

QSI International School of Malta
2026-2027



Child Safeguarding and Protection
Handbook

Guidelines and Protocol for Fostering a Safe School Environment for Children and Youth

How to Use the Handbook: A To-Do Chart

Tasks to complete	Responsible Party	Date Completed
Determine if your school's host country signed or ratified the United Nations Convention on the Rights of the Child (UNCRC), and is therefore subject to the related international law: https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?Treaty=CRC&Lang=en	Director	Malta signed the UNCRC in 1990
With your community, create a Child Safeguarding and Protection Commitment Statement that: • Is user-friendly for children and the entire school community. • Clearly outlines the school's position regarding the provision of a safe school environment. • References cooperation with the greater community. • Is aligned with QSI policies.	Director	
Submit the Child Safeguarding and Protection Commitment Statement to the Accreditation and Information Coordinator (susan-friend@munster.qsi.org) for approval before publishing. The statement should be published in the Information Packet, on the school website, and in other places as decided upon by the Child Protection Team. The statement may be translated into other languages to	Director	

promote understanding within the community.		
On your school website: • Post the school's Child Safeguarding and Protection Commitment Statement. • If your school is a member of the Central and Eastern European Schools Association (CEESA), publish the CEESA statement and commitments that you can find in the last section of this handbook.	Director	
Designate a Child Protection Team that will both implement child safeguarding and protection protocols and, within those protocols, respond to any reports of abuse. Within this team, designate the spokesperson who will communicate with families, community members, staff, local authorities, international authorities, and the media regarding child protection and any issues that are reported.	Director	
Gather background checks from all current, local employees.	Director	
Finalize the Introductory Letter to School Community that is in this handbook. Translate it as necessary and share it with all families in the school community.	Child Protection Team	
Create a plan for consistently sharing the Introductory Letter with families who are new to the school, and with all families annually.	Child Protection Team	
Contact local agencies for help in researching local laws, upholding local laws, and creating a network of resources for child safeguarding and protection. Potential contacts include: • Local law enforcement. • Embassies. • Legal system. • Child protection agencies. • Forensic personnel. • UNICEF. • Local Non-Governmental Organizations (NGOs).	Child Protection Team	

• Mental health providers and resources. • Regional QSI resources. • Global QSI resources.		
Work with the QSI legal team to research child safeguarding and protection laws in the country where your school is located and refer to any applicable laws when personalizing this handbook, especially laws involving offenders and victims of child abuse.	Director	
In the Child Safeguarding and Protection Handbook, personalize all red text to your school name or situation, and delete or alter the text as necessary. Once revisions are complete, change the text color to black.	Director	
Add your school name to the Code of Conduct. The approved version of the Code of Conduct is in the final chapter of this handbook. Translate it into the local language of the host country as necessary.	Director	
Create and follow a plan to introduce the Code of Conduct to every parent, staff member, volunteer, coach, and other person who works with children through the school, and ask them to review and sign the Code of Conduct annually.	Child Protection Team	
Incorporate child safeguarding and protection hiring practices (see Recruitment section of this handbook) into the school local hiring protocol. If you do not have a workable application for local staff positions, please see the template in the last chapter of this handbook.	Director	
Conduct all-staff (anyone who works with children: faculty, cafeteria workers, bus drivers, cleaners, volunteers, coaches, etc.) training on Child Safeguarding and Protection. Use the information in this handbook as a guide for the training. See the training section of this handbook for topics to cover. Be sure to document attendance and topics covered.	Child Protection Team	

Create guidelines for field trips, events, off-campus events, and student travel that are aligned with the Code of Conduct. See the section on “Excursions, School Events, and Student Travel” in this handbook.	Child Protection Team	
Create a plan for documenting, storing, and sharing any disclosures of abuse. Use the section on this topic in this handbook as a guide.	Child Protection Team	
Create a plan for implementing the Empower Program beginning in January 2024.	Child Protection Team	
Create a plan for reviewing and updating this handbook annually.	Child Protection Team	

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Special thanks to our sources:

- Association of International Schools in Africa (AISA) Child Protection Program Guide.
- International Schools Services (ISS).
- The work of International Task Force on Child Protection (ITFCP)* and accreditation agencies in the recommendation of child and youth protection standards.
- International Task Force on Child Protection (ITFCP) recruitment committee recommended screening practices & other recommendations.

- International Centre for Missing & Exploited Children (ICMEC) education portal's checklists and summary resources (<http://www.icmec.org/education-portal/>).
- Central and Eastern European Schools Association (CEESA).
- Tirana International School.

**The work of the International Task Force on Child Protection (ITFCP) has been undertaken by a coalition of 90+ volunteers, leaders of international education organizations, school leaders, counsellors, business and security managers and teachers, school accreditation, inspection and recruitment professionals, working collaboratively across professions with dedicated law enforcement officials and the medical community. It is this broad collaboration and diverse perspective from a variety of roles which has enriched their discussion and results. From its origin in May of 2014, its charter has been to apply its collective resources, expertise, and partnerships to help international school communities address child and youth protection challenges.*

Chapter 1

Background Information for Child Safeguarding and Protection Procedures

Definitions of Abuse and Neglect

Definitions of abuse are complex and based in various cultures, child-rearing behaviors, and gender role expectations. The primary determination of **abuse** is that it is dependent on some form of a relationship that is used to meet the need of the more powerful person, either a member of the family, a teacher, or a friend. Research guides the definitions, and the understanding of the impact of certain behaviors.

Important Notes:

- Behavioral indicators in and of themselves do not constitute abuse or neglect; the presence of indicators does not necessarily mean that abuse or neglect is present.
 - The behavioral indicators could be rooted in other issues, or may represent normal developmental phases experienced by a child.
 - Troubling student behavior should be addressed in a constructive way, regardless of the cause.
 - Use common sense and consider other indicators, such as culture and family dynamics, when deciding if a referral is warranted.
 - If in doubt, ask for help from the school Counselor or Director.
- Possible indicators of abuse or neglect may be the same across multiple types of abuse.
- Indicators may be entirely absent in a child who is a victim of abuse.
- The most powerful evidence of abuse is self-reporting. If a child reports abuse, a referral must be made, whether indicators are present or not.

Physical Abuse

Physical abuse is defined as a parent or caregiver deliberately inflicting pain or injuries to the child, or allowing another person to inflict pain or injuries to the child.

Possible indicators of physical abuse include:

- Bruises, burns, sprains, dislocations, bites, cuts.
- Improbable excuses given to explain injuries.
- Injuries which have not received medical attention.

- Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc.
- Repeated urinary infections or unexplained stomach pains.
- Refusal to discuss injuries.
- Withdrawal from physical contact.
- Self-destructive tendencies, including cutting or suicidal ideation.
- Arms and legs kept covered in hot weather.
- Fear of returning home or of parents being contacted.
- Showing wariness or distrust of adults.
- Being aggressive toward others.
- Being very passive and compliant.
- Chronic running away.

Neglect

Neglect is defined as a parent or caregiver intentionally denying a child access to things that support healthy development, including adequate food, clothing, shelter, sleep, supervision, medical treatment and education.

Possible Indicators of Neglect include:

- Basic needs not met.
 - Inadequate supervision, nutrition, hygiene, or clothing.
 - Medical needs unattended.
- Fatigue or listlessness.
- Extreme loneliness.
- Hunger.
- Self-destructive tendencies, including cutting or suicidal ideation.
- Reluctance to go home.
- Low self-esteem.
- Poor social relationships.
- Compulsive stealing.
- Alcohol or drug abuse.
- Frequent lateness or low attendance.
- Child is left for extended periods of time without parents or a guardian.
- Parents cannot be reached in the case of emergency.

Emotional Abuse

Emotional abuse is defined as a parent or caregiver persistently mistreating a child emotionally, often causing severe and adverse effects on a child's emotional well-being or development. Some level of emotional abuse is involved in all types of ill treatment of a child, but it may also occur alone. It includes:

- Conveying to children that they are worthless or unloved.
- Conveying to children that they are inadequate or valued only insofar as they meet the needs of another person.
- Imposing inappropriate age or developmental expectations on children.
- Exposing children to domestic violence.
- Causing children frequently to feel frightened.
- Exploiting or corrupting children.

Possible indicators of emotional abuse include:

- Delayed physical, mental, or emotional development.
- High anxiety.
- Delayed speech or sudden appearance of a speech disorder.
- Fear of new situations.
- Low self-esteem.
- Inappropriate emotional responses to painful situations.
- Extremes of passivity or aggression.
- Alcohol or drug abuse.
- Chronic running away.
- Compulsive stealing.
- Obsessions or phobias.
- Sudden under-achievement or lack of concentration.
- Attention-seeking behavior.
- Persistent tiredness.
- Lying.

Sexual Abuse

Sexual abuse is committing, or allowing others to commit, any sexual offense against a child, regardless of whether the child is aware of what is happening. Sexual abuse has some unique characteristics that warrant special attention. While physical abuse may be the unplanned result of immediate stress, sexual abuse requires planning with results that are more insidious. The planning, referred to as “grooming,” often results in victims accepting the blame, responsibility, guilt, and shame for the sexual behavior of the offender.

Sexual abuse requires more secrecy than other forms of child abuse, so is more difficult to report. Some victims, through the process of grooming, are taught that sexual activity is a form of love, so may be protective of their abusers because of their perception of being loved. Any disclosure of sexual abuse must be taken seriously, regardless of the signs that are present or absent. The offender must be removed from the school setting as quickly as possible. School counselors can’t work

to treat sexual offenders; out-sourced professional assistance should be consulted as necessary.

Sexual abuse may include:

- Intentionally touching, either directly or through clothing, the genitals, anus, or chest area/breasts of a child for other than hygiene or child care purposes.
- Engaging in sexualized non-contact activities, such as involving children in the production or viewing of pornographic material or encouraging children to behave in sexually inappropriate ways.
- Involving children in commercial sex work. These children are victims of sexual abuse, whether they perceive themselves as victims or not.

Possible Indicators of Sexual Abuse:

- Age-inappropriate sexual knowledge, language, or provocative behavior.
- Withdrawn or aggressive behavior.
- Unusual interpersonal relationship patterns.
- Mention of special treatment from an adult, or a new “secret” friendship with an adult or younger person.
- Venereal disease, unusual vaginal or penile discharge, or difficulty urinating.
- Physical trauma or bleeding to the oral, genital, or anal areas.
- Difficulty in walking or sitting.
- Regressive behavior, like bedwetting or stranger anxiety.
- Refusal to change into PE clothes.
- Fear of people or places.
- Running away from home without a specific complaint.
- Pregnancy, especially at a young age.
- Unusually protective parents.

Possible signs of sexual offenders:

In addition to knowing the signs of victimization, below are some early warning signs to look out for in potential sexual offenders.

Signs of student offenders:

- Unusual interest in sex, sexualizing inanimate objects and activities.
- Continuation of sexual misbehavior when told to stop.
- Use of force and coercion in social situations.
- Unusual intensity when discussing sex and sexuality.
- Socialization with much younger children.
- Gifts.
- Requiring secrecy in relationships.

Signs of adult offenders:

- Identification of “favorite” student or child.
- Attempts to find ways to be alone with children.
- Inappropriate language, jokes and discussions about students/children.
- Sexualized talk in the presence of students/children.
- Private gifts or private chats, in person or online.

Child Exploitation

(The following is taken entirely from Save the Children’s Resource Center, <https://resourcecentre.savethechildren.net/keyword/commercial-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. These activities are to the detriment of the child’s physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

There are two main forms of child exploitation that are recognized:

- Sexual exploitation: the abuse of a position of vulnerability, differential power, or trust for sexual purposes; this includes profiting monetarily, socially or politically from the exploitation of another as well as personal sexual gratification.

Examples: Child prostitution, trafficking of children for sexual abuse and exploitation, child pornography, sexual slavery.

- Economic exploitation of a child: the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labor. Economic exploitation implies the idea of a certain gain or profit through the production, distribution and consumption of goods and services. This material interest has an impact on the economy of a certain unit, be it the State, the community or the family.

Examples: Child domestic work, child soldiers and the recruitment and involvement of children in armed conflict, child bondage, the use of children from criminal activities including the sale and distribution of narcotics, the involvement of children in any harmful or hazardous work.

Bullying

The following definition of bullying was taken directly from

<https://www.stopbullying.gov/what-is-bullying/definition/index.html>:

Bullying is unwanted, aggressive behavior among school-aged children that involves a real or perceived power imbalance. The behavior is repeated, or has the potential to be repeated, over time. Both children who are bullied and who bully others may have serious, lasting problems. Bullying includes actions such as making threats, spreading rumors, attacking someone physically or verbally, and excluding someone from a group on purpose. In order to be considered bullying, the behavior must include:

- An Imbalance of Power: Children who bully use their power — such as physical strength, access to embarrassing information, or popularity — to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviors happen more than once or have the potential to happen more than once.

There are three types of bullying. Verbal and social bullying may be carried out in person, on paper, or through cyber-bullying (via phone, text, video, online, or other electronic means).

- Verbal bullying is saying or writing mean things. Verbal bullying includes:
 - Teasing.
 - Name-calling.
 - Inappropriate sexual comments.
 - Taunting.
 - Threatening to cause harm.
- Social bullying, sometimes referred to as relational bullying, involves hurting someone's reputation or relationships. Social bullying includes:
 - Excluding someone on purpose.
 - Telling other children not to be friends with someone.
 - Spreading rumors about someone.
 - Embarrassing someone in public.
- Physical bullying involves hurting or threatening a person's body or possessions. Physical bullying includes:
 - Hitting/kicking/pinching.
 - Spitting.
 - Tripping/pushing.
 - Taking or breaking someone's things.
 - Making mean or rude hand gestures.

More information on bullying is found in the Peer-on-Peer Abuse Addendum section in Chapter 7.

Context of the School Community

One of the essential roles and characteristics of the international school is that the school becomes the conduit for the social life in which expatriate families engage. Thus, international schools have a responsibility to literally fill the child safeguarding and protection gap in helping to connect these families to the necessary services. When the family reports that this is a safe and nurturing environment, the school can rest assured that it has fulfilled a critical service.

To clarify our task and its context within the community, it is important for school personnel to understand and be cognizant of the experience of the students we serve. Following are some of the characteristics and attributes of international school communities that should be taken in account when considering the context of our child safeguarding and protection guidelines.

Characteristics and attributes of international school children:

- Transience and mobility impact development of identity and relationships, especially for support in times of need.
- Children may demonstrate early maturity and sophistication in some areas, but naivety and immaturity in other areas.
- Separation from extended families, working and traveling parents, and interrupted long-term friendships and relationships may contribute to attachment issues, and support during times of crisis or need may be minimal or non-existent.
- Being lost between multiple and sometimes conflicting cultures and value systems results in confusion of behavioral expectations.
- High expectations are placed on students to achieve academically.
- Children have access to paid help in the home.
- Children may attend private international schools abroad and public schools in their home countries.

Characteristics of international school families:

- Isolation from extended family, previous community creates a lack of support.
- Power differential in marriage (who has the work permit) creates vulnerability.
- Absentee parents impact family functioning.
- Expatriates may have a challenging or superficial relationship with the host country.

- Expatriates may experience a lack of control over critical life decisions; the employer may decide where, when, and how the family moves, creating a lack of stability.

Characteristics of international school communities:

- School takes on sole role as center of family life and often provides superficial relationships that cannot meet mental health needs.
- Power influence: A family's political position in the community can inhibit a school from taking action.
- Sense of being lost in diversity of community can cause further isolation.

