

April 2026

Dear Parents/Guardians and Employees of ISSH,

Child protection is of utmost importance. We want each student to know that they are known, loved, safe, and able to be successful at the International School of the Sacred Heart. To achieve this, home and school need to work together so that our children feel safe and are knowledgeable about their rights, and the responsibilities they have to themselves and to others.

The ISSH Child Protection Handbook of Policies and Procedures 2025 is rooted in our Goals and Criteria, Japanese law, the UN Convention on the Rights of the Child and recommendations from the International Task Force on Child Protection.

As the parent/guardian of a student, and/or as an employee, board member, volunteer or service provider at the International School of the Sacred Heart, you are required to agree to partner with and abide by ISSH policies. This Child Protection Handbook of Policies and Procedures outlines the respect and dignity due our students at all times, the responsibility of all adults to keep children safe from harm, and it affirms that an abused child is never responsible for abuse and cannot consent to abuse.

Our Child Protection Officer is also our Student Health Officer. If you have specific questions, please contact her or your Division Principal.

Thank you for your partnership on behalf of all children.

Anne Wachter, RSCJ
Head of School

CHILD PROTECTION POLICY SUMMARY

The International School of the Sacred Heart Child Protection Policy is rooted in the SH Goals and Criteria, Japanese law, the UN Convention on the Rights of the Child, and aligns with the recommendations from the International Task Force on Child Protection (ITFCP).

The Policy states:

- Roles, responsibilities, and rights of all students, parents/guardians/caregivers, volunteers, guests, service providers, and employees are clearly defined when on campus, at excursions off-campus, and during home e-learning;
- All suspected, disclosed, or observed incidents of abuse are responded to following a defined process;
- The Child Protection Code of Conduct is understood and signed by all employees, service providers, board members, parents/guardians/caregivers, guests, and volunteers who interact with students;
- Aligned with the recommendations of the International Task Force on Child Protection (ITFCP) for effective safe recruiting and hiring practices International School of the Sacred Heart does the following:
 - The ISSH public webpage for employment clearly communicates the school's commitment to safeguarding/child protection and there is a link to the ISSH Child Protection Handbook of Policies and Procedures 2026;
 - The ISSH commitment to safeguarding is articulated on job descriptions and postings;
 - At least one member of the interview team has current training in safer recruitment/safeguarding;
 - The names of interview team members are noted in the *Letter of Evaluation*;
 - Open letters of support ('To whom it may concern') do not substitute as references.
 - Applicants must complete the ISSH Employment Application modeled on the ITFCP recommendations;
 - Proof of identity is required of applicants, and proof of teaching credentials is required from those seeking an academic/teaching position;
 - Background checks are conducted on all overseas/non-Japanese hires to ensure the person is safe to work with children. Candidates from within Japan who have no access to another background check in another country are required to sign a pledge indicating their commitment to child protection and safeguarding. This is in addition to the Code of Conduct agreement.
 - Interviews and reference checks include the questions about safeguarding as outlined by the ITFCP;

- Before an official offer of employment is made, confidential questionnaires are completed by at least three referees of supervisory capacity and personal contact is made/documentated via “live contact” by phone or Google Meet via the person’s school/business email/phone (not personal accounts). The confidential inquiry specifically asks if the reason for leaving their employment, and whether the referee has any reason to be concerned about the suitability of the person to work with young people; safeguarding questions and gaps in employment are repeated per the ITFCP wording during the personal follow up with each referee.
 - Employment offers are contingent on clear background and reference checks including a social media scan and verification of credentials to the extent possible.
 - Annually reviews and updates recruitment practices as per ITFCP guidelines.
 - A single central registry of employees is maintained to track/ensure all are screened in the recruitment/hiring process: reference checks, background checks, Japanese pledge for local hires, received training in safeguarding, and signed commitment to the Code of Conduct.
- Safeguarding education provided for employees, board members, service providers, and parents/guardians/caregivers includes at least:
 - expectations of behaviour for all adults interacting with students
 - rights and responsibilities related to safeguarding and child protection
 - definition of safeguarding and child protection
 - types of abuse and how to recognise abuse
 - mandatory reporting of child protection concerns (when reporting is necessary, ways to report, expectations after making a report)
 - Additional information is included based on the target audience;
 - Age-appropriate personal safety education is provided to all students;
 - Child protection record keeping is protected and confidential through a secure online management system, and divulged as legally required;
 - Child protection information and the codes of conduct are in both English and Japanese;
 - The policy is reviewed and updated every year, and more often as needed;
 - All employees, the Board Safeguarding Lead, Board Chair, and Managing Director of the SH School Corporation are required to know and understand the Child Protection Handbook of Policies and Procedures;
 - All employees, service providers, board members, students, parents/guardians/ caregivers, guests, and volunteers are expected to review the Child Protection Handbook of Policies and Procedures.

CHILD PROTECTION HANDBOOK OF POLICIES AND PROCEDURES 2026

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1. Our Vision, Values, and Commitment

The International School of the Sacred Heart (ISSH) has a long tradition marked by a distinctive commitment to developing the whole person. In this spirit, we work to foster a balance in students that includes their physical, social-emotional, intellectual, and spiritual well-being. In accordance with our school Goals and Criteria, ISSH promotes a safe and welcoming environment in which each person is valued, cared for, and respected (Goal 4.4). We are committed to our role as a protector of children and ensuring that all children in our care are afforded a safe and secure environment in which to learn, grow, and develop, both at school and outside of school. We believe that effective child protection is paramount to supporting students' well-being and we aim to be a safe space for students who may be experiencing abuse in any aspect of their lives.

This policy applies to all students at ISSH. Japanese laws regarding child protection, define the term "child" as individuals under the age of 18. However, due to our position of trust in the lives of our students, ISSH acknowledges that a student at ISSH is considered under our duty of care until the time of their graduation, irrespective of their age, and are therefore covered by all aspects of this policy.

We recognise contextual safeguarding and that young people are influenced by a range of environments and people outside of their family, including school, the community, their peers, and online. They may encounter risks in any of these environments. ISSH works to understand these risks and engage with students and parents in ways to help keep students safe. As such, the school will:

- implement safe recruitment and hiring practices to ensure the safety of children
- distribute this policy annually to all parents and parents of applicants during the application process
- partner with our parent community to help them understand the importance of safeguarding and their role in it, through parent education sessions
- provide annual safeguarding training for all adults who interact with children
- communicate relevant aspects of this policy in a student friendly and developmentally appropriate format annually to students
- provide age appropriate lessons for all students to help them understand their personal safety rights and how to seek help
- post this policy on our website and Faculty/Parent/Student portals
- review and update the policy every year for compliance with international standards and effectiveness

Our commitment to our students does not end if they leave ISSH. Child protection concern records may follow a child if we believe the child continues to be at risk within their family. In these cases, ISSH may relay potential safety concerns to the new school. ISSH also seeks child protection concern information regarding incoming students transferring from other schools. This ensures we provide ongoing vigilance for any students with identified child protection

concerns from their previous school. This information will not jeopardise the family's application but allows us to continue monitoring the well-being of the child.

In the case of a faculty or staff member (current or past) reported as an alleged offender, ISSH will conduct a full investigation following a carefully designed course of due process, keeping the safety and well-being of the child or past student at the highest priority.

This policy outlines our requirements in relation to child protection at ISSH. It relates to risk of harm against students by employees, service providers, guests, and volunteers, parents/guardians/caregivers, other students, or by other persons from outside the school.

