CHILD PROTECTION POLICY

'It is important that schools don't only try to do something about violence against children after it has happened. They must also take action to prevent it from occurring in the first place'.
Save the Children

Introduction

The following policy is a guiding document which aims to provide our school with safe, clear and effective practices to safeguard the health and welfare of our students.
As a staff member, parent, student we all have a responsibility to safeguard the children in our school community. We all form part of a child protection 'safety net' which keeps everyone safe from harm, abuse and exploitation.

Background

Child abuse, Human Rights abuses and neglect are a growing concerns for schools across the world. It is known that unsafe environments or situations adversely affect a child's development educationally, physically, emotionally, psychologically, spiritually and socially. A safe child is more likely to thrive in all these areas and will have better longer term outcomes and opportunities.
It is a fact that predatory adults actively seek opportunities for contact with children and for this reason schools are especially vulnerable to unsafe people both from within the community and from people outside the community.
A child Protection Policy and high awareness of child safety amongst all staff is the key to effective safeguarding. This is in some part due to the school being less attractive to potential offenders and partly due to creating an environment where unsafe behaviour is noticed and responded to.

Child Protection Policy format

The document aims to provide the following:

Part 1	**Child Protection Overview**
	KIS Commitment: Awareness, Prevention, Reporting, Responding
Part 2	**Definitions of Abuse**
	Definitions and indicators of abuse
	Grooming behaviour
	Myths and realities
Part 3	**Guiding Principles**
	Confidentiality, Protection, Prevention awareness, Child-centred planning, Accountability and Responsibility
Part 4	**Preventative Measures**
	Dissemination and awareness
	Recruitment and selection
	Building child safeguarding into management systems and procedures
	Risk assessment and risk management
	Learning and development
	Information technology and communication technology
	Audit and review
Part 5	**Creating a Protective Environment**
Part 6	**Responding to Abuse – Protocols and Actions**
Part 7	**Child Protection Law**
Part 8	**Child Protection Code of Conduct**

PART 1 CHILD PROTECTION OVERVIEW

The aim of the revised Child Protection Policy is to encourage more proactive, preventative ways to keep the children we work with safe from harm, as well as to set out the measures we take to report and respond to abuse when it occurs. Kodaikanal International School must take steps at all levels to reduce the risks of harm to children in all areas of our work, including when those risks result from any failure on our part. Management is expected to provide an organizational environment in which these measures are implemented and the risks of harm to children are reduced.

There is an increased global awareness of the issues of sexual exploitation and abuse by people in positions of trust and authority within environments where there is easy access to children. This is clearly an unacceptable reality to which KIS as an International School is vulnerable. It is recognized that the first steps in safeguarding children in the school is to have a policy which raises awareness, takes preventative measures and provides a clear protocol for monitoring, reporting and responding to abuse and exploitation.

This Policy represents a bold expression of our determination not to tolerate such exploitation or abuse of children, especially within our own school community.

This Policy should be seen as the product of the approach to safeguarding that KIS has developed over a number of years. As such, it does not depart radically from the previous policies or protocols; however, by setting down clearer and firmer standards for compliance, this Policy embodies with renewed vigour the KIS commitment to safeguarding children.

It is now universally accepted that children have a right to protection from violence, exploitation, abuse and neglect. This is evident in the widespread ratification of the United Nations Convention on the Rights of the Child. However despite this, the abuse and sexual exploitation of children still occurs on a global scale and in every country, culture and society. It is the view of KIS that all child abuse and sexual exploitation involves the abuse of children's rights and is unacceptable.

International school employees are all employed in a position of trust; parents and visitors are also invited onto campus in a trusted capacity. When that special trust is exploited, immense damage is caused to the child and the organization. KIS has a zero tolerance approach to the sexual exploitation and abuse of children by our staff, partners and others who represent us.

Case studies indicate that there is a risk of abuse within any organization. Furthermore, organizations without a clear policy or child centred environments and cultures are more likely to aggravate the trauma experienced by the 'victim' through inefficient processes, organizational cover ups and inadequate responses to perpetrators.

Kodaikanal International School Commitment to Children

Awareness:

We will ensure that all staff, students, parents and partners are aware of the problem of child abuse and sexual exploitation and the risks to children. Staff, children and their families will be made aware of the standards of behaviour they can expect from our representatives and of how they can raise a concern.

Prevention:

We will ensure through awareness raising that staff and others minimize the risks to children. Staff and managers will create an environment where children's rights are respected and sexual exploitation, abuse or bullying is prevented.

Reporting:

We will ensure that staff and others are clear as to what steps to take where concerns arise regarding the abuse or exploitation of children.

Responding:

We will ensure that appropriate action is taken to support, safeguard and protect children where concerns arise regarding their possible abuse and exploitation.

There are 5 stages to effective Child Protection in Schools and Institutions.

1. Gate Keeping (all staff, students, visitors, parents)
2. Awareness and Sensitization (all staff, students, parents)
3. Monitoring (incidents, behavioural patterns, warning signs)
4. Reporting (all staff, students, visitors, parents)
5. Responding

PART 2 DEFINITIONS OF ABUSE Source: Save the Children

Overview: Child abuse consists of anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into well-adjusted adults.

Physical Abuse: physical abuse is the inflicting of physical injury on a child.

Sexual Abuse: sexual abuse is inappropriate sexual behaviour with a child.

According to WHO, child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or that violates the laws and social taboos of any society.

Emotional Abuse: emotional abuse is also known as verbal abuse, mental abuse, and psychological maltreatment.

