



American Cooperative School of Tunis

OPENING DOORS,
HEARTS AND MINDS

CHILD AND YOUTH PROTECTION POLICY

Original Policy Statement Date: May 2018

Revision	Author and Input	Approval	Date
2025 - 8	Pascale Thomas Josh Richardt Zeina Abourousse Kate Wood	Dr. Zak Palsha	19-June-2025
2026 - 9	Zeina Abourousse Kate Wood Becky Riddle Bridget Coughlin Mourad Ben Amor	Superintendent	4-Aug-2026

TABLE OF CONTENTS

1. INTRODUCTION	4
FOUNDATIONAL FRAMEWORK	4
CONTEXTUAL SAFEGUARDING	4
STUDENT WELL-BEING & BELONGING	4
CULTURALLY RESPONSIVE SAFEGUARDING	5
2. POLICY AND PROCEDURES	5
INTRODUCTION	5
CHILD AND YOUTH PROTECTION COMMITMENT	6
KEY RESPONSIBILITIES	6
2.1.1. ADULT COMMUNITY MEMBERS	7
2.1.2. CHILDREN AND YOUTH	7
2.1.3. THE CHILD PROTECTION TEAM	7
APPLICABILITY	8
PROFESSIONAL CONDUCT & BOUNDARIES	8
CONFIDENTIALITY	9
SAFE RECRUITMENT & HIRING PRACTICES	10
TRAINING & ONBOARDING	10
SUPERVISION EXPECTATIONS	10
DIGITAL SAFEGUARDING & COMMUNICATION	10
3. TERMS, DEFINITIONS, & INDICATORS	11
3.1. SAFEGUARDING TERMS	11
3.1.1. ACTIVE DUTY OF CARE	11
3.1.2. IN LOCO PARENTIS	12
3.1.3. MANDATED REPORTER	12
3.1.4. CONSENT & INFORMED CONSENT	13
3.1.5. CONTEXTUAL VULNERABILITY	14
3.1.6. BOUNDARY CONCERN	15
3.1.7. GROOMING	15
3.1.8. SAFETY CONCERN	16
3.1.9. CONFIDENTIALITY & NEED TO KNOW INFORMATION SHARING	16
3.2. FORMS OF ABUSE & HARM	17
3.2.1. BULLYING/HARASSMENT	17
3.2.2. DIGITAL BULLYING & ABUSE	18
3.2.3. EMOTIONAL ABUSE	19
3.2.4. IDENTITY-BASED HARM	20
3.2.5. PHYSICAL ABUSE	20
3.2.6. NEGLECT	21

3.2.7. SELF HARM	22
3.2.8. SEXUAL ABUSE	22
4. REPORTING & FOLLOW-UP PROCEDURES	24
4.1. REPORTING CONCERNS	24
4.2. REPORTING PATHWAYS	24
4.3. INITIAL REVIEW & RESPONSE	25
4.4. SAFEGUARDING RESPONSE PROCESS	25
4.5. CONCERNS OR ALLEGATIONS INVOLVING STAFF MEMBERS	29
4.6. CONCERNS OR ALLEGATIONS INVOLVING EXTERNAL PROVIDERS	29
APPENDIX A: ANNUAL LETTER TO PARENTS/GUARDIANS	30
APPENDIX B: ACST COMMON AGREEMENT (EXPECTATIONS OF CONDUCT WITH CHILDREN)	32
APPENDIX C: SAFETY CONCERN FORM	34
1. Reporter (optional)	34
2. Student(s) Involved	35
3. Concern	35
4. Person(s) Involved	35
5. Safety	35
6. Additional Information	35
7. Acknowledgment	35
Optional Add-On	36

1. INTRODUCTION

FOUNDATIONAL FRAMEWORK

At ACST, the safety, well-being, and protection of our students, and any student visitors to our campus, are our highest priorities. We believe that every young person, regardless of age, gender, race, or background, has the right to be protected from all forms of physical, emotional, and sexual abuse and harm, neglect, and exploitation. We hold a zero-tolerance policy toward any behavior that harms a child or threatens their development. Moreover, we are committed to being a community that practices equity and inclusion for each child. Faculty, administrators, support staff, volunteers, contractors, visitors, parents, and board members share the responsibility to safeguard all children.

