



OIS Child Safety Policy, Procedure and Protocol



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Mission

Oasis International School - Kuala Lumpur is a community of students, parents, and qualified educators working together as an Oasis Network School, to instill in our school community:
a passion for truth,
a commitment to excellence,
and an appreciation for diversity.
Veritas, Virtus, Varietas!

The Oasis Way

To accomplish our mission, Oasis International School - Kuala Lumpur provides an American education experience that cultivates character, leadership, and innovation.

NICS/Oasis Child Safety Policy

The Oasis International Schools Network takes its responsibility to protect and nurture children seriously, creating a safe and positive environment in which to grow. The protection of children is the responsibility of every adult within Oasis. We expect staff to conduct themselves with utmost integrity and professionalism at all times. Working together, we can create a safe, positive, and nurturing environment for children, protecting and safeguarding them to the highest standards possible. Our nurturing is always to be guided by biblical standards of morality, ethics, and prudence. There is no intent, in any way, to usurp a parent's role as the primary caregiver and guardian of their children. However, the responsibility of the parent, as well as of the organization, is to provide a safe and secure environment for all children in our care.

As an organization, Oasis International School is committed to:

- Valuing children and ensuring their safety in all locations and facilities where we are responsible to care for them
- Encouraging and supporting parents
- Ensuring that all staff involved with children are given support and training in child safety and protection
- Complying with legal requirements in reporting as necessary

Oasis expects proper moral and ethical conduct toward all children who are in the care of Oasis, whether on Oasis property, at an Oasis school, under the care of Oasis staff, or attending an Oasis function. This expectation applies to all staff (expatriate and local), volunteers (regardless of their length of service), employees, associates seconded to Oasis, and partner organization staff working with Oasis. It also applies to any visitors at any school campus. Adult staff and volunteers assume the responsibilities of setting and maintaining clear, appropriate boundaries in all interactions with children. This extends to extra-curricular activities where staff members and volunteers continue to represent the confidence

placed in them by Oasis in areas of integrity and in their responsibility to uphold standards of safety and accountability in their interactions with children.

Oasis International School is a member of the Child Safety & Protection Network (CSPN). Oasis' child safety policies and procedures are consistent with the recognized elements of an organizationally mature child safety program adopted by CSPN¹.

As a part of the Oasis International Schools Network, Oasis International School - Kuala Lumpur has adopted the following Child Safety and Protection policies to guide stakeholders in creating and maintaining a safe environment for our students through transparency and accountability. The focus of this document is child safety. As such, the following policies take into account best practices in the international school community, the legal mandates of Malaysia and the United States of America, as well as the guidelines set forth in the United Nations Convention on the Rights of the Child. All organizational participants who have regular contact with children under the school's care are trained in, sign agreement to, and participate in an annual overview of these policies.

It is the expectation of all school faculty to report any incident. All reports will be addressed within the scope of the procedures outlined in this handbook.

Code of Conduct for Child Safety

The Code of Conduct is duplicated from the Oasis International Schools Network Child Safety and Protection Code of Conduct which all employees and volunteers must sign before interacting with students.

1. **Visibility**

Risk decreases as visibility increases. I will plan my work and interaction with children in a way that increases visibility by others as much as possible.

2. **Overcoming Isolation**

Risk decreases as isolation decreases. I will reduce isolation in my interactions with children as much as possible by keeping others informed of or observant of these interactions.

3. **Accountability**

Risk decreases as accountability increases. I will interact with children in a mature, capable, safe, caring, and responsible manner with a high level of accountability. I will give and accept feedback from others in order to maintain a high level of professionalism and integrity in interactions with children.

4. **Supervision**

Risk decreases as supervision increases. I will welcome supervision and observation of my interactions with children at any time and place.

5. **Parental Involvement**

¹The Child Safety & Protection Network was formed in 2006. It is a network of like-minded organizations formed to develop common protocols in child safety. This network has developed a common set of recognized child safety elements which includes written policies and procedures, child abuse definitions, screening, a code of conduct for adult interactions with children, training of adults and children in child safety, child care guidelines, child abuse response protocols, and counseling and member care.

Risk decreases as parental involvement increases. Because parents are ultimately responsible for the care of their children, I will welcome parental involvement at appropriate times and settings.

6. Discipline

Proper discipline reduces risk. I agree that discipline is best viewed as instructive and corrective and will exercise discipline with my students in a way that is reasonable and healthy.

7. Touch

Healthy, caring touch is valuable to children, but unhealthy touch is abusive. I agree that healthy touch should be open, age-appropriate, responsive to the needs of the child, and respectful of the child's wishes. I also agree that any touch that could be perceived as sexual in nature is inappropriate and that I will not engage in it.

8. Verbal Interaction

Words can be used to support and encourage a child, but words used in a wrong way can be destructive. I will use my words to encourage and edify children, and not to demean or damage them in any way.

9. Child-to-Child Behavior

Positive child-to-child interaction is essential for healthy development. I will, along with members of my team, monitor child-to-child interactions for inappropriate or abusive behavior or neglect.

10. Responsibility

Acceptance of reporting responsibility decreases risk. I understand and agree that I am responsible to report (as soon as possible and within 24 hours) to my supervisor/director any actual or reasonably suspected abuse or neglect of any child by anyone regardless of where it may have occurred. I will not attempt to handle the situation privately or enter into any private agreement with the offending or accused individual or reporting person.

Definitions of Abuse

Child abuse is the ill treatment of a child by a parent, caregiver, someone living in their home, or anyone who works with or around children in the context of a relationship of responsibility, trust, or power.

Abuse of a child is any action (or lack of action) that causes injury or endangers or impairs a child's physical, mental, or emotional health and development.

The following definitions are adapted from several organizations including the Child Safety and Protection Network, the Council of International Schools, and the United Nations Committee on the Rights of the Child Malaysian Child Act 2001 (Act 611).

A. Types of Abuse

Sexual Abuse

Sexual abuse is the involvement of a child in any sexual activity. These are activities that he or she does not fully comprehend and is unable to give informed consent, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social mores of society. It is an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust, or power. This may include but is not limited to:

- A. Verbal: Remarks which include sexual threats, solicitation, innuendoes, comments about a person's body or appearance, inappropriate sexual talking, obscene phone calls, inappropriate text messaging or sending inappropriate images (sexting²), obscene or inappropriate sexual talking via the internet (social media³, email, etc.), inappropriately affectionate comments, or any verbal expression with intent to arouse or stimulate.
- B. Visual: Indecent exposure, showing or taking of suggestive pictures, peeping, leering, or staring. Visual sexual abuse also includes voyeurism⁴, exhibitionism⁵, showing of pornographic material, or the showing of any human sexual activity or simulated sexual activity. This form of abuse also includes filming or photographing pornographic material.
- C. Physical Touching: Physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or (in the case of a female) breast; causing a child to perform or witness any of these acts. This form of abuse also includes any act in front of or to a child, such as rubbing, holding, or kissing for the purpose of sexual gratification; sexual penetration; or prostitution.