2. International and National Law and Statutory Guidance

This policy is governed by the national laws of Japan that state the abuse of children is prohibited by law. This includes the [Child Abuse Prevention and Treatment Act](#) and the [Child Welfare Act](#). The term "child abuse" as used in Japan's Child Abuse Prevention and Treatment Act (Act No. 82 of May 24, 2000) means the following acts committed by a custodian (meaning a person who exercises parental authority, a custodian of a minor or other person who is currently engaged in the custody of a child; hereinafter the same applies) against a child (meaning a person who is under 18 years of age; hereinafter the same applies) under their custody.

Japanese law includes but is not limited to classifying the following as child abuse:

- Spanking a child
- Inflicting burns
- Holding upside down
- Locking outside (with no way back in)
- Not providing appropriate food, clothing, and shelter
- Not taking children to hospital even if they are sick
- Leaving an infant in the house alone
- Violence toward other parents or caretakers

The laws of Japan also require schools to mandatorily report cases of suspected, disclosed, or observed abuse to the Child Guidance Centre of the ward the student resides in. ISSH complies with this law.

The International School of the Sacred Heart Child Protection Policy is also based on the recommendations of the International Task Force on Child Protection (ITFCP) and on the [United Nations Convention on the Rights of the Child](#) (UNCRC) of which Japan is a signatory.

The following principles apply:

- All children have equal rights to be protected from harm and abuse regardless of age, ability, religion, nationality, culture, gender identity, sexual orientation, language, socioeconomic status, or physical appearance.

- Everyone has a responsibility to support the protection of children.
- All schools have a responsibility to build a community that values diversity, equity, and inclusion for each child.
- All schools have a duty of care to children enrolled in the school and those who are affected by the operations of the school.
- All actions on child protection are taken with the best interests of the child, which are paramount.

The two key articles of the UNCRC we wish to draw attention to are:

Article 19 – Protection from abuse

The Japanese government seeks to protect children from all forms of maltreatment by parents or others responsible for their care and establish appropriate social programs for the prevention of abuse and the treatment of victims.

Article 34 – Protection from sexual exploitation

The Japanese government seeks to protect children from sexual exploitation and abuse, including prostitution and involvement in pornography. Japan is a participating country in the [We Protect Global Alliance to End Child Sexual Exploitation Online](#).

3. Purpose and Aim

This Child Protection Policy in action aims to:

- ensure consistency and equal access to education for all students regardless of age, gender identity, ability, religion, nationality, etc. and compliance with national laws and statutory guidance related to child safety
- provide clear expectations about child safety and the school's response to concerns or allegations of harm
- establish responsibility of all adults to protect children and the rights of children enrolled at the International School of the Sacred Heart and impacted by the operations of our school to be free from harm, and to raise concerns promptly when they arise
- establish clear recruitment and hiring expectations to enable diligent screening and selection of faculty, staff, volunteers, and other ISSH identified trusted adults
- outline continued professional development for faculty and staff, student prevention education and parent/guardian support around child protection prevention of harm, and response to harm if it occurs
- support continued communication and shared understanding about child abuse definitions, signs and indicators, and response when risk of harm is evident or harm occurs
- establish that ISSH prioritises the well-being of students and acknowledges that children cannot consent to abuse
- establish that ISSH faculty, staff, and board members are accountable to this policy which is linked to our policies and protocols also related to student safety, protection,

and well-being

- outline where this policy will be cited including the public-facing website, parent and faculty/staff portals, student applications, and staff employment announcements and applications.

4. Roles and Responsibilities

Board of Directors and Board Safeguarding Lead (BSL): The Safeguarding Lead for the Board of Directors works with the Child Protection Officer of ISSH and the Head of School to act as the liaison for major child protection incidents, annually review child protection data, ensure that the members of the Sacred Heart School Corporation Boards are trained in safeguarding, that members agree to the Child Protection Code of Conduct, the Board Safeguarding Manual is current, and the Board is current regarding this ISSH Child Protection Handbook of Policies and Procedures.

Head of School and Leadership Team: The Head and Leadership Team are responsible for ensuring that the school continuously works towards its goal of providing a safe and welcoming environment in which each person is valued, cared for, and respected. They also work in the Child Protection Response Team to investigate reports of suspected, disclosed, or observed abuse, co-operate with any investigations by the Child Guidance Center and/or the police, and communicate appropriately with the Board and ISSH community.

Child Protection Officer (CPO): Our CPO has overall responsibility for coordinating child protection strategy, operations, policy/training communications, CP data management, and ensuring the Child Protection Policy is implemented. They ensure all adults who interact with children are trained in safeguarding, including recognizing potential abuse and how to report child protection concerns. The CPO also acts as a safeguarding information resource for the school community.. They support the Leadership Team in responding to child protection concerns and ensure that the school continues to review and improve its child protection policies and procedures. The CPO manages CP data and at the end of each school year generates a report outlining:

- the number of reported cases per division
- type of concern per division
- whether incidents were self, peer, or adult reported
- reports to external agencies
- reflection on trends for future training, education and policy improvements.

This report will be shared (names omitted) with the Head of School, reviewed by the Leadership Team, and reported to the Board Safeguarding Lead.

Faculty and Staff: All employees are expected to be familiar with the Child Protection Policy, must participate in annual safeguarding training, uphold the Child Protection Code of Conduct for Faculty, Staff, and Service Providers, diligently report any suspected, disclosed, or observed incidents of abuse, help create a safe school environment by being attentive to potential abuse

including child-on-child abuse, and uphold other school policies regarding communication with students and social media.

Service Providers: All must uphold the Child Protection Code of Conduct for Faculty, Staff and Service Providers, and diligently report any suspected, disclosed, or observed incidents of abuse.

Guests and Volunteers: All must uphold the Child Protection Code of Conduct for Guests and Volunteers, and diligently report any suspected, disclosed, or observed incidents of abuse.

Home and School Partnership: All parents, guardians, and caregivers are expected to read the Child Protection Policy and sign that they agree to the Child Protection Code of Conduct for Parents, Guardians, and Caregivers. They are asked to work collaboratively with the school to support the well-being of children. They are also expected to report any suspicions, disclosures, or observations of child abuse they become aware of. Parents, guardians, and caregivers are encouraged to attend workshops and information sessions run by the school to support them with parenting and keeping children safe.

Students: Students are required to follow school policies including: the Anti-Bullying: Positive Peer Relations Policy, the Student Code of Conduct, the Academic Integrity and Honesty Policy, the Generative A.I. User Policy, the Responsible Use Policy for the MS/HS, the G3/G4 Online Seminar and Responsible Use Agreement and the Communications Policy. Students have a responsibility to report to a trusted adult, counsellor, or the CPO any suspicion, observation, or disclosure of abuse of their peers. They are urged to report and seek help for themselves should they experience abuse in any form. Students are also expected to participate in research-based and developmentally appropriate personal safety lessons.

5. Definitions and Indicators of Abuse

Child Abuse - According to the World Health Organization, child abuse constitutes “all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.” A person may abuse a child by inflicting harm, or by failing to act to prevent harm.

A child is never to blame for being abused or exploited and cannot be considered to give consent to any form of abuse.