Neglect: is the failure to provide for the child's basic needs. Neglect constitutes physical, educational or emotional neglect.

Abuse further defined and detailed:

Definitions of abuse in an International context are complex due to different cultural and social expectations throughout the world. The primary determination of abuse is that it is dependent on a power imbalance within a relationship, often to meet the needs of the more powerful person. The power dynamic can be due to age, gender, status, disability, development, role, dependency, etc.
A particular emphasis in an International School context is that staff members are employed in a 'position of trust' and within a role which has power imbalance associated with it e.g. Dorm parent, Teacher, Administrator, Security, etc.

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, loss or impairment of any bodily function, or 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 of 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.

INDICATORS OF PHYSICAL ABUSE

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

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.
Intentionally touching either directly or through clothing, the genitals, anus, or breasts of a child for other than hygiene or child care purposes.
Sexual acts that are reasonably considered beyond the age, physical development or understanding of the child.
Sexual acts perpetrated by a person in a position of trust regardless of consent.
Whilst sexual abuse can be opportunistic it usually requires planning and intent. It usually requires a degree of grooming to elicit trust with the child and other staff. The process often sets the abuser up as someone who is beyond reproach which makes reporting harder from colleagues and grooming also aims to make it harder for the victim to report when they want the abuse to stop (either through guilt, shame, threats, menaces, blackmail etc.)
Sexual abuse requires far more secrecy than other forms of child abuse, so is often more difficult to notice and report for colleagues and victims.

INDICATORS OF SEXUAL ABUSE

- Sexual behaviour, or use of language not appropriate to age level
- Unusual interpersonal relationship patterns
- Venereal disease in a child of any age
- Evidence of physical trauma or bleeding to the oral, genital, or anal areas
- Difficulty in walking or sitting
- Refusing to change into PE clothes, fear of bathrooms
- Child running away from home, school, dorm and not giving any specific complaint
- Not wanting to be alone with an individual
- Pregnancy, especially at a young age
- Extremely protective parenting
- Refusing to eat certain foods or eat in front of people
- Promiscuity or touch aversion
- Sexual touching from child / different sexual boundaries
- Personal hygiene issues.
- Dressing down.
- Socially guarded, withdrawn, self-protecting.

Emotional Abuse is:
Treating a child / person in a way which deliberately undermines their confidence, self-esteem, and self-worth.
Stigmatizing, discriminating or humiliating a child based on their age, gender, sexual orientation, race, language, physicality, intellect.
Name calling, humiliation, sarcasm directed at the child.
This kind of abuse often swings between being over protective and over punitive (inconsistent care giving).
Parental interference in school life / humiliation in front of other children.
Overly negative attitude toward child from parents, staff or carers.
Threatening love or care withdrawal as a punishment.
Using put downs, threats or other verbal or written means to undermine the person's emotional security and psychological well being.
Verbal abuse, harassment, menaces, threats humiliation all constitute emotional abuse.
Refusing to acknowledge presence of child – deliberate ignoring.
Invasion of privacy or personal space for no specific reason (menace, annoyance).

INDICATORS OF EMOTIONAL ABUSE

- Child is quiet or withdrawn
- Socially isolated; avoids interactions with community
- Child appears depressed
- Loss of appetite
- Loss of motivation for school or activities
- Mood swings
- Changes in behaviour
- Angry outbursts
- Tearful
- Avoids eye contact
- Unwillingness to try new things
- Avoidance of people, places, situations.

Neglect is:

Failure to provide for a child's basic needs within their environment i.e. food, shelter, warmth, clothing, age appropriate supervision.
Physical neglect (e.g., failure to provide necessary food, warmth, clothing or shelter)
Lack of appropriate supervision, 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 neglect e.g. inattention to a child's emotional needs, failure to provide psychological care, or permitting the child to use alcohol or other drugs.

INDICATORS OF NEGLECT

- Child is unwashed or hungry
- Child's clothes are too small, not fit for purpose
- Poor personal hygiene,
- Over filling plates when eating
- Stealing others property
- Tired looking, physically small, 'non organic failure to thrive'
- Parents are uninterested in child's academic performance
- Low energy and motivation
- Parents do not respond to repeated communications from the school
- Child does not want to go home
- Parents / carers cannot be reached in the case of emergency
- Little future ambition (focussing on daily survival)

Note: Behavioural indicators in themselves do not constitute abuse or neglect. There can for example be several explanations why a child is avoiding class which are not abuse related.
Being aware of indicators along with other factors can contribute significantly toward understanding a child's distress and ultimately safeguarding the child.

Grooming behaviours

Staff and children need to be aware of 'grooming' behaviours. In the event of physical abuse, the abuse is often perpetrated as part of a bullying culture or as an event triggered by anger, frustration or other high expressed emotion. Typically the event is not premeditated or planned. In the event of sexual abuse the behaviour tends to be more secretive and insidious in nature. Typically a predator will 'groom' the child(ren) and the organization over a period of time. Often, when paedophilia or abuse is exposed, it is a member of staff who has been considered beyond reproach. The grooming of organizations involves behaviours and personal friendships with key people, the staff member making themselves indispensable and valuable. This strategy serves as a self-protective mechanism making it harder for people to raise concerns. Grooming behaviours with children often involves the adult developing a 'special' relationship with a child. This relationship gradually changes in nature as the adult elicits trust or fear in the child which prevents them from telling. Sometimes the nature of the attention is enjoyed by the child creating confusion around intimacy and boundaries.