Physical Abuse

Physical abuse is any act that results in a non-accidental physical injury. Inflicted physical injury could represent unreasonably severe corporal punishment or unjustified punishment. Physical abuse may also include slapping, punching, beating, kicking, biting, shaking, burning, holding underwater, pulling hair or holding against one's will.

Parental Discipline

Although discipline should be instructive and restorative rather than punitive, there is an occasional fine line between parental disciplinary practices and physical abuse. Oasis International Schools will not interfere with parental disciplinary matters unless an incident of abuse is clearly suspected or observed (i.e. bruises, marks, emotional distress) or unless there is a pattern of abusive behavior on the part of one or both parents. Oasis International School has defined a pattern of behavior as two (2) incidents or occurrences.

Emotional Abuse

Emotional abuse is defined by a pattern of inappropriate emotionally harmful behavior over time⁶. It includes acts of omission and acts of commission.

Acts of Omission (or "what is not done"): Omission includes the failure to provide a developmentally appropriate and supportive environment, including the availability of a primary attachment figure so that the child can develop a stable and full range of emotional and social competencies commensurate with his or her individual potential and in the context of the society

²Sexting: the act of sending sexually explicit messages or photographs, primarily between mobile phones.

³Social Media: forms of electronic communication or internet sites through which users create online communities to share information, ideas, personal messages, and other content.

⁴Voyeurism: obtaining sexual gratification from seeing sex organs and sexual acts; one who habitually seeks sexual stimulation by visual means.

⁵Exhibitionism: a perversion marked by a tendency to indecent exposure.

⁶Emotional abuse implies a pattern of inappropriate behavior. There is a distinction between one-time inappropriate behavior, which needs to be addressed to prevent recurrence, and repeated action, which could necessitate a report of suspected abuse.

in which the child dwells. Behaviors that fall under omission include, but are not limited to, not expressing or showing love and affection as well as prolonged isolation from the child's parent or caregiver.

Acts of Commission (or "what is done"): This includes acts toward the child that cause or have a high probability of causing harm to the child's health or mental, moral, or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust, or power. Such acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, humiliating, screaming, blaming, using sarcasm, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.

Neglect

Neglect is the failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions in the context of resources reasonably available to the family or caregivers. Neglect causes or has a high probability of causing harm to the child's health or physical, mental, moral, or social development. This includes the failure to properly supervise and protect children from harm as much as possible.

Neglect also includes depriving a child of their basic needs of food, clothing, warmth and shelter, emotional and physical security and protection, medical and dental care, cleanliness, education, and supervision.

Children may occasionally disregard proper hygiene, minor medical attention, or even what some adults consider proper protection from the weather. These isolated examples are not considered neglect. Neglect is defined as the failure to care for or give the proper attention to something or someone.

Symptoms of Abuse or Neglect

Adults should be alert to the physical signs of abuse or neglect, as well as to behavioral and verbal signs a victim might exhibit. A one-time event would not necessarily constitute a potential abuse case; however, sudden unexplained physical or behavioral changes, particularly by children visiting other children in their homes, would warrant some investigation.

Physical signs may include

- Lacerations and bruises
- Nightmares
- Irritation, pain, or injury to the genital area
- Difficulty with urination
- Discomfort when sitting
- Torn or bloody underclothing

Behavioral signs may include

- Unexplained anxiety when approaching a specific location
- Nervous or hostile behavior toward adults
- Sexual self-consciousness

- “Acting out” sexual behavior
- Withdrawal from usual activities and friends
- Depression
- Self-destructive or aggressive behavior

Verbal signs may include the following statements

- “I don’t like (names a particular person)”
- “(Particular person) does things to me when we’re alone”
- “I don’t like to be alone with (particular person)”
- “(Particular person) fooled around with me”

B. Inappropriate Behavior

Inappropriate Behavior by an Adult

Oasis International School considers behaviors that do not meet the definition of abuse, but do constitute behaviors that are harmful to children, as *inappropriate behavior*. An appropriate action plan will be put in place to provide accountability, mentoring, and counseling to overcome both the behavior and its causes.

At no time will a dating relationship be allowed between a student and an Oasis International School employee or staff member. Parental consent for a relationship that is commonly accepted and defined as inappropriate or abusive does not sanction that relationship nor excuse any resulting behaviors and their consequences.

Child-to-Child Inappropriate Behavior

If the victim and alleged offender are both children, it is generally considered abuse if there is more than three years age difference between the children. If their age difference is three years or less, it is considered inappropriate behavior and will be dealt with on a disciplinary level. The following actions may involve inappropriate behavior or abuse of one child to another and should be prohibited: bullying, hazing⁷, derogatory name-calling, creating or sharing pornographic content, ridiculing, humiliating, or singling out a child for negative treatment or exclusion. These acts will first be dealt with on a disciplinary level.

Sexual abuse between individuals under the age of 18 involves any sexual behavior that occurs without consent by one party or as a result of coercion or grooming. There is a difference between normal childhood sexual exploration and inappropriate sexual behavior or abuse.

Other factors considered in evaluating whether abuse has occurred include the following: differences in responsibility, trust, power, development, awareness and understanding, coercion, and threats, whether implied or verbal.

⁷Hazing: harassing, exacting humiliating tasks as a form of initiation into a group, or playing rough practical jokes upon another child

Additional Note on Abuse Definitions

While it is recognized that local and/or national definitions of child abuse may vary, and there are cultural, religious, and ethnic differences in child rearing and relating to children and understandings of what constitutes child abuse, it is important to remember that all children have basic human rights. Therefore, Oasis International School has utilized common basic definitions of abuse which have been built on international standards. In addition, it is recognized that by adopting internationally accepted definitions by which all staff and volunteers will abide, adults of different cultures and cultural expectations will work together to prevent child abuse.

The question of how to handle “shame-based” rather than “guilt-based” cultural communication styles will be handled in the investigative stage by ensuring that cultural issues are addressed from the outset. Cultural representation during the investigative interview process is recommended.

The head of school and/or a designated school employee is responsible to proactively investigate and know the civil and/or criminal laws that may apply to child safety and protection issues in Malaysia.