Physical Abuse - Physical abuse may involve hitting (with hand or other item), punching, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating, sustained physical activity or restraint, or otherwise causing intentional physical harm to a child. Possible indicators of physical abuse include:

- bruises, burns, sprains, dislocations, bites, cuts, etc
- injuries which have not received medical attention

- injuries that occur to the body in places that are not normally exposed to bumps, falls, rough games, etc.
- improbable excuses given to explain injuries
- refusal to discuss injuries
- unexplained stomach pains
- withdrawal from physical contact
- arms and legs kept covered in hot weather
- fear of returning home or of parents being contacted
- distrust of adults
- self-destructive tendencies
- aggression towards others
- extreme passivity and compliance
- chronic running away.

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

- delayed physical, mental, or emotional development
- delayed speech or sudden speech disorder
- inappropriate emotional responses to painful situations
- extreme passivity or aggression
- increased anxiety
- fear of new situations
- low self-esteem
- persistent fatigue
- sudden under-achievement or lack of concentration
- attention-seeking behaviour
- drug or alcohol abuse
- chronic running away
- compulsive stealing
- obsessions or phobias
- lying

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

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 results that are more insidious. The planning, known as “grooming” often results in victims accepting the blame, responsibility, guilt, and shame for the sexual behaviour of the offender. Sexual abuse requires far more secrecy than other forms of child abuse, so is more difficult to report. Possible indicators of sexual abuse include:

- pain, irritation, or bleeding from the genital area
- vaginal or penile discharge
- repeated urinary infections
- sexually transmitted infections
- unexplained stomach pains
- difficulty urinating
- discomfort walking or sitting
- sleep disturbances
- fear of people or places
- fear or distrust of a particular adult
- regressive behaviours, bed wetting, or stranger anxiety
- excessive masturbation
- sexually provocative behaviour
- age-inappropriate sexualised behaviour or language
- refusal to continue with school or usual social activities
- being unusually quiet and withdrawn or unusually aggressive
- suffering from what seem physical ailments that cannot be explained medically
- mentioning receiving special attention from an adult or a new “secret” friendship with an adult or young person
- having things such as money, phones, expensive clothes, or other items that parents don’t know how they have bought them.

Neglect - Neglect is the persistent failure to meet a child’s basic physical, socio-emotional, or physiological needs, likely to result in serious impairment of the child’s health or development. Some possible indicators of neglect include:

- unattended medical or dental needs
- lack of supervision
- consistent hunger
- inadequate nutrition
- inappropriate dress
- poor personal hygiene
- frequent tardiness or non-attendance at school
- hesitancy to return home
- persistent fatigue
- self-destructive behaviour
- extreme loneliness
- extreme need for affection

- failure to grow
- low self-esteem
- poor social relationships
- compulsive stealing
- drug or alcohol abuse

Child Exploitation - Child exploitation refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel, and harmful treatment of the child. It covers situations of manipulation, misuse, abuse, victimisation, oppression, or ill-treatment. There are different types of exploitation that children can experience and they can often occur simultaneously with other forms of exploitation and abuse:

- **Child sexual exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child or young person under the age of 18 into sexual activity. The child may have been sexually exploited even if the sexual activity appears consensual. The child may be forced into sexual activity in exchange for money, gifts, affection, or status. Child sexual exploitation can include actual violence or the threat of violence towards the child or their family which may prevent the child from disclosing the abuse, or exiting the cycle of exploitation. It is important to remember that on some occasions as a result of grooming, the child may not perceive any abuse at all.
- **Child criminal exploitation** is when another person or persons manipulate, deceive, coerce, or control the person to undertake activity which constitutes a criminal offense where the person is under the age of 18.
- **Commercial/economic exploitation** refers to the use of the child in work or other activities for the economic benefit of others and includes child labour.

Child-on-Child Abuse - Child-on-child abuse refers to any form of physical, sexual, emotional, and financial abuse, or coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Child-on-child abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth violence, harmful sexual behaviour, and/or gender-based violence.

Grooming - Grooming refers to behaviours that manipulate and control a child or young person, their family and other support networks, with the intent of gaining access to the child or young person for the purposes of engaging in sexually harmful behaviour, obtaining the child or young person's compliance, maintaining the child or young person's silence, and avoiding discovery of the sexual abuse.

Grooming behaviour often involves a graduation from attention giving and non-sexual touching to increasingly more intimate and intrusive behaviours. Grooming usually involves a perpetrator establishing a trusting relationship with a child or young person and those associated with the child or young person's care and well-being, to create an environment in which sexual abuse can occur. Anyone can engage in grooming behaviour. They can be people of all genders. They can include older children, relatives, family friends, strangers, professionals, people from a

family's place of worship, sporting coaches, early childhood educators, and school teachers.

Identifying Grooming Behaviour

Grooming can be very difficult to identify as it includes a range of techniques, many of which are not explicitly sexual or directly abusive in themselves. Most techniques do not appear unusual or remarkable in isolation. Grooming is not a single act of unprofessional or inappropriate conduct, but rather a pattern of behaviour where the trust of a child, or the adult with authority for the child, is gained.

Indicators of grooming behaviours by adults include:

- persuading a child or group of children that they have a special relationship
- asking a child to keep the relationship to themselves
- testing boundaries (e.g. by undressing in front of a child)
- maneuvering to get or insisting on uninterrupted time alone with a child
- buying a child gifts
- insisting on physical affection such as hugging, wrestling, or tickling even when the child clearly does not want it
- being overly interested in the sexual development of a child
- taking or having a lot of photos of an unrelated child or young person
- engaging in inappropriate physical contact with a child
- sharing alcohol or drugs with a child
- making inappropriate comments about a child's appearance or excessive flattery
- making jokes or innuendo of a sexual nature with a child
- making obscene gestures or using obscene language with a child
- sending correspondence of a personal nature to a child via any medium
- entering change rooms or toilets occupied by children when supervision is not required or appropriate
- communicating with a child's parent/step parent/carer with the intention of befriending them to facilitate a close relationship with their child

Indicators that a child or young person may be subject to grooming include:

- developing an unusually close relationship with an adult or older student
- displaying significant behaviour changes, including hyperactivity, sensitivity, hostility, aggression, impatience, resentment, anxiousness, being withdrawn or demonstrating depression
- using 'street' or different language they learned from a new or older 'friend'
- having new jewelry, clothing, expensive items, or large amounts of money that were gifts from a new or older 'friend'
- using a new mobile phone excessively to make calls, videos, or send text messages to a new or older 'friend'
- being excessively secretive about their use of social media or online communications
- frequently staying out late or overnight with a new or older 'friend'
- being dishonest about where they have been or who they were with
- drug or alcohol use

What is Not Grooming Behaviour?

Some of the adult behaviours listed above may not constitute grooming behaviour as a one-off incident but, when repeated or escalated over a period of time, may indicate grooming behaviour.

However, one-off incidents may be a violation of our codes of conduct or constitute professional misconduct and if so, should be reported to the Child Protection Officer or Division Principal. For example, a young tutor or volunteer sports coach using obscene language with a student may not necessarily be grooming, but is a violation of our code of conduct.

Similarly, not all physical contact between a student and a faculty or staff member, or any person engaged by ISSH to provide services to children will be inappropriate and/or an indicator of possible grooming behaviour. The following examples of physical contact with students is not grooming behaviour:

- Assisting students as per intimate care procedures
- Assisting students who are injured or ill, including administration of first aid or assessment by the Student Health Officer
- Using non-intrusive gestures to comfort a student who is experiencing distress (e.g. hand on the upper arm or upper back)
- Using non-intrusive gestures to encourage or congratulate students (e.g. shaking a student's hand or a pat on the back)

Online Sexual Exploitation and Artificial Intelligence

Child sexual exploitation does not always involve physical contact. It can also occur online through use of phones, tablets, computers, social media, and gaming applications. It may involve grooming behaviours in which perpetrators access a child online and manipulate them to share self-generated Child Sexual Abuse Material to meeting a child in person for sexual activities.