Cultural dynamics of international school communities:

- Multiple norms rooted in different cultural traditions can cause confusion involving religious values, values of parenting, discipline, care-giving, sexuality, gender roles and responsibilities.
- Impact of rapidly changing "pop culture" from developed nations affects student behavior.
- Varying degrees of openness rooted in cultural traditions affects students' relationships with their families and peers.
- Varying cultural attitudes toward gender issues and child development, including different concepts of developmental needs through childhood, affect the families' views of different situations.

International school communities are vulnerable to abuse because abusers capitalize on secrecy, insularity, isolation, and limited access to support resources.

International schools must respond to the reality that these characteristics are exactly the characteristics that perpetrators will use to their advantage in abusing children.

QSI Statement of Inclusion

QSI is open to all students. We respect their diversity regardless of race, ethnicity, gender, cultural background, disability, religion, personal beliefs, and socioeconomic status. QSI employees will be considerate of diverse cultural and family beliefs when teaching in the classroom. In QSI schools, we provide a safe and supportive environment for all students.

Myths and Facts about Child Abuse and Neglect

Myth: Child abuse is carried out by strangers.

Fact: Research indicates that 90% of abuse is domestic and committed by individuals known to the child. International school communities tend to have families that move often and are separated from their extended families. When abuse is within the family, the transient lifestyle increases the risk to international school students who tend not to have access to outside resources and therefore can't get help.

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

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

Myth: Child abuse is a result of poverty and happens in low socioeconomic circumstances.

Fact: Research indicates that child abuse occurs in all racial, ethnic, socioeconomic, and cultural sectors of society. A common characteristic of an abusive family is isolation, such as that commonly found in international families who move often and are separated from their extended families.

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

Fact: International schools are bound by the laws of their host countries and must be knowledgeable and compliant with the child protection laws of their location. 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 in which schools are facing legal action regarding non-compliance.

Chapter 2

QSI Policies

QSI Policies Related to Child Safeguarding and Protection

The following components of QSI policies are in place to support child safeguarding and protection, as well as the well-being, health, and safety of students, families, and staff.

I.A.2.a Core Beliefs of the QSI Educational Model

It is the responsibility of the school to provide the conditions for success.

- QSI believes that more learning will occur if students have a desire to learn, have positive feelings concerning the school environment, and have success in their work. A comfortable atmosphere of caring and acceptance is considered important to QSI. Possibility for success increases when students work at the appropriate level of difficulty and sense positive expectations from well-qualified, experienced, and caring educators.

To achieve these Core Beliefs, QSI takes on the responsibilities:

- To provide educators who have a love for children, who have positive expectations of children, and who are willing to expend the time and energy necessary to meet the success of individual students.
- To employ educators who maintain core values and who believe their lifestyle should be a positive influence on their students.

I.A.2.c Philosophy

Social Behavior

- For a useful and meaningful life, we encourage the development of personal qualities leading to acceptable values and harmonious relationships.

I.A.2.d Objectives

Functions of the Administration:

- To recruit teachers who have a love for children, who have positive expectations of children, and who are willing to give the time and energy necessary to meet the needs of individual students.
- To employ teachers who have acceptable values and who believe that their lifestyle should be a positive influence on their students.

Functions of teaching staff:

- To inspire students to help them see what they can be and what they can accomplish with a view to excellence and creativity.

- To provide a positive school atmosphere by working with a cooperative spirit, giving support to one another, and encouraging a high morale and efficiency within the staff.

Social Behavior

- To encourage an understanding of one's self with a view to developing acceptable values such as patience, kindness, unselfishness, honesty, and consideration for others.
- To provide a positive and secure atmosphere, treating the students honestly and fairly.
- To encourage each student to feel good about himself and to help him promote similar feelings in fellow students.
- To provide guidance in problem-solving and decision-making situations.
- To develop a sense of responsibility and to encourage leadership.

I.C.2.a.i Success Orientations

Trustworthiness

The Student Will demonstrate honesty by:

- habitually telling the truth and avoiding deception.
- telling the truth when negative consequences may follow.
- bringing lost items or money to the teacher or the office.
- being a person who does not cheat on tests.
- being a person who is not involved in theft.

TSW demonstrate trustworthiness by:

- following a commitment with the appropriate action.
- promptly accomplishing an errand when requested by a teacher.
- displaying acceptable behavior when not under teacher supervision.
- being a person who is not involved in vandalism.

Concern for Others

TSW demonstrate tolerance for those of other nationalities, races, religions, cultures, ages, and mental and physical abilities by:

- being a person who does not make disparaging remarks concerning those different from themselves.
- joining in group activities with those different from themselves.
- having friendly associations with those different from themselves.

TSW demonstrate acceptance of others, particularly newcomers, by:

- including them in informal social groups.
- being a person who does not actively exclude individuals from group activities.
- approaching newcomers with a view to making them feel welcome.

TSW demonstrate concern for others by:

- avoiding actions or words which hurt another person.
- actions and/or words of support and/or sympathy for those who are unhappy or sad.
- helping others to be successful in their schoolwork, activities, and play.
- displaying unselfish behavior.

Kindness/Politeness

TSW demonstrate kindness by:

- being a person who does not make remarks which put down another.
- being a person who does not physically abuse others.
- displaying acts of kindness (sympathy, encouragement, helpfulness, patience, etc.) toward others, particularly fellow students.
- giving time and resources to help another in need.

TSW demonstrate politeness by:

- being a person who does not exhibit rudeness.
- using socially acceptable language.
- displaying acts of courtesy toward others.

Group Interaction

TSW demonstrate group involvement by actively participating in activities.

TSW demonstrate support of leadership by:

- displaying words and actions which encourage responsible behavior by others.
- displaying words and actions which promote learning in a classroom by others.
- being a person who does not discourage responsible behavior or learning by others.
- assisting the leadership of others by cooperating and being good followers.

TSW demonstrate support of group activities by:

- contributing ideas which are related to the goals of the group.
- being a person who does not make negative comments which are not constructive.
- controlling emotions when discussing different points of view.
- displaying kindness when expressing an opinion.
- displaying a cooperative attitude.

II.G.2.a General School Safety

Stranger Safety

Teachers should instruct students to:

- Look for identification Tags/Badges, or Police or Fire personnel identification.
- Speak only to those wearing identification.
- Go directly to the classroom or teacher from your location.
- Move quickly between locations, but do NOT RUN.
- INFORM A STAFF MEMBER OR PARENT OF ANY UNSAFE SITUATION IMMEDIATELY!

Teachers should frequently remind, monitor, and reinforce/recognize the above behaviors to their students.

I.C.4 Standards of Behavior

The primary goal relating to student behavior is to develop a sense of responsibility such that the student develops an internal desire to observe acceptable behavior patterns. The responsibility of obtaining this objective rests first and foremost at home. The school also has a responsibility to work in every possible way toward this goal. The home and school, working as a team, should coordinate efforts. We hope this results in positive attitudes toward the school and country.

Standards of Behavior:

Students are expected to be kind to others and should consider the feelings of others. Verbal unkindness and physical abuse are not accepted.

II.D.3 Guidelines for Teachers

Teacher expectations for students:

- Expecting children to be kind to others and to respect the rights of others.
- Expecting children to respect authority and to feel that teachers' actions and decisions are intended to make the school a better place and therefore a more enjoyable place for all concerned.
- By teacher actions, make the children to feel that the teachers have a positive attitude toward them. This includes praise of children when an opportunity arises and general comments which lead the children to believe that they are important and liked by the teacher.

Chapter 3

Prevention

Child Protection Team Roles and Responsibilities

The school's Child Safeguarding and Protection Plan includes the operation of the Child Protection Team. This team will plan and implement protocols, monitor interventions, and carry out follow-up activities.

The Child Protection Team consists of:

- School Director.
- Director of Instruction.
- School Counselor.
- Wellness Coordinator.
- Teacher representatives from each level in the school (preschool, lower elementary, upper elementary, secondary).
- External resource (e.g. community child protection worker, U.S. Embassy RSO, Advisory Board Member, etc.).

The role of a school-based Child Protection Team is to ensure that there is a comprehensive Child Safeguarding and Protection program in place at the school and to annually monitor the effectiveness of the program. Specific tasks include:

- Develop and monitor the guidelines and protocol from the Child Safeguarding and Protection Handbook.
- Research local laws related to child safeguarding and protection.
- Create a directory of local resources related to child safeguarding and protection.
- Finalize, translate, and distribute the Introductory Letter to School Community.
- Personalize and make a plan for distributing and collecting signed copies of the Code of Conduct.
- Ensure that school-based hiring practices are aligned with those outlined in the "Recruiting and Hiring" section of this handbook.
- Organize child safeguarding and protection training for all staff and community members.
- Create a plan for documenting, storing, and sharing any disclosures of abuse.
- Create guidelines for field trips, events, off-campus events, and student travel that are aligned with the Code of Conduct.
- Ensure the implementation of child safeguarding and protection curriculum in all homerooms.
- Respond to any reports of abuse.
- Appoint a spokesperson to communicate with members of the school community in the case that an allegation is made.
- Create a plan for updating this handbook annually.

Role of the School-Based Child Protection Lead

The Role of the Child Protection Lead: The Child Protection Lead is a member of the Child Protection Team and is an assistant to the director of the school for the child protection tasks that are outlined in the Child Protection Handbook. The ultimate responsibility of those tasks being completed is that of the director, but the Child Protection Lead can be a significant help. The Child Protection Lead is required to receive the Level 1 ICMEC training certificate. Their tasks may include:

- Child Protection Handbook updates
- Child Protection Code of Conduct Updates
- Code of Conduct distribution, beginning of the year and ongoing
- Staff training, beginning of the year and ongoing
- Parent training
- Organization of the Child Protection Team including managing the agenda and minutes
- Connection to local law enforcement

The Child Protection Team will meet at least three times annually. A general schedule of activities is below.

Timeline	Activity	Responsibility
August	Inform Advisory Board, staff, students, and parents about the school Child Safeguarding and Protection Handbook and associated protocols.	Director
	Inform new families of school Child Safeguarding and Protection Handbook and associated protocols. • Update, translate as necessary, and share the Introductory Letter to School Community in this handbook. • Make a plan for distributing the letter and communicating policies to new families throughout the year.	Director
	Convene Child Protection Team, appoint chair, orient new members.	Director
	Review data from previous school year, revise and update the Child Safeguarding and Protection Handbook accordingly, and develop implementation plans for current year.	Child Protection Team

September	Implement annual plan.	Child Protection Team
	Train all staff on child safeguarding and protection.	Director
	Organize parent training(s) on child safeguarding and protection.	Director
	Ensure all staff, parents, volunteers, contracted service providers, coaches, after-school activity helpers, and everyone else who interacts with students through the school signs the Code of Conduct.	Director
October	Complete trainings for parents and staff, if necessary.	Director
November	Convene Child Protection Team to review implementation and progress of plans.	Director
	Review local hiring practices to ensure: • Background screening. • Criminal history check. • Reference check includes discussion of child protection history. • Code of Conduct signed upon hiring.	Director
January	Inform new families of Child Safeguarding and Protection Handbook and associated protocols	Director
	Convene Child Protection Team to update and review activities of first term and recommend areas of further action.	Director
As needed	Convene Child Protection Team.	Director
	Revise and Update Child Safeguarding and Protection Handbook as necessary, at least annually.	Director

Recruiting and Hiring

QSI strives for certainty in hiring people who are well-suited to work with children. The following recruiting and hiring protocols are in place to ensure:

- Candidates with a tendency toward child abuse are deterred from applying to QSI.
- Candidates who have a criminal record, or about whom concerns have been raised regarding their suitability to work with children, are not offered a position.
- Successful candidates fully understand their responsibilities in safeguarding children while employed by QSI.

- QSI maintains appropriate records that might be required in a possible future investigation or inquiry.
 - QSI works with recruitment agencies such as ISS and Search to ensure that the reference checks and background screening undertaken by such agencies complements QSI's own recruitment protocols for QSI-contracted teachers.
 - Government-issued background check certifications will be performed for all staff employed at each QSI school.

Employment Records

The following records will be maintained for each employee:

- A QSI application or local application, whether electronic or hard-copy format.
- Government-issued background check certifications.
- Copies of educational certifications, university degrees, and other teacher certification documents.
- Signed Code of Conduct, stated in the QSI Employee Terms of Contract Booklet.
- Record of child safeguarding and protection training.

Recruitment and Hiring Process

Please note:

- QSI follows procedures and maintains records to ensure compliance with respect to the following for every QSI employee.
- QSI School Directors are responsible for following procedures and maintaining records to ensure compliance in respect to the following for every school-contracted employee.

Application:

- QSI candidates are required to complete a check-box indicating that the information in the application is accurate and true, and that QSI can contact references.
- QSI candidates respond "yes" or "no" to questions about their personal conduct regarding:
 - Having an education license revoked.
 - Having been convicted of a felony or misdemeanor.
 - Having been discharged from a previous position.
 - Having been denied professional credentials.
- The QSI Personnel Office screens applications prior to assigning a candidate to a recruiter.

Screening:

- Satisfactory confidential QSI reference forms from at least two previous employers or teachers including most recent supervisor, and a mandatory phone, video call, or other personal contact reference from the most recent supervisor.
- Public records screening.
- Government-issued background check certificate from candidate's passport country.
- An internet search including the teachers full name(s), plus the search terms: teacher; child protection; and safeguarding.

Interview:

- A QSI recruiter holds a personal interview with each QSI candidate.
- QSI recruiters are aware of the QSI child safeguarding and protection protocols.
- QSI recruiters are tasked with asking candidates about child safeguarding and protection experience.

Contract:

- Employees will be required to:
 - Sign the Code of Conduct with each contract renewal.
 - Undergo child safeguarding and protection training as part of their orientation, and any time the training is offered at the school.

Reporting Requirements

QSI International School of Malta aims to ensure that all students are given a safe learning environment by maintaining appropriate practices and supervision in the school.

Reporting of suspected child abuse, whether it occurred in or out of school, is the responsibility of any employee who suspects that a student may have been abused. Self-reporting of abuse by students must always be reported to the Director and Counselor. The school will investigate all reports and will take appropriate action to ensure the safety of the student in accordance with host country law.

QSI International School of Malta endorses the Convention on the Rights of the Child* of which the host country for the School, Malta, is a signatory, and seeks to be a safe haven for students who may be experiencing abuse or neglect in any aspect of

their lives. QSI International School of Malta will distribute this policy annually to all parents and applicants, will communicate this policy annually to students, will provide annual training for all staff, and will make every effort to implement hiring practices to ensure the safety of children. In the case of a staff member reported as an alleged offender, QSI International School of Malta will conduct a full investigation following the course of due process.

This requirement is endorsed by Quality Schools International.

(***Sources:** Amnesty International Unofficial Summary of the UN Rights of the Child: <http://www.amnestyusa.org/our-work/issues/children-s-rights/convention-on-the-rights-of-the-child>; and Convention on the Rights of the Child: <http://www.crin.org/docs/resources/treaties/uncrc.asp#Nineteen>).

Training

Training on child safeguarding and protection is required annually for all school staff (instructional and support), volunteers, coaches, and anyone else who works with students. A good time for the initial training is the teacher orientation days before school starts. Follow-up trainings may be part of staff meetings or held in other settings throughout the year.