Abuse Prevention

1) Screening

In addition to the written application questions completed by all Oasis appointed personnel and locally hired personnel, the basic screening done by Oasis Placement Specialists, the reference forms completed by the applicant’s references, and the personal interview conducted by school administrators, the Mobilization Department at the Oasis International Schools Network Home Office conducts a criminal background search using a third-party firm.

1. The written application contains questions regarding the following:
 - a. Specific employment history including volunteer work and/or work with children. Contact information for previous employers should be included.
 - b. Questions related to inappropriate behavior or abuse of children should be answered.
2. Placement Specialists review all applicants’ paperwork and follow up with applicants regarding any questions or clarification needed before presenting a candidate to a school administrator for a personal interview.
3. All applicants identify three (3) references who are asked to complete a confidential reference form on the applicant. Completed reference forms are requested from a professional/employment-related reference, a pastoral reference, and a personal reference. These references are also asked to provide the names of two (2) individuals who may be able to provide a reference. The reference form asks specific questions about the applicant’s involvement with children. References are checked by the hiring committee or administrator in charge of hiring that position.
4. The Head of School does a personal interview with all applicants before offering a position. The Head of School will ask specific questions about the applicant’s interaction with children beyond

what is provided on the application forms. Where possible, these interviews are face-to-face or via video conference. The Head of School should undergo a child safeguarding interview training prior to interviewing candidates.

5. The Oasis International Schools Home Office Mobilization Department conducts a criminal background check on all new hires once the new hire completes the appropriate release form. Individuals are not allowed to serve with the organization until the background check is completed and verified as clear of any misconduct.

MLH and ELH Candidates Screening:

1. All local hires must submit a Certificate of Good Conduct (COGC) from the Ministry of Foreign Affairs. The employment becomes null and void if a candidate has a questionable background.
2. The HR Specialist will contact previous employers for references.
3. Where possible and permissible in Malaysia, the Head of School is responsible to obtain a criminal background check on all national/local staff hired by the school, as well as volunteer personnel.

2) Training

Training of Staff, Contractors, and Volunteers in Child Safety

Oasis staff members, contractors and volunteers undergo training on observing and reporting child safety situations. This training is provided by an external organization and required for all. The Oasis International Schools Network Home Office keeps records of all staff who have undergone child safety training.

Initial Training

Oasis International Schools shall provide training in child protection policy and procedures to all those in active service within the organization, no matter what their official category. This includes all employed staff (expatriate and local), volunteers (regardless of the amount of volunteer time), and contractors from other organizations.

This training is accomplished through [ChildSafeguarding.com](https://www.childsafeguarding.com) (approved by Oasis International Schools). Initial training for ODH staff will happen during IMPACT (the agency's pre-field training program). The LCSO is responsible for training all ELH, LHP and staff members hired during the school year once they arrive on the field.

Key aspects of the training program include:

1. What is Child Protection and why is it important?
2. Types of danger and ways children can be hurt
3. What to look for when protecting children at your school
4. Your responsibilities for protecting children at your school

Ongoing Training

The Head of School is responsible to ensure that ongoing training occurs. Please refer to the [Child Protection Training Schedule and Protocols](#). Ongoing training for all Oasis International School's staff will be provided and will include⁸:

1. Review of Oasis International Schools Network Child Safety Policies, focusing on expected behavior with children
2. Safety measures and safe environments
3. Reporting procedures and documentation
4. New tools and knowledge in the field of child safety

Training of Children and Parents in Child Safety

Oasis International Schools will teach a child safety unit annually to all children. This training will include information on where to go for help related to inappropriate behavior, abuse, and harassment. Oasis International Schools will provide information on the training of children to their parents. Additionally, schools are to have basic child safety training available to school parents who choose to participate.

This training includes topics such as:

- Healthy homes
- Resources for parents
- Developmental norms
- Hospitality and babysitting safety
- Culture-specific norms

Training for children and parents is still being produced at Oasis International School - Kuala Lumpur. The child safety team will update this manual when training is established.

3) Online Safety

All online classes, including whole group and small group classes, should be recorded when possible. One-on-one online meetings between students and teachers must be recorded. In all calls, students are expected to maintain online etiquette as directed by the school in the [Responsible Use Agreement](#) and the [Community Handbook](#). Since recording is not possible in breakout sessions on Google Meet, our students are encouraged to report any breach of online etiquette by a fellow student to their teacher or principal, who will take disciplinary action.

Oasis Child Safety Procedure

OIS Child Safety Team

The Child Safety Team consists of four or more OIS Staff members, one or more being local Malaysians, and at least two trained by CSPN in Response Team Training.

⁸The exact frequency and scope of the ongoing training is still in development.

This team is responsible for ensuring the safety of all OIS students through quarterly team meetings, annual review of the Child Safety Policy, Procedure & Protocol manual, and immediate response to Child Safety reports.

School Campus Procedures

- Bullying will be dealt with on a disciplinary level, unless serious physical harm is done
- Two-one (2 to 1) rule: If a student and teacher are meeting together, there should always be at least three people present. If this is not possible, then accountability measures should be taken, such as 1) meeting in a room with windows or in the open, 2) clearly stating on Google calendar that the teacher and student are meeting, 3) letting colleagues and parents know of the meeting.
- Students cannot be without adult supervision/awareness
- Bathroom policies
 - a. Adults should only use the staff/handicap bathrooms.
 - b. MS & HS students may not use the bathrooms on level 1.
 - c. ES students can use the bathrooms on level 2 when they have specials. However, K4/5 students must go in pairs.
 - d. In the gym, ES should be using the single, handicap bathroom only. The locker rooms are for MS & HS. Staff must use the Staff bathroom.

Oasis Reporting Protocol

Oasis International School will respond to all reports in an Oasis school regarding alleged abuse or unsafe situations. Oasis International School will respond regardless of the perceived validity or severity and to current or historical reports/allegations.

Reporting Process

The two most frequent report types are observations and direct communication.

Observations

There will be times when you observe a situation that you believe is unsafe. Examples of an unsafe situation may be: unsupervised students, improper signage, lack of rules in the weight room, inappropriate touching in lower grade levels, etc. You may also observe signs of abuse or neglect without solid proof. In these cases, Oasis staff are required to make an initial report so that the Child Safety Team can investigate and make proper policy or respond to alleged abuse.

Direct Communication

A child's communication of abuse may be direct or indirect, or an adult may notice signs of abuse or neglect. When any adult in the community has reasonable suspicion⁹, observes, is given a report of child abuse, or has knowledge which gives reason to suspect child abuse or neglect, he or she has two responsibilities:

⁹Reasonable suspicion is defined as being objectively reasonable for a person to entertain a suspicion, based on facts that could cause a reasonable person, drawing on their training and experience (when appropriate), to suspect child abuse or neglect.

