:

Recognize unsafe behavior

Report by telling a trusted adult

Refuse by learning how to say No.

Response

All adults have a duty to act if they have a concern about a child's welfare.

Concerns may be as a result of:

- **Observed** student behavior (physical, emotional, change in behavior)
- **Hearsay** (third party disclosure)
- **Disclosure** (specific report made by a student directly or via a trusted adult)
- **Observed** adult behavior (breach of Code of Conduct)

With any concern, adults will be expected to:

- **Maximize confidentiality by sharing only with Safeguarding Response Team members**- Respect privacy of students, families and teachers by only sharing the information with the DSO, minimize possibility of sensitive and personal information spreading within the community
- Make a written report by completing the **Record of Concern Form**
- Pass on their concern to the designated safeguarding Officers (DSO) or Lead (DSL) within 24 hours. A specific disclosure by a student must be reported before the close of the school day.
- Relevant DSOs take initial steps to evaluate threat/risk and next steps
- If deemed necessary, entire safeguarding response team is immediately called to convene

Student Services and Safeguarding

There may happen that a safeguarding or child protection concern may arise as part of a broader discussion of student learning and wellbeing during a Student Services Team meeting (SST). In this case, the meeting will be ended, a report completed and submitted and the Safeguarding team called together as needed.

Low Level Concerns

There may be times in which there is a question about whether the concern meets the threshold for reporting. For example a student has a change in behavior that is difficult to pinpoint or an adult is interacting with students in a way that doesn't "seem right" but is difficult to explain.

It is still important that these concerns are reported, using the Record of Concern form linked above. The concern could be a misunderstanding or an issue not related to safeguarding. However, there are times in which multiple low level concerns over a period lead to larger concerns about staff conduct or student safety.

Concerns About an Adult

Whistleblowing - No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and following the whistleblowing procedures.

All adults in the AISZ community (staff, contracted employees, volunteers) are expected to adhere to the Staff Code of Conduct and uphold the AISZ core values. If there is a concern about how an adult(s) interacts with a child, even if it is a gut feeling that something does not seem right, it should be reported to the Designated Safeguarding Lead (DSL).

In the event that a concern about an adult is reported to another member of staff or faculty, that report needs to be brought directly to the DSL.

If the concern involves the Director (or a member of the Board of Management) or where an adult feels unable to raise a concern about poor safeguarding practice with the Principals or Director, or where they feel that their concern is not being addressed, then a report should be made directly to the Chair of the School Board.

The Report of Concern will be filed in a confidential file in the HR Department.

Neutral Notification (self-report) is the mechanism through which staff can self-report any conduct that is out of the ordinary or could be misconstrued as a safeguarding concern. Neutral notification can take place before an interaction (i.e. explaining why you will need to have a private meeting with a student) or after the event (you urgently need to go into a child designated bathroom to assist a student in need). Neutral notification reports can be made by anyone and given any DSO for safe record keeping.

Handling a Disclosure

Any adult, to whom a student makes a disclosure, must:

Listen carefully to what is said. Don't interrupt or prompt. Let the child tell the story in his/her own words. Use **TED** questions:

- o **TELL** me what happened?
- o **EXPLAIN** what happened?
- o **DESCRIBE** what happened?

Reassure - the child that they are right to speak up. Be calm, attentive, non-judgmental.

Confidentiality – The limits of confidentiality do not apply if there is a risk of harm to self or others.

- **Explain** to the student that the disclosure cannot be kept a secret and that you have a duty to report it to an adult who is properly trained to help students in this situation.
- **Question** - the child only if necessary to clarify something that is unclear such as when and where. Do not ask leading questions.
- **Action** – contact a DSO and complete a Report of Concern form as soon as possible and at latest, before the end of the school day. **If there is a concern about a physical injury as a result of abuse**, referral to medical staff may be required as part of the process. However, the Safeguarding Response Team must be notified of the examination.
DO NOT - take pictures of a student at any time or ask to see a body part covered in clothing.
Document using the Body Map.
- **Write it down** – record the child's exact words and observed behaviours as objectively as possible using the **TED** questions:
 - o **TELL** me what happened?
 - o **EXPLAIN** what happened?
 - o **DESCRIBE** what happened?

Based on the data collected, the Safeguarding Response Team will make an assessment as to the level of risk to the child's wellbeing and agree a strategy for working with the student and family.

Possible actions and responses may include contacting:

- appropriate authorities or other child protection agencies
- the police if there is a possible criminal act
- the employer or Embassy if the alleged offender is a parent of a student
- other community support agencies

Feedback

Each person who reports a concern should expect to receive feedback from the DSO or DSL that the concern has been dealt with. Any relevant information and/or follow up will be provided to staff on a “need to know” basis only. Any information shared with a member of staff in this way must be held confidentially to themselves.

If there is no feedback, and there is on-going cause for concern, then the reporter should contact the DSO to make sure that action is being taken.









If the reporter has cause to believe the actions taken are insufficient, they may escalate the concern to the level of DSL.

Record Keeping

Locating all information regarding safeguarding in a central place ensures that any patterns of concern are more easily identified.

Incident Case Files - The detailed, confidential case files relating to any incident will be maintained by a designated DSO. Completed case files, with all original documentary evidence, must be sent to the Lead Counselor (DSO) who will maintain these files for up to 10 years after the student graduates in secure, fireproof storage.

Concern FlowChart

ADULT/Staff or Faculty	STUDENT		
			
Report of Concern Made	Report of Concern Made		
			
Report directly to DSL	DSO		
	Inform/Meet with Divisional Head <ul style="list-style-type: none"> • assess risk • check existing files • Information Gather 		
	Low Level Risk	Immediate or High Level Risk	None
		Call Safeguarding Team Together <i>Determine Immediate Child Safety and Location Plan</i>	
			
Action: Follow Policy Guidelines	Action: <ul style="list-style-type: none"> • Investigation • Report • Parental involvement and Communication • Counselor Support • Refer to Outside Services 		Action: <ul style="list-style-type: none"> • Report Kept on File • Monitor for pattern of Low Level Concern • Possible parent communication