Training topics for all staff must include:

- Definitions of abuse, neglect, and bullying.
- Possible indicators of abuse, neglect, and bullying.
- Statistics of prevalence of abuse and neglect, as closely related to the school's population and location as possible.
- Myths and facts about child abuse and neglect, especially as related to international school communities (see "Myths and Facts about Child Abuse and Neglect" in this handbook).
- Vulnerabilities of international school children (see "Context of the School Community" in this handbook).
- Preventative measures to safeguard children.
- Measures to avoid allegations against school community members.
- Procedures for handling disclosure.
- The roles and responsibilities of the administration, faculty, and staff to report and react to suspected, observed, or disclosed abuse.
- A timeline for response.
- Procedures for investigating the suspected, observed, or disclosed abuse.
- Possible actions that will address confirmed cases of abuse.
- A flow chart for steps to be followed after disclosure.
 - Communication with children, families, staff, authorities and the media regarding child safeguarding and protection and related issues. Generally, this involves complete confidentiality, except in communicating the report to the Director/Counselor and, if necessary, involved legal authorities. Only the Director or appointed spokesperson speaks with the community and media.
- Identification and functions of Child Protection Team members.
- Code of Conduct.
- Empower Educator's Training Part 1 and 2

Differentiated Training for Different Staff Members

Advisory Board Members:

- School guidelines and procedures.

- Implementation of Child Safeguarding and Protection Plan.
- Content of parent trainings.

Administrators:

- Administrative responsibilities in implementation of guidelines, procedures, and Child Safeguarding and Protection Plan.
- Code of Conduct development.
- Accountability.
- Case management. How to handle:
 - Uncertainty of reporter.
 - Direct disclosure.
 - Working with personnel involved in the case.
 - Any questions the administrators have about issues that may arise.
- Specific reporting of concerns.
- Case studies.
- Due diligence when a teacher is implicated.
- Hiring practices.

Child Protection Team

- ICMEC Level I Training
- ICMEC Level II Training (as needed)
- School specific training for administrators and teachers
- Child Protection Team orientation in Teacher Academy
- One member of the Child Protection Team must complete the Empower Train-the-Trainers course

Support staff and After-School Activity coaches, volunteers, and helpers:

- Content of staff training.
- Code of Conduct.
- How to avoid allegations of abuse.
- How to access help.

Parent Training

Before beginning any information or training sessions, the school needs to work to promote parent support and buy-in. This can be achieved through several methods:

- Annually distributing a parent-student handbook that highlights child safeguarding and protection plans, and providing this handbook to all new families during the admissions process.
- Meeting with parents and encouraging them to participate in their children's education by reading school newsletters, classroom newsletters, emails, and

other forms of written communication from the school. These meetings might take place during:

- Morning coffees.
- Formal parent education classes.
- Evening meetings with parents.
- All-school events, like assemblies.
- When speaking to parents about the child safeguarding and protection plan, emphasize that it is **preventative**.

In the fall, after preparing parents to learn more about the plans for child safeguarding and protection, schedule a training session (or multiple training sessions as needed) to reach the most parents possible. Provide translation as needed. The following concepts should be included in the training:

- Understanding of the specific guidelines, protocol, and regulations of the school, including the response of the school in the case of a report of abuse.
- Awareness of:
 - Signs and symptoms of child abuse.
 - Statistics of incidence and prevalence.
 - Awareness of risks to which students are exposed, globally and locally.
 - Vulnerabilities of international school students in international school communities.
 - Talking with children; prevention and empowerment strategies.
 - Handling disclosure and reporting as a parent.
- Community resources available, especially to help with domestic violence and child abuse.
- Pointers for keeping safe and keeping children safe.

Responsibility for Trainings

School Director:

- Ensures trainings take place and adequate resources are available to support them.
- Publicly advocates for the Child Safeguarding and Protection Plan and its implementation and endorses personnel in their roles.
- Either leads trainings or supports Counselor, Director of Instruction, Empower trainer or school medical office staff in leading the trainings.
- Provides School Nurse or Doctor with the highest level of training so that person can help with all other trainings and can be a first responder if an allegation is made.
- Brings in an outside consultant to facilitate trainings, if possible. Options include:

- A School Counselor from another QSI school.
- Online training or consulting.
- Consultants who are recommended by CEESA or AAIE.

Avoiding Behaviors that Lead to Allegations

- Avoid situations in which you are alone with a child. This includes not transporting youngsters alone in your car. When it is necessary to speak privately with a child, find a space out of earshot, but within sight of others for your conference.
- The privacy of children in situations such as toileting, showering, and changing clothes should be respected. When it is necessary to supervise children in these situations, at least two adults should be present and intrude only to the extent that the health and safety of the children require. Adult volunteers should preserve their own privacy in these situations also.
- Avoid touching areas that are normally covered by swimming suits; breasts, buttocks, and groin. When hugging is appropriate, hug from the side over the shoulders, not from the front.
- Sexual jokes, comments of a sexual nature, kissing, sensual massages, or sexual gestures are not appropriate behavior for an adult staff member or volunteer at the school or in the presence of students.
- When volunteering to supervise overnight activities, adults should not share sleeping quarters with children other than their own.
- Revealing personal information about one's sex life by an adult volunteer or staff member is never appropriate.
- Do not use corporal punishment in any form.
- It is the adult's responsibility to set and respect boundaries. When a child attempts to involve an adult in inappropriate behavior, the adult must reject the overture and inform the director of the exchange.

Excursions, School Events, and Student Travel

The school must have guidelines, to be agreed upon by all involved parties, that outline staff and chaperon responsibilities and expected student behavior for excursions, school events, and student travel. In creating such guidelines, make sure that they are:

- Aligned with the Code of Conduct.
- Aligned with reporting protocols in this handbook.

For help in creating the guidelines, please see the "Guidelines for Excursions, School Events, and Student Travel" section in the final chapter of this handbook.

Child Safeguarding and Protection Curriculum

There are many opportunities for children to learn about safeguarding and protection throughout the school day, and any opportunities to further discussions about relevant topics should be taken. However, to best protect students, QSI has adopted the Empower: Skills for Safety, Success, and Global Citizenship Curriculum. All teachers must be trained to teach the curriculum. QSI will host a training-of-trainers every two years to ensure that each school has an Empower trainer on staff. The school must provide a yearly opportunity for the trainer to train any teachers who are not yet certified to teach the curriculum. Additionally, the school must schedule weekly or bi-monthly time for lessons on child safeguarding and protection to each class in the school, throughout the school year.

The EMPOWER program is an evidence-based comprehensive child development curriculum. EMPOWER was created collaboratively with QSI teachers, counselors, and administrators. The curriculum is based on the Center for Academic and Social Emotional Learning (CASEL) framework, International School counselors Association (ISCA) standards, the Association of International Schools in Africa (AISA), and the International Center for Missing and Exploited Children (ICMEC) best practices for child protection curriculum. Each of these organizations are renowned organizations in their fields.

Success Orientation Concept Strands	Social Emotional Learning Concept Strands	Child Protection Concept Strands
Kindness and Politeness	Self-Awareness	Body Privacy
Concern for Others	Self-Management	Personal/Social Safety
Responsibility	Social-Awareness	Abuse
Trustworthiness	Relationship Skills	Trusted Networks
Group Interaction	Responsible Decision Making	Self-Advocacy
Aesthetic Appreciation		Personal Rights
Independent Endeavor		

In addition to Empower, the school may wish to develop other resources for working with children in the classroom on child safeguarding and protection issues. The Association of International Schools in Africa (AISA) developed a child protection curriculum guide, which outlines curriculum to be taught at each grade level. It should be used by teachers as a resource in lesson planning. The guide is available at <https://aisa.or.ke/wp-content/uploads/2020/09/Child-Protection-Handbook->

Curriculum-Guidance-7July2016-1.pdf. Also, the iSafe curriculum that is already in use by QSI schools covers cyber-safety.

If the school has a counselor, the counselor may support teachers in implementing child protection lessons in their classrooms. However, the counselor should not be the sole person responsible for teaching the curriculum. Homeroom teachers must be involved. Required topics and teaching suggestions are in the table below. These topics are also covered in the Empower: Skills for Safety, Success, and Global Citizenship Curriculum.

Topic	Teaching Suggestions
Anti-Bullying	Anti-bullying can be taught in conjunction with the Success Orientations of Concern for Others and Kindness and Politeness.
Abuse and Safety	Lessons on abuse and safety can be linked to the Success Orientations of Trustworthiness, Responsibility, and Kindness and Politeness, and may also be covered in conjunction with health topics.
Cyber-Safety	Cyber-safety is covered in the QSI technology curriculum through the iSafe program (www.isafe.org). Each QSI school has a subscription to this program, and it is a required component of the technology curriculum.
Rights of Children and Youth	Lessons on children's rights can be linked to Group Interaction, or taught as a separate topic during the homeroom/advisory period.
Identification of Protective Supports	Lessons on identifying people to turn to for help and support may be linked to Group Interaction, or taught as a separate topic during the homeroom/advisory period.
Consent	The meaning and significance of consent may be linked to Trustworthiness and Responsibility, or covered in conjunction with health topics.

Chapter 4

Disclosure and Follow-Up

Principles and Guidelines for Disclosure, Reporting, and Follow-Up

General Principles

The following principles are considered when implementing procedures for disclosure, reporting, and further action:

- **The child's readiness and privacy must be respected. The child will disclose whenever he or she is ready. Therefore, do not push for any information other than that which the child volunteers.**
- We operate in a country that may offer limited internal and external support services.
- We should recognize the limitations of expertise in child safeguarding and protection. For example, teachers are not trained investigators or therapists. Therefore, our international school must make use of any local community partnerships, and engage consultants with particular expertise in child safeguarding and protection services, whenever needed.
- We must assess the skills of our staff in an environment that has relatively few professional mental health resources and determine boundaries for which cases the school can handle and which cases can be referred out.
- Laws vary from country to country, and we must act according to local regulations and international conventions to which the host country is a signatory.
- The cases of alleged abuse need to be considered both from the perspective of the alleged victim and the alleged child abuser, establishing the need for due process.
- It is important to minimize the number of times the child engages in disclosing.

What to do if a Child Discloses Abuse

Please note: Teachers and school staff are not investigators. Your role is to listen and respond to disclosures in order to determine the next step for students to get the help they need. When appropriate, a request for an investigation must be completed.

- Do not let a child swear you to secrecy before telling you something. You may need to report, which the child will view as breaking your trust with them.

- Listen without judgment, and without asking leading questions. Do not ask for a great amount of detail.
- Respond calmly and matter-of-factly. Even if the story the child tells is difficult to hear, it is important not to register disgust or alarm. Do not make judgmental or disparaging comments about the abuser; it is often someone whom the child loves or with whom the child has a close relationship.
- Do not confront the abuser.
- Reassure the student that:
 - You believe the student, and the student did the right thing by telling you.
 - You are sorry that someone hurt the student.
 - No one deserves to be abused.
 - It was not the student's fault, no matter what the student did or did not do.
 - You will do everything you can to help to make the abuse stop, which may involve getting the help of someone the student trusts at school.
- Concentrate on the immediate needs of the student; ask what the student needs or wants right now.
- If the child does not want to go home, this should be considered an emergency. Report it and handle it immediately by contacting the school's Child Protection Team. The team should decide on an appropriate plan for the child. DO NOT take the child home with you.
- In other cases, empower the student by asking if he or she feels comfortable reporting the abuse to the Director or Counselor, and if it would help if you were present.
 - If the student agrees, accompany the student to the Director's or Counselor's office.
- If the student does not want to report to anyone other than you, inform the student that you must inform the Director and Counselor.
- Be honest with the student, and don't make promises you can't keep.
- Document the disclosure in writing, with date, time, and your signature.
- Keep the disclosure confidential, other than reporting to school administration and, if appropriate, to local authorities.
- Work with the school administration and the student to create a safety plan for the student.

Guidelines for Reporting and Action

It is obligatory for faculty, staff, and administrators to report incidents of physical or psychological violence, aggression, harassment, neglect, and physical or sexual abuse to the Director or Counselor immediately. If there is reasonable cause to

believe that child abuse occurred, the Director or Counselor must document all aspects of the investigation and resulting actions. Actions must be considered for appropriateness based on specific details of each situation. After consultation with the QSI legal team, and according to the “Response to Disclosure or Report Flowchart”, the following actions may be taken:

- Conference with involved students.
- Meet with parents.
- Meet with others pertinent to the case, including alleged perpetrator(s).
- Contact the school nurse.
- Refer the child for a psychological assessment.
- Refer the case to the Child Protection Team.
- Report to local authorities, including local child protection services if available.
- Report to an embassy.
- Pursue legal action.

Certain details lead to different actions. For example:

- If a Director is accused of abuse, then the person who received the allegation should report it directly to the Regional Supervisor.
- If the child is in preschool or the 5-year-old-class, then identify someone who is familiar with child development and can interact appropriately with the child, and include that person in conversations with the child.
- If the child has difficulty communicating in a language that is not understood by trained staff members, then identify a translator who is not involved in the situation and include that person in conversations with the child.
- If the child has other challenges that make communication difficult, then identify a person who is not involved in the situation and who can help the child to tell his/her story in a way that is understood (e.g. someone with a special education background), and include that person in conversations with the child.
- If family members from any embassy are accused of abuse, or a child from an embassy family is a victim of abuse, then the Director must inform the embassy Regional Security Officer (RSO) as soon as possible and work with them to plan the next steps.
- If the child is an expatriate, then in addition to following local guidelines that apply, the school must consult with the QSI legal team and work with the appropriate embassy Regional Security Officer (RSO). If one or both parents are accused of abuse, then in addition to contacting the embassy RSO, the school must contact the parents’ employers.