1. Listen to the Child's Report and Provide Care. When a child reports abuse to any adult, that adult's first and primary responsibility is to listen with compassion and care, without any attempt to evaluate the credibility of the report at this point.

The following responses are important to convey to the child:

- **Affirmation:** Statements such as, "I hear you", "I'm sorry that you experienced this" can communicate empathy for what they might be experiencing
- **Procedure:** Let the child know what you will do with this information. "I will help you and support you, but we cannot do this alone. I'm going to share this information with our Child Safety Officer who will help us move forward."
- **Assurance:** Reassure the child's confidence with statements such as, "It's not your fault", "You've done the right thing in telling me", and "It was right and courageous to tell".

Listen to whatever information the child tells you without asking leading questions, asking the child for more details than they are comfortable sharing voluntarily, or trying to evaluate the credibility or the seriousness of the report. The compassion and care demonstrated by the first person to hear the child's report is one of the key determinants of the child recovering from whatever occurred.

At some point in this conversation it is also important to communicate:

1. That the child cannot handle this alone.
2. That you take this seriously and will get the proper help to ensure that the child and others are safe.

Mistakes to avoid include:

1. Promising not to tell anyone. Often children/teenagers will say, "I need to talk to you, but you've got to promise not to tell anyone." Making this kind of promise is not helpful to the child/teenager. Instead we can say, "I can't make that kind of promise, since whatever is concerning you may take more help than I can give. However, I do care about you and want to listen well, support you and do whatever I can to help."
2. Forming conclusions about the truthfulness of the report.
3. Minimizing the seriousness of the actions or dismissing it as not significant. What is traumatic varies from one individual to another.
4. Handling it on your own. Abuse, like hostage situations or evacuations, is a situation that can have a huge impact on the community and the organization as a whole.

2. Make Initial Report to Child Safety Team. Please see the section below titled Initial Report for more details on the process of reporting.

Initial Report

Following the observation and the initial care given to the child, the adult's second duty is to report the alleged abuse. Fill out the [OIS Child Safety Concern Report Form](#) immediately, without taking action or doing any preliminary investigation. Detail what was learned in writing as soon as possible so that it is remembered fully and accurately. If a formal report is deemed necessary, you may be asked to fill out a [NICS-Oasis Initial Report Form](#) and email it to the Head of the School & the Local Child Safety Officer.

The report is the sole responsibility of the person(s) that witnessed abuse and no supervisor, administrator, or board member may impede or inhibit the reporting duties. No person making a report will be subject to any sanction by Oasis International School for making a reasonable report and all reporters will be kept confidential throughout the investigation.

Reporting the information regarding a case of possible child abuse or neglect to a person other than the Head of School or the Local Child Safety Officer (or the Oasis International Schools Network Child Safety Officer if the Head of School is accused of abuse) breaks agency procedure and will not be a substitute for making the mandated report.

Several principles guide this process:

1. All situations must be reported, regardless of the perceived severity or validity, including both those reports initiated by adults and those initiated by children. It is often incorrectly assumed that incidents between same or similar aged children can be handled between the families if the children are repentant and show no signs of being affected. If the children involved do not get appropriate counseling, there is a significant percentage of individuals who repeat the behavior with other children.
2. There is no statute of limitations on internal investigations. Some legal systems make provision for a statute of limitations on investigating abuse incidents, allowing offenders to avoid prosecution if a certain amount of time has passed since the offense was committed. Oasis International School will, however, respond to reports of abuse, no matter how old, because of the importance to the victim, other children, and the organization itself.
3. Oasis International School assists victims who are reluctant to report. Because of the danger offenders pose and the importance we place on the care and protection of the children entrusted to us, the organization will take responsibility for investigating reports of child abuse, rather than expecting parents of children who are victims to pursue claims independently. When victims or their parents are reluctant due to fear of reprisal, lack of understanding of other potential victims, or lack of current symptoms, Oasis International School will seek to provide support, education, and care to them while moving forward with the reporting process.
4. Oasis International School will become involved in any abuse accusation concerning an Oasis student, parent, employee, volunteer, or other person with a direct connection to an Oasis school whether or not the incident occurred on the property/facility of an Oasis school or was a school sponsored event.

Confidentiality

Confidentiality is critical both to protect the victim and the accused from further harm through exposure and to preserve the integrity of the process. Oasis International School expects that a “need to know” policy will be strictly adhered to throughout the reporting process. Thus the individual receiving the report is to not widen the circle of “need to know” people beyond the Head of School and the Local Child Safety Officer. Once reported, the Head of School and the Local Child Safety Officer may use discretion as to who is in the “need to know” group (child safety team, nurse, Pastoral Care, etc. as appropriate).

Documentation of the report is kept with the Network Child Safety Officer(s) at the Oasis Home Office and in a Google Drive to which only members of the Child Safety Team have access. Files pertaining to

specific reports are shared with only those involved in the response team. Access privileges are revoked once debriefing has concluded.

Helpful Definitions for Reporting

Child: The common legal definition of a *child* is anyone under the age of 18. Oasis International School considers any student enrolled at an Oasis school to also be included in this definition and fall under the protection of these policies, even those who may be 18 or older.

Adult: Oasis International School considers an *adult* to be any person who is not enrolled at the school and is at least 18 years old. This includes but is not limited to staff, parents, contractors and volunteers.

Victim: Oasis International School uses the term *victim* when referring to a person who has suffered harm. While this term may be used in documentation, Oasis International School understands that not every person who has suffered harm identifies as a victim. Consideration is given when deciding which terms to use in addressing individuals.

Response: Oasis International School uses the term *response* to refer to the process of inquiry initiated after a report has been filed. This is done in part to avoid any conflation with official investigations that may be launched by law enforcement agencies.

Respondent: Oasis International School uses the term *respondent* in reference to the alleged offender in order to protect the safety of a person who has had an accusation levied against them.

Grooming: is the intentional behavior by an individual for the purpose of building trust with a child and potentially that child's parents/guardians in order to gain greater access to that child, thereby increasing the risk of harm.

Harm: While often used interchangeably with abuse, the term *harm* is preferred when focusing on the effects on the child; the term *abuse* often focuses on the actions of the respondent.

Bullying: Oasis International School recognizes *bullying* as intimidation or harassment of another student through words or actions such as: direct physical contact, including hitting or shoving; verbal assaults, acts of hate, including teasing or name-calling; social isolation or manipulation; and cyber bullying.