Indicators that a child or young person may be subject to online grooming include:

- discovering Child Sexual Abuse Material on their computer or device
- receiving or making calls to unrecognised numbers
- increasing or excessive amount of time spent online
- being increasingly secret in what they are doing online and efforts to try and hide what they are doing online
- having increased followers or contacts
- using new devices and/or platforms
- evidence of people on their 'friends' list that are unknown and that they have never met offline

In addition, generative artificial intelligence presents increased child protection risk. This includes use of artificial intelligence to generate images to manipulate a child to believing a perpetrator is someone who they are not, training chatbots to groom children and acquire Child

Sexual Abuse Material on the perpetrator's behalf, or generate manuals on how to groom children. Artificial intelligence can also generate new or edit existing Child Sexual Abuse Material in which these images can present a high risk for extortion.

6. Potential Long Term Impact of Child Abuse

The impact of child abuse can persist for a lifetime after the abuse has been committed. Some victims of abuse are resilient and manage to function in their lives, while others may suffer negative life-time health and well-being outcomes, especially if the child does not get appropriate support to help them cope with the trauma. All forms of abuse have the potential for long-term impact on the victims and can affect the victim's ability to function.

Possible long term impacts of child abuse include:

- poor educational achievement
- inability to complete responsibilities and care for self
- inability to coexist, cooperate or work with others, poor peer relations
- lack of self-confidence or low self-esteem
- attachment difficulties
- inability to express love or accept love
- prone to mental health concerns, such as depression, anxiety, addiction, post traumatic stress disorder, eating disorders, self-harm, and suicide

7. Child Protection Code of Conduct for Faculty, Staff, and Service Providers

It is the responsibility of all adults to keep students safe. We ask all adults on campus who interact with students to sign a Child Protection Code of Conduct which outlines the expected behaviour of adults in our community. The content of the Code of Conduct differs on the role of the adult. This includes the Code of Conduct for Faculty, Staff, and Service Providers, the Code of Conduct for Volunteers and Guests, the Code of Conduct for Parents, Guardians, and Caregivers, and the Code of Conduct for Board Members. All codes of conduct are provided in English and Japanese.

The English-language version of the Child Protection Code of Conduct for Faculty, Staff, and Service Providers is below for reference.

Child Protection Code of Conduct for Faculty, Staff, and Service Providers

At the International School of the Sacred Heart, we are committed to protecting students in our care. Each year, every member of faculty and staff, and service providers are required to sign a Child Protection Code of Conduct. The Code of Conduct outlines the expected behaviour of all faculty, staff, and service providers working with students and/or providing services at the International School of the Sacred Heart.

By following the below standards, you are both protecting the children at our school and protecting yourself from false allegations of inappropriate behaviour. It is always the adult's responsibility to set and respect boundaries with children. These below standards apply both on-campus and off-campus.

You must:

- Treat everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Use positive reinforcement rather than criticism, inappropriate competition, or comparison when working with students.
- Maintain professional boundaries with students. You must not use profanity or other language that is contextually inappropriate, culturally insensitive, or offensive in reference to race, religion, ethnicity, sexual orientation, and cognitive or physical abilities. Avoid any behaviour that could be interpreted as sexual, including flirtatious or seductive looks. Do not reveal any personal information about your sex life.
- Only consume alcohol in moderation during school events. You must not consume while on duty.
- Ensure windows on classrooms/office/laboratory doors are unobstructed.
- Notify the After School and Summer Programs Coordinator of any before or after-school scheduled tutoring on campus.
- Inform a colleague or parent if you must be alone with a student during an off-campus activity.
- Obtain parental consent and inform the Division Principal if you must accompany a student off campus alone.
- Inform the Division Principal if a guest is invited to work with students as part of a curricular or extracurricular program.
- Inform the Division Principal if you organise to meet students on weekends or holidays.
- Report any suspected, disclosed, or observed child protection concerns and cooperate fully in any follow-up procedures.
- Comply fully with any background checks to confirm my suitability to work with children.

You must not:

- Inflict any physical, emotional, or sexual abuse on a child. This includes hitting a child, saying unkind words to a child, touching a child's private area, or speaking to a child using profanity or sexual innuendo.

- Initiate or respond to physical contact from a child. If it is necessary to touch a child, you must do so in ways that are appropriate, non-sexual, and follow the Touch and Intimate Care policy. If a student attempts to involve you in inappropriate behaviour, you must reject the overture and report it to the Child Protection Officer.
- Enter student washrooms or changing areas while students are on-campus. This excludes situations when it is necessary to provide intimate care or confirm student safety.
- Engage in private communications with students through electronic or social media, except for activities strictly involving school business.
- Store images of students on a personal device for more than 30 days. Taking or storing images of students in swimwear is prohibited.
- Accept gifts from or give gifts to students without the knowledge of their parents or guardians. This excludes small gifts of food or items to express gratitude from students.
- Smoke, vape or use tobacco products around students.
- Possess, or be under the influence of, illegal drugs at any time while in Japan.
- Do not bring or view sexually-explicit content or engage in sexual acts on school premises. Viewing of sexually-explicit content on school equipment off campus is also prohibited.

My signature confirms that I have reviewed this Child Protection Code of Conduct and agree to follow these standards as a person working with students at the International School of the Sacred Heart. I acknowledge that I have familiarised myself with the contents of the Child Protection Policy and affirm my understanding of its content, including the right to access the policy for review at any time on the Faculty and Staff Portal or International School of the Sacred Heart website.

I understand that any action inconsistent with this Child Protection Code of Conduct or Child Protection Policy, or failure to action as mandated by the above may result in disciplinary action up to and including removal from the International School of the Sacred Heart.

Name: _____ Signature: _____
Date: _____

8. Touch and Intimate Care Policy

Any touch should only be in response to the needs of the student. Touch should be child-initiated and consent should be obtained before touching. It is generally appropriate to place a hand on a student's back or arm to comfort a student. Touching of genital areas, chest, buttocks, or thighs is prohibited, except in the case of providing intimate care.

Intimate care involves providing assistance with personal care due to a student's developmental level or medical need in which faculty or staff must view and/or touch a student's genital area, chest, buttocks, or thighs. These situations include toileting, hygiene, changing, and nursing care in the Student Health Office. Whenever this occurs, there must be two adults in the room with the student to protect against any allegations of inappropriate behaviour. The child should

be encouraged to do as much as possible independently. Before offering any physical assistance, consent should be obtained by asking if it is okay to assist. Gloves should be worn when providing care. If a child refuses assistance, this decision must be respected in which case faculty and staff should provide support as much as possible.

9. Mandatory Reporting

Educators, having the opportunity to observe and interact with children over time, are in a unique position to identify children who are in need of help and protection. As such, educators have a professional and ethical obligation to take steps to ensure that these children and families are connected to services needed to remedy any situation that constitutes child abuse, or support a child who has experienced abuse.

All faculty, staff, and service providers employed at ISSH must mandatorily report suspected, disclosed, or observed incidents of possible child abuse as soon as possible whenever they have reasonable cause to believe that a child has suffered, or is at significant risk of suffering abuse. Reporting and follow up of all child protection concerns will proceed in accordance with administrative procedures respective to this policy.