ACST's Child and Youth Protection Policy is grounded in the following sources:

- Tunisian Child Protection Code
- United Nations Convention on the Rights of the Child
- Association of International Schools in Africa (AISA) Child Protection Program Guide
- International Task Force on Child Protection's (ITFCP) best practices and recommendations
- International Centre for Missing & Exploited Children (ICMEC)

CONTEXTUAL SAFEGUARDING

ACST takes a contextual safeguarding approach and recognizes that safeguarding extends beyond the school day and campus. ACST is committed to responding to child protection concerns that occur across a range of contexts, including school-sponsored and non-school-sponsored activities, the home, social groups, the school environment, off-campus settings, and online spaces. The school will take all concerns seriously and respond in accordance with safeguarding procedures, working in partnership with families and, where appropriate, external agencies to support the safety and well-being of students.

STUDENT WELL-BEING & BELONGING

International school students come from diverse cultural, linguistic, national, neurotypes, racial, religious, family, identity backgrounds, and abilities, and experiences of vulnerability may shift depending on context, environment, relationships, or local cultural and legal realities. ACST recognizes that students who may not be considered vulnerable in one environment may experience increased vulnerability in another, particularly when living outside of their home culture, navigating identity-related differences, participating in online spaces, or engaging in experiences away from school.

ACST is committed to creating safe, inclusive, and culturally responsive environments where all students experience dignity, belonging, and access to trusted adults. The school recognizes that safeguarding includes proactively identifying barriers to participation, supporting student well-being, and ensuring that students have safe pathways to seek support and report concerns. Staff members are expected to approach students with

cultural humility, respect, and awareness that personal experiences, identities, beliefs, and lived realities may influence how students experience safety, relationships, supervision, communication, and school participation.

CULTURALLY RESPONSIVE SAFEGUARDING

At ACST, we recognize that abuse, neglect, exploitation, and harm can occur across all cultures, backgrounds, identities, and settings. We also recognize that cultural differences may influence approaches to caregiving, communication, discipline, relationships, and family practices. We are committed to approaching all families with cultural humility, respect and understanding of the diverse values and experiences represented within our community.

At the same time, cultural context does not diminish a child and young person's right to safety, dignity, well-being, healthy development, or protection from harm. No cultural custom, tradition, belief, or social norm justifies actions that place a child at risk or compromise their fundamental rights.

Our safeguarding decisions are informed by cultural awareness while remaining grounded in internationally recognized child protection principles and the rights of the child. We expect all members of our school community to approach safeguarding concerns with cultural sensitivity, professional curiosity, and a shared commitment to acting in the best interests of every child.

2. POLICY AND PROCEDURES

INTRODUCTION

At American Cooperative School of Tunis, safeguarding children is a shared responsibility and a foundational component of the school's duty of care. ACST is committed to creating and maintaining a safe, inclusive, and respectful learning environment where all students are protected from harm, abuse, neglect, and exploitation. This commitment extends across all school operations, including academic, co-curricular, athletic, travel, and community-based experiences, and is grounded in international child protection standards and the United Nations Convention on the Rights of the Child.

ACST recognizes that strong safeguarding systems depend on intentional policies, consistent procedures, and the collective responsibility of all adults working with children. The school prioritizes child-safe recruitment and hiring practices, including background checks, reference verification, and child protection screening, while also ensuring that faculty, staff, coaches, volunteers, and external providers receive ongoing training related to child protection, professional conduct, reporting responsibilities, and school expectations. Through these practices, ACST seeks to ensure that all adults are equipped to uphold Active Duty of Care, respond appropriately to concerns, and contribute to a culture where student safety, dignity, and well-being remains the highest priority.

CHILD AND YOUTH PROTECTION COMMITMENT

The American Cooperative School of Tunis (ACST) is committed to providing all students with a safe, inclusive, and respectful learning environment through appropriate practices, supervision, and safeguarding procedures across all school-sanctioned experiences, both on and off campus. ACST recognizes that safeguarding is a shared responsibility and seeks to create a culture where student safety, dignity, and well-being remain the highest priority. As a school community, ACST is committed to upholding the rights of children and endorses the United Nations Convention on the Rights of the Child, of which Tunisia is a signatory.