Warning signs:

- Staff member(s) spending more/ excessive time with one particular child
- Staff who have developed a 'special' relationship with one particular child
- Secretive behaviours e.g. walks, meetings out of hours in private, classrooms / offices etc.
- Staff who buy gifts for a particular child to the exclusion of others
- Inviting children to staff homes / spending the night (unauthorized or regularly)
- Child's demeanour changes in the presence of a particular adult
- A child receiving different treatment to other children
- Intimate touch or body language between staff member and the child
- Intimate words used by adult or child toward each other or in conversation with others
- Children bragging about or name calling about a particular adult
- Leaving notes or drawing for others to see (attempts at whistleblowing).

Note: In several high profile cases it has transpired that in several nurseries, schools and children's homes several people had suspicions and little pieces of information that they did not consider worthy of reporting. All the information together would have identified a dangerous pattern and child abuse would have been prevented. The learning from this is that organizations need a central person who receives information. Small concerns need to be reported to this person so that the bigger picture can be seen and patterns identified. It therefore needs to be a duty for all staff, children, and families to report concerns in the interests of protecting children.
Note: Evidence indicates that a robust Child Protection Policy is a protective factor for organizations because the nature of an adult predator is to seek out 'soft targets.' Staff and student awareness is the single most effective deterrent to predatory behaviour.

MYTHS AND REALITIES OF CHILD ABUSE Source: Save the Children
Myth: Child abuse is carried out by strangers.
Fact: Research indicates that 90% of abuse is from domestic causes and is committed by individuals known to the child. E.g. parents, baby sitters, teachers, family friends, carers.
Myth: Learning about child protection is harmful to your children.
Fact: Research indicates that developmentally appropriate education makes children more confident and able to respond better to dangerous situations.
Myth: Abuse education is sex education.
Fact: It is more about personal safety which prepare students to develop the skills and attitudes to keep themselves safe from perpetrators, as well as behaviours that include bullying, harassment and other forms of exploitation. As much as sex education is necessary, abuse education goes above and beyond this in what is addressed and the need for it.
Myth: Abuse is a matter of culture; physical or sexual abuse falls within the norms of some cultures and is acceptable.
Fact: The reality is that there no excuse for child abuse! No culture supports harming children.
Myth: Child abuse is a result of poverty and happens in low socioeconomic circumstances.

Fact: Research indicates that child abuse occurs in all racial, ethnic, socio-economic, and cultural sectors of society.
Myth: International Schools do not have to report abuse to local authorities.
Fact: International schools are bound by the laws of the host country and as such international schools must be knowledgeable and compliant with the child protection laws in their locale. Furthermore, international schools are legally and ethically liable for any violation of existing laws related to reporting of cases of abuse or neglect; there are cases now pending where schools are facing legal action in regard to non-reporting.

An Indian context:

In India there is a legal duty to report sexual abuse under the 'Protection of Children from Sexual Offences Act 2012.' The Act also provides for punishment for failure to report a sexual offence.

There is no provision to report an incident of physical abuse to the Police. Moreover, police (including women police officers) in India are not specifically trained to handle situations of abuse with sensitivity. However, as an International School, physical abuse comes within the remit of the code of conduct and will be dealt with through child protection procedures.

In an Indian context sexual abuse has additional layers of impact and consequence for the victim. The stigmatisation can make reporting and disclosure more difficult and the abuse potentially more secretive. Those from the School dealing with the victim and family must be clear that catering to this stigmatisation ends up making the abuse situation about the family (or the school), instead of about the victim. It also allows the abusive situation to continue unchecked.
Where abuse has been identified, it is entirely possible that the staff member has been given the option of resigning quietly without any mention on their record. This may be particularly true in India where the professional/ manager/ administrator/ director is a well-regarded member of society, while the student's experience and testimony is considered questionable. The perpetrator then moves on to another school to continue the predatory behaviour.

An International School context

Staff are often more transient and international than most main stream schools, which makes recruitment and reference checking more difficult. This creates a vulnerability in the safeguarding systems.
Several countries do not provide police checking services.
Abusive staff members can often move to another school with impunity, creating another vulnerability which is peculiar to International Schools. It is highly likely that they would move from school to school, perhaps being suspected of "strange" behaviour, but often being respected members of the community.
International school communities tend to have staff families that move often and are separated from their extended families in their home of origin. When abuse is within the family, the transient life-style then increases the risk to these children who tend not to have access to outside resources, and therefore cannot get help.

PART 3 GUIDING PRINCIPLES

Dealing with Child Protection and Safeguarding issues requires some guiding principles. Cases are invariably different and each case is unique. Even the best and most thorough guidance cannot legislate for the individual circumstances of every case. For this reason guiding principles assist the process of making good safeguarding choices.

Confidentiality

Due to the sensitive nature of abuse, confidentiality must be maintained through the investigation process and permanently, unless the victim articulates otherwise. Those involved in the investigation or procedures should be kept to a minimum. Details of the abuse should not be shared with anyone. People with support roles do not need to know details e.g. dorm parents do not need to know details of the abuse – they do however need to know the child might need extra support. The child needs to be informed clearly whom information will be passed to. Clear guidelines on confidentiality vs duty to report are essential for all staff in the event of a disclosure of abuse.

Protection
The emphasis in all investigations and actions is in protection of the child. The child needs to be protected from further potential abuse and measures taken to safeguard the child e.g. suspension of staff should be done with the child's safety and emotional vulnerability as paramount. Staff and parents should understand this type of action as a protective measure and not a disciplinary measure or assumption of guilt.