ISSH is obliged to follow Japanese laws and reporting procedures if the school has cause to believe that a child is being abused. If the source of abuse is suspected to be a parent or guardian, the local Child Guidance Center may be informed as required by law, pursuant to Article 5 of the Child Abuse Prevention Act. In the case of any credible reported allegation of student abuse by an ISSH employee, the Head of School will inform the chair of the Board, school administrators, and parents/guardians.

Cases of suspected child abuse may also be reported to the respective consulate in Japan, and/or to the appropriate child protection agency or teacher licensing agency in the home country, depending on the seriousness of the case.

10. Reporting Child Abuse

All adults who interact with students should take action when:

- A child discloses information indicating abuse
- A third person discloses information that provides reason to believe that abuse has occurred or is likely to occur
- A child has non-accidental injuries or an explanation that is inconsistent with the injuries that suggest abuse
- The adult observes child abuse directly
- The adult is concerned that child abuse has occurred or is likely to occur

Whenever there is suspected, disclosed, or observed child abuse, adults should follow these steps:

1. Determine if the student needs immediate medical or emotional care, and contact the Student Health Officer or School Counsellor as needed.

2. If the child has disclosed to you, let the child decide how much they wish to share. You may prompt the conversation by asking “and then what happened?”
3. Report the concern to the Child Protection Officer or Division Principal as soon as possible. If a student does not want to go home, this must be taken extremely seriously and reported immediately to the Child Protection Officer or Division Principal.

If another adult reports that a child has been or is likely to experience abuse, encourage the individual to report directly to the Child Protection Officer or Division Principal. Students are encouraged to report their concerns to the Child Protection Officer, trusted adult, or other faculty or staff member. If another child reports concern for another child to an adult, the adult should encourage the child to speak to the Child Protection Officer, trusted adult, or other faculty or staff member but it is your responsibility to ensure that the concern is reported. Any concern from a member of the community or external person/agency can report to the Child Protection Officer, Division Principal, or any other faculty or staff member.

Reporting a concern to the Child Protection Officer or Division Principal can be done through the secure online management system, in-person, or by emailing the Child Protection Officer at childprotection@isssh.ac.jp or the Division Principal at their designated email.

It is the responsibility of the Child Protection Officer to activate the response team to deal with concerns of child abuse. The response team will then work to plan the next steps.

Note that faculty and staff are not investigators. The role of faculty and staff is to listen and report any concerns so that the response team can help the student as needed. It is also essential that the student's trust is respected and information is only shared with the Child Protection Officer or Division Principal. In Japan, any person who reports abuse in good faith is immune from any civil or criminal liability. ISSH has a Child Protection Whistleblower Policy that outlines our protection for people making allegations or reports in good faith and potential consequences for those who make malicious allegations.

The following provides background and guidance on responding to disclosures using a trauma-informed approach:

- Remember that it is often difficult for children to disclose or talk about abuse. They may:
 - Try to “forget in order to cope”.
 - Worry they will lose the love of their parents or friends.
 - Be ashamed of the abuse.
 - Fear they will get in trouble for telling.
 - Fear they will be blamed.
 - Be under threat by the offender to harm them or their family.
- If a student asks to speak with you, try to find a neutral setting which is quiet and has few interruptions.
- Do not make promises that you cannot keep. Preserving trust with students is essential.
 - Do not let the student swear you to secrecy. You may need to report the concern.
 - Do not make promises to the student that things will get better.

- Do active listening:
 - Do not seek help while the child is talking to you.
 - Do not lead the child into telling. Just listen, letting them explain in their own words. Do not pressure for a great amount of detail. Do not fill in words, finish sentences, or make assumptions.
 - Avoid asking too many questions, especially “why” or “how” something took place.
 - Believe the student and praise the student for sharing with you (e.g. “I believe you.” “I am glad you told me.”)
 - Tell the student that the abuse is not their fault.
 - Respond calmly. Even if the story that the student tells you is difficult to hear, it is important not to show disgust, shock, or alarm.
 - Do not make judgmental or disparaging comments about the abuser – it is often someone the student loves or with whom they are close.
- Respect the student’s agency:
 - Explain to the student that you must tell someone else to get help and it is in their best interest that it is reported.
 - Explain that the information will only be shared with people who need to know.
 - Let the student know that someone else will also need to talk with them.
 - Empower the student as much as possible by allowing the student to have a voice (e.g. “The Child Protection Officer needs to be told this. Do you want to do it alone or go together?”)
- React appropriately:
 - Address any immediate health concerns and contact the Student Health Officer.
 - Do not confront the abuser – report the concern to the Child Protection Officer or Division Principal.
 - Record the **actual words** of the child when reporting.
- Public disclosures
 - It is possible that a student may start to disclose in class or with a group of other students. In this circumstance, a teacher should use a strategy of 'protective interrupting' and:
 - acknowledge that you have heard the student and stop further disclosure while maintaining support and encouraging the student to discuss the matter in a more private environment
 - quietly arrange to see the student as soon as possible away from other students
 - do not allow other students to ask questions and discourage them from making judgements.

11. What Happens After Child Abuse is Reported?

The Child Protection Officer activates the response team. In addition to the CPO, this may consist of the following people as deemed appropriate on a case by case basis:

- Head of School

- Division Principal
- Student Health Officer
- School Counsellor
- Teacher to whom the initial report was made
- Homeroom Teacher

ISSH has a close association with outside professionals for advice as needed.

External Multidisciplinary Team (as required)

- Legal representative (Attorney at Law specializing in Child Protection)
- Medical representative (Physician from a local medical clinic)
- Child Guidance Centre from several representatives wards in Tokyo
- Business manager consults with the Shibuya police if required

The response team will review the report and determine if there is reasonable cause to suspect abuse. If there is not, the concern will be recorded on the secure online management system. If there is reasonable cause to suspect abuse, the response team will follow the steps of initial assessment and response, investigation/inquiry, and make a decision on next steps. This will include performing risk assessments and safety planning for the student. Throughout the process, the response team will evaluate the need for medical or emotional care, and refer the student to the School Counsellor or Student Health Officer, or suggest to the parents/guardians to seek external care.

When the alleged offender is a family member/guardian or other non-ISSH individual

If it is determined that the alleged abuse may involve a student's parent, guardian, or other family member, the following actions may take place depending on the nature of the report:

- Providing support for the child and family within the school
- Family meeting
- Outside referral for support and/or counselling
- Reporting to outside authorities, including the Child Guidance Center and/or the police who will be responsible for further investigation and taking appropriate actions outside the school.

In the case of suspected abuse by individuals who are neither a family member/guardian nor an ISSH employee or contractor, parents will be notified and the incident may also be reported to the Child Guidance Center and/or police for investigation and follow-up actions as appropriate.

When the alleged offender is another student at this school

Response to allegations of bullying or breaches of our Code of Conduct for Students will be dealt with according to the guidelines in our school's Anti-Bullying: Positive Peer Relations Policy and our Child-on-Child Abuse Policy. If the alleged abuse involves youth produced sexual imagery, it should be reported to the CPO or Division Principal immediately. Such cases will be dealt with in accordance with [guidelines to schools](#) for responding to such incidents.

