

Letter from Head of School

Dear ASM Parents/Guardians and Community,

The safety of our children is our highest priority. In order for our children to thrive in school, we must ensure their safety. American School of Madrid, in accordance with our core values and vision statement, has developed and implemented a Child Protection Policy to guide our staff and families in matters related to the health, safety, and care of our children at ASM.

The ASM Child Protection Policy is based on international law and on the United Nations Convention on the Rights of the Child of which Spain is a signatory. Additionally, ASM is required to follow local Spanish Law. The two key articles from the U.N. Convention on the Rights of the Child that drive our Child Protection Policy are:

Article 19 - Protection from abuse and neglect

The State shall protect the child from all forms of maltreatment by parents or others responsible for the care of the child and establish appropriate social programs for the prevention of abuse and the treatment of victims.

Article 34 - Sexual exploitation

The State shall protect children from sexual exploitation and abuse, including prostitution and involvement in pornography.

By enrolling your child at The American School of Madrid, you agree to work in partnership with our school and abide by the policies adopted by our school. At ASM, we believe that our partnership is fundamental in ensuring the safety and care of our children.

As part of our overall educational programs and in order to ensure that our children are treated with respect and dignity at all times, the American School of Madrid will:

1. Provide age-appropriate lessons at each division to help students understand personal safety, personal needs, and personal rights.
2. Provide parent materials and information sessions to help you better understand our programs and policy.
3. Ensure school employees and contracted staff are given Professional Development in regard to abuse and neglect.

We thank you for your support and we know that we can work together to ensure that our children are safe and knowledgeable about their rights and responsibilities in a safe and supportive environment. We are available to answer any questions you may have.

Sincerely,
Benjamin Weinberg
Head of School, American School of Madrid

American School of Madrid Child Protection Policy

School Year 2023-2024

This comprehensive child protection document serves to outline ASM definitions, policies, and procedures for investigating allegations of child abuse (physical, emotional, sexual, and neglect). In alignment with our accrediting agency, the Middle States Association (MSA), we are addressing the following standards they require us to demonstrate:

7.6. Provides appropriate training for all staff members on implementing the school's emergency and crisis plans, including but not limited to handling accidents and illnesses, universal precautions for preventing the spread of infectious diseases, and child abuse prevention and reporting.

7.11. Has effective relationships with community organizations that are able to provide appropriate support, advice, and services related to health, safety, and child protection.

7.14. Implements policies, procedures and/or programs to promote awareness, prevention, and responsiveness to issues related to the social and emotional well-being of the students and staff.

Below, each part of this policy is outlined. Parts I and II are for all stakeholders while Parts III, IV, and V, are for specific stakeholder groups. The comprehensive document will be reviewed and updated each school year to reflect any changes or additions to the ASM Child Protection Policy.

Part I: ASM Child Protection Statement and Beliefs

Part II: ASM Expectations and Engagement in Best Practices

- i. Identification of Abuse and Neglect
- ii. ASM Procedures for Ensuring the Safety of All Children

Part IIIa: Staff and Faculty Training and Communication Protocols

- i. Part IIIa: Procedures in the Case of Suspected Child Abuse (Student to Staff)
- ii. Part IIIb: Procedures in the Case of Suspected Child Abuse (Student to Student)

Part IIIc: Procedures in the Case of Suspected Child Abuse Outside of School

- iii. Part IIId: Specific Details for Staff Who are Parents of K-12 Students

Part IV: ASM Preventative Procedures for Ensuring the Safety of Children

Part V: ASM Gender-Based Anti-Discrimination Protocols

PART I

ASM Child Protection Statement and Beliefs

The safety of our children is our highest priority. In order for our children to thrive in school, we must ensure their safety. Child abuse and neglect are violations of a child's human rights and are obstacles to the physical, emotional, and cognitive development of the child. The American School of Madrid endorses the U.N. Convention on the Rights of the Child, of which our host country, Spain, has been a signatory since 2014.

At ASM, we promote a safe and welcoming environment in which each person is valued, cared for, and protected. Educators have a professional, legal, 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 ASM must report suspected incidences of child abuse or neglect whenever the staff member has reasonable cause to believe that a child has suffered or is at risk of suffering abuse or neglect. Reporting and follow-up of all suspected incidences of child abuse or neglect will proceed in accordance with the ASM administrative regulations respective to the Child Protection Policy. Furthermore, cases of suspected child abuse or neglect may be reported to the appropriate child protection agencies or local authorities.

The American School of Madrid seeks to be a safe environment for students who may be experiencing abuse or neglect in any aspect of their lives. As such, ASM will distribute and communicate this policy annually to all stakeholders (staff, families, applicants, and students), will educate all students about child protection, will provide training for all staff, and will continue engaging in hiring practices to ensure the safety of our children.

In the case of any child abuse accusations, ASM will conduct a full investigation carefully following our investigation protocols while keeping the safety of the child at the highest priority until the investigation has reached a satisfactory conclusion.

In order to protect all children in our care and ensure their well-being, ASM staff and community members (all adults and students) must work collectively to educate ourselves on the best practices for maintaining a safe learning environment. Additionally, we must be aware of, be able to identify, and have proper training in effective ways to deal with child safety situations that may arise at school or involving our students outside of school.

What constitutes 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 physical or psychological harm, or by failing to act to prevent harm.

Physical abuse may include actual injury or risk of physical injury to a child, or failure to prevent physical injury (or suffering) to a child. This includes deliberate poisoning, suffocation, fictitious illness by proxy, and excessive punishment.

Physical abuse is:

- Inflicting physical injury on a child by other than accidental means, causing skin bruising, burns, disfigurement, impairment of physical or emotional health, or loss or impairment of any bodily function, death.
- Creating a substantial risk of physical harm to a child's bodily functioning.
- Committing acts that are cruel or inhumane regardless of observable injury. Such acts may include but are not limited to, instances of extreme discipline demonstrating a disregard for a child's pain and/or mental suffering.
- Assaulting or criminally mistreating a child as defined by either the criminal code or school policy.
- Engaging in actions or omissions resulting in injury to, or creating a substantial risk to the physical or mental health or development of a child.
- Failing to take reasonable steps to prevent the occurrence of any of the above.