Prevention awareness
Prevention is better than having to respond to actual abuse. The school should engage in reflective practices to safeguard children and identify vulnerabilities in current practices and procedures. Key areas being:
Gatekeeping (recruitment and selection procedures, visitor policy)
Awareness and sensitization (staff training, student and parent education and awareness, whole school approach, foster a school culture of care, trust and respect)
Monitoring (incidents, concerns, reviewing and updating policies)
Reporting (complaints procedure, responsibilities, clear structures)
Responding (procedures and best practice, roles and responsibilities, supports, actions, learning, future prevention)

Child-centred planning
Planning and processes need to be child centred at all times. The child's wishes need to be taken into consideration and their welfare must be considered paramount throughout the process.
In child protection cases there are often several stake holders with conflicting priorities. Decisions and processes should at all times be conducted with the best interests of the child in mind.

Accountability and responsibility
A whole school approach is essential for effective safeguarding. Everyone is accountable and responsible for reporting, whistle-blowing, safe practice, safeguarding, etc. Roles and responsibilities will differ at various points in the process. Good governance is required and clear, transparent processes are essential.

PART 4 PREVENTATIVE MEASURES

DISSEMINATION AND AWARENESS-RAISING
Child Protection information should be mandatory staff training. All staff, children and parents need to be made aware of the Child Protection Policy. New staff should receive child protection training during their Orientation Program. Child Protection training should include all staff members including Security, Maintenance, Ayahs, and Food Services. Information posters should be displayed in dorms and staff/ student notice boards. Information should be in a visible, simple, understandable, clear, format using words and imagery. Safe touch information awareness campaign needs to be conducted within the school. Current staff should be given a personal copy of the code of conduct for child protection and sign a 'Declaration of Acceptance'. New staff and Internship students (student teachers, volunteers, etc.) should be given a personal copy of the code of conduct for child protection and sign a 'Declaration of Acceptance' prior to employment.
The Council of Directors needs to ratify / endorse the policy and sign a 'Declaration of Acceptance.'
An anonymous system of complaining must be implemented in each Dorm for students and in the school using an addressed envelope and a drop system.
The number for the child-line should be displayed for students and staff.
Awareness of cyber-crime needs to be passed on to staff and students.

RECRUITMENT AND SELECTION
Recruitment and selection of staff and others must reflect KIS's commitment to safeguard children by ensuring checks and procedures are in place to screen out anyone who may be unsuitable to work with children. This should include following up references with phone calls, accounting for gaps in employment history and not employing people who cannot account for gaps. KIS must request a police check from staff who come from countries which can provide checks. Consider the use of a checking agency which has access to more sophisticated checking systems than KIS. Ensure staff sign a 'Child Protection Declaration of Acceptance' prior to starting work. Ensure new staff receive child protection training prior to their employment.

BUILDING CHILD SAFEGUARDING INTO MANAGEMENT SYSTEMS AND PROCESSES

Child Protection Policy must be incorporated into all existing systems and processes that have any bearing on the safeguarding of children so that an environment is established where the rights of children are respected and where sexual exploitation and abuse is not tolerated.

Child Protection Policy should be reflected in all human resource and management arrangements that define or determine how staff and other representatives carry out their work, including job descriptions, performance management systems and disciplinary procedures.

Children and their care-givers are made aware of the systems that exist to raise a concern or a complaint.

Where KIS is responsible for providing activities or services for children we will at all times supervise and safeguard them to the best of our abilities. E.g. camp, field trips, hiking, etc.

Engagement with children and their carers for the purposes of marketing should not exploit the child or carer, nor increase their vulnerability, or place them at risk.

RISK ASSESSMENT AND RISK MANAGEMENT

All activities, especially activities involving staff, visitors or parents having direct contact with individuals or groups of children must be assessed to make sure that any child safeguarding risks are identified and adequate controls developed.

Awareness raising of cyber-crime and risk assessments / policies developed where children have access to information technologies.

Due vigilance in dorms and other areas of school regarding access to books and materials - hard copies or on-line (including films) - that are beyond the child's age and stage of development.

LEARNING AND DEVELOPMENT

Staff, parents and students should be supported to develop child safeguarding skills, knowledge and experience appropriate to their role in the organisation.

Child Protection Policy should be included in induction and mandatory training for staff.

Raise awareness of cyber-crime, personal privacy and bullying on line for staff and children.

INFORMATION AND COMMUNICATION TECHNOLOGIES

Guidance is required which governs the appropriate use of information and communication technologies such as the internet, websites, social networking sites, etc. to ensure that children are not put at risk and aware of the risks. This guidance should cover staff and children who utilise the technologies.

Awareness training for staff and children around cyber-crime, cyber-bullying, etc.

Ensuring children do not have access to films and media unsuitable to their age and stage of development.

AUDIT AND REVIEW

Each department should review their policies following child protection training to ensure they reflect current guidance. Policy review should occur on a minimum 3 yearly cycle.

PART 5 CREATING A PROTECTIVE ENVIRONMENT

The creation of a protective environment requires the commitment of every staff member, parent and KIS partner. It is not the job of one person or a select group of people.

A protective environment starts with the community and the people within it.

The 5 stages to effective Child Protection in Schools form the foundations of a safe and protective environment.

1. Gate Keeping helps ensure that staff, parents, visitors and students are safe people and screens out people who are potential risk factors.
2. Awareness and Sensitization helps ensure that staff are aware of risks and are consequently more vigilant. Students are aware of what constitutes safe and unsafe behaviour and are more likely to report. High levels of awareness creates a natural deterrent for the organization which reduces the risk attracting unsafe people.
3. Monitoring systems help identify patterns of behaviour which indicate risk and this either identifies abusive practices or prevents potential abuse.