Actions in the Case that the Suspected Offender is a School Employee

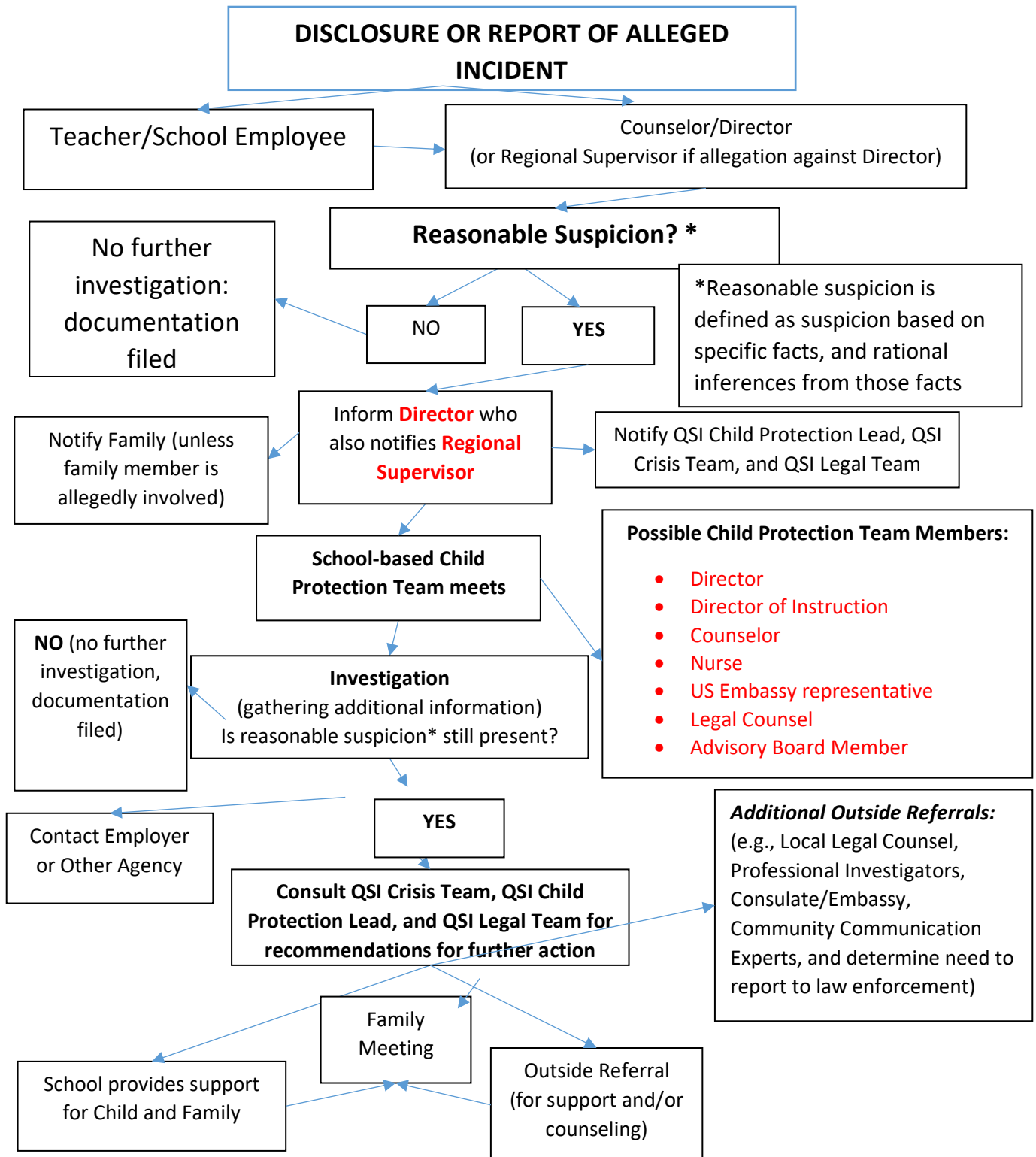
When a child, parent, staff member, or other community member reports inappropriate behavior by a member of the school staff or someone who works with students, the school must respond immediately. The emotional and physical safety of children is dependent upon a safe school environment; therefore, any disclosure of teacher, staff, or volunteer offenses must be taken seriously and dealt with swiftly. The integrity of a school and a school system is not dependent on whether an offender exists; instead, the integrity of the school or system depends on how the school responds when an alleged offender within the school is reported.

In the case that the reported offense is sexual in nature, appropriate embassies, child protection agencies, and law enforcement must be contacted, and the alleged perpetrator must be prohibited from further contact with any children at the school while an investigation is conducted. In cases of sexual offenses against children, offenders are likely to have multiple victims in the same location.

Immediate responses include:

- Informing and involving the child(ren)'s parent(s).
- Informing the person under investigation of the allegations.
- Depending on the severity of the allegation, placing the accused on forced leave while an investigation is conducted.
- Depending on the severity of the allegation and the laws of the country, determining who will conduct the investigation (Child Protection Team, law enforcement, embassies, etc.).

Response to Disclosure or Report Flowchart



Guidelines for Disclosure or Report Follow-Up

Determine risk for re-offense:

- What happened? Might it happen again?
- Who was involved? Are they still present?
- When did the offense occur?
- Where did the offense occur?

If the offense is ongoing and the child lives with the offender:

- Will you make a report to the authorities?
- Whom will you bring in to protect the child, such as a non-offending parent?
- What immediate actions can the child take, or might be taken on the part of the child, apart from reporting?

When interacting with the child:

- Listen to the child without pushing for details. Allow the child to tell you as much as he or she wants to share. Give alternatives for continuing conversations, like involving a counselor or others in the child's support network.
- Explore feelings and concerns the child has about the experience, such as guilt, fear, shame, and anger.
- Affirm that the experience was an assault, and the child is never to blame for someone else's actions.
- Affirm each feeling the child shares, while also determining if those feelings are overwhelming to the child. Work to help the child put a healthy limit on the feelings.
- Explore the child's support system to give the child options for others whom they can ask for help, including parents, adult relatives, friends, and other trusted adults.
- Explore the play that the child enjoys and help the child to make plans to do what he or she likes to do, like going to a movie or going to a safe friend's house.
- End the session by making sure the child knows what to do if assault happens again or is attempted again:
 - Say NO!
 - Identify a safe place to which the child can run.
 - Specify people to whom the child can run or call for help.

Documentation of Disclosed or Reported Cases of Abuse

QSI and school policies regarding confidentiality and management of school records applies to all aspects of the documentation of incidents of abuse. The school will be guided by local law, international norms, the advice of the QSI and school legal teams, and local or embassy child protection personnel.

The Child Protection Team will create guidelines that address:

- Confidentiality agreement for all members of the Child Protection Team.
- Minutes of Child Protection Team meetings, including decisions or recommended actions.
- Where records of reports of abuse or bullying are kept.
- Creation of a child protection reporting form (see example in the final chapter of this handbook) that includes:
 - Reporter's relationship to the child/victim.
 - Child's name, gender, age, address.
 - Parents'/Guardians' contact information and other relevant information.
 - Family information, including siblings, nationality, embassy relationships, etc.
 - Name, contact information, relationship to child, and other helpful information about alleged perpetrator.
 - Information about reporter and school.
 - Nature and extent of injuries/mistreatment.
 - Evidence of prior abuse.
 - How reporter was alerted to the abuse/bullying.
 - Description of action taken, or recommended action.
 - Other helpful information.
- Reporting to local authorities and documentation of such a report.

Confidentiality in Communication in Case of Abuse or Emergency

In the case that an allegation of abuse is made, everyone involved with the school will have questions, and the media may approach the school for a statement. When communicating with the community, or if contacted by the media, the integrity of the victim is paramount. It is also critical to maintain the confidentiality of the victim's family, the alleged perpetrator and his/her family, and the reputation of the school. Therefore, the following must be considered when sharing any information with the community or media:

- Designate a spokesperson who will communicate with the school community and the media. In most cases, this should be the Director. Make sure that all

staff and others affiliated with the school know that they should not answer questions or share information; they should refer all questions to the spokesperson.

- If local authorities are investigating, then no statements should be made as they might compromise the investigation. If asked about the situation, the only response by the school's spokesperson should be, "There is an ongoing investigation so we are not at liberty to share any details regarding the alleged incident at this time."
- Less is more. It is not the job of the school to share detailed information of the allegations, to confirm or deny specific allegations, or to share publicly the results of any internal or external investigations. Rather, when there are allegations of abuse/neglect in the school (not within a school family) and the allegations have become public knowledge, a letter should go out to school families that does not share any specific information about the allegation, but includes:
 - Acknowledgment that an incident of alleged misconduct has been brought to the administration's attention.
 - Reassurance that the school is cooperating with the appropriate officials.
 - An explanation of the need for confidentiality, both to protect the child and to avoid compromising the investigation.
 - Reassurance that the highest priority of the school is to provide a quality education that includes a safe environment, and a brief statement of ways the school works to ensure a safe environment.
 - A list of the resources that are available for students and families (e.g. school counselors or QSI regional counselors).
 - Contact information for the designated spokesperson for questions and concerns.
- If you suspect that an alleged incident of misconduct may hit the media, the Child Protection Team should gather to create a media strategy.
 - It is critical that the school identifies one spokesperson who will represent the school in all communication with the media, and that no other staff members speak to the media. Information that is shared must be tightly controlled.
 - Do not allow the media to speak with students on campus.
 - Always maintain confidentiality of the victim, perpetrator, allegations, and investigation outcomes. Do not confirm or deny any information about which the media asks for comments.
 - Prepare a statement before speaking with the media, and if possible run this statement by the school's or QSI's legal team.

- If possible, ask a reporter for a list of questions ahead of an interview. Prepare written responses to the questions.
- If multiple media outlets are contacting the school, schedule a press conference, prepare talking points, and limit questions at the end.
- Consistency of information shared is key, and should include the same information that is shared above in the letter to school families.
- There is no obligation of the school to talk to the media, but the media is looking for a sensational story and they will share any information they have. Therefore, it helps the school to provide an official statement if the story is publicly escalating.

Chapter 5

School-Specific Documents

Child Safeguarding and Protection Statement

QSI International School of Malta Child Safeguard and Protection Reporting Protocol

QSI International School of Malta aims to ensure that all students are given a safe learning environment by maintaining appropriate practices and supervision in the school.

Reporting of suspected child abuse, whether it occurred in or out of school, is the responsibility of any employee who suspects that a student may have been abused. Self-reporting of abuse by students must always be reported to the appropriate administrative authority. The school will investigate all reports and will take appropriate action to ensure the safety of the student in accordance with Maltese law.

QSI International School of Malta endorses the Convention on the Rights of the Child of which the host country for the School, Malta, is a signatory, and seeks to be a safe haven for students who may be experiencing abuse or neglect in any aspect of their lives. The school will distribute this policy annually to all parents and applicants, will communicate this policy annually to students, will provide annual training for all staff, and will make every effort to implement hiring practices to ensure the safety of children. In the case of a staff member reported as an alleged offender, the school will conduct a full investigation following the course of due process.

QSI International School of Malta will follow specific protocols in the reporting of suspected child abuse. The Child Safeguarding and Protection Handbook developed by Quality Schools International and adopted by QSI International School of Malta lays forth the definitions of abuse and neglect. Please note this document for clarification and understanding guidelines and protocols.

This document is designed as the specific protocol for QSI International School of Malta in the reporting, documenting, storing, and sharing of any and all disclosures concerning child protective issues. Please adhere to protocol to protect

integrity of the process and afford protective rights of disclosure. The following steps are to be followed in the event of a student disclosure or teacher/staff suspicion of neglect and/or abuse.

In the event of an abuse disclosure or suspicion of abuse and/or neglect immediately contact the School Counselor or Director. The reporting to the School Counselor or Director must be immediate by the teacher/staff upon the suspicion or disclosure. Staff should utilize the Child Protection Reporting form and contact the School Counselor or Director immediately. In the event the School Counselor or Director is unavailable to take the report contact the highest listed member of the Child Protection Team or the school Director of Instruction until the report has been successfully made.

The School Counselor or Director will convene an immediate meeting including the Director of Instruction and the Child Protective Team (CPT) as needed. The response to disclosure or report of incident protocol outlined in the Child Safeguarding and Protection Handbook will be followed. (Please note flowchart provided in handbook)

Documentation of all actions taken by administration or the Child Protection Team (CPT) will be kept by the Director. A summary report of all actions taken will be ongoing and maintained throughout the process. The Child Protection Team (CPT) will be made aware of the report as determined by the Director. All meeting minutes will be taken by a member of the Child Protection Team and entered into the summary report of action.

If the Director and CP Team confers that the standard has been met for making an official report then the school Director will make the appropriate contact with Maltese authorities and appropriate Embassies. This report will be completed under the supervision of an administrative witness and notes documenting the contact will be entered into the summary report of action.

All documents created from the initial Child Protection Reporting form will be maintained by the Director, and stored.

The transition of new staff will require the current Director to inform the incoming Director of the location of the files. The incoming Director will ensure that proper notification is made to all required parties of the documents on a need to know basis.

Each file will contain a custody document showing when and who viewed documents. Please see attached chain of custody documentation form.

Local Laws Related to Child Safeguarding and Protection

Article 10

(Second level of abuse, forms and educational work)

Second level of Abuse Forms:

- Forms of physical violence are: slapping, hitting, kicking, ripping clothes, spitting, taking and destroying property, pulling hair and ears
- Forms of psychological abuse are: blackmail, threats, unreasonable punishment, communication ban, exclusion
- Forms of social violence are: scheming, denying the group's attention (ignorance), non-inclusion, disapproval, exploitation
- Forms of sexual violence are: sexual contact
- Cyber bullying: inappropriate advertising, recording and sending videos, abuse of blogs, forums and chats, recording individuals against their will and knowledge, recording violent scenes, distribution of images and pictures.

On the second level, the activities are undertaken by the homeroom teacher in cooperation with the pedagogue and director, with the obligatory participation of parents or legal representatives in the sense of enhanced educational work. If intensified educational work is not effective, an Educational-Disciplinary measure is initiated and a measure is imposed in accordance with the law.

Article 11.

(Third level Abuse Forms and Educational Work)

Third level of Abuse Forms:

- Forms of physical abuse are: fight, strangling, throwing, causing burns and other injuries, food and sleep deprivation, exposing to low temperatures, attacking with weapon.
- Forms of psychological violence are: intimidation, serious blackmail with the serious threat, extortion of money and things, limitations of movement, reference to the use of narcotic drugs and psychoactive substances, involvement in destructive groups and organizations.
- Forms of social abuse are: threats, isolation, bullying of an individual or a group by another group, making clans to hurt others, false bomb threats
- Forms of sexual violence are: displaying pornographic material, displaying images of intimate parts, seduction by an adult, rape, incest.

- Cyber bullying: recording violent videos, distribution of violent videos and images with an explicit content, child pornography.

At the third level, the actions are taken by the director and the pedagogue, with the mandatory engagement of parents/legal representatives and competent authorities, organizations and services (Center for Social Work, Health Service, Police) At this level, there is a required educational work that is appropriate to the needs of students, as well as the initiations of Educational Disciplinary Measures and the impositions of measures in accordance with the law. If another institution or service is engaged with the student, the school is cooperating with each other and coordinating activities.

Roles and responsibilities of school employees and students in the case of abuse

Article 12.

(Duties of all school staff)

In the case of violence and abuse among students at school, all staff is obliged to:

- Immediately stop violent behavior and separate the students in a way that a staff member stands between the participants of the conflict, in order to disenable the eye contact between the students. Kindly ask all other students to walk away, using a soft but determined tone of voice
- Help the injured student
- Notify the homeroom teacher about the event, pedagogue and director.

Article 13.

(Duties and responsibilities of a School Director, homeroom teacher, pedagogue, students and other staff)

Special duties in preventing and resolving abuse situations of a school director, assistant director and a school secretary are:

- Getting acquainted with the School Rules and Protocols
- Conformation of the existing school regulations
- Mandatory participation in the procedures regarding student abuse by a school staff or persons outside of the school
- Director or acting director informing the authorized services (Social Services, Police, Ministry of Education)
- Tracking and evaluating steps taken towards protecting students.

Teacher on duty has a responsibility to:

- Be familiar with stipulations of the School Rules and Regulations
- Attend duty according to schedule
- Notice abusive behavior and act immediately
- Inform a homeroom teacher

Homeroom teacher has a responsibility to:

- Be familiar with stipulations of the School Rules and Regulations, and to inform the student about those,
- Notice abusive behavior and to act immediately
- Interview participants and collect information about the abusive incident
- Inform parents/guardians and have a conference with them
- Follow up on the effects of the steps taken
- Documenting the case and keeping the record on the case
- Communicate with relevant institutions
- Cooperate with Social Services

Teacher has a responsibility to:

- Be familiar with stipulations of the School Rules and Regulations
- Notice abusive behavior and to act immediately
- Inform the homeroom teacher

Students should:

- Be familiar with the School Rules and Regulations
- Notice abusive behavior
- Report the abusive behavior to a homeroom teacher, teacher on duty and/or school counselor.