ACST will establish and maintain clear procedures for responding to and reporting suspected child abuse, neglect, exploitation, or inappropriate conduct that may occur on or off campus. Reporting concerns is the responsibility of every employee who suspects that a child or youth may be at risk of harm and must also include provisions that empower students to self-report concerns or seek support from trusted adults. The school will inquire into all reports, regardless of when the alleged incident occurred, and will take appropriate action to ensure the student's safety and well-being, in accordance with international and Tunisian law and school safeguarding procedures. In cases where a staff member is reported as an alleged offender, ACST will conduct an inquiry in accordance with established procedures and principles of due process.

ACST recognizes that effective safeguarding systems depend on intentional recruitment, hiring, training, and education practices. The school will make every effort to implement child-safe recruitment and hiring procedures designed to protect children, including background checks, reference verification, qualification review, and child protection screening for employees, coaches, volunteers, and external providers. All staff members will receive annual child protection training focused on safeguarding expectations, professional conduct, reporting responsibilities, and school procedures. ACST also recognizes the importance of educating students about personal safety, healthy relationships, boundaries, trusted adults, and reporting pathways so that students are equipped to advocate for themselves and others within safe and supportive environments.

To support transparency and community awareness, ACST will distribute this policy annually to all parents, guardians, employees, and applicants, communicate safeguarding expectations and reporting pathways to students, and review the Child Protection Policy annually through the school's Child Protection Team to ensure alignment with best practices, operational realities, and the evolving needs of the school community.

KEY RESPONSIBILITIES

All members of the ACST community share an Active Duty of Care to protect the safety, dignity, and well-being of children and youth. ACST is committed to maintaining safe, inclusive, and respectful learning environments where students are protected from bullying, neglect, physical abuse, emotional abuse, sexual abuse, exploitation, and other forms of harm. Safeguarding is a shared responsibility that extends across all aspects of school life, including academic programs, co-curricular activities, experiences away from school, online environments, transportation, and community interactions.

2.1.1. ADULT COMMUNITY MEMBERS

All adults within the ACST community—including employees, coaches, volunteers, external providers, contractors, chaperones, parents, and legal guardians—are expected to maintain professional conduct and uphold safeguarding expectations whenever interacting with children and youth. Adults are responsible for maintaining appropriate boundaries, using safe and respectful communication practices, recognizing indicators of abuse or neglect, removing students from immediate danger when necessary, and promptly reporting concerns or reasonable suspicions of harm in accordance with school procedures. As mandated reporters within the ACST community, all adults have a duty to act in the best interest of the child and support environments where students feel safe seeking help from trusted adults.

2.1.2. CHILDREN AND YOUTH

Students are expected to contribute to safe and respectful school environments by demonstrating conduct aligned with the school's core values and Student Family Handbook. ACST is committed to providing age- and grade-appropriate education that helps students understand personal safety, healthy relationships, boundaries, digital citizenship, trusted adults, and reporting pathways. Students are encouraged to seek support and report concerns related to their own safety or the safety and well-being of others.

2.1.3. THE CHILD PROTECTION TEAM

The Child Protection Team at ACST comprises trained professionals responsible for supporting prevention, reporting, response, and ongoing review of safeguarding practices across the school. The team collaborates to assess, intervene, and monitor child protection concerns; ensure timely, confidential, and appropriate responses to reports; provide support and guidance to affected students and families; and coordinate with external agencies when necessary to uphold the best interests of the child. The Child Protection Team also supports staff training, policy review, and the ongoing development of safeguarding systems and practices to ensure alignment with the evolving needs of the school community and international best practices. In addition, the team supports the review and development of student safety education and curriculum to ensure that students receive age- and developmentally-appropriate learning related to personal safety, healthy relationships, boundaries, digital citizenship, trusted adults, and reporting pathways.

