



INTERNATIONAL SCHOOL OF FLORENCE CHILD PROTECTION POLICY & PROCEDURES

COMMITTED TO SAFEGUARDING STUDENT WELLBEING

DRAFT

Updated 28/10/2022 - Using "Action Steps for your Child Protection Policy" - [CIS document](#), Sept 2022

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1. PURPOSE OF THE POLICY

- Provide Child Protection documentation that is appropriate to ISF and its context.
- Provide the necessary definitions and assessment tools for clear identification and recognition of abuse/neglect situations.
- Ensure an exemplary standard of Child Protection at ISF.
- Ensure that prompt and adequate assistance is provided to a child in need of special care and protection.
- Define procedures for staff members and establish clear reporting guidelines and mechanisms.
- Outline processes and protocols for ISF in connecting to its local community, and to agencies for child protection support.
- Managing allegations for teachers, staff members and volunteers.
- We are guided by the [International Task Force Report on Child Protection](#)

1.1 AIM OF POLICY

This document outlines ISF's Safeguarding and Child Protection policy. It applies to all adults, including volunteers, working in or on behalf of the school. This policy deals primarily with procedures for reporting and managing concerns regarding adult behaviour. It recommends steps to take before an allegation arises, when an allegation arises, and after an allegation has been addressed. It also specifies critical points when your school should consult with external experts.

To ensure that all members of the ISF community help keep children and young people safe by:

- Contributing to the provision of safe learning environments for children and young people;
- Taking appropriate action with the aim of making sure they are kept safe at school;
- Identifying children and young people who are suffering or likely to suffer significant harm;
- Communicating to the school and wider community our commitment to safeguarding children.

This policy outlines how ISF will:

- Provide parents, staff and students with a developmentally-appropriate common definition of and understanding about child abuse (physical, neglect, sexual and emotional) [See Appendix 1 and 2];
- Create an environment where children and young people feel secure, have their viewpoints valued, are encouraged to talk, and are listened to;
- Continue to develop awareness in all staff of the need for safeguarding student Well-being in all aspects of their work and their responsibilities in identifying abuse, with particular care being taken with children with disabilities and learning needs;
- Ensure that all staff are aware of the referral procedures and Designated Safeguard Lead (DSL)s within the school;
- Provide a systematic means of monitoring all students who have been identified as 'having protection needs';
- Ensure that outside agencies are involved as appropriate;
- Ensure that key concepts of safeguarding are integrated within the curriculum;
- Ensure that children know the adults in the school whom they can approach if they are worried;
- Provide information for parents/carers outlining the procedures laid down by this policy;
- Secure any documentation regarding allegations or sensitive information about teachers, staff and volunteers;
- Practice safe recruitment ensuring the suitability of all staff and volunteers who work with children.

1.2 SCOPE OF THE POLICY

This policy applies to all members of the ISF community - all staff, students, parents, and visitors to our school.

1.3 POLICY STATEMENT

Child abuse and neglect are concerns throughout the world, which can have serious short and longterm psychological and physical implications for victims. Child abuse and neglect are violations of a child's human rights and are obstacles to the child's education as well as to their physical, emotional, and spiritual development. The International School of Florence endorses the UN Convention on the Rights of the Child (1989).

Schools fill a special institutional role in society as protectors of children. Schools need to ensure that all children in their care are afforded a safe and secure environment in which to grow and develop, both at school and away. Educators have the opportunity to observe and interact with children over time. As such, educators have a professional and ethical obligation to identify children who are in need of help and protection, and to take steps to ensure that the child and family avail themselves of the services needed to remedy any situation that constitutes child abuse or neglect.

All staff employed at ISF must report suspected incidents of child abuse or neglect whenever the staff member has reasonable cause to believe that a child has suffered, or is at significant risk of suffering abuse or neglect. Reporting and follow up of all suspected incidents of child abuse or neglect will proceed in accordance with administrative regulations respective to this policy. Furthermore, cases of suspected child abuse or neglect may be reported to the appropriate child protection agency in the home country, and/or to local authorities, depending on the case or the nature of the allegation. In the case of a staff member reported as an alleged offender, ISF will conduct a full investigation following a carefully designed course of due process, keeping the safety of the child at the highest priority

ISF seeks to be a safe haven for students who may be experiencing abuse or neglect in any aspect of their lives. As such, ISF will distribute this policy annually to all parents and applicants, will communicate this policy annually to students, will provide training for all staff, will make every effort to implement hiring practices to ensure the safety of children, and will review the policy annually for compliance and effectiveness.

2. INTERNATIONAL AND NATIONAL LAW AND STATUTORY GUIDANCE

2.1 POLICY GOVERNED BY THE NATIONAL LAWS OF ITALY

2.2 **RESPONSIBILITY TO ACCREDITATION AGENCIES**

ISF must meet the programme and best practice standards of the Council of International Schools (CIS) and the Middle States Association (MSA) and must also follow Italian law. It is important for ISF to be knowledgeable about and respond to changes in standards of accreditation. CIS and MSA have added specific standards related to Child Protection Programmes in their most recent edition of accreditation standards. ISF will be well served by these standards in developing the Child Protection Program for their community.

The CIS Guide to School Evaluation and Accreditation - 8th Edition (8.2) contains the following relevant standards:

- **[Standard D1]** The school shall have faculty and support staff that are sufficient in numbers and with the qualifications, competencies and sound moral character necessary to carry out the school's programmes, services, and activities, to support fulfillment of the mission and objectives, and to ensure student protection and well-being.
- **[Indicator D1a]** Recruitment and screening processes are in place to ensure that employees in all categories are appropriately qualified and of sound moral character.
- **[Indicator D2d]** Members of the faculty foster respectful interactions among and with students and with their peers, both in classrooms and about the school.
- **[Indicator D4a]** School policies include recruitment and hiring guidelines that include provisions such as background checks which ensure the protection of students
- **[Standard F1]** A school climate characterized by fairness, trust, and mutual respect shall support student learning and well-being.
- **[Indicator F1]** A culture of shared responsibility for the social and emotional well-being and protection of students is promoted by the school leadership and teachers through programmes to address awareness, prevention and responsiveness to issues such as child abuse, sexual harassment, substance abuse, hazing and bullying, and discrimination in any form.
- **[Indicator F1b]** The school has policies, procedures, and practices that promote and address the physical, emotional, and social well-being of students and staff.
- **[Indicator F1f]** Student, staff and parent information is treated with an appropriate degree of confidentiality.
- **[Indicator G4b]** Appropriate and regularly reviewed arrangements exist to cover threats to the security of people and premises as well as to support – to the extent possible – programme continuity under exceptional circumstances.
- **[Indicator G4e]** School trips are well planned and executed, ensuring a positive learning environment and supporting the school's academic or activities programme. Appropriate consideration is shown for the comfort, welfare, security and safety of students and accompanying adults.