V - SCHOOL PROCEDURES IN THE CASE OF VIOLENT CONFLICT BETWEEN STUDENTS

Article 14.

(Procedural steps in the case of violent conflict between students)

- Teachers, homeroom teachers, advisors and the director are to take the following steps in the case of a violent conflict between students:
- Immediately undertake all the measures to stop and terminate violence among students. Ask for help from other staff members, if needed. Director or another authorized person-teacher on duty in the afternoon shift (director, director of instruction, counselor, librarian, or secretary) may call a police, if needed.

- If a student is hurt to an extent that requires doctor's intervention or an examination, or if, under the circumstances, a reasonable assumption can be made that such an intervention or examination are needed, it is necessary to call the emergency services, or in the quickest possible way escort/provide an escort to the emergency room, and wait for the doctor's recommendation on the further steps to be taken and wait for the arrival of students' parents or guardians.
- After termination of the conflict, homeroom teachers are obliged to have an immediate conversation with students who participated in the conflict, and if doctor's intervention was required, after the doctor approve such conversation. These conversations are always performed with the presence of one of the schools counselors, and in the case that they are not available, other authorize person-teacher on duty in the afternoon shift (director, director of instructions, counselor, librarian, secretary). These conversations need to be performed in a careful manner, respecting students' dignity.
- After termination of conflict among students, homeroom teacher is obliged to inform parents/legal guardians of the students involved. Parents/legal guardians need to be informed of all the facts and circumstances of whose accuracy teachers are completely certain (talk about actual behavior during the incident) and inform them of all actions/steps which will be taken. Parents/guardians are called by phone or in written form.
- Conduct the interviews with other students or witnesses or adults who have any knowledge about the violence that took place. Also, confirm all the circumstances regarding the form, intensity and duration of the violent conflict. If the violent conflict was between the class peers, the homeroom teacher (in the presence of school counselor) should conduct the interviews with the involved students and witnesses. If the violent conflict happened involving students from different classes, homeroom teachers are to talk with students from their own class, and the school counselor or the office staff should talk with witnesses.
- Ask the participants of the violent conflict to fill out the Violent Conflict Report Form.
- Ask the witnesses to fill out the Violent Conflict Report Form.
- Immediately have a counseling interview with student/students who committed violence, where special attention should be drawn upon to the harmfulness and unacceptability of such behavior. Students should also be advised and influenced to change their behavior.
- During conversation, pay attention if the student is revealing some circumstances that would reveal if they have themselves been a victim of abuse

in or outside of their family (if this is the case, immediately notify the Social Work office and/or in case of criminal activity, notify the Police)

- Make an official notification about the activities, conversation, statements taken, and your own observations. And report to the “Teaching Council”
- If the student is repeatedly involved in the peer violence, they should be enrolled in the counseling program and pedagogical support in school or in the program outside of the school in agreement with the parents.

Article 15.
(Reconciliation)

The students involved in the confrontation could be offered the reconciliation which must be agreed upon by all parties involved. The process of reconciliation is led by the “expert associate”, student peace council for level one or in special cases a teacher who is trained in this educational procedure.

Article 16.
(Educational-disciplinary procedure)

In accordance with Article 9 of this Protocol, the Educational-disciplinary procedure is put in motion and the student involved in the violence will be given an educational-disciplinary measure.

VI - THE SCHOOL PROCEDURE IN CASE OF STUDENT ABUSE

Article 17.
(The order of procedure in case of student abuse)

In case of a report of a student abuse or a report of an abuse among the students, the Home Room teacher, the school's "expert associate", and a director are under obligation to:

- Immediately take actions to stop and desist the student abuse, and if need be, and in accordance to the observation of the severity of the abuse, notify the services in charge and the Police
- In case a student is injured, or if under the circumstances one could reasonably assume or suspect that the medical intervention or medical exam are needed, immediately call the Emergency. Assure the students' transport to

the Emergency, and wait for the medical recommendation concerning the further action and the arrival of the student's parents or legal guardians.

- Upon the reported abuse, immediately notify the student's parents or legal guardians, report all facts and circumstances that have been known thus far, and inform them of the activities that are to be taken.
- Following the report of the abuse, immediately conduct a conversation with the student - victim of the abuse, or in the case of the medical intervention, conduct the previous as soon as possible, with an agreement with the medical personnel. These conversations are always done in the presence of one of the "expert associates" of the school, extremely carefully, respecting the dignity of the student and offering and giving support.
- Parents or legal representatives of the student who is the victim of bullying should be informed of possible forms of counseling and professional assistance in the educational institution and beyond, with the aim of supporting students.
- Interview other students or adults who have knowledge of the bullying, and determine all the circumstances related to the form, intensity, severity and duration of the same.
- If it is a particularly difficult form, intensity or longer duration of abuse that can cause the trauma of students who have witnessed violence, consult with the competent service Center for mental health and social services, to assist students, witnesses of violence.
- To talk to a student who has committed the abuse, to show him the inadmissibility and harmfulness of such behavior, and to advise him and encourage the change of such behavior.
- During the conversation, pay particular attention to whether a student who has committed abuse indicates that he is the victim of neglect or abuse within or outside his family. In that case, the Center for Social Work will immediately be notified and, if necessary, inform the police.
- Invite parents or legal representatives of the student who has committed the abuse, inform them of the events, as well as the inadmissibility and harmfulness of such behavior, advise them in order to change such student behavior, and invite them to engage in counseling or professional support within or outside the school (centers for social work, child care clinics, family counselor, etc.) and inform them about the obligation of the school to report to the competent social work center, the Ministry of Education and Science and the police.
- Make the notes about the undertaken activities, conversations, statements and observations, as well as keep appropriate records of the protected data that

will be delivered on request to other competent bodies, and report to the Teachers' Council of the school about the events.

Article 18.
(Discipline measures)

In cases of abuse, an educational disciplinary procedure is initiated in accordance with Article 9 of this Protocol and the abuser are pronounced an educational disciplinary measure.

Article 19.
(Reporting of abuse to the competent institutions)

The school is obliged to report more serious forms of student abuse to the police, the competent center for social work and the Ministry of Education and Science.

VII - ACTIONS TAKEN BY SCHOOL IN RESPONSE TO THE DOMESTIC VIOLENCE

Article 20.
(The obligation to report abuse in the family)

In case that student is being abused by the grown up person in school (employer of the school, their parents/legal guardians, parents/legal guardians of other students, unknown person)

Employers are obligated to:

-immediately try and stop abusive behavior toward the student,

In case that any employee of the school receives information or suspects that the student is exposed to or is a subject of abuse, that is witnessing the abusive behavior of any family member or is neglected, is obligated to immediately inform a homeroom teacher, school director or expert associates of the school.

Article 21.
(Order of procedures in case of recognizing or suspecting of domestic abuse)

In case of domestic abuse director or expert associates are obligated to:

- Have interview with the student if the student is available and inform him/her of the further procedures during the interview,

- Call the students parent or legal guardians immediately for an interview and familiarize them with the information that school employers received. If the child was abused by one parent, informed the other parent of a student,
- Alert the parents that abuse is unacceptable and warn of its damages as well as the obligations that the school has to report the case to the competent social services center, police, Ministry of Education, and office of the Ombudsman of the Human rights, in order for competent services to take action,
- If the student is abused by both parents/legal guardians or there is a suspicion of such abuse, immediately inform the social services and proceed further as agreed with social services,
- If the parent/legal guardian refuses the cooperation, inform the competent social services,
- If the student needs help or doctors check, parent/legal guardian will accompany the student (if it is available and If it is not a suspect in the case) and/or representative from the social services, except, if the medical help is an emergency, student will be accompanied by the homeroom teacher or the expert associate of the school,
- During the interview with the student expert associate need to take official notes, or record the interview which need to be sign by the associate that interviewed the student, homeroom teacher or other reliable person with the previous announcement of the recording taking place,
- School is obligated to work with competent social services and work accordingly with the social services toward wellbeing of the student

VIII-ORDER OF PROCEDURES OF THE SCHOOL IN CASE OF ABUSE TOWARD THE STUDENTS FROM THE ADULT IN SCHOOL (PROFESSOR, PARENT/LEGAL GUARDIAN, OTHER EMPLOYEES OF THE SCHOOL, UNKNOWN PERSONS)

Article 22.

(Obligations of the school employees in case of abuse toward the student from the adult in school)

- If this fails, immediately call the director, expert associate or employee of the school, to try to discontinue violent treatment towards a student.
- Within a short period of time the director informs the police of the event.

Article 23.

(Order of conduct in case of knowing or suspicion of violence from an adult in school)

- In the event that there is a suspicion or a student has experienced violence from an adult, the
- order of conduct is as follows:
 - a professional or associate is obliged to conduct a conversation with the student
 - immediately after learning about the events with the purpose of informing about the facts,
 - establishing or normalizing the student's feelings and preventing the long-term consequences of the trauma, and during the conversation to keep an official note signed by
 - the director, an expert associate, and homeroom teacher who interviewed the student,
- when an expert associate is interviewing a student, a director, an expert associate, a
- homeroom teacher, or a member of the Teachers' Council should immediately inform the
- parents or guardians of the child (or another parent or guardian if one of the parents has
- violently behaved in school towards their own child] to take student home and inform them
- about the possible need to involve a child and parent or guardian in counseling and
- professional help at school or outside of school,
- in case a student is injured or there is a suspicion that he / she could be injured, he / she
- should be taken to a medical examination, accompanied by a parent [if available) or a
- representative of a school or center for social work,
- Director of the school is obliged to warn a person about violent and unacceptable
- behavior, and the obligation of the school to report the case to the police,
- Director or other authorized person in the school informs the police about the event.

(These articles were taken from Malta's Protocol about School Procedure in Cases of violence)

Local Authorities and Services Working on Child Safeguarding and Protection

Law Enforcement, Legal Services, Child Protection Services, etc.

Agenzija Appogg Malta	22959000
Child Protection Services Malta	22588900
Malta Police Force	112
Support Line 179	179
Child Safety Services	Studentservices.mede@gov.mt

Local Counseling and Treatment Resources

TAASC Malta <https://www.taascmalta.com/>

Foundation for Social Welfare Services <https://fsws.gov.mt/en>

FSWS Reporting Form <https://fsws.gov.mt/en/appogg/Pages/Intake-and-Protection-Services/Child-Protection-Services.aspx> (referral form for Child Protection Services)

Solace – A Safe Space <https://www.solace.com.mt/>

Chapter 6

Document Examples and Templates

Code of Conduct

This Code of Conduct must be read and signed by all employees of the school, parents, and anyone who will have contact with students as part of a school program, activity, field trip, or other event. The person's signature indicates understanding and agreement to the Code of Conduct.

QSI International School of Malta Code of Conduct

QSI International School of Malta is committed to the safety and protection of children. This Code of Conduct applies to all faculty, staff, employees, and volunteers. The public and private conduct of faculty, staff, employees, students, and volunteers acting on behalf of the school can inspire and motivate those with whom they interact, or can cause great harm if inappropriate. We must, at all times, be aware of the responsibilities that accompany our work. Additionally, members of the school community, including parents, must be aware of the parameters of the Code of Conduct and the expectation of adult behavior toward children within the school community.

******For the purposes of this Code of Conduct, the phrase "faculty, staff, and volunteers" includes coaches, contractors, and all other adults who work with, or around, children within the school community.

- We should be aware of our own and other persons' vulnerability, especially when working alone with children and youth, and be particularly aware that we are responsible for maintaining physical, emotional, and sexual boundaries in such interactions. We must not engage in any covert sexual behaviors with those for whom we have responsibility. This includes seductive speech or gestures as well as physical contact that exploits, abuses, or harasses. We are to provide safe environments for children and youth at all school activities, both on and off campus. We ask families to provide safe environments for children at private events as well.
- We must show prudent discretion before touching another person, especially children and youth, and be aware of how physical touch will be perceived or received, and whether it would be an appropriate expression

of greeting, care, concern, or celebration. School personnel and volunteers are prohibited from physical discipline of a child.

- Physical contact with children can be misconstrued both by the recipient and by those who observe it and should occur only when completely nonsexual and otherwise appropriate, and never in private. The following are examples of appropriate and inappropriate physical behavior.

- Appropriate physical behavior includes contact that maintains physical boundaries at all times and only consists of public and nonsexual touches, such as:
 - Pats on the back or shoulder
 - Child-initiated hugs, or hugs given with consent to meet a child's needs, e.g. saying to a crying student, "What do you need right now? Would you like a hug or is there another way I can help you?"
 - Holding hands to cross the street safely
 - Support with toileting or changing clothes, as outlined in the Intimate Care Policy
 - To prevent a child from injury (such as catching a child in a fall)
 - To restrain a child from self-harm
- Inappropriate physical behavior is any contact that abuses, exploits, or harasses a child; crosses professional boundaries; or places the needs of the adult above the needs of the child.

Inappropriate behavior includes:

- Slapping, shaking, pinching, hitting, punching, pushing, grabbing, kicking
 - Patting the buttocks
 - Touching private body parts
 - Intimate/romantic/sexual contact
 - Showing pornography or involving children in pornographic activities
 - Hugs initiated by the adult to meet the adult's needs, e.g. "I need a hug today--will you give me a hug?"
- One-on-one meetings with a child or young person are best held in a public area; in a room where the interaction can be (or is being) observed; or in a room with the door left open, and another staff member or supervisor is notified about the meeting. All meetings between adults and children must be observable and interruptible.
 - We must intervene when there is evidence of, or there is reasonable cause to suspect, that children are being abused in any way. Suspected abuse or neglect must be reported to the appropriate school and local authorities.

- Faculty, staff, employees, and volunteers must refrain from the illegal possession and/or illegal use of drugs and/or alcohol, and from the use of tobacco products, alcohol and/or drugs when working with children. Adults should never buy alcohol, drugs, cigarettes, videos, or reading material that is inappropriate and give it to young people. Staff members and volunteers should not accept gifts from, or give gifts to, children without the knowledge of their parents or guardians.
- Communication with children is governed by the key safety concept of transparency. The following steps will reduce the risk of private or otherwise inappropriate communication between parents, administration, teachers, personnel, volunteers, and minors:
 - Any dual relationships with students (close family friendships with parents of students, volunteer positions outside of school that involve students, etc.) are governed by the professional expectations of behavior and adhere to all other points in this Code of Conduct.
 - Any one-on-one encounters with minors must be observable and interruptible.
 - Where possible, email exchanges between a minor and a person acting on behalf of the school are to be made using a school email address.
 - Faculty, staff, and volunteers who use any form of online communications including social media (Facebook, Twitter, etc.) and text messaging to communicate with minors may only do so for activities involving school business.
 - Faculty, staff, and volunteers will not connect with, or “friend,” any student on any social media platform until the child has graduated from secondary school and reached the age of maturity.
 - Volunteers will not engage in dating or any form of “romantic” relationship with a student until that student has graduated from secondary school and reached the age of maturity.
 - Faculty and staff employed by QSI will not engage in dating or any form of “romantic” relationship with a student until that student has reached the age of 21.
 - Faculty, staff, and volunteers will not share names or photos of any students on social media without written permission from the students and their parents/guardians.

Statement of Acknowledgement of Code of Conduct for Signature

I promise to follow the rules and guidelines in this Code of Conduct as a condition of my providing services to the children and youth participating in QSI International School of Malta programs.