Possible Indicators of physical abuse:

- Unexplained bruises and welts on any part of the body
- Bruises of different ages (various colors)
- Injuries reflecting shape of article used (electric cord, belt, buckle, ping pong paddle, hand)
- Injuries that regularly appear after absence or vacation
- Unexplained burns, especially to soles, palms, back, or buttocks
- Burns with a pattern from an electric burner, iron, or cigarettes
- Rope burns on arms, legs, neck, or torso
- Injuries inconsistent with information offered by the child
- Immersion burns with a distinct boundary line
- Unexplained lacerations, abrasions, or fractures

Sexual abuse is committing or allowing to be committed any sexual offense against a child as defined in either the criminal code of the host country or school policy, or intentionally touching either directly or through clothing, the genitals, anus, or breasts of a child for other than hygiene or child care purposes.

Sexual abuse has some different characteristics of child abuse that warrant special attention. While physical abuse is often the result of immediate stress and not usually planned, sexual abuse requires planning with more insidious results. The planning, referred to as "grooming", often results in victims accepting the blame, responsibility, guilt, and shame for the sexual behavior of the offender. Sexual abuse requires far more secrecy than other forms of child abuse, so is more difficult to report.

Many victims, through the process of grooming, are taught that sex is a form of love, so tend to love their offender and often present as happy and well-adjusted children with no negative symptoms because of their perception of being loved.

Possible Indicators of Sexual Abuse:

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

Neglect is failure to provide for a child's basic needs within their own environment

<p>Neglect may be:</p> <ul style="list-style-type: none"> • Physical (e.g., failure to provide necessary food or shelter, or lack of appropriate supervision). This would include failure to provide proper adult guardianship such as leaving children unsupervised at home for any extended period of time. • Medical (e.g. failure to provide necessary medical or mental health treatment) • Emotional (e.g., a pattern of actions, such as: inattention to a child's emotional needs, failure to provide psychological care, or permitting the child to use alcohol or other drugs. Specific examples may include verbal humiliation, refusing to acknowledge the presence of a child, invasion of privacy for no specific reason, violent threats, etc.) 	<p><u>Possible Indicators of Neglect</u></p> <ul style="list-style-type: none"> • Child is unwashed or hungry • Parents are uninterested in their child's academic performance • Parents do not respond to repeated communications from the school • Child does not want to go home • Both parents or legal guardians are absent from Madrid for any period of 24 hours or greater without appropriate provision made for child's care, and a temporary guardian named • Parents cannot be reached in the case of emergency
--	--

Emotional abuse can be defined as verbal or behavioral actions that psychologically cause damage to a child's psychosocial development.

<p>Emotional abuse includes:</p> <ul style="list-style-type: none"> • Consistent rejection of child or aspects of the child • Putdowns • Mean "jokes" • Threats • Humiliating on purpose • Isolating • Withholding affection or providing love only on condition • Or an accumulation of these behaviors can constitute emotional abuse 	<p><u>Possible Indicators of Emotional Abuse</u></p> <ul style="list-style-type: none"> • Constant crying • Withdrawn • Cringing when there is perceived wrongdoing • Aggression • Lack of confidence • Not wanting to socialize/self-isolation from peers • Afraid of authoritative figures • Demonstrating some of the emotionally abusive behaviors (mentioned above) with their peers • Attention-seeking (appropriate or inappropriate) • Clingy
--	--

Vulnerable Populations

There are certain groups of individuals who are more susceptible to abuse or child protection danger. All of our students will receive protection, and we will closely monitor children who are:

- Disabled or have possible special educational needs
- Living in a domestic abuse situation
- Affected by parental substance misuse
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Living transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, or sexuality
- Involved directly or indirectly in sexual exploitation, prostitution, or child trafficking
- At risk of female genital mutilation (FGM) or forced marriage

Inclusivity and Gender-Based Discrimination

The ASM definition of emotional abuse includes “consistent rejection of child or aspects of the child”, and aspects of the child also encompasses identity. The American School of Madrid regards the discrimination on the basis of race, religion, nationality, gender identity, or sexual orientation to be inconsistent with its goal of providing an atmosphere in which students, faculty, and staff may learn, work, and live. ASM values diversity and understands that it is due to our diverse population that our community thrives. As such, ASM pledges to students, prospective students, employees, and the public that it will defend pluralism in our community.

This statement is meant to advise and inform all ASM school stakeholders regarding ASM's stance and support for our LGBTQ+ identified staff, families, and students. ASM will not discriminate the use of school space based on gender identity or gender expression. ASM policy prohibits gender-based harassment, therefore, transgender-identified and gender-non-conforming identified students and staff must be protected from discrimination and harassment while at ASM. Any student or staff may inform a school faculty/staff or school administration of their expressed desire to be consistently recognized at school using their stated gender identity, and this request should be acted upon respectfully. The school shall accept the gender identity that each student determines, and there is no medical or mental health diagnosis or treatment threshold that students must meet in order to have his or her gender identity recognized and respected. (Please note that some accommodations are contingent upon parent agreement.)

In order to create a safe learning environment for all students, which includes transgender-identified and gender non-conforming/gender expansive identified students, ASM ensures that every student has equal access to all aspects of their educational program.

PART II

ASM Expectations and Engagement in Best Practices

As a basic set of expectations, all adult members of the ASM community are to follow the below Basic Practices for Adult interactions at ASM. In addition to these basic practices, there are even more specific guidelines for Faculty and Staff, which are also outlined below.

Definitions of Groups:

1. Adults in ASM Community: any adult who is connected to ASM. This includes all non-teaching staff, teaching staff, parents, adult siblings of current students, coaches, outside service providers, cafeteria workers, custodial team, ASA instructors, and security staff.
2. Teaching Staff: any staff who is employed full-time by ASM and directly engages with students in a teaching capacity. This includes teaching interns, classroom teachers, learning support teachers, counselors, and divisional directors.
3. Non-Teaching Staff: any staff who are employed full-time by ASM and do not engage with students in a teaching capacity. This includes maintenance staff, headmaster, administration office staff, and business office staff.
4. Contracted Staff: any staff who are employed part-time or on a limited basis by ASM. This includes coaches, substitute teachers, and After School Activity (ASA) facilitators who are not ASM staff.
5. Non-School Staff: any staff who are contracted through third-party companies who have service contracts with ASM. These staff provide services on campus and some have direct contact with students at ASM but are not ASM employees. This includes bus drivers, bus monitors, cafeteria workers, custodial staff, and security staff.