Responsibilities to local and international laws and agencies In addition to the standards above, there are local, national and international obligations with respect to protecting children. In addition to the United Nations Convention on the Rights of the Child (CRC) 1989, and the EU Agenda on the Rights of the Child 2011, Italian Law clearly stipulates the school's and individuals' responsibilities with regard to child protection.

These documents make clear the commitment of the member states to address significant issues of child abuse and neglect, and the inherent responsibility to protect children from its various forms.

3. ROLES AND RESPONSIBILITIES

3.1 LEGAL OBLIGATION

It is a legal obligation (see appendix 3)) for faculty, staff, and school leaders, either as individuals or members of the institution, to report incidents of, or concerns about, physical or psychological violence, aggression, harassment, and physical or sexual abuse.

The reporting should be done within the next school day, or at most within 48 hours, to the school Designated Safeguard Lead (DSL), namely the Vice Principal for Student Well-being and Vice Principal of Student Support in the relevant part of the school. In his or her absence, the concern must be reported to the Principal, or in their absence, the Head of School.

Contact may be made at any time, and is not restricted to working hours.

3.2 INCIDENT RESPONSE TEAM

When a Child Protection concern is reported, the respective Vice Principal of Well-being/Vice Principal of Student Support will inform the Head of School and the Principal, and convene the response team. This team will be led by the Designated Safeguard Lead (DSL) and will include the School Social and Emotional Counselors, the School Nurse and the Principal. In the Junior School, this team will also include the Junior School PE Teacher.

3.3 SCHOOL NURSE

The school nurse on both campuses has an infirmary where she receives students, staff and parents. For confidentiality reasons she may close the door and curtain. The school nurse has the right to administer medication and treatments with the approval of parents/guardians. This may necessitate touching body parts of students (such as administering creams, ice packs) or asking students to undress to show injured or affected body parts. In this case the nurse will always ask the students' permission and explain what they will do before doing so. The parents are also always informed by the nurse that this has occurred.

4. DEFINITIONS

4.1 KEY TERMS

The difference between Child Protection and Safeguarding

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

(National Society for the Prevention of Cruelty to Children (NSPCC) 2019)

Child Protection: a broad term used to describe philosophies, policies, standards, guidelines and procedures to protect children from both intentional and unintentional harm. In this document the term "child protection" applies to protection of children at ISF.

Child Protection Policy: a statement of intent that demonstrates a commitment to protecting students from harm (to self and from others) and makes clear to all what is required in relation to the protection of students. It serves to create a safe and positive environment for children and to demonstrate that the school is taking its duty and responsibility seriously. This handbook considers that ISF will provide appropriate child safety classes supported with a well-defined curriculum to increase children's ability to understand abuse prevention.

Child Protection Concerns: Includes suspected, alleged, self-disclosed, or witnessed abuse of a child by anyone associated within or outside the school which must be investigated and followed by appropriate action.

Child Abuse: According to the World Health Organization, child abuse constitutes “all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, 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.”

A person may abuse a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional (e.g. school) or community setting; children may be abused by individuals known to them, or more rarely, by a stranger. Children may experience multiple forms of abuse simultaneously, further complicating the problem. Most child abuse is inflicted by someone the child knows, respects or trusts. International school communities have unique characteristics of which school personnel must be aware in terms of the individuals who are around our children. School personnel should be knowledgeable of the potential reasons why children may not be able to talk about any victimization they might have experienced.

To increase the ISF community's awareness, this Handbook focuses on four main categories of abuse and provides basic information about the physical and behavioral signs associated with each type.

Physical Abuse (child in danger): may involve hitting, punching, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing intentional physical harm to a child. (These symptoms could also indicate harm to self, such as, cutting and suicidal ideation).

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

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

Neglect (child at risk): is the persistent failure to meet a child’s basic physical or physiological needs, likely to result in serious impairment of the child’s health or development.

4.2 SIGNS THAT SHOULD ALERT EDUCATIONAL PROFESSIONALS

This is a list of possible signs of abuse and neglect which would arouse concern. Children may exhibit one or more of these signs. Whilst we must not ignore these potential signs of abuse, we also need to be mindful of the fact that many of them are exhibited in many other contexts.

As educators we have to be vigilant about gradual or sudden changes in the behavior of the children in our care.

- Changes in moods
- Severe or frequent anxiety
- Unexplained fears
- Attention-seeking behaviors
- Sudden under-achievement or lack of concentration
- Extremes of passivity or aggression
- Withdrawal from physical or emotional contact (towards strangers as well as non-strangers)
- Mutism
- Changes in sleeping patterns
- Unexplained physical injuries (e.g. bruises, broken bones, burns, wounds, bites, scratches), which may have not received medical attention
- Improbable excuses or vagueness given by parents/guardians/students, or refusal to discuss injuries
- Patterns in absence from school

- Arms and legs kept covered in hot weather
- Refusal to go to the swimming pool
- Physical, mental and emotional development is delayed
- Inappropriate emotional responses to painful situations
- Persistent tiredness
- Physical ailments - such as pain or irritation to the genital area - that can't be explained medically
- Sexually transmitted infections
- Regressive behaviors
- Enuresis and encopresis (bed-wetting and/or soiling caused when happening to a child who is old enough to exert self-control)
- Age-inappropriate sexualized behaviors or language
- Drawings with developmentally-inappropriate sexual content
- Stomach pains or discomfort walking or sitting
- Mentioning receiving special attention from an adult or a new "secret" friendship with an adult or young person
- Medical needs unattended
- Lack of supervision
- Consistent hunger
- Inappropriate dress
- Poor hygiene
- Inadequate nutrition
- Self-harm behaviours, and suicidal ideations and/or attempts
- Extreme need for affection
- Frequent lateness or non-attendance at school
- Poor social relationships
- Conduct disorder behaviors - vandalism, stealing, aggressiveness towards others
- Compulsive lying
- Drug or alcohol use

4.3 COMMONLY HELD MYTHS VS REALITIES ABOUT CHILD ABUSE AND NEGLECT

MYTH: *Child Abuse is carried out by strangers.*

FACT: 90% of abuse is from domestic causes and is committed by individuals known to the child. International school communities tend to have families that move often and are separated from their extended families in their home-of-record. When abuse is within the family, the transient lifestyle then increases the risk to international school students who tend not to have access to outside resources, and therefore cannot get help.