4 Reporting procedures which are clear, open, and understood in the spirit of child safeguarding help ensure that abuses do not go undetected.
5 Responding to abuses or allegations of abuse in a clearly identified way creates further safety for the organization, staff and children. When the process is fair to both staff and children and objective within a clear protective framework, trust in the system is generated and safeguarding promoted.

School culture
An additional significant factor in promoting a safe environment is the School culture. KIS already has some stated core values and these need to be embodied and lived in order to promote a culture which safeguards children.
The core values are:

- Integrity
- Contextuality
- Reverence
- Appreciation
- Performance
- Accountability
- Openness
- Cooperation

A safe school culture is one which is based on:

- A common goal / mission
- Respectfulness
- Trustworthiness
- Openness / transparency
- Safety
- Personal and Organizational Responsibility
- Personal and Organizational Accountability
- Morality
- Inclusiveness and Collaborative practices
- Fairness and Justice
- Responsiveness (as opposed to reactive)
- Objectivity

The school needs opportunities to reflect as a group (assemblies, home-rooms, dorms, staff meetings, Council meetings etc.) in order to refresh and remind the community of its key values and school culture.

PART 6 RESPONDING TO ABUSE – PROTOCOLS AND PROCEDURES

REPORTING ABUSE

Reports of abuse can come from different sources and reports of abuse are also likely to take several different forms. Below is a list of some of the common sources of reporting abuse and some of the common forms of reporting.

Sources of reporting:

- Student involved
- Student witness
- Parent
- Staff member
- Local community member

Forms of reporting:

- Personal disclosure (verbal)
- Written
- Incident form
- Letter
- Complaint form

The first port of call for ALL Child Protection or Safeguarding issues is the Child Protection Coordinator.

In **ALL** cases, the information must be taken seriously (even if the information appears trivial or unimportant) and passed to the Child Protection Coordinator without delay. The Child Protection Coordinator will assess the information and take an appropriate action based on the information provided.

In the case of written reports (or multi media) these should be forwarded to the Child Protection Coordinator without delay e.g. complaint forms, incident forms, letters, e-mails, notes, pictures, videos etc.

In the event of a verbal disclosure of abuse you need to consider taking one of 2 actions:

1. Encourage the person to put their concerns in writing at the time of the disclosure and ensure it is forwarded it to the Child Protection Coordinator.
2. Listen to the person, summarise their concerns in writing yourself and pass it to the Child Protection Coordinator.

Managing disclosures:

If a child makes a disclosure about any form of abuse you have a duty to pass the information on.

Note: Potential pitfall: Often a child will want to speak to you in confidence when abuse has been perpetrated. If you get a sense of this happening you must inform them that you are happy to talk to them but you need to be clear about confidentiality boundaries with them.

E.g. '*I am happy to talk to you but you need to know before we start that if you tell me anything about physical or sexual abuse I have a duty to pass it on to the Child Protection Coordinator.'*

If a child begins by telling you something that you have a duty to pass on - stop them and tell them you will need to pass this information on, thus giving them a choice about whether they continue or not. Emphasise that there is a trusted and confidential process for dealing with this.

In the case of a disclosure of abuse made to you: Your role is to **Listen, Record and Pass on**. DO NOT probe or ask for more details as this will re-traumatise the child. Allow the child to tell you what they are ready to tell you at the time.

Take the child seriously and do not judge them. If the story sounds far-fetched or unbelievable do not say this to the child. Let them tell their story and experience being believed. Your role is to **Listen, Record and Pass on – not to investigate or judge.**

What happens after suspected abuse is reported?
Where there is cause to suspect child abuse or neglect, it is the duty of the staff member to report their suspicions to the Child Protection Coordinator in writing. (In all cases the Principal will be notified by the Child Protection Coordinator.)
All KIS staff and employees, faculty and administrators/ management are mandated to report incidences of abuse and neglect to the Child Protection Coordinator in writing and without delay.
All KIS employees are also required to report suspicion of abuse or neglect to the Child Protection Coordinator.

CHILD PROTECTION COORDINATOR
At this point in time, it is recommended that the Child Protection Coordinator be the school counsellor.
The Child Protection Coordinator's role is to assess and collate information received and initiate appropriate action. Unlike physical abuse, the nature of child sexual abuse is that it is rare to have a clear definite incident to work with. It is more likely that information will trickle in in smaller disconnected parts. The coordinator's role is to monitor information, identify patterns of behaviour, build the bigger picture and respond appropriately.
The Child Protection Coordinator will assess the information based on the following:

1. Is a child potentially at immediate risk?
2. Is the child safe but investigation is required to further assess risk?
3. Is the information too vague to act on but needs to be collated for further monitoring?

1. The child is at immediate risk - If a child is in danger the first priority of the Coordinator is to take actions which ensure the child is removed from Danger or otherwise made safe.
2. The child is safe but an allegation has been made - the Child Protection Coordinator will assign a person or team to conduct an investigation.
3. The information is too vague to act upon - the Child Protection Coordinator will initiate actions which allow for continued monitoring and child safety.

NEXT STEPS
STEP 1 Child at risk → make safe

Safety measures if the child is at risk
Convene a Child at Risk Meeting without delay comprising of Child Protection Coordinator, SMT member and Administrator on Duty (or in the absence of any one person any faculty member not linked to the allegation or staff member). Notify Principal of actions. Notify parents.
Their role is to implement the following:

- Ensure child is in a safe place
- Suspend staff member as a precautionary measure (it must be made clear that this is not punitive).