I will:

- Treat everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Never be alone with children and/or youth at school activities without another adult being notified or in a place that is observable and interruptible by others (e.g. an open classroom door or open meeting area).
- Use positive reinforcement rather than criticism, competition, or comparison when working with children and/or youth.
- Maintain appropriate physical boundaries at all times and touch children only in ways that are appropriate, public, and non-sexual.
- Comply with the mandatory reporting regulations of the school by reporting any suspected child abuse or neglect to the Director.
- Cooperate fully in any investigation of abuse or neglect of children and/or youth.
- Protect the child and the child's family by maintaining confidentiality in the case of a report of misconduct and refusing to share any details about the report with anyone outside of the school's Child Protection Team and relevant authorities.

I will not:

- Touch or speak to a child and/or youth in a sexual or other inappropriate manner.
- Inflict any physical or emotional abuse such as striking, spanking, shaking, slapping, humiliating, ridiculing, threatening, or degrading children and/or youth.
- Smoke or use tobacco products, or possess, or be under the influence of alcohol or illegal drugs at any time while working with children and/or youth.
- Give a child who is not my own a ride alone in a car without permission from the child's parent/guardian, unless the child's well-being is in danger. In the case of transporting the child in an emergency situation, I will always make a written report of the circumstances and actions taken as soon as possible to submit to the director.
- Accepts gifts from or give gifts to children or youth without the knowledge of their parents or guardians.

- Engage in private communications with children via text messaging, email, Facebook, Twitter or similar forms of electronic or social media except for activities strictly involving school business.
- Connect with or “friend” students on social media.
- Engage in a dating or “romantic” relationship with a student.
- Share photos or names of students on social media without written permission.
- Discuss the details of any allegations with anyone outside of the Child Protection Team.

I understand that as a person working with and/or providing services to children and youth under the auspices of QSI International School of Malta, I am subject to a criminal record background check. My signature on my contract confirms that I have read this Code of Conduct and that as a person working with children and youth, I agree to follow these standards. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action up to and including removal from the school. If a report is made against me, and the allegations are confirmed, the school may share, as per the local laws, the findings with anyone who inquires for a reference about me.

**It is impossible to predict every situation that may arise. In all cases, the staff member is expected to exercise sound judgment to protect the safety and well-being of the child.

Parents:

I understand the rules regarding mandatory reporting that are in place at the school. I agree to maintain an environment in my home and at private events that is free from abuse and neglect, for my own children and any other children with whom I may interact.

Name: _____

Signature: _____

Date: _____

Introductory Letter to School Community

Dear Parents,

QSI International School of Malta strives to provide your children with positive educational experiences that are characterized by caring, supportive relationships and free from neglect or abuse of any kind. We are committed to working with you to ensure that the school maintains this type of environment.

Quality Schools International (QSI) has developed a Child Safeguarding and Protection Handbook, which has been adapted to and adopted by this school. By enrolling your child(ren) at QSI International School of Malta, you agree to work in partnership with the school and you understand and agree to the child protection Code of Conduct. Protocols outlined in the handbook are aligned with the QSI Mission Statement, Exit Outcomes, and Success Orientations, as well as these two articles from the United Nations Convention on the Rights of the Child:

Article 19: Protection from abuse and neglect

. . . Shall protect the child from all forms of maltreatment by parents or others responsible for the care of the child and establish appropriate social programs for the prevention of abuse . . .

Article 34: Sexual exploitation

. . . Shall protect children from sexual exploitation and abuse, including prostitution and involvement in pornography.

To help our students to learn and grow in a safe environment, the following educational components are included in the school's Child Safeguarding and Protection plan:

- Age-appropriate lesson plans to foster understanding personal safety, needs, and rights in each classroom.
- Parent information sessions and resources regarding the school's Child Safeguarding and Protection programs and policies.
- Faculty and staff professional development workshops on recognizing and reporting child abuse and neglect.

Thank you for your support in maintaining a school and community in which students, staff, and parents feel safe and happy. If you have any questions about the Child Safeguarding and Protection plan or any other school policies, please don't hesitate to contact me.

Sincerely,

Child Protection Reporting Form

Reporter's relationship to the child/victim	
Child's name, gender, age, address	
Parents' or Guardians' contact information and other relevant information	
Family information, including siblings, nationality, embassy relationships, etc.	
Name, contact information, relationship to child, and other helpful information of alleged perpetrator	
Relevant information about reporter and school	
Nature and extent of injuries/mistreatment	
Evidence of prior abuse (if any)	
Way in which reporter was alerted to the abuse/bullying	
Description of action taken, or recommended action	
Any other helpful information	

CEESA Statement and Commitments for School Websites

If your school is a member of the Central and Eastern European Schools Association, you must ensure that the following is true and publish it on your school's website. If your school is not a CEESA member, you may adapt the statement and commitments, remove references to CEESA, and use the statement and commitments on your website.

CEESA Safeguarding and Child Protection Statement

- Safeguarding and Child Protection is a priority for every CEESA School.
- CEESA commits to supporting school environments that safeguard children through both prevention and intervention.
- CEESA works in cooperation with international agencies to ensure standards associated with best practices are regularly reviewed, revised, and applied in all operations, activities, and events.
- CEESA leaders honor and uphold child protection guidelines and procedures, in partnership with all stakeholders in their respective school communities.

All CEESA schools will:

- Actively uphold the CEESA Safeguarding and Child Protection Statement.
- Implement school-based Safeguarding and Child Protection Policies and Procedures that include regular onsite training.
- Employ safe recruitment practices consistent with Safeguarding and Child Protection Policies.
- Educate students and adults on Safeguarding and Child Protection.

Application for Local-Hire Positions

Below is a sample application for employment for local-hire positions. This application may be adapted for use by your school. It should be translated into the local language(s) of the country in which your school functions.

As part of the screening process, ensure that you:

- Call at least two previous employers or teachers including most recent supervisor.
- Screen public records.
- Screen government-issued background check certificate from candidate's passport country.
- Perform an internet search including the teachers full name(s), plus the search terms: teacher; child protection; and safeguarding.

Application for Local-Hire Positions

Please attach:

- 1) A signed Code of Conduct agreement.
- 2) A government-issued background check certification.
- 3) Copies of any certifications or university degrees.

Personal Information

Name (first, middle, last):		Date of application:	
Any other name you have used:		Gender:	
Email address:		Birthdate:	
Country of citizenship:		Permanent address:	
Phone number:		Local address (if different from permanent address):	

Education

Institution Name	Location	Dates of Study	Major Subject	Degree & Date

Experience

You may attach a résumé instead of completing this section.

Name of School or Company	Location	Dates of Employment	Position	Description of Responsibilities

[illegible]

Further Employment Information

Position you are seeking:	
Your qualifications for this position:	
Date you are free to begin employment:	
State in detail the circumstances leading you to seek a new position:	
Languages you speak easily:	
Languages you read easily:	

References

Please list three professional references

Name	Relationship	Location	Email/Skype	Office Phone	Cell Phone

Please list three character references

Name	Relationship	Location	Email/Skype	Office Phone	Cell Phone

Further Information

How did you learn about this school?	
Have you ever had an educational license or any professional license revoked? If so, please explain in detail.	
Have you ever been convicted of a crime, whether felony or misdemeanor? If so, please explain in detail.	
Have you ever been discharged from a previous position? If so, please explain in detail.	
Have you ever been denied professional credentials? If so, please explain in detail.	

With my signature below, I confirm that all information in this application is true, and that the school may contact the references I listed in this application.

Signature: _____ Date: _____

Chapter 7

New Policy Addendums

Addendum 1

QSI Child Safeguarding and Protection for Online Learning

School Name: QSI International School of Malta

Policy owner: Quality Schools International

Date: 19 August 2025

Date shared with staff: 20 August 2025

Revised from a Policy by Andrew Hall Safeguarding

Context

In spring 2020, QSI schools all over the world closed due to COVID-19. Schools turned to online instruction to continue teaching students.

This addendum of the QSI Child Safeguarding and Protection policy contains details of our individual safeguarding arrangements in the following areas:

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Attendance Monitoring

Student attendance should be taken, as usual, and logged in QMS or the local attendance system. If students miss more than one online class, the school should contact the parents or caregivers to check on the wellbeing of the child and encourage the child to attend classes.

Reporting a Concern

When school staff members have any concerns about children's safety, whether at home or online, they should continue to follow the reporting process outlined in the school Child Safeguarding and Protection Handbook. Reports should be made by phone or virtual call whenever possible. Staff members should report all concerns immediately.

Recruitment and Training

When recruiting new staff, QSI and QSI International School of Malta will continue to follow safe recruitment practices. Any staff members who join the school while online instruction is in place will read and sign the Code of Conduct and receive training on the Child Safeguarding and Protection Handbook.

Online Safety

It is important that all staff who interact with children online continue to look out for signs that a child might be in a harmful or dangerous situation and report any concerns immediately to the Director or child protection team. When appropriate, referrals should still be made to children's social care and the police.

Online teaching should follow the same principles as set out in the Code of Conduct. The school should also ensure that use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- All online lessons should be **observable and interruptible**, just like classroom lessons. Make sure that your Director and/or DI, and classroom parents, have a link to all Zoom or other video calls. Administrators and parents should be able to see all online assignments.
- It is the teacher's responsibility to share links, course codes, and other access information for any online platforms they are using with school administrators and parents, in addition to students.
- Whenever possible, use passwords to protect video calls so that only those you invite to the call may participate.

- Directors and DIs must observe lessons and video calls. Just like in classrooms, administrators don't need to stay for the whole lesson, but should drop in on calls or lessons frequently to see how things are going.
- One-on-one lessons are discouraged. It is preferable to have two adults present, or more than one student. If a one-on-one lesson is necessary, it **must also be observable and interruptible**. Make sure your administrators know you are having a one-on-one call and have the link so they can drop in.
- Participate in video calls from an appropriate place in your house—not your bedroom. Encourage students to participate in video calls from a shared space, like the kitchen or living room, or to open their bedroom door if the bedroom is their workspace.
- QSI discourages video recording online lessons in which students are present. If it is possible to record only the teacher for other students to watch later, that is fine. And of course, instructional videos that involve only teachers are fine. The reasoning for not recording students is:
 - From GDPR and similar data protection standpoints, recording and storing videos of students is largely forbidden.
 - Classrooms on school campuses are regularly observed, but not regularly recorded. We are trying to make students as comfortable online as possible, and respect physical classroom relationships by not enacting measures online that might have a negative effect on those relationships.
- Dress appropriately for video calls.
- Just like in the classroom, report any child protection concerns to the director or your child protection team.

Child Protection Curriculum

The Empower Curriculum will begin with face-to-face instruction for the 2023-2024 school year. It will not be taught online in the first year. In the event that face-to-face instruction is interrupted, the Curriculum team will provide guidance on Empower lessons that can be taught online.

Peer-on-Peer Abuse

If the school receives a report of peer-on-peer abuse, the school will follow the peer-on-peer abuse policy and work with the children involved and their parents or caregivers to ensure the safety and security of the children.

Addendum 2

Peer-on-Peer Abuse Policy

Introduction

At Quality Schools International (QSI), we continue to ensure that any form of abuse or harmful behavior is dealt with immediately and consistently to reduce the extent of harm to the child, with full consideration of the impact on that individual child's emotional and mental health and well-being.

Purpose and Aim

Students report that they want a school environment where they are encouraged to report hurtful incidents that they experience or observe because they feel that more reports, especially of behavior by the same student, will result in ending hurtful behavior.

Children and young people may be harmful to one another in multiple ways which might be classified as peer-on-peer abuse. The purpose of this policy is to explore the many forms of peer-on-peer abuse and include a planned and supportive response to the issues so that student concerns are addressed effectively.

At Quality Schools International, we have the following policies in place that should be read in conjunction with this policy:

- Child Protection Handbook
- Staff Code of Conduct
- Technology Acceptable Use Policy

Theoretical Framework

The United Nations Convention on the Rights of the Child states that, among other tenets, children have the right to be free from abuse or exploitation. It is the intent of QSI to respect and uphold the dignity of each child as they interact with peers and adults. This is clearly echoed by the Empower: Skills for Safety, Success, and Global Citizenship Curriculum Program. This program clarifies that procedures are in place in schools and other settings to ensure we hear the voice of the child. The curriculum is an integral part of the advisory time of all QSI schools as students learn of their rights as individuals, gain knowledge and skills on self-care, and advocate for others. The six concept strands of the child protection component are:

- Body Privacy;
- Personal and Social Safety;

- Abuse;
- Trusted Network;
- Self Advocacy;
- Personal Rights.

As an organization, QSI is dedicated to the following beliefs about our responsibilities as adults in schools:

- All children have equal rights to be protected from harm and abuse;
- Everybody has a responsibility to support the protection of children;
- 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 as the paramount consideration.

Introduction to Abuse and Harmful Behavior

There is no excuse or justification for peer-on-peer abuse. It is the role of the school to address abusive behavior whether it happens in the school or in other settings as it can affect school relationships, academic performance, and behavior.

Types of abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or bullying behavior is described in detail followed by advice and support on actions to be taken.

Physical Abuse

Physical abuse may include, hitting, kicking, pinching, shaking, biting, hair pulling, or otherwise causing physical harm to another person. Since there are various reasons that a child might harm another, it is important to understand the reasons a child engaged in such behavior before deciding on a course of action.

Emotional/Verbal Abuse

Emotional and verbal abuse may include threats, blackmail, manipulation, name calling, gaslighting (manipulating by psychological means to the point that a person doubts their own perception or memories), or causing fear, isolation, or humiliation.

Sexually Harmful Behavior or Sexual Abuse

Sexually harmful behavior includes inappropriate sexual language, inappropriate role play, sexual touching of another child, forcing a child to

witness sexual acts, forcing a child to view pornographic images or media, and sexual assault. When assessing sexually harmful behavior by children, it may be helpful to consider the behavior along Hackett's Sexual Behaviors Continuum Model below (<https://www.icmec.org/wp-content/uploads/2019/07/Hackett-Continuum-of-Harmful-Behavior-Excerpted.pdf>).

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behavior	Problematic and concerning behavior	Victimizing intent or outcome	Physically violent sexual abuse
Socially acceptable		Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Socially acceptable behavior within peer group (that is not appropriate in the wider community)	No overt elements of victimization	Coercion and force to ensure compliance	Instrumental violence which is psychologically and/or sexually arousing to the child
Shared decision making		Consent issues may be unclear	Intrusive	responsible for the behavior
	Context for behavior may be inappropriate	May lack reciprocity or equal power	Informed consent lacking or not able to be freely given	Sadism
	Generally consensual and reciprocal	May include levels of compulsivity	May include elements of expressive violence	

Bullying

Bullying includes: making threats; spreading rumors; attacking someone physically or verbally; attacking someone for a particular reason like size, hair color, gender, sexual orientation; and deliberately excluding someone from a group. Bullying is unwanted, aggressive behavior among school-aged children that involves a real or perceived power imbalance. The behavior is repeated, or has the potential to be repeated, over time.

There are three types of bullying. Verbal and social bullying may be carried out in person, on paper, or through cyber-bullying (via phone, text, video, online, or other electronic means). More detailed information on each of these types can be found in Chapter 1. Pertinent to this chapter, two types of bullying are further defined: Prejudice-Related bullying and Cyberbullying.