MYTH: *Learning about child protection is harmful to your children.*

FACT: Developmentally appropriate education makes children more confident and able to react to dangerous situations. Teaching, using a specific population context, increases protective behavior.

MYTH: *Abuse education is sex education.*

FACT: Research-based programs prepare students to develop the skills and attitudes to keep themselves safe from perpetrators and behaviors that include bullying, harassment, and other forms of exploitation.

MYTH: *Abuse is a matter of culture; physical or sexual abuse falls within the norms of some cultures and is acceptable.*

FACT: The reality is that there is no excuse for child abuse. No culture supports harming children.

MYTH: *Child abuse is a result of poverty and happens in low socio-economic circumstances.*

FACT: Child abuse occurs in all racial, ethnic, socio-economic, and cultural sectors of society. A common characteristic of an abusive family is isolation, such as that commonly found in our international school families who move often or are separated from their extended families at home.

MYTH: *International schools do not have to report abuse to local authorities.*

FACT: International schools are bound by the laws of the host country and as such international schools must be knowledgeable and compliant with the child protection laws in their locale. Furthermore, international schools are legally and ethically liable for any violation of existing laws related to reporting of cases of abuse or neglect; there are cases now pending where schools are facing legal action in regard to noncompliance.

4.4 WHY INTERNATIONAL SCHOOL STUDENTS ARE VULNERABLE TO ABUSE

- Characteristics/attributes of international school children
- Transience and mobility impacts development of identity and relationships (especially for support in times of need)
- Early maturity/sophistication vs. naiveté and immaturity in other areas;
- Separation from extended families; working and traveling parents, and separation from long term friendships/relationships results in attachment issues and thus support during times of crisis or need may be minimal or non-existent
- Lost between multiple and sometimes conflicting cultures and value systems resulting in confusion of behavioral expectations
- High expectations placed on students to achieve academically
- Access to nannies and other daily helpers (drivers)
- Access to expensive international schools because companies pay tuition while they (and their peers) in their home-of-record, previously attended public school
- Characteristics of international school families
- Isolation from extended family, previous community for support
- Power differential in marriage (Who has the work permit?) creates vulnerability
- Impact of absentee parents
- “Love – hate” relationship with host country for expatriates
- Lack of control over critical life decisions: company decides where, when, and how the family moves.
- Lack of stability
- Superficial/tourist relationship with host country
- Characteristics of international school communities
- School takes on sole role as center of family life - “goldfish bowl” - and often provides superficial relationships that cannot meet mental health needs
- Power influence: family's “position” in community can be an inhibitor for school to act
- Sense of being “lost” in the diversity of a community – can cause further isolation.
- Cultural dynamics of international school communities
- Multiple norms rooted in different cultural traditions can cause confusion: religious values, values of parenting, discipline, care-giving, sexuality, gender roles and responsibilities
- Impact of rapidly changing “pop culture” from developed nations
- Varying degrees of openness rooted in cultural traditions
- Varying cultural attitudes toward gender issues and child development – different concepts of developmental needs through childhood

International school communities are vulnerable to abuse because the nature of abuse requires secrecy, insularity, isolation and limited access to support resources, which are some characteristics of the international community. International schools must respond to the reality that these characteristics are exactly the characteristics that perpetrators will use to their advantage in abusing children.

Child abuse is a multifaceted issue that involves dynamics of the child, the family, and the community. In international communities we can assume that child abuse occurs, that certain factors and characteristics of international communities make expat children vulnerable to abuse, that international schools tend to be isolated from social service resources.

5. CODE OF CONDUCT

5.1 STAFF CODE OF CONDUCT

The ISF Staff code of conduct policy can be found here: [Staff Code of Conduct Policy](#)

6. MANDATORY REPORTING

6.1 ITALIAN LAW

It is a legal obligation for faculty, staff, and administrators, either as individuals or members of the institution, to report to social services when acknowledging that a child is neglected, or is living in dangerous or unhealthy conditions, or when the child's parents are unable to provide for their education. Police shall be called or reported in case of sexual abuse and violence, instigation to suicide, homicide, beatings, harassment, aggression, personal injuries.

7. INTERNAL REPORTING PATHWAYS

7.1 RESPONDING TO A CHILD'S DISCLOSURE

Step 1: Any member of staff who has concerns that abuse (physical, emotional, sexual abuse and/or neglect) is occurring or has occurred, must report it immediately to the DSL (Vice Principal of Well-being/Vice Principal of Student Support, Principal, or the Head of School). Contact may be made at any time, and is not restricted to working hours.

Step 2: The DSL (Vice Principal of Well-being/Vice Principal of Student Support, Principal or the Head) will gather information regarding cases of suspected physical, emotional, sexual abuse and/or neglect.

Step 3: In all cases, follow-up actions will be conducted in a manner that ensures that information is documented factually and that strict confidentiality is maintained.

The following procedure will be used:

- Interview staff members as necessary and document information relative to the case.
- Consult with school personnel
- Review the child's history in the school through CPOMS and Isams school student management database
- Determine the course of follow-up actions [see CHILD PROTECTION DECISION TREE¹]. Implementation of the action as described in Appendix 4.

Step 4: During and after the process described above, there may be a need for emotional support for staff, students and families involved. This will be provided by the Head of School.

All documentation of the investigation will be kept confidential and will be stored in a designated lockable space, under the supervision of the Principal.

7.2 HOW TO REPORT AND RECORD A CONCERN

Step 1: If a staff member is concerned about a child's immediate safety, has a safeguarding concern (including disclosures) or needs some advice, please seek out one of the DSL's immediately.

Disclosure

Any adult receiving a disclosure from a student at ISF has the obligation to report the disclosure. The following are provided as guidelines to follow during and after the moment of disclosure, to decrease the risk of causing more trauma, or compromising a future criminal investigation. Disclosures can also come from a friend of a victim and should be treated in the same way, maintaining the same confidentiality and without approaching the victim directly.

Every disclosure is different, but in every case, it is important that the adult in whom a student has decided to confide remain calm and show support throughout the disclosure phase.

When informing the DSL of the disclosure it is important that the following details are given.

- Name and position of person reporting disclosure:
- Date, time and place of completion of form:
- Name of student:
- Date, time and place of disclosure:
- How were you contacted/approached by the student?
- Describe what you observed about the student, his/her appearance, gestures, voice tone, eye contact, etc.
- Describe in as much detail as possible what the student said and what you said.