When Child Sexual Abuse Material is involved

If a student shares with a faculty or staff member that they have shared or been sent a nude

image, or such an image is found on a student or school device, faculty or staff should:

- **Never** view, copy, print, share, store, or save the imagery yourself, or ask a child to share or download – **this is illegal. Note:** In exceptional circumstances, it may be necessary for the CPO only to view the image to safeguard the child or young person. That decision should be based on professional judgment to determine whether the police may need to be called or a student from the school needs to be identified. If this needs to take place, it will be done in the privacy of the office of the Head of School or Division Principal, with neither of them viewing the image. The CPO will make a record of the need to view the image in the secure online management system, including the justification for viewing the image, the name of the other adult present, the date and time, and any follow up steps that need to take place.
- If you have already viewed the imagery by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the CPO or Division Principal and seek support.
- **Do not** delete the imagery or ask the young person to delete it. When this is to be done, it will be handled by the CPO or possibly the police.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the CPO or Division Principal.
- **Do not** share information about the incident with other members of faculty, staff, the young person(s) it involves, or their parents/guardians. This is the job of the CPO or Division Principal.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help.

When the alleged offender works for the school

If a report is made about inappropriate behaviours of a school personnel, the school will respond no differently than if the alleged offender is a family member. All allegations will be taken seriously and investigated. The International School of the Sacred Heart will initiate an investigation in cooperation with relevant authorities following a carefully designed course of due process as detailed below, keeping the safety of the child at the highest priority. Depending on the severity of the allegation, the incident may be dealt with internally or referred to outside authorities. The safety of our students is paramount in this situation.

In the case of a report of historic abuse at the International School of the Sacred Heart, the school will take the report seriously and conduct a thorough and prompt investigation. See below for concern and allegation protocol.

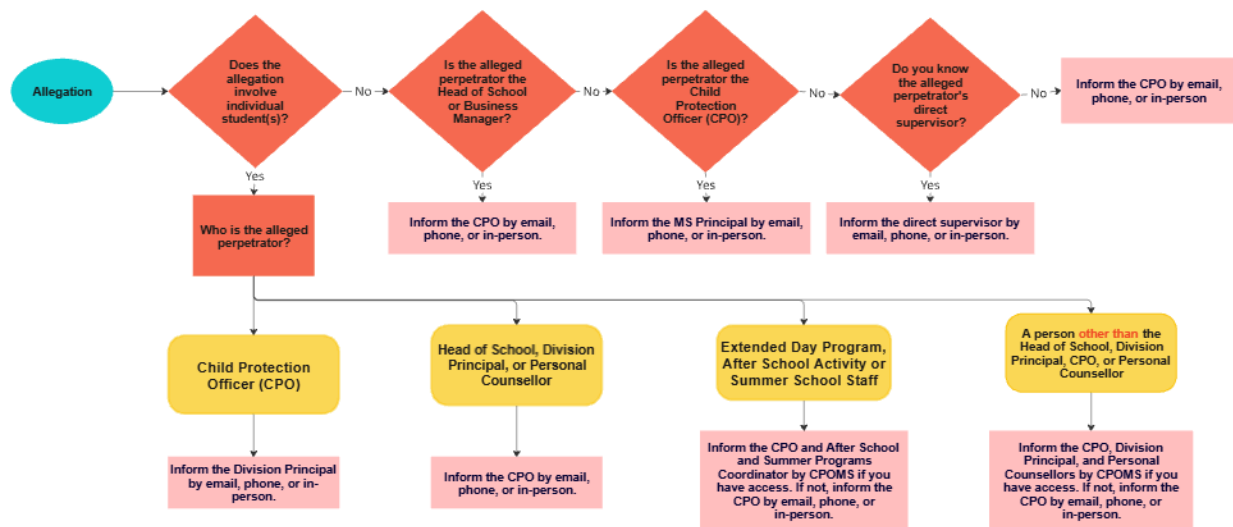
12. Concern and Allegation Protocol

An allegation is any concern that an **adult working with students in the school and/or providing services at the International School of the Sacred Heart** has harmed a child, behaved in a way that could constitute a criminal offense towards a child, or behaved in a way

that indicates they pose a risk to children or not suitable to work with children. An allegation may come from a variety of sources, including the victim themselves, another student, faculty, staff, service provider, parent/guardian, or external person/agency.

The school will respond to all allegations of abuse. The process in responding to an allegation is the same as any other child protection concern. However, the person who is reported to changes based on the alleged perpetrator. The reporting structure is presented in the flow chart below.

An allegation or concern arises



Initial Assessment and Response

- After an allegation has been communicated to the Child Protection Officer or the Division Principal (in the event that the alleged perpetrator is the Child Protection Officer), the response team will assess and determine next steps.
- The Child Protection Officer or Division Principal (in the event that the alleged perpetrator is the Child Protection Officer) is responsible for facilitating formation of the response team and supporting the ongoing response.
- The response team may include the Head of School, Division Principal, the Child Protection Officer, School Counsellor, Student Health Officer, or the After School and Summer Programs Coordinator. If any of these members are the alleged perpetrator, they will be excluded from the response team.
- The response team leader will be the Head of School. If the Head of School is unavailable or the Head of School is the alleged perpetrator, the relevant Division Principal will be the response team leader.
- The response team may:
 - Perform an initial inquiry of the allegation

- Perform risk assessments and safety planning for the victim and other members of the school community
- Communicate with relevant individuals, including the victim and their parents/guardians, other students, the parent body, faculty and staff, and Board.
- Evaluate the need for medical or emotional care, and refer the student to the School Counsellor or Student Health Officer, or suggest to the parents/guardians to seek external care.
- Appoint a member of the response team as a point of contact for the alleged perpetrator.
- Contact the school's child protection lawyer for recommendations on how to proceed, considering the rights of both the accused and the reporter.
- Place the accused on suspension until the investigation is completed or request they stay away from campus until further notice.
- Assess the need to consult or report to the police.
- The school will respect confidentiality as much as possible consistent with the necessity to investigate allegations fully.
- The Division Principal or Head of School will contact the parents/guardians and inform or update them on the allegation. As needed, the Assistant to the Head of School or the Middle School/High School Assistant will provide language interpretation.
- If the alleged perpetrator is the Head of School, the Chair of the Board, Board Safeguarding Lead, and Managing Director will be informed.
- When possible, the School Counsellor will support the victim emotionally and the Student Health Officer will address physical needs of the student.

Investigation/Inquiry

- The response team will decide whether or not to consult or refer the allegation to the police. The Business Manager will act as the liaison.
- The school will readily share information with the police and cooperate with any investigation.
- Regardless of the results of an investigation by the police, the response team will investigate the suitability of the alleged perpetrator to work with children.

Making a Decision

- Based on the results of the investigation or inquiry, a meeting will be held between a member of the response team with the alleged perpetrator.
- The meeting will follow the principles of natural justice. The details of the allegation are communicated to the alleged perpetrator in which they can put forward a defense and a right of appeal.
- The result of the meeting may involve disciplinary action including training and dismissal if the alleged perpetrator is unsuitable to work with children.
- An alleged perpetrator may be reinstated or reintegrated only when the school is confident that they do not pose a risk of harm to children.
- When an individual is dismissed for child protection reasons, educator licensing, or certification agencies may be notified.

Following an Allegation/Investigation

- The school will carry out a debrief and safeguarding review to identify weaknesses, and revise procedures and training as needed.
- The school will consult those affected by the abuse for redress including discussing their story with the Leadership Team and participating in reviewing the school's procedures.

Ongoing Considerations

At any point in the protocol, the school will:

- Consult with the school's legal advisors and external agencies.
- Consider dismissal or suspension of the alleged perpetrator based on the risk to students or potential influence in an investigation/inquiry.
- Facilitate ongoing safeguarding considerations: support for the victim/family and other victims who come forward, protection for other students and faculty/staff.