Note: suspension in the case of Child Protection allegations is for child safety and is not part of the disciplinary process. The purpose is to keep the child safe whilst an investigation is carried out.

STEP 2 Investigation
The Principal will select a person or a team to conduct an investigation. These may be from the KIS community and/ or appropriate external professionals, but may be in no way connected to either party involved in the allegation. The investigation will gather information and facts about the incident. This will involve interviewing witnesses and parties involved in the allegation. The investigation team needs to reflect the requirements of the allegation. Investigations might include a medical examination with the school Doctor. The investigation will be carried out within 14 days and provide documentary evidence for the case.
The Investigators' role is to gather factual evidence and not to express opinions or judgements about the evidence. Sensitivity will be required when interviewing children and if necessary this task can be carried out by the counsellor or with guidance from the counsellor.
The School Doctor will, where physical evidence may exist, report any findings to the hearing at Stage 3. The School Doctor may be obligated to report certain medical issues to a third party in accordance with his / her professional code of ethics.

In the event of Sexual Abuse KIS is mandatorily obligated to report the incident to the Police (Women and Children's unit). Failure to do so is a criminal offence.
In the event of Physical Abuse there is no obligation for the school to report to the police but a guideline for reporting should be if it is considered to be a criminal offence such as an assault causing actual bodily harm (cuts, broken bones, black eyes etc.)
Notify parents at every stage of the investigation.
Maintain strict confidentiality.

STEP 3 Child protection hearing
On completion of the Investigation a Child Protection case conference will be convened to hear the evidence and make a decision based on evidence presented.
The Child Protection Hearing will be chaired by the Principal and a panel of 3 comprising an SMT member, An HOD and a Faculty member will hear the evidence. (No panel members shall be connected with the investigation stage or the incident).
The purpose of the investigation is to read documentary evidence, hear the investigators report (facts), hear medical evidence and where necessary hear witnesses first hand.
The hearing will decide the following:

- Whether an abuse has occurred
- What actions to take in order to:
    - Maintain child safety and support the child
    - Prevent future occurrences and learn from the experience

The hearing will decide:

- Whether the perpetrator should face disciplinary action / criminal charges, dismissal - refer to disciplinary process.
- Whether protective / remedial measures need to put in place to supervise the movements and actions of the staff member.

STEP 4 Follow up: Support and prevention
The Hearing members will convene after the hearing within 2 days to consider further actions such as:

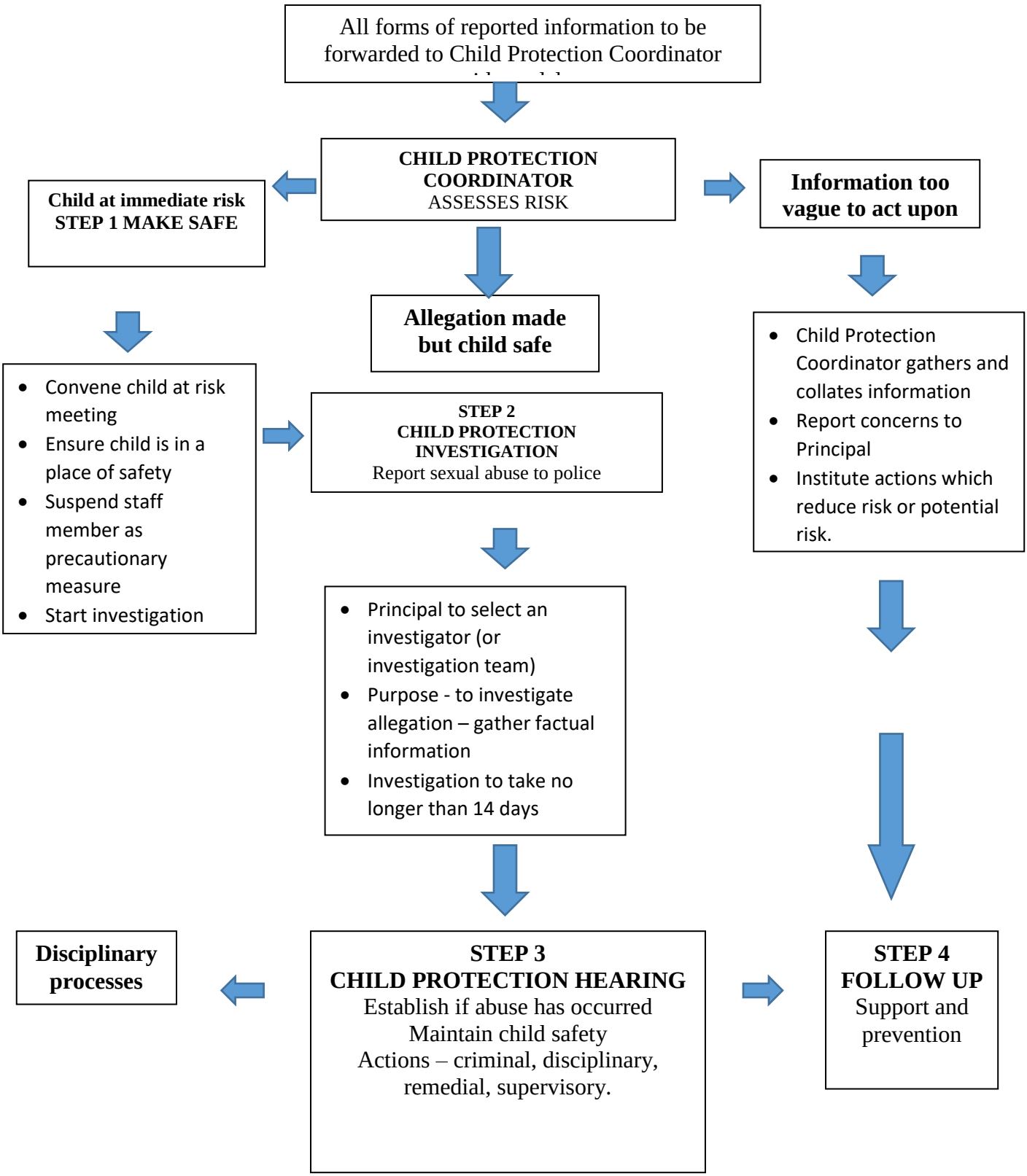
- Support for the child and family
- Support for faculty and other affected people
- Supports for the school community.
- Specialist support e.g. therapists, counsellors, doctors, police etc.
- Consultation with the consulate of the country of the involved family.
- Safeguarding actions to prevent future abuses in other settings or environments: i.e. inform International School Associations, local authority of the person's home country, etc.
- Awareness raising.