2026-2027 Child Protection Team

- Dr. Zak Palsha, Superintendent
- Ms. Zeina Abou Rousse, Designated Safeguarding Lead, Educational Psychologist
- Mr. Mourad Ben Amor, Safety & Security Manager
- Ms. Rihab Afrit, Human Resources Manager
- Ms. Sabine Ben Salem, School Nurse

- Ms. Islem Gmati, School Nurse
- Dr. Lauren Dillard, Elementary Principal
- Ms. Alyssa Wakely, Elementary Assistant Principal
- Mr. Augusto Gubert, Elementary School Counselor
- Mr. Chris Boyle, Secondary Principal
- Mr. Tim Schlosser, Secondary Assistant Principal, Athletics & Activities Director
- Mrs. Jerilea Anne Jones, Secondary School Counselor

APPLICABILITY

This policy applies to all members of the ACST community and any individuals or organizations interacting with students through school-sponsored programs, services, activities, or experiences. Applicable community members include, but are not limited to:

- All employees of ACST and employees of affiliated organizations;
- Individuals and entities with contractual relationships with the school;
- Board members and other school leaders;
- External providers, partners, consultants, and service providers, including those supporting students and families through digital or online platforms;
- All students, parents, and legal guardians, particularly in relation to upholding the school's Code of Conduct, Common Agreements, Core Values, and the reporting of concerns or reasonable suspicions;
- All coaches, instructors, chaperones, volunteers, and other adults working with children and youth through school-sponsored programs and activities; and
- Visitors, vendors, guests, and other individuals accessing school premises or participating in school-sponsored experiences.

ACST recognizes that expectations for appropriate personal conduct are established through the school's Code of Conduct, Common Agreements, safeguarding procedures, and professional expectations. The school also acknowledges that interpersonal interactions and understandings of behavior may be influenced by cultural context within an international school environment. At the same time, all members of the school community are expected to uphold standards that prioritize student safety, dignity, well-being, and respectful relationships.

ACST further recognizes its ethical and operational responsibility to comply with the legal, safeguarding, and child protection obligations not only of the country in which the school operates, but also of the environments and countries in which school-sponsored travel, programs, and activities occur. The school is committed to informing, training, and supporting applicable members of the community in understanding these expectations and their responsibilities related to child protection, student well-being, professional conduct, and reporting procedures.

PROFESSIONAL CONDUCT & BOUNDARIES

All adults interacting with students at ACST are expected to maintain professional conduct and appropriate boundaries that support student safety, dignity, and well-being. These expectations apply across all school-related interactions, including academic settings, co-curricular activities, transportation, experiences away from school, digital communication, and online environments. Adults are expected to model respectful behavior, maintain appropriate communication practices, avoid favoritism or unnecessary isolated one-to-one situations when possible, and ensure that interactions with students remain appropriate, transparent, and aligned with school safeguarding expectations. Professional and developmentally appropriate physical contact may occur only when necessary for safety, instruction, or care, but should always remain appropriate, public, non-sexual, and aligned with school expectations and cultural considerations.

ACST recognizes that certain environments may present increased safeguarding vulnerability, including locker rooms, bathrooms, transportation, overnight trips, online communication spaces, medical treatment areas, and situations involving extended supervision outside of the traditional school day. ACST has established clear expectations and supervision structures for these environments to ensure that students are protected and supported at all times. Any concerns related to professional boundaries, inappropriate conduct, or violations of safeguarding expectations must be reported in accordance with school procedures.

CONFIDENTIALITY

ACST recognizes that confidentiality and privacy are fundamental rights of students and families and essential components of safeguarding and professional practice. Families maintain the right to disclose personal, medical, psychological, academic, and other sensitive information related to their child. In order to appropriately support student safety, well-being, learning, and access to services, families may choose to share information with the school through informed consent and established school procedures. ACST is committed to handling all student and family information with care, professionalism, and respect for privacy.

Access to confidential student information is guided by a legitimate educational and safeguarding need-to-know basis. It should not be assumed that all staff members have access to or require the same information about a student. Employees are expected to maintain professional confidentiality and exercise discretion regarding when, how, and with whom student information is shared. Information related to medical care, counseling, educational evaluations, safeguarding concerns, and other sensitive matters should only be shared with individuals directly responsible for supporting the student's safety, well-being, or educational needs and in accordance with school procedures, consent practices, and applicable laws and regulations.