¹ Please see paragraph 6.1 above

Step 2: The DSL will inform the staff member to record the incident onto CPOMS. Details for how and what to add an incident and/or action onto CPOMS can be found [here](#) on.

NB: It is essential that the staff member who has the concern or observation must be the person who records the incident; it cannot be passed on to another person.

Designated Safeguard Lead (DSL)s

JUNIOR SCHOOL	<p>JS Designated Safeguard Lead (DSL): John Male, Vice Principal of Well-being j.male@isfitaly.org tel. +39 055 646 1007 mobile +39 334 6231398</p> <p>In the absence of the designated Designated Safeguard Lead (DSL) Tony Pascoe, Junior School Principal t.pascoe@isfitaly.org tel. +39 055 646 1007 mobile +39 3385726164</p> <p>In the absence of the designated Child Protection Officer Nicky Shamash, Junior School Vice Principal n.shamash@isfitaly.org tel. +39 055 646 1007 mobile +39 3405839196</p>
UPPER SCHOOL	<p>US Designated Safeguard Lead (DSL)s:</p> <p>Inka Szablinski, Vice Principal of Student Support i.szablinski@isfitaly.org tel. +39 055 200 1515 mobile +39 3358263869</p> <p>In the absence of the designated Designated Safeguard Lead (DSL)s Jan Stipek, Upper School Principal j.stipek@isfitaly.org tel. +39 055 200 1515 mobile +39 335 125 9175</p> <p>In the absence of the Upper School Principal Clare Kelly, Vice Principal of Learning c.kellyi@isfitaly.org tel. +39 055 200 1515 mobile +39 334 678 7024</p>
WHOLE SCHOOL	<p>In case of absence of designated Child Officers and Principals Sharyn Baddeley, Head of School s.baddeley@isfitaly.org tel. +39 055 200 1515 mobile +39 337 105 9238</p>

Step 3: The Incident Response Team will convene to develop the action plan.

The HoS who is the whole school Designated Safeguard Lead (DSL) must (Article 357 of the Codice Penale) report to the Carabinieri or Polizia di Stato.

NB: Please note that Parents/Guardians must be part of this process throughout all steps and informed of the transmission of all acts related to the situations of “danger or at risk of danger” or “of grave and imminent concern,” unless their being informed is contrary to the physical and/or emotional interest of the child.

7.3 INCIDENT RESPONSE TEAM

When a child protection concern is reported, the Designated Safeguard Lead (DSL) (CPO) will inform the Head of School and the Principal, and convene the response team. This team will be led by the Designated Safeguard Lead (DSL), and will include all relevant participating teachers.

Designated Safeguard Lead (DSL) (CPO)- Receives incident details and communicates with the Principal and Head of School and where necessary convenes and leads the Response Team. At ISF, the VP Well-being role is the same as the CPO.

Roles of incident response team may be:

- Principal- Liaises with CPO to explore incident details
- Vice Principal of Learning- Liaises with CPO to explore incident details
- JS Lead Teacher of PE- Liaises with CPO to explore incident details (for JS incidents only)
- School Nurse- Provides medical information strictly upon request
- School SEL Counselor- Provides wider background knowledge of student social and emotional aspects of learning.
- Operations Manager- Provides liaison between ISF and all contractors
- Head of School- Supports the investigation and agrees the final decision outcome with the CPO.

8 CENTRAL RECORD

8.1 WHAT IS INCLUDED?

All relevant documentation regarding any information related to a child where there are possible reasons to be concerned about safeguarding issues.

8.2 WHERE IS IT STORED?

All data related to a child at ISF is securely stored on CPOMS. Employee records in the office of HR if applicable.

8.3 WHO HAS ACCESS?

The DSLs are the only staff members who have access to the records. The employee file is secured in the HR office. Within [CPOMS Staff Safe](#) there is all relevant information regarding adults working within ISF is stored.

8.4 DATA PROTECTION CONSIDERATIONS FOR RETENTION AND DESTRUCTION

Data regarding any Child Safeguarding issue shall be retained for 10 years.

9 ALLEGATION PROTOCOL

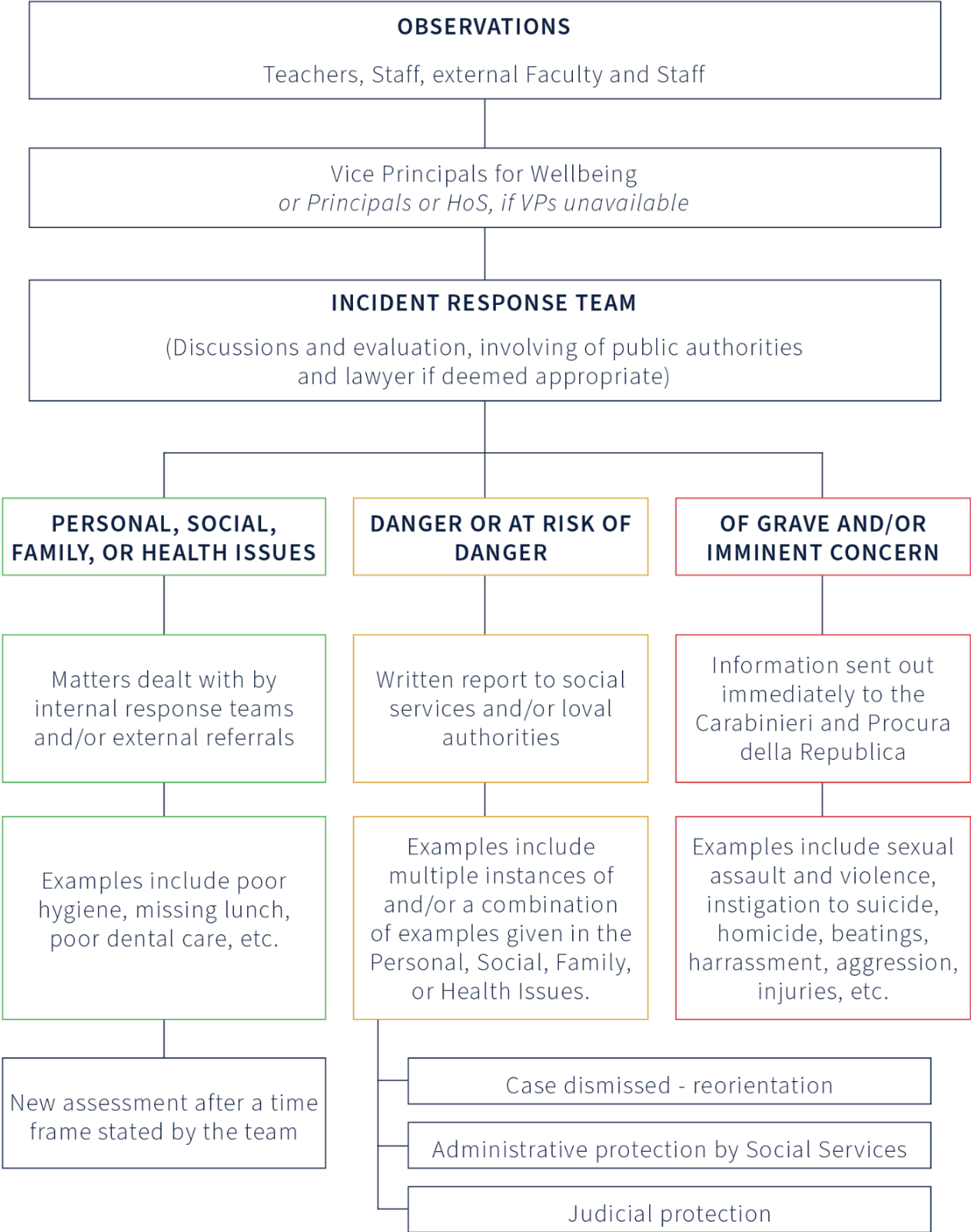
ANINSEI School regulations and disciplinary rules