All Adults

All Adults in our community **WILL**:

- Respect and comply with all Spanish laws and ASM policies.
- Act as a responsible citizen in their own actions and treat children/youth with respect in order to help students reach their full potential and develop their self-worth.
- Empower both the personal and intellectual development of each child by protecting their dignity through the use of positive reinforcement rather than criticism or comparison to others.
- Use appropriate language and interact respectfully.
- Demonstrate appropriate measures of compassion when students are in times of need.
- Demonstrate honesty and integrity in all situations.
- Respect the differences in others regardless of race, ancestry, place of origin, color, ethnic origin, citizenship, religion, gender identity, sexual orientation, age, or disability.
- Maintain appropriate physical boundaries at all times. When touch is indicated, it will be with consent, appropriate, public, and non-sexual in nature.
- Cooperate fully in any investigation of abuse of children and/or youth.
- Communicate concerns about possible misconduct to appropriate administrators.

- Report or question any suspicious person on campus.
- Report any child protection concerns to divisional directors or counselors immediately.
- Engage in digital communication in an appropriate manner and only involve third parties when absolutely necessary

All Adults in our community **WILL NOT**:

- Engage in bullying behavior.
- Touch or speak to a child and/or youth in any sexual or inappropriate manner.
- Inflict harm on a child physically or emotionally including hitting, shaking, slapping, humiliating, ridiculing, or threatening.
- Offer tobacco products, drugs (or paraphernalia), pornography, or alcohol to any child and/or youth.
- Use profanity in the presence of children and/or youth at any time
- Possess any weapon or illegal drugs at school.
- Threaten or intimidate another person (adult or child)
- Use toilets or changing rooms that are designated for students.
- Drink alcohol at any event on campus or school-sponsored trip.

Teaching Staff, Non-Teaching Staff, Contracted Staff, and Non-School Staff

Teaching Staff, Non-Teaching Staff, and Non-School Staff as individuals in specific positions to safeguard and protect children **WILL**:

Respect and comply with all Spanish laws and ASM policies.

- Act as a responsible citizen in their own actions and treat children/youth with respect in order to help students reach their full potential and develop their self-worth.
- Empower both the personal and intellectual development of each child by protecting their dignity through the use of positive reinforcement rather than criticism or comparison to others.
- Use appropriate language and interact in a professional manner with all adults and children
- Demonstrate appropriate measures of compassion when students are in times of need.
- Demonstrate honesty and integrity in all situations.
- Respect the differences in others regardless of race, ancestry, place of origin, color, ethnic origin, citizenship, religion, gender identity, sexual orientation, age, or disability.
- When alone with students ensure there is appropriate visibility, including open doors so individuals in the room are visible from the hallway.
- Maintain appropriate physical boundaries at all times. When touch is indicated, it will be with consent, appropriate, public, and non-sexual in nature.
- Cooperate fully in any investigation of abuse of children and/or youth.
- Engage in digital communication in a professional and appropriate manner, and involve a third party via cc: when necessary.
- Remain in professional roles at all times in their interactions with students.
- Be alert to the impact of their actions, not just intentions.

- Communicate concerns about possible misconduct to appropriate administrators.
- Keep student information confidential.
- Use discretion (appropriate self-disclosure) when disclosing details about personal life.
- Report or question any suspicious person on campus.
- Report any child protection concerns to direct supervisor and/or divisional director or counselor immediately

Teaching Staff, Non-Teaching Staff, and Non-School Staff as individuals in specific positions to safeguard and protect children **WILL NOT:**

- Engage in bullying behavior.
- Touch or speak to a child and/or youth in any sexual or inappropriate manner.
- Inflict harm on a child physically or emotionally including hitting, shaking, slapping, humiliating, ridiculing, or threatening.
- Offer tobacco products, drugs (or paraphernalia), pornography, or alcohol to any child and/or youth.
- Engage in non-school related personal or private communication, with students, using electronics including texting, email, social media, or other similar forms of electronic communication platforms.
- Disclose personal details of colleagues, students, or families outside of educational purposes.
- Use profanity in the presence of children and/or youth at any time outside of educational purposes.
- Possess any weapon or illegal drugs at school.
- Threaten or intimidate another person.
- Cross over into a 'parenting role' (displaying rescuing behaviors) or peer role (acting more like a friend and less like an adult/ professional).
- Build connections with students that are one of dependency.
- Use toilets or changing rooms that are designated for students.
- Drink alcohol at any event on campus or school-sponsored trip.
- Give students a ride in a staff member's own car to and from school or on field trips.

Identification of Abuse and Neglect

All staff must be able to clearly identify the signs and symptoms of abuse, and have the obligation to take the appropriate action. Definitions of abuse are complex and can differ across various cultures according to their child-rearing behaviors, gender and role responsibilities, and expectations. The primary determination of abuse is when there is a relationship between two individuals where one person holds more power over the other and the "power holding" individual uses that power to meet their own needs at the suffering of the other individual. Oftentimes, the abuse that is discovered in the educational setting is when a child (a minor in the eyes of the law) and an adult (typically a family member, teacher, or a friend) are in a situation where the adult uses their authority to meet their own needs and the child is suffering emotionally and physically as a result. There are also instances in which the "adult" is actually an older child.