ACST also recognizes its ethical responsibility to ensure that digital systems and platforms used to store, manage, or communicate student information prioritize data protection, privacy, and security. To the greatest extent possible, ACST utilizes digital tools and platforms that include appropriate privacy and protection measures that are GDPR compliant. ACST is committed to implementing systematic reviews and safeguards related

to digital storage, access permissions, cybersecurity, consent practices, and information-sharing procedures to help protect confidential student and family information.

SAFE RECRUITMENT & HIRING PRACTICES

ACST is committed to implementing child-safe recruitment and hiring practices designed to reduce the risk of harm to students and ensure that individuals working with children and youth uphold the school's safeguarding expectations. Recruitment and hiring procedures apply to employees, coaches, volunteers, contractors, consultants, external providers, and other adults who may interact with students through school-sponsored programs or activities. As part of the hiring and onboarding process, ACST may conduct background checks, identity verification, qualification review, professional reference checks, and child protection screening in accordance with local laws, operational realities, and international safeguarding expectations. Individuals must acknowledge and agree to uphold the school's safeguarding expectations, professional conduct standards, and reporting responsibilities prior to working with students.

TRAINING & ONBOARDING

ACST recognizes that effective safeguarding depends on ongoing education, training, and shared understanding across the school community. All employees, coaches, volunteers, external providers, and other applicable adults working with students will receive onboarding and training related to child protection, professional conduct, safeguarding expectations, reporting procedures, and emergency response. Training should support adults in recognizing indicators of abuse or neglect, maintaining appropriate boundaries, responding to concerns, and understanding their duty of care responsibilities.

ACST is also committed to providing students with age- and developmentally-appropriate education related to personal safety, healthy relationships, boundaries, digital citizenship, trusted adults, and reporting pathways. Safeguarding education and training practices should be reviewed regularly to ensure alignment with student needs, cultural context, current best practices, and the evolving realities of school life and online environments.

SUPERVISION EXPECTATIONS

ACST recognizes that intentional supervision is an essential component of safeguarding and student well-being. Supervision practices should prioritize student safety, dignity, inclusion, and access to trusted adults while considering the age, developmental needs, environment, and nature of the activity. Effective supervision requires adults to remain actively present and engaged, continuously scan the environment for potential concerns or students in need of support, circulate regularly throughout assigned spaces, and interact positively with students. Adults are expected to intervene promptly and appropriately when concerns related to safety, behavior, well-being, or environmental risk arise in order to prevent escalation and maintain safe, respectful, and supportive environments for all students.

DIGITAL SAFEGUARDING & COMMUNICATION

ACST recognizes that safeguarding extends to digital and online environments where students learn, communicate, and engage with others. All members of the school community are expected to demonstrate responsible digital citizenship and use technology, communication platforms, social media, artificial intelligence tools, photography, video, and other digital resources in ways that promote student safety, dignity, respectful relationships, and responsible participation within the school community. Communication between adult staff members and students should occur through school-approved platforms and remain professional, transparent, and connected to educational or school-related purposes in alignment with the school's Technology Acceptable Use Policy.

ACST recognizes that online environments may create additional safeguarding risks, including cyberbullying, inappropriate communication, exploitation, boundary violations, privacy concerns, misuse of personal identifiable information, and exposure to harmful content. The school is committed to protecting student confidentiality and privacy and expects all members of the community to handle student information, images, videos, and digital communications responsibly and in accordance with school expectations, consent practices, privacy considerations, and applicable laws and regulations. Any concerns related to digital safety, inappropriate communication, misuse of technology, or violations of student privacy should be reported in accordance with school safeguarding procedures.

3. TERMS, DEFINITIONS, & INDICATORS

The following terms, definitions, and indicators are intended to support a shared understanding of safeguarding, child protection, student well-being, and professional responsibilities within the ACST community. These definitions are designed to guide prevention, awareness, supervision, reporting, and response practices across all school environments and experiences.

3.1. SAFEGUARDING TERMS

3.1.1. ACTIVE DUTY OF CARE

The duty that rests upon an individual or organization to take all reasonable steps to ensure the safety, well-being, and protection of any person involved in an activity, program, or environment for which that person or organization is responsible.