In the event of an allegation made against a parent of the abused child, including staff member or spouse parent:
Steps 1, 2 and 3 will be followed; the hearing will consider reporting the issue to the home consulate and authorities in the child's home country if applicable.
Consider the limitations and obligations the school has to keep the child safe from further abuse.
Should a parent refuse to allow a school official to speak with a child, the school reserves the right to take appropriate measures. In extreme circumstances, measures could include, but are not limited to, denying the student access to the school premises until such time that the family agrees to appropriate private and confidential conversations. We take these measures in the best interest of students' safety and well-being.
Legal guidance will be sought.

In the event of an allegation being made against a visitor, including a parent of another student:
Follow Step 1 and take measures to prevent the visitor from entering any part of the school campus or having access to the child.
Step 2 investigate and report to the police.

In the event of an allegation being made against a KIS student:
Follow Step 1 and ensure both students are not able to have contact with each other. If necessary suspend or separate the alleged perpetrator to avoid further abuse or intimidation pending investigation.
Notify both parents.
Follow step 2, 3, 4,

SUPPORTS DURING INVESTIGATIONS
Staff supports:
A supporter will be allocated to the staff member under suspension to help manage their support needs and to remain connected to the school. The supporter will not have access to any information about the investigation.
The supporter may accompany the staff member to hearings.
Student supports:
The student 'victim' will be provided with a supporter who will be a member of staff with a good relationship with the child. The supporter will not have access to investigation information.
Supporter roles are for welfare purposes only and are not part of any investigation or disciplinary process.


All forms of reported information to be forwarded to Child Protection Coordinator
CHILD PROTECTION COORDINATOR
ASSESSES RISK
Child at immediate risk
STEP 1 MAKE SAFE
Information too vague to act upon
Allegation made but child safe
Convene child at risk meeting
Ensure child is in a place of safety
Suspend staff member as precautionary measure
Start investigation
STEP 2
CHILD PROTECTION INVESTIGATION
Report sexual abuse to police
Child Protection Coordinator gathers and collates information
Report concerns to Principal
Institute actions which reduce risk or potential risk.
Principal to select an investigator (or investigation team)
Purpose - to investigate allegation – gather factual information
Investigation to take no longer than 14 days
Disciplinary processes
STEP 3
CHILD PROTECTION HEARING
Establish if abuse has occurred
Maintain child safety
Actions – criminal, disciplinary, remedial, supervisory.
STEP 4
FOLLOW UP
Support and prevention

PART 7 CHILD PROTECTION CODE OF CONDUCT

It is important for all staff and others in contact with children to:

- Be aware of situations which may present risks and manage them
- Plan and organise the work and the workplace so as to minimise risks
- As far as possible, be visible in working with children
- Ensure that a culture of openness exists to enable any issues or concerns to be raised or discussed.
- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
- Talk to children about their contact with staff or others and encourage them to raise any concerns
- Empower children – discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.

Staff have a duty to report:

- Concerns about any person in relation to their practice or safety of children
- Physical aggression or violence within the community.
- Discriminatory actions or practices.
- Issues of a sexual concern, sexual boundaries, breaches of code of conduct.
- Issues relating to emotional / psychological abuse.

In general it is inappropriate to:

- Spend excessive time alone with children away from others
- Take children to your home, especially where they will be alone with you.

Staff and others must never:

- Hit or otherwise physically assault or physically abuse children
- Employ children under 18 years of age
- Develop physical/sexual relationships with children
- Develop relationships with children which could in any way be deemed exploitative or abusive
- Act in ways that may be abusive or may place a child at risk of abuse.
- Take part in or promote child marriages.

Staff and others must avoid actions or behaviour that could be construed as poor practice or potentially abusive. For example, they should never:

- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- Behave physically in a manner or dress in a manner which is inappropriate or sexually provocative
- Have a child/children with whom they are working to stay overnight at their home unsupervised or without permission.
- Sleep in the same room or bed as a child with whom they are working
- Do things for children of a personal nature that they can do for themselves
- Condone, or participate in, behaviour of children which is illegal, unsafe or abusive
- Tell racist, sexist or other discriminatory jokes.
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment towards, or favour particular children to the exclusion of others.
- Give gifts to a child unless approved by a member of SMT.