Cyberbullying: includes, but is not limited to, harassing, stalking, intimidating, teasing or threatening via email, social media, instant messages, text messages, voice messages, videos, pictures, or any other electronic medium.

Current Reporting Roles

- Head of School (HoS)- Ben Hale
All incident reports will be sent to the Head of School (unless the HoS is involved in the allegation), who will coordinate with the Oasis International Schools' Home Office and the Local Child Safety Officer to ensure compliance with all expectations as a member school.
- Local Child Safety Officer (LCSO) - Bethany Singh
- Elementary Principal - Rebecca Unruh

- Middle school/High School Principal - Ben Hale
All reports between a child and another child will be shared with the school-level principal by the LCSO. The school-level principals are responsible for executing responses involving students under their care with the assistance of the LCSO and the Child Safety Team.
- Network Child Safety Officer- Jesse Newman
- Child Safety Team - Bethany Singh, Ben Sullivan, Ben Hale
- Mandated Reporters - All Staff

Oasis Response Protocol

Initial Response to the Reported Abuse or Neglect (Head of School /LCSO)

When the Head of School and LCSO receives such a report, he/she initiates the following procedure:

1. Receive report and remind reporter of confidentiality

A Child Safety Team responder will contact the individual reporting the incident as soon as possible and explain OIS procedures for responding to this incident. These procedures are to be followed no matter how minor the incident is in the eyes of the individual receiving the information, and regardless of the ages of the individuals involved, including behavior that occurred between two children.

All parties involved are asked to maintain strict confidentiality. Members of the leadership team (or community members) that have no “need to know” will not be involved. It is presumed the parents of the victim are part of the “need to know” group unless they are themselves involved in the suspected abuse or pose a threat. The alleged offender is not to be advised of the report at this point. Because abuse of children has such a huge impact on the lives of those involved, and others in the school community, Oasis International School recognizes the importance of a diligent and consistent response to reports.

Note: If the person involved in the report either as an alleged offender or alleged victim is a member of another mission agency, then that entity’s Child Safety Director should be informed of the initial report. This may lead to mutual cooperation and engagement with that agency during the investigative process.

2. Contact the OIS Network Child Safety Officer

As possible and within 24 hours of receiving the report, the Head of School will forward the report to the Oasis International Schools Network Child Safety Officer. If the Oasis International Schools Network Child Safety Officer is unavailable or out of the office, the report must be sent to the NICS/Oasis Director of Academic Development (DAD) for follow-up. The same 24 hour reporting requirement must be used when contacting the DAD. Contact information for all Oasis International Schools Network Home Office personnel is available on the NICS [website](#).

3. Provide Care and Protection for the Victim

The Head of School is responsible to ensure that the child is safe. This involves ensuring the alleged offender has no further access to or contact with the child. It also may involve changing

the environment to provide a renewed sense of safety or moving the child and their family to a safer location.

4. Get the Child any Needed Medical Attention

If **physical abuse** is reported, the school nurse must evaluate the student and possibly make a hospital referral.

If **sexual abuse** involving intercourse is reported, it is important to seek immediate medical attention. There is only a small window of time during which medical staff may utilize rape protocols. Outside of emergency situations, the final decision concerning any medical treatment or counseling rests with the child's parents.

Schools are responsible to determine where medical facilities are available within close proximity that employ medical staff trained to do rape assessments.

Hospital Address:

Shah Alam Hospital - One Stop Crisis Centre (OSCC) in the Emergency & Trauma department .

The address is: Persiaran Kayangan, Seksyen 7, 40000 Shah Alam, Selangor.

Telephone number : 03-5526 3000.

Report Allegations to Appropriate Authorities (Head of School/LCSO)

Cases Occurring in the United States

In cases of suspected child abuse occurring in the United States, Oasis International School will report the abuse allegation to the appropriate authorities in a timely manner as required by laws in that local jurisdiction. The controlling factor is whether the responsible person, or caregiver, has knowledge or reasonable cause to suspect that child abuse may have occurred.

Cases Occurring outside the United States

It will be the responsibility of the Head of School, in consultation with the Oasis International Schools Network Child Safety Officer and the Local Child Safety Officer, to determine the appropriate reporting response under the statutes of the country, or locality, where the abuse allegation occurred. Once the appropriate reporting response is determined, any necessary action will take place in a timely manner. All Oasis International School's personnel are expected to cooperate with local authorities fully in reporting allegations of abuse, investigations, and in any resulting actions.

Cases Occurring in Malaysia

Based on Malaysian Child Act 2001 [Act 611], the local authorities mandated all suspicions of abuse, neglect, abandonment or exposing a child to physical or emotional injuries to be reported immediately to the Child Protection Agency or Welfare department at Talian Kasih Helpline at 15999 (24 hours). When making a report, the Network Child Safety Officer or the Head of School should provide the child's name, address, reason of suspicion, and caller's identity. Failure to report abuse is an offense and punishable by the Malaysian law.

Alternatively, suspected child abuse should be reported to the nearest Malaysian Royal Police Station. The closest police station to Oasis International Kuala Lumpur is located at: 74, Jalan SP 8/1, Bandar Saujana Putra, 42610 Jenjarom, Selangor. Telephone number : 03-5162 2222

Cases Occurring outside the United States when the offender returns to the United States

If an individual identified as someone who has abused a child returns to the United States, it is Oasis International Schools Network policy to report the incident to the appropriate authorities and jurisdictions in the United States.

B. Initial Assessment (Inquiry) Procedures

General Information

After receiving a child abuse or neglect report from a Head of School (or other school personnel), the Oasis International Schools Network Child Safety Officer will review the report and determine the extent of any inquiry to be conducted. Every report will be examined objectively. Oasis International School will default to any requirements of and involvement from local authorities within the scope of their jurisdiction as defined by Laws of Malaysia Child Act 2001 (Act 611) (page 38) Part V, Chapter 2, Item 29 Duty of Childcare provider. When child abuse laws are non-existent or local authorities take no jurisdiction, Oasis International Schools Network internal policies will be the controlling factors. Any initial assessment must never impede an ongoing criminal investigation.

Initial Assessment

If it is determined by the Local Child Safety Officer, in consultation with the Head of School (or other school personnel if the Head of School is the accused person), that the allegation warrants an initial assessment, one will be conducted.