Documentation

Student records related to an allegation will be stored in a student's file on the secure online management system for at least 5 years after the student leaves the school. Records related to an allegation will be stored indefinitely in an employee's or service provider's file.

13. Low-Level Concerns

It is important to report even low-level concerns to ensure appropriate action is taken to safeguard children. Low-level concerns are concerns that do not meet the harm threshold. This includes concerns that an adult working in the school has acted in a manner inconsistent with the code of conduct and may only cause a sense of unease or a "nagging doubt". For example, being overly friendly with children, having favourites, or inappropriate conduct outside of work.

A Low-Level Concern Arises

- If any member of the school community has a low-level concern, they should inform the direct supervisor of the adult working in the school through email.
- If the low-level concern is related to the Head of School or Business Manager, they should inform the Child Protection Officer through email.
- Low level concerns should also be recorded in the secure online management system.

Assessment and Response

- The supervisor will speak directly to the person who has raised the concern (if possible), as well as the individual involved and any witnesses.
- The supervisor will determine the next steps in response to the low-level concern. If the supervisor determines the concern meets the threshold for an allegation, the allegation protocol will be followed.
- If the low-level concern is related to the Head of School or Business Manager, the Child Protection Officer will inform the Managing Director of the School Corporation of the low-level concern.

Documentation

- Records of low-level concerns that involve individual students will be stored in the relevant student's file through the secure online management system for at least 5 years after the student leaves the school.
- If the low-level concern does not involve an individual student, records will be stored in the employee's or service provider's file indefinitely.

14. Central Record

A secure online management system serves as the central record for confidential documentation and sharing of information on child protection concerns.

Content of Records

- Records follow the chronology of events and are written in a factual manner. Any interpretation or inference from what was observed, said, or alleged is to be clearly distinguished from facts.
- Records may include, but are not limited to these elements:
 - Details of the concern, using the child's words if possible:
 - What happened
 - Where the incident/disclosure happened
 - Date/time of the incident/disclosure
 - Names of those involved
 - Date/time of report
 - Name, role, and contact details of the person making the report
 - Name, role, and contact details of the person who it was reported to
 - Actions taken to address concerns and other follow-ups including communication between faculty, staff, and parents/guardians, mandatory reporting to local authorities, safety plans, policy changes, etc
 - Any necessary justification for actions.
- Relevant paper/digital documents can be directly uploaded to the secure online management system.
- When necessary, records will be cross-referenced with other documentation, including but not limited to Student Health Office and counselling records.

Access to Records

- Access to the secure online management system is password-protected and segmented permissions ensure access to records only on a "need-to-know/contribute" basis.
- Faculty and staff directly document child protection concerns into the secure online management system and alert the Child Protection Officer, Division Principal, and School Counsellors.
- The ability to view records is dependent on the level of access of the user. The Child Protection Officer and Head of School have administrative privileges. Secure and role-specific levels of access are provided as needed for Principals, Student Health

- Officer, School Counsellors, faculty, staff, coaches, etc.
- The secure online management system tracks the records that an user has viewed.

Storage of Records

- Records related to child protection are stored/backed up by the secure online management system and kept separate from other records (e.g. Student Health Office records, counselling records) unless necessary.
- If the Child Protection Officer, Principal, or other faculty or staff receives a report of suspected child abuse by a means other than an alert (e.g. email) from the secure online management system, the report will be uploaded to the secure online management system.

Retention and Sharing of Records

- Student records on the secure online management system will be stored for at least 5 years from the time that the student leaves the school.
- Records that do not relate to individual students (e.g. low-level concern records in an employee's or service provider's file) will be stored indefinitely.
- ISSH will not enter into any non-disclosure agreements when it comes to child protection allegations.

15. Privacy and Confidentiality

Faculty/staff who have access to information regarding suspected, disclosed, or observed child abuse, including grooming behaviour, must keep such information confidential and secure and must not disclose this information unless required to do so as part of an ongoing investigation, or by law.

Students and any other parties who become involved in the investigation (this may include other students) should be informed of the reporting process and be requested to maintain confidentiality.

Inappropriate disclosure of confidential information could be subject to disciplinary action.

In the event that the Family Support Center, Child Guidance Center, or police request information about a student, the inquiry will be directed to the Assistant to the Head of School for Kindergarten and Junior School and the Middle School/High School Assistant for MS/HS.

16. Child Protection Training

Child Protection Training for Faculty, Staff, Service Providers, and Board Members

- The Child Protection Officer is responsible for delivering and tracking completion of faculty, staff, service provider, and board member child protection training. Tracking of completion for training is done through Google spreadsheets.
- All new faculty, staff, and service providers complete in-person or online child protection induction training (childsafeguarding.com or other), with translation as needed. All faculty, staff, service providers, and board members must complete in-person or online annual training, with translation as needed. This may or may not involve a quiz.
- At minimum, the induction and annual training includes:
 - The importance of child protection
 - Definitions of child protection and safeguarding
 - Definitions and indicators of abuse
 - Procedures for child protection concerns
 - How to respond to a child's disclosure of abuse
- All faculty, staff, and service providers must sign a Child Protection Code of Conduct for the current school year before working with students. This is provided in English and Japanese.
- The SH School Corporation Managing Director, Board Safeguarding Lead, and Chair of the Board are trained through childsafeguarding.com (governance specific); all other board members are trained through a program in the Japanese language that covers points made by childsafeguarding.com.
- Ongoing training in small-groups are provided during the school year (case studies, topic specific discussions).

Extended Training for Incident Response Roles

- The Child Protection Officer and Division Principals will regularly receive advanced training from outside organizations regarding child protection.
- The Child Protection Officer keeps a record of the advanced training.

Parents/Guardians/Caregivers, Volunteers, Guests, and Community Outreach

- Information on child protection topics will be provided to parents/guardians/caregivers in-person or online formats including information sessions and newsletter publications.
- Parents/guardians/caregivers are asked to sign they have read the Child Protection Policy and sign a Child Protection Code of Conduct for Parents, Guardians, and Caregivers, before enrollment is complete for each school year. Other volunteers and guests are asked to sign a Child Protection Code of Conduct for Volunteers and Guests at the time of invitation to the school. The Code of Conduct is provided in English and Japanese.
- Parent/guardians/caregiver information sessions will, at minimum, include the following topics:
 - The importance of child protection
 - Definitions of child protection and safeguarding

- Definitions and indicators of abuse
- School policy and expectation around student and faculty/staff behaviour
- Procedures for child protection concerns
- How to respond to a child's disclosure of abuse

17. Safe Recruitment and Hiring Practices

Aligned with the recommendations of the International Task Force on Child Protection (ITFCP), ISSH upholds a high standard of effective recruiting practices with specific attention to Child Protection. The International School of the Sacred Heart does the following:

- The ISSH public webpage for employment clearly communicates the school's commitment to safeguarding/Child Protection and there is a link to the ISSH Child Protection Handbook of Policies and Procedures 2026;
- The ISSH commitment to safeguarding is articulated on job descriptions and postings;
- At least one member of the interview team has current training in safer recruitment/ safeguarding;
- The names of interview team members are noted in the *Letter of Evaluation*;
- Open letters of support ('To whom it may concern') do not substitute as references.
- Applicants must complete the ISSH Employment Application modeled on the ITFCP recommendations;
- Proof of identity is required of applicants, and proof of teaching credentials is required from those seeking an academic/teaching position;
- Background checks are conducted on all overseas/non-Japanese hires to ensure the person is safe to work with children. Candidates from within Japan who have no access to another background check in another country are required to sign a pledge indicating their commitment to Child Protection and Safeguarding, this is in addition to the Code of Conduct agreement.
- Interviews and reference checks include the questions about safeguarding as outlined by the ITFCP;
- Before an official offer of employment is made, confidential questionnaires are completed by at least three referees of supervisory capacity and personal contact is made/documented via "live contact" by phone or Google Meet via the person's school/business email/phone (not personal accounts). The confidential inquiry specifically asks if the reason for leaving their employ, and whether the referee has any reason to be concerned about the suitability of the person to work with young people; safeguarding questions and gaps in employment are repeated per the ITFCP wording during the personal follow up with each referee.
- Employment offers are contingent on clear background and reference checks including a social media scan and verification of credentials to the extent possible.
- Annually reviews and updates recruitment practices as per ITFCP guidelines.