CHILD SAFEGUARDING
Declaration of Acceptance

Prior to employment

I confirm that I have:

Received and read the Child Protection Code of Conduct.

I also confirm that:

I understand the main principles, the purpose and the intentions of this policy.
I am clear on the responsibilities the policy places on me to be aware and to protect children from abuse.
I am clear that there is a mandatory requirement to report any concerns I have about possible child abuse or risks to children.
I am clear that I must adhere at all times to the KIS Child Protection Code of Conduct.
I understand that any breach or failure to comply with the KIS Child Protection Code of Conduct may result in disciplinary action being taken against me.
I agree to be bound by the guideline found within the KIS Code of Conduct.

Name: (Please print)
Position:
Signed:
Date:

Within 6 months of start date of employment

Received a face-to-face briefing on the CPP
Had the opportunity to raise any questions, issues or concerns about the policy
Had these questions, etc. answered satisfactorily

Name: (Please print)
Position:
Signed:
Date:

Appendix CHILD PROTECTION LAWS

LAWS AND POLICIES TO PROTECT CHILDREN IN INDIA Source: Save the Children

'Protection of Children from Sexual Offences Act 2012' (POCSO ACT)

In 2012, the Indian Parliament passed the Protection of Children from Sexual Offences Act, which incorporates child friendly procedures for reporting, recording of evidence, investigation and trial of offences

The Act defines a child as any person below the age of 18 years and provides protection to all children under the age of 18 years from the offences of sexual assault, sexual harassment and pornography.

This is the first time that an Act has listed aspects of touch as well as non-touch behavior (eg: photographing a child in an obscene manner) under the umbrella of sexual offences.

Significant developments incorporated within the Protection of Children from Sexual Offences Act 2012

The Act incorporates **child friendly procedures** for reporting, recording of evidence, investigation and trial of offences.

The **attempt to commit an offence** under the Act has also been made liable for punishment for up to half the punishment prescribed for the commission of the offence.

The Act also provides for punishment for **abetment of the offence**, which is the same as for the commission of the offence. This part of the Act covers trafficking of children for sexual purposes. Significantly for Schools and

Institutions it is an offence under the act to 'fail to report' Sexual Offences to the local police. This means KIS would be liable of a sexual offence if sexual offences are not reported.

For the more serious offences of Penetrative Sexual Assault, Aggravated Penetrative Sexual Assault, Sexual Assault and Aggravated Sexual Assault, the **burden of proof** is shifted on to the accused.

The media has been barred from disclosing the identity of the child without the permission of the Special Court.

Other Indian laws related to children:

Juvenile Justice (Care and Protection) Act, 2000, amendment 2006:

Comprehensive legislation covering children (0-18)

Child Labour Prohibition and Regulation Act, **1986 (CLPRA)**
The CLPRA prohibit child labour up to age of 14 years in listed occupation, whereas ban listed hazardous occupation up to 18 years. The act also provide guideline for safe working condition of children.

Right to Education Act: Free and Compulsory for education of children aged 6-14 years.
Prohibits physical and humiliating punishments.

Immoral Trafficking and Prevention Act (ITPA), 1956
The recruitment, transportation and harboring of child for the purpose of economic or sexual exploitation is punishable up to 10 years.

BUILDING A CHILD PROTECTION SYSTEM IN INDIA
India is working toward developing a comprehensive system of child protection and the following are initiatives currently either in operation or in progress. The important thing to recognize is the positive intent and current momentum toward developing child protection services. Progressive schools like KIS can be seen as leaders in the development of good systems within India.

Integrated Child Protection Scheme (ICPS) 2008

The following are some current initiatives

- To institutionalize essential services and strengthen structures
- To enhance capacities at all systems and persons involved in service delivery
- To create database and knowledge base for child protection services
- To strengthen child protection at family and community level
- To coordinate and network with government institutions and non-government institutions to ensure effective implementation of the scheme
- To raise public awareness about child rights, child vulnerability and child protection services.

Child Protection Organizations and Bodies:

Childline: 1098 is the emergency number for children. Childline can be contacted through affixing STD Code + 1098. Childline provides counselling support and ensures legal formalities.

Child Welfare Committee (CWC): First line of protection. Every district has a CWC. CWC is a quasi-judicial body decides about the custody of children in need of care and protection.

District Child Protection Unit (DCPU): The DCPU is formed as a single window initiative for awareness generation, sensitization and protection of children in districts. DCPU has a role to strengthen CP system and schools can also ask for their support.

State Commission for Protection of Child Rights (SCPCR): SCPCR is a monitoring agency, work as ombudsman to address the complaints. SCPCR also develops and suggests guidelines for the government and CSOs for protection of children. SCPCR can support in developing child protection guidelines for school. SCPCR has the mandate to investigates the issue and submit their suggestion to government and in many cases can directly register FIR. SCPCR is the monitoring agency for **POCSO and RTE act.**

Department of Women and Child Development and Ministry of Women and Child Development: The department at state level and ministry at national level is the authority to run child protection system, develop guidelines and ensure child protection program is implemented in true spirit.

NGOs/Civil Society Organizations: NGOs and CSOs raise awareness, support in building child protection system, creates model for child protection, support in program implementation and guidelines, provide counseling support, support in building preventive mechanisms.

Police: Each Police station must have a designated Juvenile Police Officer for prevention and protection of children as per Juvenile Justice Act. The IG, CID office develop child friendly preventive and protection system and sensitization of police officers.
Media: Media has also role to be sensitive to the cause of children protection as per the Juvenile Justice (Care and Protection) Act.