9.1 PROCEDURE FOR MANAGING SAFEGUARDING ALLEGATIONS AGAINST ISF FACULTY; STAFF OR VOLUNTEERS

The procedure for managing allegations against ISF staff, volunteers or faculty can be found [here](#). This investigation will be led by the Head of School and the Child Protection Team.

9.2 MANAGING ALLEGATIONS DECISION TREE

CHILD PROTECTION DECISION TREE



10. RELATED POLICIES OR LINKS

10.10 Whistleblowing Policy

10.11 Mental Health and Well being

10.12 Student behavior

10.13 Staff Code of Conduct

10.14 School trips and Visits

10.15 Procedure for Managing Safeguarding acquisitions againsts volunteers, students and staff

10.16 Health Policy

10.17 Equality, diversity inclusion and justice

10.18 Comprehensive Sexuality Education

10.19 Anti-racism

10.20 Anti bullying

10.21 Acceptable Technology Use

10.22 [Staff Guidelines for use of Social Media](#)

10.23 ISF Toileting and Intimate Care Guidelines

These guidelines are for any ISF staff member that finds themselves in an intimate care situation with a student (e.g. Early Years Teachers, School Nurse, PE teachers, overnight Trip Teachers).

10.1 CHILD PROTECTION LEADERSHIP TEAM - WHOLE SCHOOL

This team provides the oversight and strategic leadership of the child protection provision in the whole school. It is led by the Designated Safeguard Lead (DSL)s, reports to the Head of School and is responsible for the on-going monitoring, review and improvement of the child protection provision at ISF, including the following:

- Setting the schedule for lessons and other child protection tasks for the school year
- Identifying mandatory training requirements (i.e. annual training)
- Ensuring provision is up-to-date with research and current best practices
- Providing a group and venue where concerns can be discussed/assessed for suspected maltreatment to support teachers
- Addressing barriers to effective provision, such as teacher reluctance to report
- Providing emergency/after-hours contact points
- Interfacing with local social/medical/legal services and expertise
- Conducting annual review and internal audit of compliance and quality/effectiveness and analysis of policies and procedures every 2 years (including annual review by the school board)
- Collecting and collating brief descriptions of each case for ongoing research
- Ensuring access to resources in the community, Florence area, and beyond (perhaps via staff who are not on the team):
 - Legal/Social - social services, court for the minors, local police contacts, school or other e.g. lawyer;
 - Education/Training/Advocacy - colleges, universities, schools, other providers of resources;
 - Research - colleges, universities, other schools, local/national associations e.g. children's health, general health;
 - Medical/Psychological - external counselors/psychiatrists/therapists/doctors specializing in children's health; school nurses locally; local associations specializing in abuse or victims of abuse.

10.2 PARENT/COMMUNITY AWARENESS

It is vital that the school's commitment to the highest possible standards of safeguarding and child protection for all students is communicated clearly to the variety of stakeholders who come into contact with the school.

- School safety goals and objectives are communicated regularly to all parents.
- Child Protection Policy and Procedures are available on request.
- The school's commitment to child protection is stated clearly in the school's marketing and communications materials – e.g. website www.isfitaly.org
- New families receive specific information regarding the school's policies and procedures as part of the 'New Parent Orientation'.
- A statement of intent, and procedures to be followed are included in the student/parent handbooks.

- Guidance and resources on student safety issues and how parents can talk with their children are available from the counselor and respective Vice Principal for Well-being (US and JS) and through regular student information evenings.

10.3 STAFF RECRUITMENT

The school is committed to maintaining procedures to ensure the safe recruitment and selection of all teaching and non-teaching staff.

10.4 INFORMATION FOR APPLICANTS

There will be a clearly stated commitment to child protection on all recruitment communication including:

- School website;
- Job adverts;
- Information documents sent out to individual applicants.

10.5 SCREENING AND CRIMINAL BACKGROUND CHECKS

One 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 (including any individuals who regularly provide transportation to children) are given thorough reference and criminal background checks.

Human Resources will be responsible for initiating and evaluating the applicants for positions. All positions whether short-term/permanent/part-time/full-time will require background checks. The elements of the comprehensive background check will include:

- A written application and a “statement of suitability” (e.g. a covering letter);
- Requirement for a signature on a document stating that the applicant knows of no reason or prior circumstance that would preclude him/her from working safely with children;
- A personal interview, to include question(s) regarding: awareness and observation of professional boundaries; appropriateness of relationships with children; commitment to and evidence of taking action to protect children;
- Credential checks, including requested assurances regarding: awareness and observation of professional boundaries; appropriateness of relationships with children; commitment to and evidence of taking action to protect children;
- Criminal history background checks to be provided at the point of application, from all previous countries of residence.
- Background checks, which will be re-done on a yearly cycle, and will be administered for all staff returning from sabbatical or long term leave of one year or more;
- Published procedures as to how and by whom criminal history records will be reviewed and evaluated (with criteria for disqualification) – including a description of the appeal process;
- A statement that all background screening accomplished by or on behalf of the organization will comply with relevant privacy laws.

It will be made clear to all applicants that any misrepresentations, falsifications, or material omissions in the information provided by the applicant, whenever discovered, may result in disqualification from, or termination of employment or volunteer service with the organization.