1. Any initial assessment will be guided by two parameters:
 - a. All Oasis personnel involved in an assessment will operate within a climate of belief, meaning that the abuse could have taken place.
 - b. All Oasis personnel involved in an assessment will take a neutral stance toward the innocence or responsibility of the alleged respondent until the assessment process is conducted and appropriate conclusions reached.
2. An initial assessment team of two or three (2 or 3) persons from the Child Safety Team will be formed by the Local Child Safety Officer. This will include at least one staff person who has received response team training from an appropriate agency such as CSPN. Additional team members will be Oasis International School's personnel serving in that school, but other respected adults in the community will be called upon if necessary. The decision concerning the make-up of the team will be made jointly by the Head of School and the Local Child Safety Officer.
3. No one person should ever act alone in assessing an allegation of child abuse or neglect. If an interview is conducted by only one person, detailed notes and records of the interview are required. However, any interview with a child should include more than one person and at least

one person of the child's gender wherever possible. If there is a lack of available personnel, it is more important to have an experienced interviewer than one who is the right gender.

4. Following all Oasis International Schools Network policies relating to child protection, the initial assessment team will thoroughly review the initial report, and assess the reliability of the reporter and the credibility of the report.
5. The initial assessment team will notify parents if they are not already involved.
6. The alleged offender is NOT to be advised of the allegations at this time. Although the alleged offender may be placed on leave in order to ensure the safety of all involved parties.
7. The team will interview the victim's parents and the victim (or victims).
8. If possible, the team will interview a limited number of collateral witnesses who can speak to the reliability of the reporter and/or the credibility of the report. This should be carried out with caution and strong justification while holding up the principle of confidentiality.
9. The team will record all impressions, concerns and observations factually, giving time and date. Written records are to be kept confidential and secure.
10. An Outcome Decision will be prepared by the initial assessment team. This Outcome Decision will include information from the initial report, information gathered and conclusions reached. If applicable, it will also include an action plan to address any issues raised during the assessment. Legal consultation may be included to ensure compliance with all local laws.
11. If the initial assessment team concludes that the matter warrants no further action, the file will be closed. The report and all related materials will be kept in a confidential file by the Oasis International Schools Network Child Safety Officer.
12. If the initial assessment team concludes that the initial report is credible and reliable, a Child Safety Assessment (and possible Misconduct Assessment) will take place.

C. Child Safety Assessment (and possible Misconduct Assessment)

Child Safety Assessment Team

All Oasis International Schools Network Child Safety Assessment team members conducting a Child Safety Assessment must meet certain qualifications. Each team member must maintain confidentiality (and must have signed the Oasis International Schools Network Child Safety Confidentiality Agreement), have respect and credibility, must be empathetic but objective and impartial, understand the difference between interviewing and support/advocacy, and must be stable and mature. Each team member must have flexibility to set aside other responsibilities and respond quickly and fully on short notice, including travel when needed. It may be prudent to continue to use the existing Initial Assessment team.

The Child Safety Assessment team and team leader is selected by and reports to the Oasis International Schools Network Child Safety Officer. The Child Safety Assessment team is to be guided by Oasis International Schools Network policies and procedures for child safety and protection. The team leader is responsible for submitting the Outcome Decisions and eventual Statement(s) of Findings.

The Child Safety Assessment Team includes at least three (3) members representing both genders and, if at all possible, at least one individual of the same first language and/or culture of each of those involved.

One (1) or more team members may participate in team functions via Skype or other similar means, but at least two (2) team members should be in the location where the allegation occurred.

An independent, outside observer must either be on the team or engaged afterward to review both the process and findings.

At least one team member must be trained in Child Safety and Protection Network inquiry procedures.

Team members located in different areas of the world may be utilized to conduct the needed interviews in various locations or team members may travel to conduct the interviews. At times, members may be needed who speak a specific language or have experience with cultural considerations that affect the case, or have experience interviewing specific ages of children.

When Oasis International School determines that an investigation goes beyond the expertise and experience of the Child Safety Assessment team or the complexity of the case, additional expertise may be sought.

Costs of the Investigation

Should an abuse report lead to a Child Safety Assessment requiring travel, the Oasis school will pay for all Child Safety Assessment team expenses, which includes such things as transportation to the community (international and local), travel insurance, and food and lodging associated with the Child Safety Assessment.

Child Safety Assessment and Misconduct Assessment Process

1. No steps in the Child Safety Assessment will take place until the team has arrived at the location.
2. The alleged offender is notified that a child abuse report has been received, the name of the individual or family involved, that a Child Safety Assessment is beginning, and that he/she will receive a version of the Statement of Findings when the inquiry is completed.
 - a. The alleged offender is to be placed on paid administrative leave during the process (if he/she is employed by the school) and will be prohibited from having contact with or access to the child(ren) involved in the inquiry.
 - b. The team will insure that the alleged offender and their family have needed support and accountability.
3. The team reviews the initial report, all additional information gathered during the Initial Assessment, and any other relevant documents. From this information (in addition to Oasis International Schools Network Child Safety and Protective Policy), the team develops a plan to conduct the inquiry.

4. The team conducts interviews with all those who may have relevant information. Standard interview formats are used for each type of interview (these may be found on the [CSPN website](#)). Those interviewed would include:
 - a. Victim (or victims)
 - b. Victim's parents (separately and back-to-back)
 - c. Alleged offender (and spouse if applicable)
 - d. Known witnesses
 - e. Those persons who the victim and alleged offender indicate are witnesses or can contribute to the inquiry
5. The team exercises due diligence to determine whether there are additional victims. If additional victims come to light, the team must provide support and safety for them.
6. The team will record all impressions, concerns and observations factually, giving time and date. All interviews will be documented using actual quotes as much as possible. Written records are to be kept confidential and secure by the Oasis International Schools Network Child Safety Officer.

Preparation of Findings and Conclusions

Oasis International School will follow its written policies regarding possible outcomes, application of corrective actions based on those outcomes, and provision of accurate employment references to other organizations regarding offenders.

Once the inquiry is complete, the team will prepare a Statement of Findings. The Statement of Findings should include a description of the reported behaviors in the initial report, the inquiry process followed to respond to the report, the data collected, the conclusion reached, the administrative outcome (including any required responses), and any action plans (including a report to appropriate authorities, a safety plan, and follow-up counseling).

An appropriately edited copy of the Statement of Findings will be given to both the alleged offender and the victim (or victims) and/or the victim's parents and other appropriate stakeholders. A master copy is kept by the Oasis International Schools Network Child Safety Officer and the head of school .

If the Child Safety Assessment team concludes that the allegation is not supported, the file will be closed (pending discovery of further information).