- A single central registry of employees is maintained to track/ensure all are screened in the recruitment/hiring process: reference checks, background checks, Japanese pledge for local hires, received training in safeguarding and signed commitment to the Code of Conduct.

18. Off-Campus Field Trips and Overnight Excursions

During off-campus field trips or overnight excursions, the same code of conduct guidelines and physical contact guidelines apply as well as the following:

- Checking of sleeping arrangements, or supervising of students changing should be done, where possible, with another staff member present and always in a manner that respects students' privacy and personal space.
- Always knock and advise of presence prior to entering a bedroom or dormitory.
- Ensure that while in a bedroom or dormitory a strict teacher/student relationship is upheld and that no inappropriate behaviour, such as sitting on a student's bed, is undertaken. Spend the least amount of time in the room as possible.
- If you need to be alone with a student, for example to administer first aid, let another teacher know and spend the least amount of time in the room as possible alone with the student.
- All overnight trips will have a female chaperone.

19. Child Protection During Online Learning (E-learning)

In an online learning environment the following principles of child protection exist:

- The welfare and best interests of children are a key priority.
- If any employee has a child protection concern about any child, they are obligated to report that concern to the Child Protection Officer or Division Principal.
- Children will be protected by our Child Protection Policy when they are online.

ISSH uses Google Meet for video conferencing and delivery of e-learning. Faculty and parents are expected to adhere to the following child protection guidelines during e-learning:

- Faculty use a room other than a bedroom and dress appropriately. If a bedroom needs to be used, the background should be blurred.
- Faculty will report any incidents of inappropriate online behaviour such as online bullying.
- Parents are asked to dress appropriately when in the same room as a child during e-learning and parents should refrain from interrupting the lesson.

20. Related Policies and Procedures

- [Recruitment and Hiring Policy and Procedures](#)
- [Data Protection, AI and Confidentiality Agreement](#)
- [Anti-Bullying Policy: Positive Peer Relations Policy](#)
- [Child-on-Child Abuse Policy](#)
- [Responsible Use Policy for the MS/HS](#)

- [G3/G4 Online Seminar and Responsible Use Agreement](#)
- [Academic Integrity and Honesty Policy](#)
- [Whistleblowing Policy](#)
- [Code of Conduct for Parents \(Parents, Guardians and Caregivers Positive Engagement\)](#)
- [Student Code of Conduct](#)
- [Communication Policy for all Community Members](#)
- [Counseling Policy](#)
- [Critical Incident Policy](#)
- [Excursion Guidelines for Homeroom Teachers and Chaperones](#)
- [Protocol for Serious Incidents/Expressions of Concern from an Employee](#)
- [Self-Harm Policy and Protocol](#)
- Suicidal ideation, intent and attempts (from the [Counseling Policy](#))
- Completed suicide response (from the [Critical Incident Policy](#))

In addition, the *Sacred Heart School Corporation Board Manual: A summary of policies for governance and school operations for the International School of the Sacred Heart* includes Board policies and procedures on student safeguarding including training, compliance and the roles and responsibilities of the Board Safeguarding Lead, members of the Boards of Directors and Counsellors, and the Board's response to allegations of abuse.

21. Resources for Staff and Parents

For concerns, suggestions or comments regarding the Child Protection Policy, please contact the following:

Head of School

Kindergarten & Junior School Division Principal

Middle School Division Principal

High School Division Principal

Child Protection Officer

Resources About Japan Law

- [Japan Law: Child Abuse Prevention and Treatment Act \(Act No. 82 of 2000\)](#)
- [Japan Law: Child Welfare Act \(Act No. 164 of 1947\)](#)

Community Resources

- Report to the police:
 - Call 110 for police
 - Call 119 for fire/rescue ambulance
 - Call 189 for specific child abuse concerns
- Child Guidance Office's Child Abuse Hotline: Call 189
 - Persons receiving counseling from the Child Guidance Office or members of related organizations can call this emergency number: 03-5937-2330
- Family Support Center of the relevant ward office (per the victim's home address).

Sexual Health Resources

- Sexual Behaviour in Children - [NSPCC](#) advice for parents of children and teens on healthy and unhealthy sexual behaviour including what to do if you are worried.
- Sexting/Sharing nudes - Advice for Parents - [NSPCC](#)

Child Abuse Resources (Only in Japanese)

- [子ゴコロ・親ゴコロ相談@東京](#) (*Consultation of Children and Parents' Hearts@Tokyo*): Provide online consultation for child abuse prevention via LINE
- [3Keys](#): Provide online consultation and shelter for teens
- [Capna](#): Provide online consultation, hotline for DV, and shelter
- [子どもの虐待防止センター](#) (*Child Abuse Prevention Center*): Provide consultation via phone, group care, and parenting program
- [Buddy Team](#): Provide child care support, child abuse prevention, and home visit for parenting support
- [児童相談所虐待対応ダイヤル](#) (*Child Consultation Abuse Correspondence Dial*): Provide free consultation via phone. Phone: 189.

Child Abuse Resources (In multiple languages)

- [Tokyo Women's Plaza](#): Provides free DV consultation (Available in English, Chinese, Korean, Thai, & Tagalog. Phone: 03-5467-1721.
- [内閣府DV相談プラス](#) (*Cabinet Office DV Consultation Plus*): Provides 24 hours DV consultation via phone, email, and chat (Available in Japanese, English, Tagalog, Thai, Spanish, Chinese, Korean, Portuguese, Nepali, Vietnamese, & Bahasa Indonesia). Phone: 0120-279-889.

22. Location and Updates to Child Protection Handbook of Policies and Procedures

The Child Protection Officer (CPO) ensures the school's Child Protection Policy and Child Protection Handbook of Policies and Procedures is reviewed and updated by the CPO and Leadership Team every year. Between scheduled reviews, if there are updates to Japanese Law or International Task Force for child protection best practices, the CPO reviews these and as needed, the CPO recommends changes to the Child Protection Policy to the Leadership Team and Board Safeguarding Lead.

This Child Protection Handbook of Policies and Procedures reflects the experience and expertise of the faculty and staff. Conscious of the need to protect students and support employees, the Leadership Team encourages a culture of listening to students, faculty, and staff in furthering measures to enhance the well-being of the community.

This Child Protection Handbook of Policies and Procedures and supporting materials are posted on the Parent, Student, and Faculty/Staff Portals on Veracross and on the School [Website](#).

23. Links to Forms on Veracross

- [Child Protection Code of Conduct for Faculty, Staff, and Service Providers](#) (English)
- [Child Protection Code of Conduct for Parents, Guardians, and Caregivers](#) (English)
- [Child Protection Code of Conduct for Volunteers and Guests](#) (English)

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