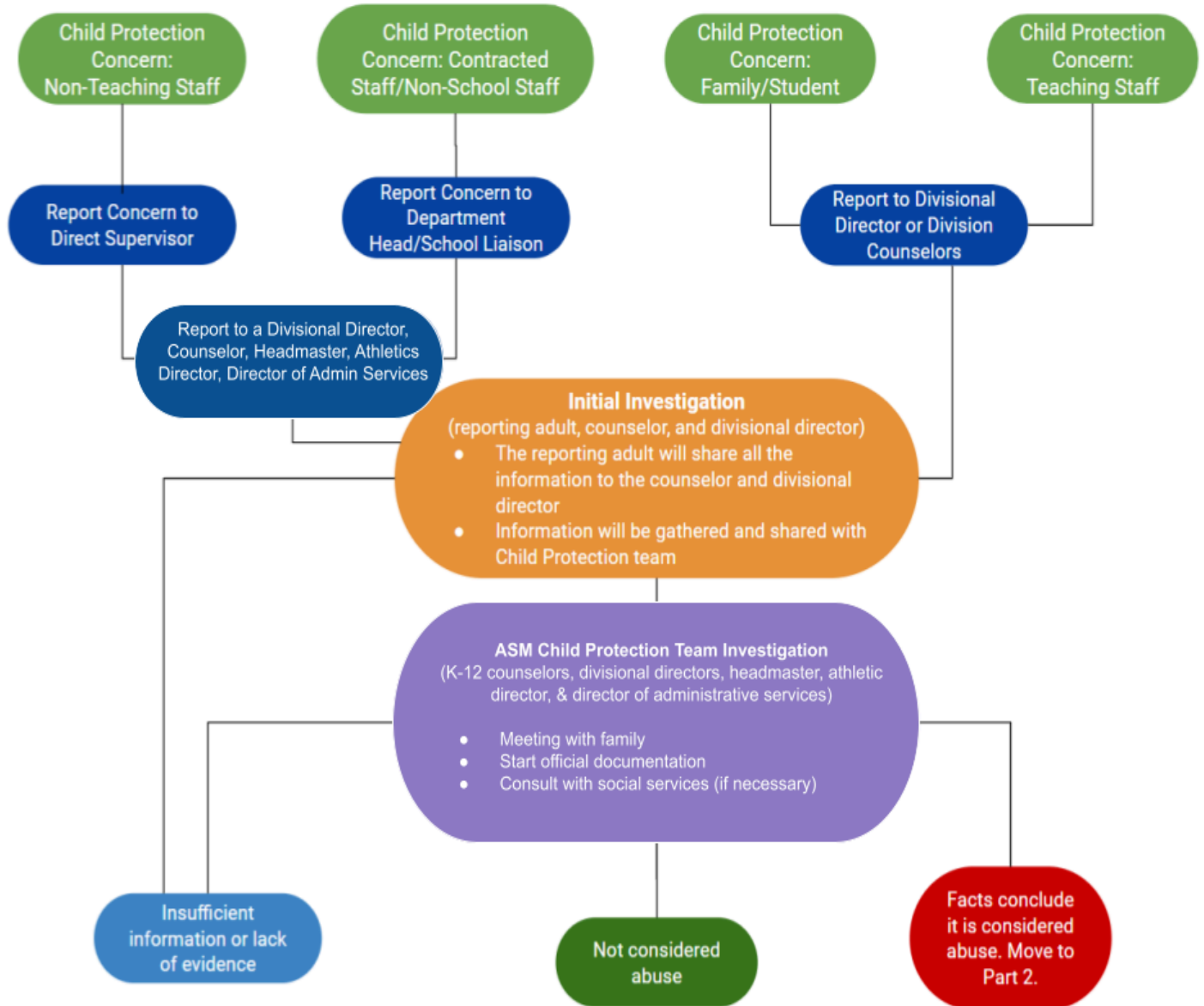
The definitions set out above provide some indicators of abuse and these **should not** be seen as an exhaustive list or as a checklist.

ASM Child Protection Team: Oversight and Investigation

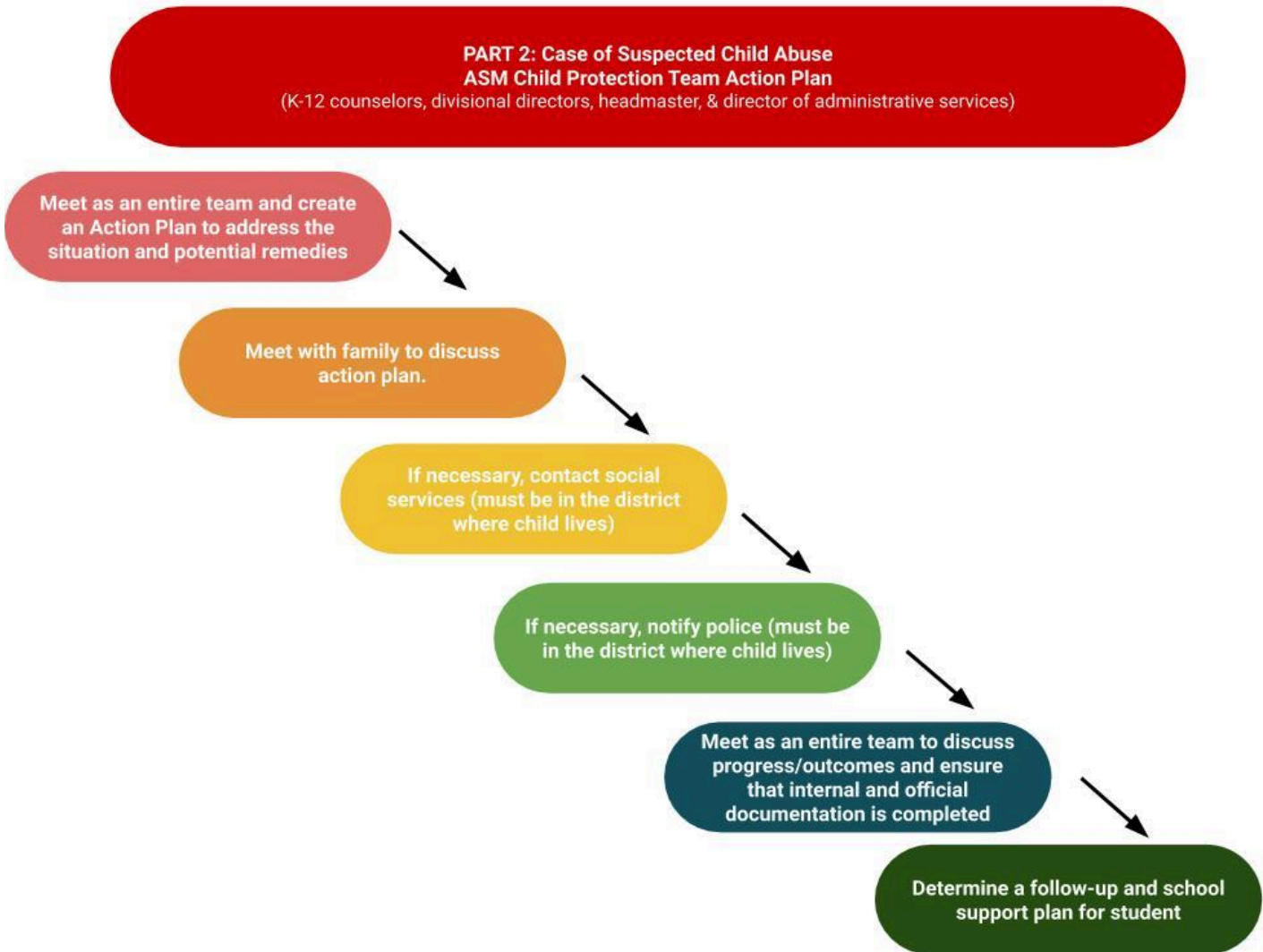
At ASM, the Child Protection Team who provides oversight across all divisions (K-12) and also serves as an investigative group (as necessary) is composed of the following:

1. ASM Headmaster
2. Director of Administrative Services
3. Lower School Director & LS Counselors
4. Middle School Director & MS Counselor
5. Upper School Director & US Counselor
6. K-12 Athletics & Activities Director

ASM Child Protection Flowchart for Reporting: Part 1



**ASM Child Protection Flowchart for Report: Part 2
(if investigation concludes abuse)**



PART III

Part IIIa. PROCEDURES IN THE CASE OF SUSPECTED CHILD ABUSE (Staff to Student)

1. Response to indications of suspected or reported abuse
 - a. If a student informs a school staff member of a situation that could be abuse to which they have been subjected, even in the case that it was carried out by ASM staff, the school staff member shall listen carefully, ask them about the event without getting into unnecessary details and communicate this to the divisional director or counselor immediately. It is also possible that a staff member notices signs of abuse and asks the student.
 - i. Once an adult has been informed, this adult is responsible for ensuring that it is communicated to the divisional director or counselor immediately before the school day ends. If the school day is already over, the morning of the subsequent school day.
 - ii. In the case the divisional director or counselor are both unavailable, it must be reported to any other member of the ASM Child Protection Team (headmaster, divisional directors, counselors, director of administrative services). It is important to refrain from promising the informant that the conversation shall remain confidential.
 - b. **Writing down a brief summary once the conversation with the student has finished is strongly encouraged** (especially if the interaction with the divisional director or counselor doesn't happen immediately) so that the ASM Child Protection Team can be informed as accurately as possible. It is important to take down the facts as accurately as possible. Focus on what the student communicated and refrain from your personal opinions or interpretations. This can be sent in an email to your divisional director and counselor.
2. Steps to be taken after having been notified of a case of abuse
 - a. Initial Investigation. The divisional director will lead an initial investigation with the support of the division counselors(s). At this stage, the divisional director or counselor will also inform the headmaster and Child Protection Lead so they know there is potential for the ASM Child Protection Team to gather.
 - b. Initial Investigation. From the very moment when an accusation or suspicion has been reported, a file shall be opened by counselors which will include the content of the conversation and the matters subject to investigation. Confidentiality is fundamental to the initial investigation and only the ASM Child Protection Team shall have access to the investigation. The individual accused will be informed of where the team is in the

investigation, however, details will not be shared unless more information is needed or the investigation has reached the conclusion.

- c. Initial Investigation. The divisional director is responsible for prudently evaluating the appropriateness of interviewing the students involved and ensuring that families are informed before they are interviewed. From the moment the investigation begins and until it concludes, the ASM Child Protection Team shall take steps to ensure that the accused individual and student do not have contact or share the same spaces.
- d. Initial Investigation. If there is a very clear case of child abuse and/or the child is in immediate danger, the divisional director or divisional counselor will inform the ASM Child Protection team and the team will work together to contact the Comunidad de Madrid authorities. Depending on the type of abuse, the Comunidad de Madrid authorities may include the local police where the abuse occurred or Ministerio de Sanidad (Servicios Sociales de Familias e Infancia).
- e. Initial Investigation. Contact with the family of the child who may have been abused will immediately be made so that the family and school are working together. At this time, the initial investigation informs the family that the child must be interviewed if they are not the ones to initially disclose the abuse. If the child is to be interviewed (or re-interviewed) the family will be invited to be present.
- f. Initial Investigation. The families of the children who witnessed the abuse shall be contacted immediately (in the event that it was an ASM staff member or student and other children observed the abuse). At this time, the initial investigation informs the families that they must interview the children.
- g. Initial Investigation. The initial investigation shall be carried out with the utmost urgency and will use all the resources necessary in order to obtain the necessary information as quickly as possible. If the initial investigation indicates a further and deeper investigation is warranted, the ASM Child Protection Team will convene to review the facts and evidence collected to make a determination.
- h. ASM Child Protection Team Investigation. Should the accused individual be a member of school staff, the ASM Child Protection Team will ensure that the accused individual will provide a written explanation of their account with as much detail as possible. The accused individual can access legal advice and outside support in order to give their statement if necessary. All possible steps shall be taken to manage the process in an efficient and confidential manner so that a temporary absence from the workplace goes unnoticed.
- i. ASM Child Protection Team Investigation. Until the allegation is proven, all possible steps shall be taken to protect the privacy, honor, and image of the accused individual.
- j. ASM Child Protection Team Investigation. During the investigation process, the ASM school staff under investigation shall be temporarily suspended from their duties.

- k. ASM Child Protection Team Investigation. Should the accusations turn out to be false or unfounded, the ASM staff member shall return to their usual role. Appropriate follow-up will occur with the individual who made the accusations so they are clear on the outcome of the investigation.
- l. ASM Child Protection Team Investigation. If more information or evidence comes to light after the investigation has concluded the accusations are unfounded or a definitive conclusion cannot be reached, the investigation can be reopened.
- m. ASM Child Protection Team Investigation. If the initial investigation has concluded the accusations are unfounded, but new evidence comes to light afterward, the ASM Child Protection team will meet again and examine the new evidence. If there is a conclusion that abuse has occurred, there is the potential for the case to be reported directly to the Ministry of Sanidad (Servicios Sociales de Familia e Infancia), the youth prosecution service, the prosecution service, and/or the police (as appropriate).
- n. If the situation is referred to a governmental entity, all protocols from the Comunidad de Madrid shall be followed thereafter.