Prejudice-Related Bullying

The term prejudice-related bullying refers to a range of physically and emotionally hurtful behaviors which cause someone to feel powerless, worthless, excluded, or marginalized, and which relate to prejudices around belonging, identity, and equality in wider society. Prejudice-related bullying includes hurtful behavior towards others based on: disabilities; special educational needs; ethnic, cultural and religious backgrounds; gender; home life (including issues of care, parental occupation, income level, and social class); and sexual identity.

Cyberbullying

Cyberbullying is the use of devices, messaging services, email, apps, or any social media to harass, threaten, or intimidate someone.

Important Note: Cyber bullying may be deemed criminal. If the behavior involves taking or distributing sexual images of young people under the age of 18, then this is also a criminal offence under most national and international laws. The school may have no choice but to involve the police to investigate these situations.

Sexting

Sexting is when someone sends or receives a sexually explicit text, image, or video. This includes sending nude pictures. There are no characteristics of a relationship that make sexting more or less likely; pressure to send nude photos can happen in any relationship at any time.

Important Note: Having or distributing sexual images of a person under 18 may be deemed criminal. The school may have no choice but to involve the police to investigate these situations.

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organization such as a private school, sports team, or other exclusive group. There are a number of different forms of hazing, from relatively mild rituals to severe and sometimes violent ceremonies. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Relationship Abuse

Relationship abuse among students is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by a child against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats, or acts of physical or sexual abuse. The student doing harm uses this pattern of violent and coercive behavior in order to gain power and maintain control over his or her partner.

Expected Action

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved harming others.

It is important to gather information as soon as possible to figure out, as well as possible, what occurred. It is equally important to deal with the situation sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example, using the word “perpetrator” can quickly create a blame culture by labelling a child.

All staff should be trained to receive disclosures of all types of abuse, including peer-on-peer abuse, and bring reports to the attention of the Director as quickly as possible. The following are guidelines from [MANAGING ALLEGATIONS OF CHILD ABUSE BY EDUCATORS AND OTHER ADULTS: Protocol for international schools, September 2018, by the International Task Force on Child Protection \(ITFCP\)](#)

DO:

- Stay calm and show no signs of shock;
- Listen and respond with empathy in a non-judgmental and open way;
- Consider the disclosure seriously;
- Remain calm, supportive, and reassuring;
- Validate the child’s feelings;
- Mirror the child’s language when appropriate (use and clarify the vocabulary that the child uses);
- Explain what you need to do (report to the director/counselor) and why;
- Allow the child control when feasible;
- Ask open-ended questions to gather information and detail;
- Consider the child’s language needs and whether support in another language is necessary;

- Reassure the child that they have done the right thing in coming forward and that they are currently safe; and
- As soon as possible following the disclosure, make a written report and write notes from the conversation.

DO NOT:

- View images of children (rather ask for a brief description and secure a device as possible evidence for law enforcement);
- Take photos (if the child shares an injury, seek medical attention);
- Interview the child, ask leading or unnecessary questions, or provide language for the child;
- Take notes during the disclosure;
- Make promises that may not be able to be honored (such as promising you won't tell anyone or that this will never happen again);
- Suggest that the child may be to blame in any way for what happened; or
- Ask the child to wait until another person can be present to witness the disclosure.

Once a disclosure has been made, the Director should work with members of the Child Protection Team to:

1. Gather the Facts

- Speak to all the children involved separately, gain a statement of facts from them, and use consistent language and open questions for each account
- Ask the children to tell you what happened.
- Interrupt only to gain clarity with open questions using where, when, why, who.
 - What happened?
 - Who observed the incident?
 - What was seen?
 - What was heard?
 - Did anyone intervene?

2. Consider the Intent (Risk Assessment)

Has this been a deliberate or contrived situation for a young person to be able to harm another?

3. Consult with Team

Bring together the child protection team and discuss how to address the situation. Consider whether to involve the Regional Supervisor and QSI Crisis Management Team.

4. Decide on the Course of Action

If from the information that you gather you believe any young person to be at risk of significant harm, make a safeguarding referral to local social services, law enforcement, or relevant embassies immediately. Depending on the case, once local authorities have been contacted, you may be informed of your next steps.

If local authorities intend to follow up on the report, they may ask to interview the children in school or they may ask for parents to come to school for an interview. It is important to be prepared for every situation and the potential time it may take.

5. Inform Parents

In all circumstances where the risk of harm to the child is evident, encourage the young person to tell their parents or caregivers about the situation with the understanding that you will have a follow-up conversation with the parents. If the student is unwilling to talk to the parents or caregivers, contact the parents or caregivers to inform them of the harm or potential harm. The school should document concerns, reports, and any other evidence that they are acting in the best interests of the young person.

Informing parents includes those of the child causing the harm. When talking to parents of the child causing harm, maintain the confidentiality and privacy of the child being harmed.

When informing parents, disclose only information pertinent to their own child. Be mindful of the language you use and how you share necessary information. Some details may not be necessary or appropriate. The goal is to avoid causing more harm or escalation of the situation.

The best way to inform parents, of both the child causing harm and the child being harmed, is face-to-face. The nature of the incident and the type of harm or abuse a young person may be suffering can cause fear and anxiety to parents.

Points to consider

- **What is the age of the children involved?** How old are the young people involved in the incident and is there any age difference between those

involved? If the student doing harm is aged 18 or older, then that student may face legal prosecution as an adult.

- **Where did the incident or incidents take place?** Was the incident in an open, visible place to others? If so, was it observed? If not, is more supervision required within this particular area?
- **What was the explanation by all children involved of what occurred?** Can each of the young people give the same explanation of the incident and what is the effect on the young people involved? Is the version of one young person different from another and why?
- **What is each of the children's own understanding of what occurred?** Do the young people know and understand what they are doing? Does the young person's explanation relate to something they heard or learned about that prompted the behavior? Is the behavior deliberate? Does the young person who is causing the harm have an understanding of the impact of their behavior on the other person? In dealing with an incident of this nature the answers are not always clear. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from local authorities, the Regional Supervisor, or the Crisis Management Team.
- **Is there repetition?** Has the behavior been repeated on more than one occasion? Has the behavior persisted after the issue was previously discussed?

If you are unsure of how to proceed at any time, please talk to your Regional Supervisor about involving the QSI Child Protection Lead and the QSI Crisis Management Team.

Next Steps

- For the young person who has been harmed:
 - Work with the student and their family to figure out what support they require. Options include:
 - Counseling;
 - Restorative justice;
 - Expert speakers on bullying and abuse;
 - Risk assessment;
 - Safety planning
 - Daily check-ins with identified safe adults;
 - Any other responses agreed upon by the child, the child's family, and the child protection team.

- For the young person who has displayed harmful behavior, responses include:
 - Therapy with a treatment provider who specializes in children's sexual behavior—this may be mandatory depending on the severity of the behavior;
 - Restorative justice;
 - Referrals to appropriate local resources;
 - Participation in courses that educate about the effects of harmful behavior;
 - Risk assessment for future behavior;
 - Strategies for behavior management;
 - Suspension, either in-house or at home, as time alone to consider behavior;
 - If approved by QSI CP Team, sharing information about harmful behavior as part of transfer or university application process;
 - If all else has been tried and the child still displays harmful behavior or the behavior is extremely severe so that other children are not safe at school, the case may be brought to the Advisory Board for possible expulsion.

*Please note: if the child who was harmed does not feel safe around the child who acted in a harmful manner, it should be the child who harmed who experiences any disruption. Meaning, the child who displayed harmful behavior may have to change his or her class schedule and have supervised break times to avoid the child who suffered harm. The child who acted in a harmful manner should undergo a risk assessment before re-engaging with peers.

After Care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behavior either towards someone else or to themselves as a way of coping (e.g. self-harm). Regular reviews with the young people following the incident(s) are imperative.

Preventative Strategies for Schools and Settings

For all schools and settings, it is important to develop appropriate strategies in order to prevent the issue of peer-on-peer abuse rather than manage the issues in a reactive way.

Firstly, and most importantly, schools must recognize that peer-on-peer abuse will occur at any school, even with the most stringent of policies and supports in place. Thus, risk management is a priority. Strategies include:

- Teaching the child protection curriculum so students know how to get help if they are in an unsafe or unhealthy situation;
- Mapping your school at a staff meeting to identify areas that are not adequately supervised, and taking steps to ensure adequate supervision;
- Sharing information with all staff about receiving disclosures and supporting students when students need help from a trusted adult;
- Discussing how to create safe spaces with all staff;
- Training staff to take all student concerns seriously and listen to students without dismissing;
- Providing a display of resources that students might choose to access on their own;
- Bringing in experts on abuse, mental health, and other social-emotional topics to share information with students;
- Providing students with a way to contribute to policies and procedures that affect them;
- Ensuring that student voice is valued by asking students to develop Rules of Acceptable Behavior to be adopted by the school.

Addendum 3

Guidelines for Excursions, School Events, and Student Travel

The following guidelines are adapted from the *Central and Eastern European Schools Association (CEESA) Athletics Activities Handbook September 2016 (revised 2019)*.

Clear communication by all participants, including students, staff, parents, and volunteers, is important to ensure that child protection and risk management protocols are in place at all school events. Please ensure these guidelines are kept intact when distributed to participants.

Host schools should ensure that host families or facilities understand their role and what is expected of them and the visiting students, especially concerning curfews and a controlled environment.

The following will apply to all school-sponsored events:

- The school will develop student-teacher ratio practices to ensure safety for all students based on student ages and the activities/trip.
- Plan to have a chaperone for all possible divisions of the whole group during the trip
- For overnight trips, the number of chaperones must account for increased risks and require increased supervision to handle sleeping arrangements, coordinate meals, disperse medicine, and oversee behavior.
- The school will develop a safety plan that identifies potential risks of the event and strategies to prevent them.
- Mixed-gender student groups must be accompanied by mixed-gender chaperone groups.
- Chaperones will not use alcohol, vapes, tobacco, or controlled substances of any kind during the duration of the school trip.
- Students are prohibited from using alcohol, vapes, tobacco, or drugs at any school-sponsored event.
- Student use of technology must be intentional and related to the needs of the activity. Students are not permitted to bring additional electronic devices (such as tablets, laptops, gaming consoles, etc.) on school trips unless explicitly instructed by the school for educational purposes.
- The use of personal cell phones during designated trip hours should be limited to essential communication with family or guardians.
- While students are travelling on school trips, all school rules and the QSI acceptable use policy still apply to device usage.

- Students of all ages may visit restaurants, shopping centers, or other places of interest with an adult from their own school or the host school.
- On the day of arrival, chaperones will survey the facilities to identify exits, safety protocol and potential risks. It is strongly recommended that on the day students arrive at the host site, host families and visiting students not go out so that student participants can rest and prepare for the event.
- Students are not allowed to be unsupervised. They should be under the direct supervision of their respective coaches, chaperones, or host parents throughout the trip.
 - Clarification: In a confined space (such as a shopping mall) or in an outdoor space with defined barriers (such as a small city walking street), students 14-years-old and older may explore in small, chaperone-approved, student-only groups and meet back at a specified time and place. Students must arrive at and depart from the defined space with a chaperone, and the chaperone must be present within the space at all times (i.e. they are not just dropping students off).
 - At least one chaperone will remain in a fixed location while the other walks around the designated space where student groups are allowed to walk in small groups.
- During social time, student activities should be observable and interruptible. This means that hotel doors should be open when students are playing games or hanging out inside hotel rooms, or games should be played in social spaces like common rooms or lobbies. Chaperones should be constantly moving throughout the spaces where students are located.
- On overnight trips, a curfew is set by the leading chaperone. It is recommended curfew is set before 22:00 hours if possible. Any changes to curfew should be communicated to parents and administration as early as possible.
- On overnight trips, the school requires the chaperone to do a room check or call the respective students' host families at curfew time on each night of an event and speak with the parents and students. Students are not to exit their room following the room check. If parents do not receive a call by 22:30, they are instructed to call the event organizer and inform him/her.
- Students in violation of the student code of behavior will have their parents contacted immediately. The teacher will work in conjunction with the school administrator to determine the next steps. The safety of all students is paramount. The student may be required to return home at the earliest possible time at the parent's expense; if a chaperone cannot be arranged by the school, the parent may be required to pick up the child.

- Chaperones are never to share the same sleeping space as a student, unless the student is the chaperone's family member.
- Teachers and attending adults must complete chaperone training facilitated by the school Director or appointed staff member.

Avoiding Behaviors that Lead to Allegations

Chaperones should avoid any behaviors that could lead to allegations of misconduct by adhering to the Child Protection Code of Conduct.

The following are not rules but best practices that can aid in the protection of our students participating in events:

- Students should be seated in groups when traveling by train, bus or plane.
- Students should be supervised on transportation (buses, minivans, taxis, etc.) while visiting a host city.
- When host schools receive dietary/medical information from visiting schools they should involve their nurse with any noted students.
- A pre-travel chaperones' meeting should be scheduled as it is an important way to share information and guidelines.
- A pre-travel parent and student meeting should be scheduled as it is a good way to share the guidelines, expectations, and collect travel documents.
- Schools should consider making it mandatory for coaches to have first aid training and concussion protocol training. (Free online concussion protocol training: <https://nfhslearn.com/courses/61151/concussion-in-sports>.)
- Chaperones, coaches, and the host school should have each other's phone numbers programmed in their phones in case of emergency.
- Chaperones and coaches should develop a supervision plan to account for all hours of the trip.
- Upon arrival at a school or facility, chaperones should be shown the school or facility's emergency protocols.
- Host schools should consider using their school security guards, or hiring outside guards, when tournaments are located off-campus. Sites do not need to be locked down (as some campuses are) but there should be a security presence circulating the event location, looking for possible non-community members.
- **A nurse should be present on site for tournaments hosted by the school.**
- **Teachers or designated trip supervisors will establish designated cell phone use times that students must adhere to throughout the trip.**

Regulations for Students

These regulations shall be followed by students participating in all events (whether athletic, academic, cultural, etc.) organized and sponsored by the school. Any student who participates in a school event agrees, by signing below, to obey all regulations.

- Students shall follow all instructions given to them by their chaperones, coaches, or host parents. This applies to all activities, irrespective of location, undertaken during the period of the school-sponsored event.
- Students should be responsible for maintaining their sleeping space and other facilities in an orderly and organized condition. This applies to making beds, organizing clothes and toiletries, and putting away trash. No cleaning services will be available during the stay.
- Any use of tobacco, vapes, alcohol, or drugs is not permitted. Students involved with school activities may not go to bars or nightclubs.
- Housing and roommate assignments made by the chaperones or responsible officials of the home or host school may not be changed unless approved by the event organizer.
- Student curfew for all school-sponsored events is 22:00, unless the chaperone allows an exception. Students must be in their rooms by this time; students are not to leave their room after curfew.
- Schools and families may set earlier curfew times. Families MAY NOT extend curfew times.
- Students under the age of 13 are not allowed out of a chaperone's supervision.
- Students, including secondary students, should never be unsupervised by an adult.
 - Clarification: In a confined space (such as a shopping mall) or in an outdoor space with defined barriers (such as a small city walking street), students 14-years-old and older may explore in small, chaperone-approved, student-only groups and meet back at a specified time and place. Students must arrive at and depart from the defined space with a chaperone, and the chaperone must be present within the space at all times (i.e. they are not just dropping students off).
- Neither host families, event staff, nor students may negotiate changes to the regulations for students with respect to housing arrangements, the use of tobacco, vapes, alcohol or drugs, or any other rules or provisions set forth by the host school.
- During social time, student activities should be observable and interruptible. This means that hotel doors should be open when students are playing games or hanging out inside hotel rooms, or games should be played in social spaces like common rooms or lobbies.