The team will develop recommended action steps for:

1. The victim or victims
2. The offender (or alleged offender)
3. The family of each victim
4. The family of the offender
5. The affected school's administration (to trigger a review of school systems)

Possible Outcomes of a Child Safety Assessment and/or a Misconduct Assessment

1. Apply Oasis International Schools Network child abuse policies

The victim's reliability has been sufficiently validated and the report sufficiently corroborated to conclude that the alleged offender violated Oasis International Schools Network child safety policy.

2. Do not apply Oasis International Schools Network child abuse policies

Oasis International School has determined that there is no substance to the allegations or has been unable to sufficiently validate the alleged victim's reliability and/or report to conclude that the child safety policies have been violated.

3. Inconclusive

The alleged victim's reliability has been sufficiently validated for us to conclude that the reported abuse did occur. There is not, however, sufficient corroborating information to conclude that the offender named in the alleged victim's report was the perpetrator.

4. Apply Oasis International Schools Network policies regarding inappropriate behavior but not child abuse.

The alleged victim's reliability has been sufficiently validated and the report sufficiently corroborated to conclude that inappropriate behavior did occur, that, while serious in nature, does not meet the organization's definition of Child Sexual Abuse. Oasis International Schools Network policies with regard to this type of behavior shall be applied. This category is also typically utilized when the behavior occurs between two minors less than three years apart in age, and there is not significant threat or coercion.

5. Other

If a Child Safety Assessment leads to a finding that does not fit one of the previous four categories, it will fall in this category, and an appropriate description and explanation of the outcome shall be stated.

D. Administrative Actions

1. Anyone who is known or determined to have committed sexual abuse of a child under the age of 18 at any time during their adult life is not eligible for service and, if serving, will have their relationship with Oasis International School terminated immediately, with no later opportunity to serve as a member, a volunteer, or an accompanying spouse, or be on school properties. There is no option of resignation. For those seconded from other sending organizations, Oasis International School will recommend that membership in their organization also be terminated.
2. Anyone who committed sexual abuse of a child before the age of 18 will be evaluated on a case-by-case basis, taking into account such factors as age, seriousness of the offense, acknowledgement of responsibility, and effective treatment.
3. Appropriate administrative actions, up to or including termination of relationship with Oasis International School will be taken for anyone who is known or determined to have committed physical or emotional abuse or neglect of a child. Mitigating circumstances may allow lesser responses than termination of relationship with Oasis International School. If the relationship is terminated, later reapplication and restoration to membership, in an assignment not

directly related to children, can be considered by the Oasis International Schools Network Child Safety Officer and personnel committee.

4. Any member whose children (under the age of 18) have been determined to have committed sexual abuse or to have initiated inappropriate sexual behavior with another child will be asked to follow through with the action plan put in place to resolve the causes and effects of the abuse or inappropriate sexual behavior, taking into account such factors as age, age difference between offender and victim(s), seriousness of the offense(s), acknowledgement of responsibility, and effective treatment. Failure to do so will lead to termination of their relationship with Oasis International School. Reapplication would be evaluated on a case-by-case basis and involve effective treatment and other factors listed above.
5. If Oasis International School is asked to provide a reference, the agency will generally disclose the reasons for termination when the termination involves abuse. Further, if the agency becomes aware that a former member, volunteer, or employee of an Oasis International School becomes employed by another organization where the individual has access to children, Oasis International School will normally make that organization aware of the reasons for the agency's termination of employment of the individual.

Follow-up

Oasis International School affirms that after-care must be provided to all members involved in any type of crisis or traumatic incident (such as an abuse case). This after-care should include a time of debriefing at a minimum. Often, additional counseling may be needed for those involved.

Debrief

1. Each individual involved in a child abuse allegation incident should have a time of debriefing.
2. The debrief process will be led by one or more individuals experienced in debriefing after crisis situations. Ideally, this will be a licensed professional counselor (LPC) with appropriate background and experience.
3. The debrief leader (or LPC referred to above) will guide the individual (or group) involved in the incident through a time of reflection on their experience. The intent is to maximize their understanding and learning regarding the incident and to help process emotional responses in a healthy way. Points of focus include restoration of self-respect and dignity, recovery, and reintegration where appropriate.
4. Debrief should be provided for:
 - a. The victim(s)
 - b. The alleged offender
 - c. All Oasis International School members at the affected school. This would include an evaluation of how to modify relevant systems to improve children's safety.

- d. The Child Safety Assessment team members. This may include the response team and/or members of the field leadership team involved in the inquiry. This would focus on an evaluation of procedures that can/need to be improved. As such, it may not necessitate a LPC.

Counseling

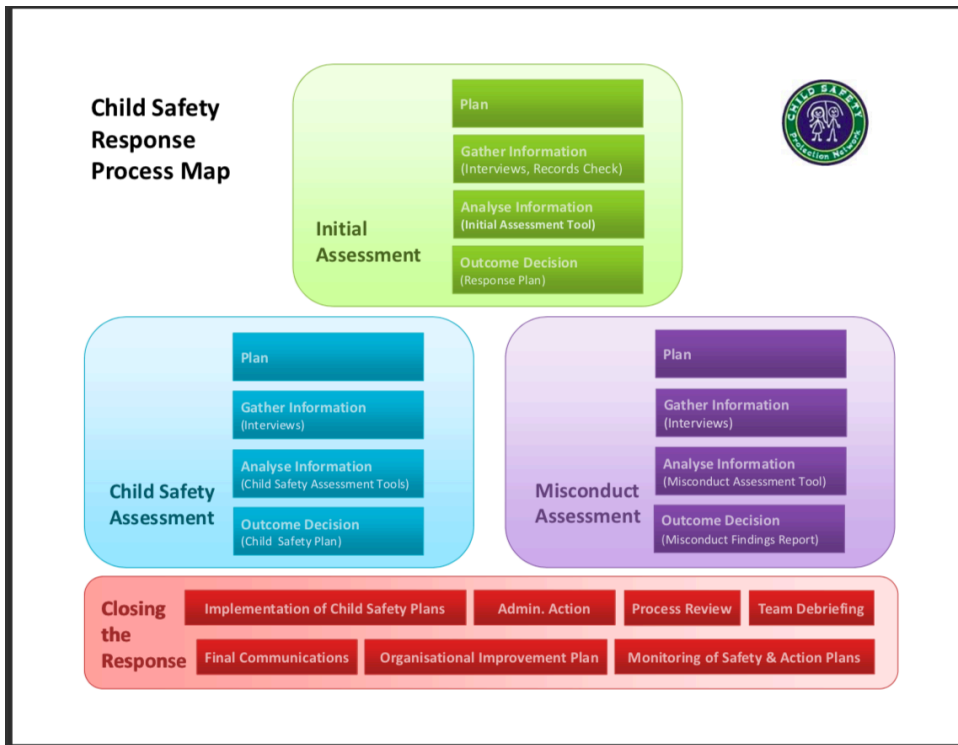
When a child has suffered abuse, counseling for the child and their parents is a top priority. Oasis International School will work with the Head of School and the family to determine the best plan for the family to obtain professional counseling. Oasis International School has a responsibility to care for the victims of verified abuse and their families and reserves the right to require counseling in order to fulfill that responsibility. This may also extend to the respondent and their family at the discretion of school administration.