As part of the ASM Child Protection Policy:

- o. Should inappropriate or criminal acts (as defined by Spanish law) within the field of child protection be confirmed as committed by school staff, ASM will immediately terminate the school staff.

Part IIIb. PROCEDURES IN THE CASE OF SUSPECTED CHILD ABUSE (Student to Student)

- 1. Response to indications of suspected or reported abuse
 - a. If a student informs a school staff member of a situation that could be abuse to which they have been subjected by another student, the school staff member shall listen carefully, ask them about the event without getting into unnecessary details, and communicate this to the divisional director or counselor immediately. It is also possible that a staff member notices signs of abuse and asks the student.
 - i. Once an adult has been informed, this adult is responsible for ensuring that it is communicated to the divisional director or counselor immediately before the school day ends. If the school day is already over, the morning of the subsequent school day.
 - ii. In the case the divisional director or counselor are both unavailable, it must be reported to any other member of the ASM Child Protection Team (headmaster, divisional directors, counselors, director of administrative services). It is important to refrain from promising the informant that the conversation shall remain confidential.

- b. **Writing down a brief summary once the conversation with the student has finished is strongly encouraged** (especially if the interaction with the divisional director or counselor doesn't happen immediately) so that the ASM Child Protection Team can be informed as accurately as possible. It is important to take down the facts as accurately as possible. Focus on what the student communicated and refrain from your personal opinions or interpretations. This can be sent in an email to your divisional director and counselor.
- c. Initial Investigation. The divisional director will lead an initial investigation with the support of the division counselors(s). At this stage, the divisional director or counselor will also inform the headmaster and child protection lead so they know there is potential for the ASM Child Protection Team to gather.
- d. Initial Investigation. From the very moment when an accusation or suspicion has been reported, a file shall be opened by counselors which will include the content of the conversation and the matters subject to investigation. Confidentiality is fundamental to the initial investigation and only the ASM Child Protection Team shall have access to the investigation. The individual accused and their families will be informed of where the team is in the investigation, however, details will not be shared unless more information is needed or the investigation has reached the conclusion.
- e. Initial Investigation. The counselor/director will determine who needs to be spoken with to gain clarifying information on the situation. Depending on the situation, this may include the student who is the alleged victim, the alleged perpetrator, and any others who were involved. From the moment the investigation begins and until it concludes, the ASM Child Protection Team shall take steps to ensure that the accused individual and student do not have contact or share the same spaces. The determination of who is removed from their shared spaces will be made on a case-by-case basis.
- f. Initial Investigation. Contact with the families of the students involved will be made so that the family and school are working together. If the child is to be interviewed (or re-interviewed) the family may be invited to be present. The family may be invited to be present taking into account factors such as entry point of the report, age of the student, etc.
- g. Initial Investigation. The families of the children who witnessed the abuse shall be contacted immediately. At this time, the initial investigation informs the families that they must interview the children.
- h. ASM Child Protection Team Investigation. Until the allegation is proven, all possible steps shall be taken to protect the privacy, honor, and image of the accused individual.
- i. Initial Investigation. If there is a very clear case of child abuse and/or the child is in immediate danger, the divisional director or divisional counselor will inform the ASM Child Protection team and the team will determine who will contact the Comunidad de Madrid authorities. Depending on several criteria, such as but not limited to the type

of abuse, immediate danger, case history, etc., the Comunidad de Madrid authorities may include the local police where the abuse occurred or Ministerio de Sanidad (Servicios Sociales de Familias e Infancia).

- j. ASM Child Protection Team Investigation. Should the accusations turn out to be false or unfounded, the student will return to their usual schedule. Appropriate follow-up will occur with the individual who made the accusations so they are clear on the outcome of the investigation.
- k. ASM Child Protection Team Investigation. If the initial investigation has concluded the accusations are unfounded, but new evidence comes to light afterward, the ASM Child Protection team will meet again and examine the new evidence. If there is a conclusion that abuse has occurred, there is the potential for the case to be reported directly to the Ministry of Sanidad (Servicios Sociales de Familia e Infancia), the youth prosecution service, the prosecution service, and/or the police (as appropriate).
- l. If the situation is referred to a governmental entity, all protocols from the Comunidad de Madrid shall be followed thereafter.

As part of the ASM Child Protection Policy:

- m. Should it be confirmed that the person responsible for the inappropriate or criminal acts (as defined by Spanish law) within the field of child protection is a student, ASM shall begin the process for their immediate expulsion from the school.

Part IIIc. PROCEDURES FOR CASES OF SUSPECTED CHILD ABUSE OUTSIDE OF SCHOOL

1. Response to indications of suspected or reported abuse
2. If a student informs a school staff member of a situation that could be abuse to which they have been subjected by another student, the school staff member shall listen carefully, ask them about the event without getting into unnecessary details, and communicate this to the divisional director or counselor immediately. It is also possible that a staff member notices signs of abuse and asks the student.
 - a. Once an adult has been informed, this adult is responsible for ensuring that it is communicated to the divisional director or counselor immediately before the school day ends. If the school day is already over, the morning of the subsequent school day.
 - b. In the case the divisional director or counselor are both unavailable, it must be reported to any other member of the ASM Child Protection Team (headmaster, divisional directors, counselors, director of administrative services). It is important to refrain from promising the informant that the conversation shall remain confidential.
 - c. **Writing down a brief summary once the conversation with the student has finished is strongly encouraged** (especially if the interaction with the divisional director or counselor doesn't happen immediately) so that the ASM Child Protection Team can be informed as accurately as possible. It is important to take down the facts as accurately

as possible. Focus on what the student communicated and refrain from your personal opinions or interpretations.