All hiring practices with regard to background checks and suitability for employment adhere to Italian law.

10.6 CODE OF CONDUCT

In addition to screening and background checks, all newly appointed staff are asked to agree to adhere to the ‘Code of Conduct’, a copy of which is provided to them (in both Italian and English). Within this document, the following statement is included:

Excerpt from March 2016:

12.8 All staff are responsible for the safeguarding and protection of all students at all times.

Scope of faculty’s responsibilities (including other staff escorting or supervising the children)

Junior School

Teachers must never leave children alone without supervision. Faculty on duty at the end of each day must ensure that administrative staff are dealing with any children who have not left.

Upper School

Children in grades 6, 7, 8, 9 and 10 are allowed to sign a pass to leave school on their own, subject to prior parental approval. If the parents have not given such approval, teachers must make sure that the Receptionist is dealing with any of these students who have not left at the end of the day.

12.9 It is obligatory for faculty, staff, and administrators to report incidents of, or concerns about, physical or psychological violence, aggression, harassment, and physical or sexual abuse immediately within the next school day, or at most within 48 hours to the school Designated Safeguard Lead (DSL).

10.7 CONTRACTORS AND SERVICE PROVIDERS

No contractors, vendors and service providers operating on-site during school operating hours will be left with unsupervised access to students.

Furthermore, when ISF enters into a contractual relationship with an external organization where that external organization will be bringing minor children onto its property (such as field trip venues, study centers, or sports facilities), these organizations will be required to provide evidence beforehand that the adults accompanying the minors have undergone the appropriate background and criminal record checks where possible.

10.8 STUDENT AWARENESS

Students' own awareness of issues affecting their personal safety (including abuse) and strategies for dealing with difficult situations is vital. At ISF students are made aware of these through:

- Student-on-student violence policy, including bullying, is publicized and implemented.
- Age-appropriate curriculum based on core elements and evidence-based practices is written and taught to students annually. This will be provided as part of the Personal and Social Education (PSE) curriculum from Grades EY-Grade 5, Well-being in Grades 6-10; and through the IBDP Coordinator in Grade 11 and 12. It includes:
 - Students' rights and responsibilities with regard to child protection issues or Strategies to recognize inappropriate behaviors, respond assertively and to report incidents to school personnel and/or family members.
 - A statement of intent, and procedures to be followed are included in the student/parent handbooks.

10.9 FACILITIES AND SECURITY

School leadership ensures that all facilities are secure and appropriate to respect the safety and Well-being of students in accordance with Italian national laws.

All rooms into which students are permitted, have a window in the door, where practical. Students are not permitted on-campus before school opening hours. Off-site facilities are regularly reviewed in terms of safety and security.

Crisis procedures (lock-down, evacuation, earthquake, bomb/terrorist attacks, fire) are reviewed annually and drills are regularly conducted.

Security guards are present on both campuses at the school gates and entrances for the entirety of the school day.

Security guards are required to conduct regular daily sweeps of the school premises and direct surroundings.

Intimate care can be defined as any care that involves washing, touching or carrying out an agreed procedure to intimate personal areas in order to care for another person. Intimate care tasks are associated with bodily functions, body products and personal hygiene that may involve direct or indirect contact with, or exposure of the genitals. All intimate care is provided in a manner so as to maintain the child or young person's dignity and confidence. The child or young person is cared for in a way that avoids distress, embarrassment or pain.

- For entry into Early Years Grades at ISF, it is an expectation that all students are toilet trained and are able to go to the toilet independently. In the case where a student is not toilet trained or has regressed please inform the parents immediately. Staff need to work in partnership with the child or young person's parents or carers to discuss their needs as to when the student can reintegrate into the regular school routine.
- When a child needs help toileting or has had an accident, alert another staff member that you are with a child.
- Always where possible, keep the toilet doors open and remain visible.
- Encourage the student to be independent and to do as much as they can by themselves e.g. 'Can you take toilet paper and wipe your bottom'.

- If possible, especially in the case where a child has been sick/had an accident, use gloves and an apron when trying to clean the child. Ask for additional support (i.e school nurse, cleaners and/or other members of staff) if need be.
- Send the soiled clothes home in double plastic bags. Spare clothes can be found in the Dean's office.
- In the case where a child/children are in a cubicle or bathroom with a closed or locked door, knock to inform the child that you are there. Ask the child to dress themselves and to open the door. In the case that the child refuses, ask them to explain why. If the child is not speaking, explain that you will have to call someone to open the door to check on their Well-being.
- If a student is using a cubicle/toilet, only one student is permitted with a closed door.
- Cameras and recording devices are never taken into bathroom areas.
- Wherever possible, staff should care for a child of the same gender.

11. STAFF TRAINING

- All new teaching staff and Educational Leadership at both JS and US must complete the *Level 2 Child protection certificate Training* which is available through the schools training provider ECIS.
- The registration details for all new teaching staff should be enrolled with ECIS by the VP wellbeing at the JS and in the US by the VP Student support.
- All new administrative/non teaching staff must complete the *ECIS Level 2 Child protection - Support Staff*.
- The US VP student support should be informed immediately with the arrival of both JS and US new administrative/non teaching staff by the Director of Finance and Human resources.
- All existing staff must complete Level 2 Child Protection refresher training made available by our training provider TES/Educare.
- The refresher training must be completed at a minimum every two years by all teaching and non teaching staff.

The ECIS Training can be accessed [here](#) with username and password

The TES/Educare Training can be accessed [here](#) with username and password.

Regular staff training is conducted to ensure staff feel confident about all aspects of child protection: awareness, types, signs/symptoms, prevention, policies and laws, reporting process, children's curricula, local authority support and resources available. Specifically:

The 'Staff Code of Conduct' link found [here](#) is provided to all staff annually to give clear expectations and boundaries regarding child protection procedures. These procedures are also included, in summarized form, in the staff handbook.

The ongoing training needs of individuals, such as the Designated Safeguard Lead (DSL)(s), staff involved in incident response teams, and PE staff are identified and met by the completing the CIS "Child Protection Deep Dive Workshop: Concerns about adults in school" Safeguarding Training. This is a 3 day comprehensive workshop.

12. RESOURCES FOR PARENTS

Various international resources including common sense education, mindful schools, the national child traumatic stress network can be found [here](#) on the ISF VL website

13. RESOURCES FOR STAFF

The TES Educare training package ([link here](#)) provides all staff with over 80 hours of online safeguarding training. This training is relevant for all staff both teaching and non teaching and is accessible as needed.