Policy Review

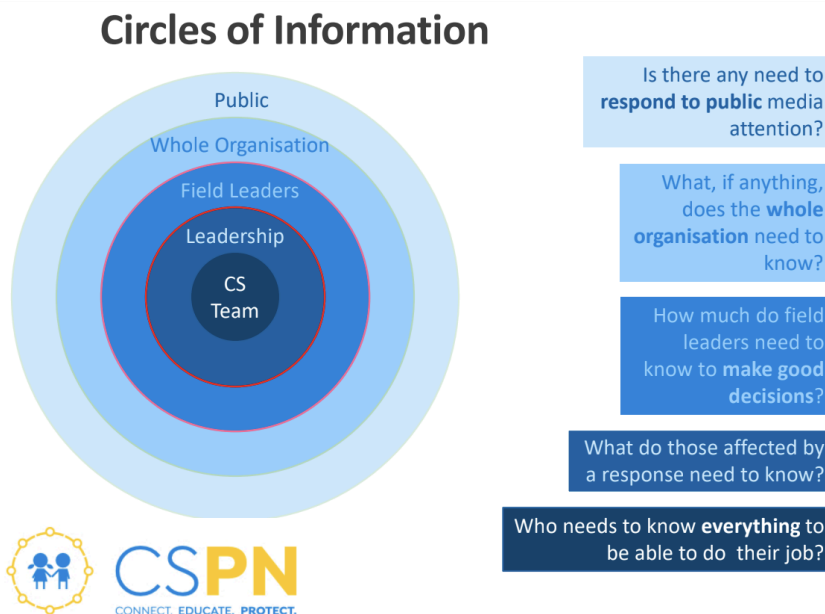
The policies in this handbook are systematically reviewed and amended on an annual basis as part of end-of-year activities. Additional review takes place as part of staff orientation prior to the start of the academic year.

Appendix

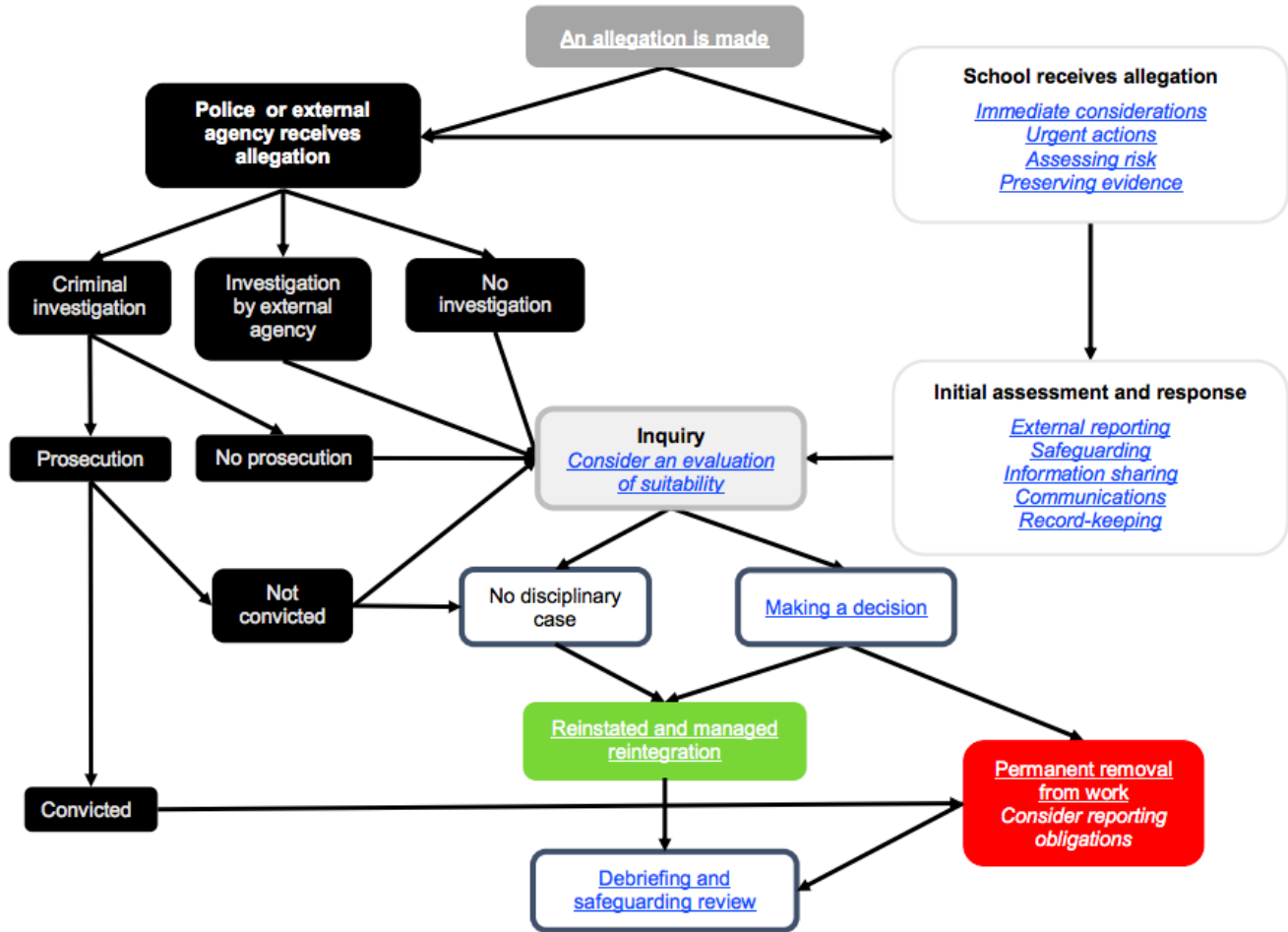
CSPN Reporting Process Flow Chart



CSPN Circles of Information



COIS Reporting Process Flow Chart



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¹⁰https://www.cois.org/uploaded/Documentation/About_CIS/Child_Protection/Protocol_-_Managing_Allegations_of_Child_Abuse_by_Educators_and_other_Adults.pdf