3. Steps to be taken after having been notified of a case of abuse

- a. Initial Investigation. The divisional director will lead an initial investigation with the support of the division counselors(s). At this stage, the divisional director or counselor will also inform the headmaster and child protection lead so they know there is potential for the ASM Child Protection Team to gather.
- b. Initial Investigation. From the very moment when an accusation or suspicion has been reported, a file shall be opened by counselors which will include the content of the conversation and the matters subject to investigation. Confidentiality is fundamental to the initial investigation and only the ASM Child Protection Team shall have access to the investigation. The individual accused and their families will be informed of where the team is in the investigation, however, details will not be shared unless more information is needed or the investigation has concluded.
- c. Initial Investigation. If applicable, the divisional director and/or counselor is responsible for prudently evaluating the appropriateness of interviewing the students involved if they are considered witnesses, and ensuring that families are informed before they are interviewed. From the moment the investigation begins and until it concludes, the ASM Child Protection Team shall take steps to ensure that the accused individual and student do not have contact or share the same spaces if it is a student. The determination of who is removed from their shared spaces will be made on a case-by-case basis.
- d. Initial Investigation. If there is a very clear case of child abuse and/or the child is in immediate danger, the divisional director or divisional counselor will inform the ASM Child Protection team and the team will determine who will contact the Comunidad de Madrid authorities. Depending on the type of abuse, the Comunidad de Madrid authorities may include the local police where the abuse occurred or Ministerio de Sanidad (Servicios Sociales de Familias e Infancia).
- e. Initial Investigation. Contact with the family of the child who may have been abused will immediately be made so that the family and school are working together. If family members are accused, the situation will be evaluated to determine a safe adult in the home.
- f. Initial Investigation. If applicable, the families of the children who witnessed the abuse shall be contacted immediately. At this time, the initial investigation informs the families that they must interview the children.
- g. Initial Investigation. The initial investigation shall be carried out with the utmost urgency and will use all the resources necessary in order to obtain the necessary information as quickly as possible. If the initial investigation indicates a further and deeper investigation

is warranted, the ASM Child Protection Team will convene to review the facts and evidence collected to make a determination.

- h. ASM Child Protection Team Investigation. Until the allegation is proven, all possible steps shall be taken to protect the privacy, honor, and image of the accused individual.
- i. ASM Child Protection Team Investigation. If more information or evidence comes to light after the investigation has concluded the accusations are unfounded or a definitive conclusion cannot be reached, the investigation can be reopened.
- j. ASM Child Protection Team Investigation. If the initial investigation has concluded the accusations are unfounded, but new evidence comes to light afterward, the ASM Child Protection team will meet again and examine the new evidence. If there is a conclusion that abuse has occurred, there is the potential for the case to be reported directly to the Ministry of Sanidad (Servicios Sociales de Familia e Infancia), the youth prosecution service, the prosecution service, and/or the police (as appropriate).
- k. If the situation is referred to a governmental entity, all protocols from the Comunidad de Madrid shall be followed thereafter.

Part IIIc: SPECIFIC DETAILS FOR STAFF WHO ARE PARENTS OF K-12 STUDENTS

It is understood that there are staff who are also parents of current K-12 students. As a result of the dual or even multiple roles on campus, it can be difficult to navigate the boundaries that educators are taught in their training programs. Within your capacity as a parent:

1. Dual relationships
2. Transporting students in staff vehicle
3. Students coming to staff homes
4. Students spending the night in staff home
5. School trips
6. Family trips

Information that is disclosed during any of these times is subject to mandated reporting.

PART IV

ASM PREVENTATIVE PROCEDURES FOR ENSURING THE SAFETY OF CHILDREN

The Leadership Team at ASM will ensure that all ASM staff are familiar with the procedures for student protection and safety with reference to activities organized by the school. The safety of all students is of utmost importance and ASM ensures their safety by engaging in best practices on-campus and off-campus when they are participating in school-sanctioned activities.

Safeguarding Procedures in Place:

1. All teaching staff, non-teaching staff, and non-school staff have fingerprinted clearance from their countries of origin or the Spanish Ministry of Education. This must be in place in order to work with and around children at ASM.
2. The admission process (Educational Commitment Contract) includes written parental consent for obtaining student photographs or recordings so that material for school magazines, the website, and other audiovisual means is made available.
3. For any activity taking place outside of school grounds, two staff members will be present regardless of the number of students up to 15 students. Thereafter, the ratio will be one staff member per additional 15 students.
4. All school staff have been instructed to leave the windows on their doors unobstructed so the interiors of their classrooms or offices are visible and to make themselves as visible as possible when having private conversations.
5. Except under very special circumstances, teaching staff, non-teaching staff, and non-school staff shall make telephone calls to families from the school, shall not give out personal mobile numbers, and shall not send text messages from personal phone devices. The same criteria apply to students.
6. All staff and faculty on campus use only adult-designated restrooms/stalls and students use only student-designated restrooms/stalls.
7. During any activity (on-campus or off-campus) requiring the use of bedrooms and showers and/or changing rooms situated outside general access areas, those to be used by students (separate for male and female students) shall not be situated next to those to be used by teachers or chaperoning adults.
8. Staff and faculty (in the context of the staff/faculty and student relationship) do not reward students with activities that take place outside of the school grounds.
9. Staff and faculty (in your role as a staff/faculty) will not have student(s) in their personal vehicles.

10. When meetings are held with families at the school outside school hours, these activities take place in specifically designated areas and these areas shall remain open and within public view. In all cases, school staff shall always be present.
11. Should any staff or faculty be made aware of information that may imply a possible case of child abuse, they shall immediately report this to their direct supervisor or divisional director. The information will then follow the ASM child protection protocols and procedures. Such matters are the responsibility of the entire ASM Child Protection Team (a team of ASM educational leaders K-12).
12. All staff on campus have a responsibility to report any reports of inappropriate adult behavior or instances of suspected abuse to ASM directors, counselors, or office administration. The information will then follow the ASM child protection protocols and procedures.
13. If any family or outside stakeholder has a child protection concern, they can communicate directly to a divisional director or counselor and the suspected abuse will be investigated.
14. Any student on campus can disclose concerns about themselves or others to a trusted adult at ASM and it will be addressed. Even if the concerns are about fellow students or other ASM staff.