13.1 CHILD PROTECTION AT ISF: ADDITIONAL GUIDANCE FOR TEACHERS

These are procedures to protect children from abuse and neglect. Child protection concerns include suspected, alleged, self-disclosed, or witnessed abuse or neglect of a child, and must be followed up with appropriate action. Types of abuse: physical abuse, psychological abuse, sexual abuse and neglect.

BEING PREPARED

Students will be taught about child protection within the curriculum in a developmentally-appropriate way. They will learn strategies to recognize inappropriate behaviors, how to respond assertively and to report incidents to school personnel and/or family members.

If a student confides in you:

- Do not let a child swear you to secrecy before telling you something. You may need to report, which the child will view as breaking your trust with them.
- You can reassure the child that the information they give you will be treated sensitively and kept as confidential as necessary.
- You may want to suggest to the student that there are other people they can talk to, and who might be better placed to help them. However, it is important for the child to not feel dismissed.
- If a child asks to speak with you, try to find a neutral setting where you can have quiet and few interruptions.
- Do not lead the child in telling. Just listen, letting him/her explain in his/her own words.
- Don't pressure a great amount of detail.
- Respond calmly and matter-of-factly. Even if the story that the child tells you is difficult to hear, it is important not to register disgust or alarm.
- Do not make judgmental or disparaging comments about the abuser - it is often someone the child loves or with whom he/she is close.
- Do not make promises to the child that things will get better.
- Do not confront the abuser.
- If the child does not want to go home, this should be considered an emergency. Report and handle immediately by contacting a member of the Well-being Team. Do not take the child home with you!
- Explain to the child that you must tell a member of the Well-being Team to get help.
- Try to let the child know that someone else also will need to talk with him/her and explain why.
- Empower the student by as much as possible allowing the child a part in the process.

Disclosures

Do:

1. Remain calm and show positive regard.
2. Listen quietly, carefully and patiently.
3. Assure the student that you believe what he/she is saying.
4. Acknowledge how difficult it must be to talk about what has happened.
5. Reassure the student that they are doing the right thing by speaking to you.
6. Accept what is being said without judgement.
7. Let the student explain to you in his or her own words what happened.
8. Ask OPEN questions such as, 'Is there anything else that you want to tell me?'
9. Tell the student that you will need to tell someone else, but only someone whose job it is to protect children. Provide the name of that person (Mr. Ihle/Ms. Stanton/ Ms. Williams).
10. The student may ask 'Will you tell my parents?' The response is 'No, but the person whose job it is to protect children may if it is necessary.'
11. A student may be accompanied by a friend who has persuaded them that they need to disclose to an adult in the school. It may be appropriate for their friend to remain in the room during the disclosure for comfort and support. Ask 'Is it alright for your friend to leave you to speak to me?' to inform your decision.
12. Take notes if this does not interrupt or distract the student.
13. Complete the disclosure form immediately or as soon as possible.
14. Record statements and observable things in a factual manner.
15. If you are told or believe that the child is in immediate danger or needs medical attention, contact the designated team member immediately. On the rare occasion that that is not possible, and the child is in immediate danger, contact the police.

Don't:

1. Do not show shock or disgust or disbelief.
2. Do not promise confidentiality.
3. Do not assume anything, speculate or jump to conclusions.
4. Do not conduct an investigation or interrogation.
5. Do not decide if the child is telling the truth.
6. Do not ask the child to repeat what they have told you to another member of staff.
7. Do not record your personal interpretations or assumptions on the disclosure form.
8. Do not discuss the case with anyone besides the designated team member.

9. Do not destroy your original notes in case they are required in court.

If you have suspicions, yet the child does not confide in you, contact a member of the Well-being Team.

13.2 PROTECTING YOURSELF FROM VULNERABILITY

Interactions between adults and students at ISF should always be appropriate, and to protect them from false allegations, adults should always ensure that they are seen to be so:

- Avoid situations in which you are alone with a child. This includes not transporting a child alone in your car. When it is necessary to speak privately with a child, find a space out of earshot, but within sight of others for your conference.
- The privacy of children in situations such as toileting, showering and changing clothes should be respected.
- Minimal physical contact should be used only in the following situations: To prevent or treat injury; to ensure safety; as a means of instruction; to meet the requirements of the sport; to comfort a student in distress.
- Do not use corporal punishment in any form.
- Sexual jokes, comments of a personal sexual nature, inappropriate physical contact, sensual massages or sexual gestures are not appropriate behaviour for an adult staff member or volunteer.
- When volunteering to supervise overnight activities, adults should not share sleeping quarters with children other than their own.
- Social media/online: Maintain your own strict privacy settings on personal online profiles and avoid contact with students on social media and in online forums, such as gaming.

It is always the adult's responsibility to set and respect boundaries. When a child attempts to involve an adult in inappropriate behavior, the adult must reject the overture and inform the Designated Safeguard Lead (DSL) of the incident.

14 Policy Update

This policy will be reviewed by the SLT and Board annually. The next review date will be June 2023.

15. Appendixes

CONTACTS FOR CHILD PROTECTION AND Well-being CONCERNS

JUNIOR SCHOOL	<p>JS Designated Safeguard Lead (DSL): John Male, Vice Principal of Well-being John Male tel. +39 055 646 1007 mobile +39 334 6231398</p> <p>In the absence of the designated Designated Safeguard Lead (DSL) Nicky Shamash, Junior School Vice-Principal of Learning Nicky Shamash tel. +39 055 646 1007 mobile +39 334 6674739</p> <p>Tony Pascoe, Junior School Principal Tony Pascoe</p>
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	tel. +39 055 646 1007
UPPER SCHOOL	<p>US Designated Safeguard Lead (DSL)s:</p> <p>Inka Szablinski, Vice Principal of Student Support i.szablinski@isfitaly.org tel. +39 055 200 1515 mobile +39 3358263869</p> <p>In the absence of the designated Designated Safeguard Lead (DSL)s Jan Stipek, Upper School Principal j.stipek@isfitaly.org tel. +39 055 200 1515 mobile +39 335 125 9175</p> <p>Clare Kelly, Vice Principal of Learning c.kellyi@isfitaly.org tel. +39 055 200 1515 mobile +39 334 678 7024</p>
WHOLE SCHOOL	<p>In case of absence of designated child officers and Principals Sharyn Baddeley, Head of School s.baddeley@isfitaly.org tel. +39 055 200 1515 mobile +39 337 105 9238</p>

APPENDIX 1 : INCIDENT RESPONSE TEAM RECORDING FORM - PLEASE USE CPOMS FOR RECORDING CONCERNS & INCIDENTS

Date of Report:

Person filling out form:

Members of Response Team:

Key Questions	Response
Student's name, gender, DOB	
Place of birth, nationality, attendance details	
Child's languages	
Address	
Siblings	
Names of parents/guardians	
Reporter's name reporter's relationship to the student	
How and where the reporter became aware (first-hand witness?). Write a brief description of disclosure circumstances.	
Name of alleged perpetrator and relationship to student (if known):	
Any previous concerns with student:	
Any other pertinent information:	
Follow-up (i.e. meeting with CP team, future actions taken or action pending etc.	