- Students are not permitted to bring additional electronic devices (such as tablets, laptops, gaming consoles, etc.) on school trips unless explicitly instructed by the school for educational purposes. The use of personal cell phones during designated trip hours should be limited to essential communication with family or guardians.
- Students' cell phones at a specified time each evening will be silenced and put away typically before lights-out or during designated downtime.
- QSI is not responsible for lost or damaged cell phones or electronic devices.
- While students are travelling on school trips, all school rules and the QSI acceptable use policy still apply to device usage.
- These regulations apply to all students throughout the event's duration including the journey to and from the site of the event.
- Students must display appropriate, respectful behavior at all times to their peers, event officials, event sponsors, chaperones, coaches, and all members of the school and host community. The use of the Success Orientations is the best way to gauge responsible behavior.

By signing below, I understand that I must adhere to all expectations in the form. I understand that violations of these regulations will be reported to the student's chaperone or coach, and to the responsible school official and may result in early dismissal from the excursion.

Name of Student _____

Signature of Student _____ Date _____

Signature of Parent/Guardian _____

Regulations for Host Parents

The following rules are intended for the use of all parents who host students as part of a school-sponsored event. In addition to these regulations, host parents should also adhere to the expectations set forth for chaperones.

For the duration of the event, you stand in place of the visiting student's parents. Please familiarize yourself with the school rules below and speak with the school if you are unclear on any of your responsibilities as a host parent.

- Please see the regulations for student behavior (below). The student(s) you are hosting has/have already agreed to observe these regulations.
- Please report immediately any violation of these regulations by the student(s) you host to the responsible official designated by your school (Event Director, Athletic Director, Activity Coordinator, etc.).
- Neither host families nor students may make changes to the regulations for students with respect to housing arrangements, the use of tobacco, vapes, alcohol, or drugs, or any other rules set forth by the host school.
- Students must be supervised by a coach, chaperone, or host parent at all times.
 - Clarification: In a confined space (such as a shopping mall) or in an outdoor space with defined barriers (such as a small city walking street), students 14-years-old and older may explore in small, chaperone-approved, student-only groups and meet back at a specified time and place. Students must arrive at and depart from the defined space with a chaperone, and the chaperone must be present within the space at all times (i.e. they are not just dropping students off).
 - At least one chaperone will remain in a fixed location while the other walks around the designated space where the student groups are allowed to walk in small groups.
- Please contact the student(s) you are hosting at the time designated by the host school.
- Suitable transportation must be arranged as needed for the student(s).
- Please provide the student(s) with a suitable meal at whatever time may be necessary because of the scheduling of the event.
- Schools and families may set earlier curfew times. Families MAY NOT extend curfew times.
- The school requires that coaches/chaperones call their respective students' host family at curfew time on each night of an event. They are required to speak with both a host parent and the student(s). If the coach/chaperone has not contacted the host parent by 22:30, the host parent should call the event organizer and inform him/her.

Name of Host Family Member _____

Signature of Host Family _____ Date _____

Addendum 4

Intimate Care Guidelines

Introduction

Quality Schools International (QSI) is committed to ensuring that all staff responsible for the intimate care of children undertake their duties in a professional manner. Staff responsible for the intimate care of children will always undertake their duties in a professional manner. QSI Schools recognize that there is a need to treat all children with respect when intimate care is given. No child should be attended to in a way that causes distress, embarrassment, or pain.

Definition

Intimate care is any care given when meeting the toileting and hygiene needs of a child. The scope of this care can range from minimal to full depending on age, special needs, disability, or illness. Examples include care associated with toileting,

continence, medical procedures, or menstrual management as well as assistance and supervisory tasks such as overseeing washing, toileting, or changing clothes. Most people usually carry out intimate care tasks themselves, but some children are unable to do because of their young age, physical disabilities, or other special needs.

Approach to Best Practice

The management of all children with intimate care needs will be carefully planned. The child who requires intimate care will be treated with respect at all times. The child's welfare and dignity are the top priorities of QSI staff and will be maintained through a high level of privacy, choice, and control. To achieve these objectives:

- QSI staff who provide intimate care are trained in child safeguarding and protection, moving and handling children, and best practice in intimate care. Only members of staff will carry out intimate care with children at the school. It is not appropriate to have students or parent helpers carrying out this role. Staff behavior must be open to scrutiny and staff must work in partnership with parents and caregivers to provide continuity of care to children wherever possible.
- QSI students and staff should have access to clean bathrooms with equipment that is safe and in good working order. There should be a designated staff bathroom and designated student bathrooms. Within the constraints of the country and school, the most suitable equipment and facilities will be provided to assist with children who need special arrangements.
- QSI staff will ensure that all the normal precautions are taken to avoid infection such as the use of disposable gloves when appropriate and the proper disposal of waste.
- In the case of a child with a specific medical or developmental condition, which could impact toilet training, advice should be sought by the parents or guardians from a pediatrician. That advice should then be shared with the school to create a toileting plan for the child.
- Staff will be supported to adapt their practice in relation to the needs of individual children taking into account developmental changes. Staff will be alert and responsive to each child's reaction to care and provide appropriate support and reassurance.
- QSI staff supports each student to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage children to do as much for themselves as they can. This may mean, for example, giving the child responsibility for washing themselves. Individual intimate care plans will be drawn up for particular children as appropriate to suit the circumstances of the child. All children will be taught personal safety skills carefully matched to their level of development and understanding.
- Each child's right to privacy will be respected. However, to protect the adult and the child, no adult will be left alone with a child behind a fully closed

door when carrying out intimate care procedures. Careful consideration will be given to each child's situation to determine how many caregivers might need to be present when a child is toileted. Where possible one child will be catered for by one adult unless there is a sound reason for having more adults present. If this is the case, the reasons will be clearly documented in the child's intimate care plan.

- Wherever possible staff should only care intimately for an individual of the same sex. However, in certain circumstances this principle may need to be waived where failure to provide appropriate care would result in negligence, for example, female staff supporting boys as no male staff are available.
- Intimate care arrangements will be discussed with parents and/or guardians upon enrollment and during conferences. The needs and wishes of children and parents will be respected within the constraints of staffing and host country regulations.
- If a QSI staff member has concerns about any marks, bruises, or injuries on a child's body, they will immediately report the concern to their superior (lead teacher, DI, or Director).
- If a child becomes distressed or unhappy about being cared for by a particular member of staff, the matter will be looked into and outcomes recorded. We will contact parents or caregivers at the earliest opportunity in order to reach a resolution. Staffing schedules will be altered until the issues are resolved so that the child's needs remain paramount. If a child makes an allegation against a member of staff, we will follow the reporting guidelines in the QSI Child Safeguarding and Protection Handbook.
- All QSI staff will be required to confirm that they have read the "Intimate Care and Supervision Policy" who provide intimate care for children and young people.

Early Years (2-4-Year-Old Classes) Intimate Care

It is important that toilet training in the early years is identified as intimate care.

Early Years teachers and staff should:

- Create a written toileting schedule for the early years students that includes the daily schedule of toilet visits (after snack, before lunchtime, before naptime, etc.).
 - Include the names of staff members who will assist the students with toileting.
 - Do not force children to use the toilet if they do not feel the need, but rather encourage them to listen to their bodies.
- Review intimate care arrangements that have been agreed upon with a parent annually (Parent Letter).
- When intimate care is required, report the duty of intimate care to another member of staff and record on an agreed-upon chart (see Intimate Care Record Sheet for sample chart).

Parents, staff, and children should all understand that when the child has an accident, it is not a problem, and the child should not be made to feel that way.

Parents should be informed and agree to the following guidelines. To help your child gain toilet independence:

- Children in the 2-year-old class are expected to come to school in underwear only and provide as many changes of clothing as needed; diaper pants (aka "pull-ups") can be worn during the nap time. Children who wear diaper pants are expected to learn to change back into their underwear with little or no help.
 - It is the goal that children in the 2-year-old class become independent in the toilet (with only occasional accidents) during the school year.
- Children in the 3-year-old class are expected to come to school in underwear only, including during the nap time, and provide changes of clothing as needed.
 - It is the goal that 3-year-old children show toilet independence (few to no accidents) within the first month of attendance.
- Children in the 4-year-old class are expected to come to school in underwear only, including during the nap time, and provide changes of clothing as needed.
- Teachers and paraprofessionals will help children to clean themselves and change their clothes if a toilet accident occurs.
- Teachers and paraprofessionals will regularly take children to the toilet to encourage a toilet routine. In addition, children can go to the toilet as needed.

- Parents agree to actively support toilet training at home, including during school holidays.
- Teachers will give parents regular feedback on their child's toilet training progress on the progress report and in the message book (for children who are not yet independent).
- If a child is having particular trouble in toilet training, the teacher and parent will agree on a support plan to follow, including a timeline.
- In the event that a child is not showing improvement in gaining toilet independence after a support plan is followed, a child may be asked to leave school for a period of time until progress is made at home, unless there is a documented medical issue that parents are working to address. If there is a medical issue, the school will work with the parents to develop an appropriate care plan.

Procedure for Helping a Child to Change Clothes

- Ascertain the child has had an accident.
- Offer to help the child to change their clothes and make themselves clean.
- Seek out a second adult to provide support if necessary, or inform another adult that you are going to help the child to change.
- Ensure all changing equipment and resources are ready.
- Take the child to the designated changing area (usually the toilets) and establish that the child is happy and comfortable with being changed by talking to the child throughout and telling them what you are about to do before each step.
- Reassure the child and make changing an enjoyable time from beginning to end by chatting and/or singing.
- If possible, wear disposable gloves. Please note, the use of disposable gloves is not a substitute for good hand hygiene and hands must still be washed at the start and end of the procedure.
- Encourage the child to undress independently where possible. If adult help is needed, the adult is to remove only the clothes required to reach soiled underpants unless further soiling has occurred, and the child needs to be changed fully. Soiled clothing should be placed in a sanitary bag to be sent home with the child.
- If possible, instruct the child to clean themselves with disposable wipes and help as necessary, or if the child is not able to clean themselves do it for them.
- Help the child to get dressed or encourage the child to dress in clean clothes if they may do so independently. Place dirty clothes into a plastic bag to be given to parents or caregivers when the child is picked up at the end of the day. Staff members will not attempt to wash or rinse the clothes.
- Oversee the child's handwashing.
- Determine if changing area should be wiped with anti-bacterial spray and dried after use.
- Record completed intimate care procedures on the Intimate Care log and sign, detailing the procedure carried out and any additional notes, for example if child was upset or a rash was present. Inform the parent or caregiver of the need to carry out intimate care at the end of the school day.
- Class teachers should consider creating an individual healthcare plan for children who require regular changing. This should be written by parents/caregivers and staff and signed by both.

Procedures for Helping a Child into a Child Car Seat

For schools with buses that have harness car seats with harness/crotch buckles for use with young children, the following policy applies:

- When buckling children into car seats, school personnel and those working for a bus company must avoid touching the genital area of the child. It is most appropriate to use the child's upper body and straps to adjust positioning in the car seat.

Intimate Care Parent Letter

To Parents and Caregivers of children in the 2-year-old, 3-year-old, or 4-year-old classes:

Please find below an overview of our Intimate Care procedures for your information. We would be grateful if you would complete the permission slip and return it to your child's class teacher. In the event of consent not being given, we will contact you to discuss the next steps with the school.

Yours sincerely,

Child Protection Coordinator

Intimate Care Procedures

It is often necessary to change clothing in early years program, either through toileting accidents or spillage.

Clothing is removed with the children's approval and they are encouraged to help. This is carried out in accordance with Child Safeguarding and Protection procedures.

Personal hygiene and respect for the children is paramount. If a child is distressed or protests, the intimate care will cease and parents/caregivers will be contacted.

Intimate Care Permission Slip

I have read the enclosed Intimate Care procedures and I give consent for my child
..... to be changed by a member of staff.

Signed: ----- [Parent(s)/Caregiver(s)] **Date:** -----

Intimate Care Record Sheet

Class.....

Class Teacher.....

Authorized Staff Members

[illegible]

Addendum 5

Electronic Device Confiscation Guidelines

Definition: Child sexual abuse material (CSAM) is sometimes called child pornography, but that name is inaccurate as children cannot consent to participating in sexual activities. For the purposes of this policy, CSAM refers to any representation of a child engaged in sexual activity or representation of body parts of a child for primarily sexual purposes. Child sexual abuse material also includes self-generated sexual images of children.

Guidelines: If a concern is raised about messages or content on an electronic device used by a minor student that may contain CSAM or other evidence of child abuse that may be used as evidence in a legal case, any devices involved will be confiscated by the director or acting director. A confiscation is conducted in the presence of the student (if possible) and by a committee of three members, i.e. director, teacher, and representative of the IT department. The committee shall seal the confiscated device in aluminum foil and tape with the date and hour of confiscation and signatures of all members of the committee, which cannot be removed without being destroyed. Detailed minutes of confiscation shall be prepared. The confiscated device shall be kept in a locked cabinet which only the director can access, unless the device in question belongs to the director in which case the child protection team will appoint an acting director. The director, or acting director, will give the device to law enforcement officials as soon as possible. If local law enforcement officials are not prepared to receive the device, the school should immediately contact the QSI Child Protection Team for advice.

If a concern is raised about messages or content on an electronic device used by a school employee or adult student that may contain child pornography or other evidence of child abuse that may be used as evidence in a legal case, the director or acting director shall immediately contact law enforcement officials. Confiscation may only be done when necessary and urgent to do so without any delay, to save life or prevent irreparable damage which might occur to the school, student, parent or any other third person, and in accordance with the preceding paragraph.

Important note: No staff, administrators, students, parents, or any other members of the school community should look at any photos on a device if there is a suspicion that the device contains nude, semi-nude, or otherwise sexual photos. Looking at CSAM is a crime, no matter the circumstances. Instead, the device confiscation procedures described above should be followed in any case where images of CSAM

are suspected to exist on a device. As always, if a child is in danger, and local law enforcement is unable to help, please contact the QSI Child Protection Team for guidance immediately.

Addendum 6

Guidelines for QSI Students Living Separately from Parents

All students enrolled in a QSI school are expected to live with a parent or legal guardian during the academic year. There are times when parents, or legal guardians, of a student may travel outside of the city or country where the school is located while leaving the student in the city to attend school. Because of the importance of school to home contact, it is expected that these situations are temporary, and there should not be situations in which a student is left in a country long term (longer than a few weeks) without a parent's or legal guardian's supervision.

According to the enrollment guidelines, when enrolling a child in the school, the parent or legal guardian and the child must have legal status in the country or be in the process of obtaining legal status.

In addition, to protect a child's safety and best interests, before a parent or guardian is travelling while leaving a child in school:

- The parents or guardians must share a plan for medical care for the child, in case of emergency, with the school.
- The parents must provide contact information for a legal guardian, or an adult appointed by the parents in writing, who has decision-making power over the child. If there is a behavioral, medical, or other issue that arises and parents cannot be contacted immediately, there must be an adult who can work with the school to take care of the issue.
 - In the case that the parents do not inform the school before they leave, and the school finds out a child is living on their own or with caretakers other than their parents, the school should contact the parents as quickly as possible to ask them to share contact information for the adult responsible for the child.