PART V

ASM GENDER-BASED ANTI-DISCRIMINATION PROTOCOL

Basic Definitions

- Cisgender, cisperson: identifies as their gender/sex assigned at birth
- Gender expression: manifestation of one's gender identity through clothing, hairstyle, voice, body shape, etc. (typically referred to as masculine or feminine)
- Gender identity: One's internal sense of self on the gender spectrum as male, female, neither, a blend of both, or other gender(s). Very individual experience, but very formative of the sense of self. One's gender identity can be the same or different from their sex assigned at birth.
- Intersex persons: An umbrella term describing people born with reproductive or sexual anatomy and/or a chromosome pattern that can't be classified as typically male or female
- Nonbinary person: An identity outside the male or female binary division. This term refers to individuals who identify as neither man nor woman or as a combination of man or woman. Instead, nonbinary people exhibit a boundless range of identities that can exist beyond a spectrum between male and female.

- Transgender, transperson: umbrella term representing a whole spectrum of gender identities of those who do not identify or exclusively identify with their sex assigned at birth, including trans men (FtM), trans women (MtF), non-binary, fluid, and other non-cis identities. Not all trans people undergo transition. Being transgender does not imply any specific sexual orientation. Therefore, transgender people may identify as straight, gay, lesbian, bisexual or something else.
- Transitioning: A process of individuals striving to more closely align their gender identity with their gender expression.
 - Social (coming out, changing name, pronoun, clothing, hairstyle, etc. in order to be socially recognized as another gender)
 - Physical (hormonal treatment HRT, hormone blockers, medical/surgical interventions)
 - Legal (change of name, gender, and birth ID number in official documents)

Privacy

All students have a right to privacy; this includes the right to keep private one's transgender or gender-nonconforming status. Information about a student's transgender status, legal name, or biological sex assigned at birth also constitutes confidential information. School personnel should not disclose information that may reveal a student's transgender or gender non-conforming status to others, including the student's family, school personnel, and other community members, unless the student has authorized such disclosure. Breaching the student's privacy is considered "outing", which is broadly defined as the inappropriate act of publicly declaring (sometimes based on rumor and/or speculation) or revealing another person's sexual orientation or gender identity without that person's consent.

In situations where the student has a desire to compete in gender-divided school teams or other extracurricular-sanctioned activities, the school administration will work with the family to identify what information would need to be shared prior to submitting such information to the destination school. Administrators and/or counselors and other school personnel, as appropriate, should involve parents or guardians in the implementation of these guidelines and the process of social transition at school to support the student's well-being at school, but should first discuss familial involvement with the student to avoid inadvertently putting the student at risk.

Names/Pronouns

Students shall have the right to be addressed by a name and pronoun that they choose. Students are not required to obtain a court-ordered name and/or gender change or to change their official records as a prerequisite to being addressed by the name and pronoun that corresponds to their gender identity. This directive does not prohibit inadvertent slips or honest mistakes, but it does apply to an intentional and persistent refusal to respect a student's gender identity (consistent and intentional misgendering). ASM shall work with the student and family to decide how to best inform the larger community. Each student has a unique process for transitioning. The school shall customize support to optimize each student's integration.

Official Records

ASM shall change a student's official records to reflect a change in legal name or gender upon receipt of documentation that such legal name and/or gender have been changed.

Restroom Accessibility

Students shall have access to the restroom that corresponds to their gender identity that is exclusively and consistently asserted at school. If available, a single-stall bathroom may be used by any student who desires increased privacy, regardless of the underlying reason. The use of such a single-stall bathroom shall be a matter of choice for a student, and no student shall be compelled to use such bathroom.

Locker Room Accessibility

Transgender students shall not be forced to use the locker room corresponding to their gender assigned at birth. In locker rooms that involve undressing in front of others, transgender students who want to use the locker room corresponding to their gender identity that is exclusively and consistently asserted at school will be provided with the available accommodation that best meets the needs and privacy concerns of all students involved. Based on availability and appropriateness to address privacy concerns, such accommodations could include, but are not limited to:

- Use of a private area in the public area (i.e., a bathroom stall with a door, an area separated by a curtain, a PE instructor's office in the locker room);
- A separate changing schedule (either utilizing the locker room before or after the other students); or
- Use of a nearby private area (i.e., a nearby restroom, or a nurse's office).

Sports and Gym Class

Transgender students shall not be denied the opportunity to participate in physical education, nor shall they be forced to have physical education outside of the assigned class time. Generally, students should be permitted to participate in gender-segregated recreational gym class activities and sports in accordance with the student's gender identity that is exclusively and consistently asserted at school. Participation in competitive athletic activities and contact sports will be resolved on a case-by-case basis and with student input.

Dress Codes

Students shall have the right to dress in accordance with their gender identity that is exclusively and consistently asserted at school, within the constraints of the dress codes adopted at their school site.

Overnight Trips

In the planning of sleeping arrangements during overnight field trips and athletic trips, the needs of students who are transgender shall be assessed on a case-by-case basis with the goals of maximizing the student's social integration and equal opportunity to participate in overnight activity and athletic trips. The student's safety and comfort, and minimizing stigmatization of the student are to be ensured. Any student who has a need or desire for increased privacy, regardless of the underlying reason, should be provided with reasonable accommodation, consistent with the policies and

procedures for child safety. Any alternative arrangement should be provided in a way that allows the student's transgender status to be kept confidential. In no case shall a student who is transgender identified be required to share a room with students whose gender identity conflicts with their own or causes them discomfort.

About Case-By-Case Basis: To ensure this procedure is implementable, since transgender students should have the opportunity to room with peers that match their gender identity, and schools should try to pair the transgender-identified student with peers with whom there is a mutual level of comfort – the hosting school or institution should also honor requests for alternative sleeping arrangements if that is the transgender-identified student's preference.

Gender Segregation in Other Areas

As a general rule, in those rare circumstances where students are separated by gender in school activities (i.e., health discussions), students shall be permitted to participate in accordance with their gender identity exclusively and consistently asserted at school. Activities that may involve the need for accommodations to address student privacy concerns will be addressed on a case-by-case basis. In such circumstances, staff shall make a reasonable effort to provide an available accommodation that can address any such concerns.