APPENDIX 2: ITALIAN LEGISLATIVE REFERENCES

LEGISLATIVE DECREE of 10 August 2018, no. 101

Provisions for the adaptation of Italian legislation to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation).

LEGISLATIVE DECREE of 22 December 2017, no. 220

Supplementary and corrective provisions to Legislative Decree No 142 of 18 August 2015 implementing Directive 2013/33/EU laying down standards for the reception of applicants for international protection as well as Directive 2013/32/EU on common procedures for granting and withdrawing international protection status

LAW 29 May 2017, no. 71

Provision for the protection of minors for the prevention and combating of the phenomenon of cyberbullying

Translation of Law No. 47 of 7 April 2017 by Agia (Law No. 47 of 7 April 2017 - "Provisions on Protective Measures for Unaccompanied Foreign Minors" - unofficial translation)

LAW 16 November 2015, no. 199

Ratifying and implementing the Optional Protocol to the Convention on the Rights of the Child, establishing a procedure for the submission of communications, adopted by the General Assembly of the United Nations on 19 December 2011

LAW 19 October 2015, no. 173

Amendments to Law of 4 May 1983, no. 184, on the right to affective continuity of children in family foster care

LAW 18 June 2015, no. 101

Ratification and implementation of the Convention on Jurisdiction, Applicable Law, Recognition, Enforcement and Cooperation in respect of Parental Responsibility and Measures for the Protection of Children, done at The Hague on 19 October 1996

LAW 01 October 2012, no. 172

Ratifying and executing the Council of Europe Convention for the Protection of Children against Sexual Exploitation and Sexual Abuse, done at Lanzarote on 25 October 2007, as well as rules for the adaptation of the domestic legislation

LAW 12 July 2011, no. 112

Establishment of the Supervisory Authority for Childhood and Adolescence

LAW 8 February 2006, no. 54

Provisions on the separation of parents and shared custody of children

LAW 6 February 2006, no. 38

Provisions on the fight against the sexual exploitation of children and child pornography, including through the Internet

LAW 20 March 2003, no. 77

Ratification and implementation of the European Convention on the Exercise of Children's Rights, done at Strasbourg on 25 January 1996

LAW 11 March 2002, no. 46

Ratification and implementation of the Optional Protocols to the Convention on the Rights of the Child, concerning respectively the sale of children, child prostitution and child pornography and the involvement of children in armed conflict, done at New York on 6 September 2000

LAW 31 December 1998, no. 476

Ratification and implementation of the Convention on Protection of Children and Co-operation in Respect of Intercountry Adoption, done at The Hague on 29 May 1993. Amendments to Law No 184 of 4 May 1983 on the adoption of foreign children

LAW 03 August 1998, no. 269

Rules against the exploitation of prostitution, pornography and sex tourism to the detriment of minors, as new forms of enslavement

LAW 23 December 1997, no. 451

Establishment of the Parliamentary Commission for Children and of the National Observatory for Children

LAW 28 August 1997, no. 285

Provisions for the promotion of rights and opportunities for children and adolescents

LAW 15 January 1994, no. 64

Ratification and implementation of the European Convention on Recognition and Enforcement of Decisions concerning Custody of Children and on Restoration of Custody of Children, opened for signature in Luxembourg on 20 May 1980, and of the Convention on the Civil Aspects of International Child Abduction, opened for signature in The Hague on 25 October 1980; rules for the implementation of these Conventions, as well as of the Convention on Protection of Children, opened for signature in The Hague on 5 October 1961, and of the Convention on the Repatriation of Children, opened for signature in The Hague on 28 May 1970

LAW 27 May 1991, no. 176

Ratification and implementation of the Convention on the Rights of the Child, done at New York on 20 November 1989

PRESIDENTIAL DECREE no. 616/1977

Local authorities (Regions, Provinces, Municipalities) organize and manage services in favor of minors and, in collaboration with the Health Service, implement the integrated system of social services, which provides support to minors and their families (Presidential Decree n. 616/1977 art. 23, 25 and Framework Law n. 328/2000, art. 22).

LAW 30 June 1975, no. 396

Ratification and execution of the European Convention on the Repatriation of Minors, signed in The Hague on 28 May 1970

LAW 22 May 1974, no. 357

Ratification and execution of the European Convention on the Adoption of Children, signed at Strasbourg on 24 April 1967

ARTICLES 575-623ter Italian Criminal Code (Crimes against the person)**References**

The Council of International Schools (CIS) publication “Managing Allegations of Child Abuse by Educators and other Adults.”

Servizio nazionale Telefono Azzurro <https://www.azzurro.it/> (phone number 19696 - active 24hrs/365dys)

United Nations Human Rights (1989), Conventions on the Rights of the Child, <http://www.ohchr.org/en/professionalinterest/pages/crc.aspx> (retrieved 10.02.16)

World Health Organization (Ed.2014) Fact sheet N.150 Child maltreatment,

<http://www.who.int/mediacentre/factsheets/fs150/en/> (retrieved 10.02.16)

Northamptonshire County Council, UK 'Toileting Guidelines for early years settings and schools 2015'

<http://www.northamptonshire.gov.uk/en/councilservices/EducationandLearning/specialeducationalneeds-disability-support/EHC-assessment-planspolicies/policiesguidance/Documents/PDF%20Documents/Toileting%20Guidelines%20%20September%202012.pdf> (retrieved 5.4.16)

Surrey, First published in November 2007 'Intimate care and toileting; Guidance for early years settings and schools Updated July 2014'. With acknowledgement and thanks to Leicester City LEA, and Royal Borough of Kingston, Kent County Council, and Chailey Heritage guidance. https://www.surreycc.gov.uk/data/assets/pdf_file/0018/50238/Intimate-care-and-toileting-policy.pdf (retrieved 8.4.16)

Safeguarding children and child protection 2019 <https://learning.nspcc.org.uk/safeguarding-child-protection> (retrieved 5.5.2022)