Examples of Active Duty of Care may include:

- Providing appropriate supervision of students;
- Identifying and responding to safety risks or hazards;
- Following safeguarding, health, and emergency procedures;
- Maintaining safe environments, equipment, and practices; and
- Acting promptly when concerns about a child's safety or well-being arise.

Possible indicators that Active Duty of Care is not being met may include:

- Inadequate supervision of students;
- Failure to respond to known safety concerns;

- Unsafe environments or practices;
- Delayed reporting of safeguarding concerns; and
- Failure to follow established policies or procedures.

3.1.2. IN LOCO PARENTIS

The temporary professional responsibility of school staff and approved adults to act in the best interests of students by ensuring their safety, well-being, supervision, and care while students are under their responsibility. This responsibility requires adults to make reasonable, developmentally appropriate, and professionally responsible decisions that align with school policies, safeguarding expectations, and duty of care obligations. In loco parentis does not replace the role of parents or legal guardians and does not permit adults to exceed professional boundaries, school procedures, or safeguarding expectations.

Examples of In Loco Parentis may include:

- Supervising students during the school day, trips, activities, and events;
- Making reasonable decisions to protect student safety and well-being;
- Providing care and support when a parent or guardian is not present;
- Ensuring students are released only to authorized adults; and
- Responding appropriately to illness, injury, or safeguarding concerns.

Possible indicators that in Loco Parentis responsibilities are not being met:

- Students left unsupervised or released without verification;
- Failure to act in response to student safety concerns;
- Inconsistent supervision practices;
- Lack of communication regarding student welfare or dismissal; and
- Failure to prioritize the best interests of the student.

3.1.3. MANDATED REPORTER

An individual who is legally, ethically, or institutionally required to report suspected abuse, neglect, exploitation, boundary violations, or other safeguarding concerns involving a child or young person. Within the school setting, all employees, contracted staff, volunteers, coaches, and approved adults working with students are considered mandated reporters and are required to promptly report concerns in accordance with school safeguarding procedures.

Examples of Mandated Reporter responsibilities may include:

- Reporting suspected abuse or neglect to the Designated Safeguarding Lead (DSL) or appropriate Child Protection Team Member;
- Completing a Safety Concern Report when concerns arise;
- Responding appropriately to student disclosures;
- Maintaining confidentiality while sharing information on a need-to-know basis; and
- Acting promptly even when uncertain whether a concern meets the threshold for harm or abuse.

Possible indicators that in Mandated Reporter responsibilities are not being met:

- Failure to report concerns or disclosures in a timely manner;
- Attempting to investigate concerns independently;
- Sharing safeguarding information inappropriately;
- Dismissing or minimizing student disclosures; and
- Delaying action while waiting for proof or certainty.

3.1.4. CONSENT & INFORMED CONSENT

A voluntary, informed, and developmentally appropriate agreement to participate in an activity, interaction, service, assessment, use of information, or sharing of personal information. Within the school setting, consent may involve students, parents, legal guardians, or school personnel depending on the context, age of the student, legal requirements, and the nature of the activity or support being provided. Consent should be based on clear communication, understanding, respect for privacy and dignity, and the ability to ask questions or decline participation when appropriate.

Examples of consent practices may include:

- Obtaining parent or guardian permission for educational evaluations and consultations, travel, medical care, photography, media use, or participation in specific activities
- Explaining procedures, expectations, or physical contact to students in age-appropriate ways
- Respecting student privacy, personal boundaries, and dignity during supervision, medical care, or personal support situations
- Using approved consent and release forms for student participation, information sharing, and media use
- Ensuring students and families understand how personal information will be stored, shared, and protected

Possible indicators that consent practices are not being appropriately followed may include:

- Sharing personal or confidential information without appropriate authorization or need-to-know access
- Failure to obtain required permission for non-instructional assessments or consultations, medical treatment, travel, photography, or media use
- Students expressing confusion, discomfort, pressure, or lack of understanding regarding participation or information sharing
- Physical interactions occurring without appropriate explanation, transparency, or professional purpose

3.1.5. CONTEXTUAL VULNERABILITY

Situations in which a student's environment, relationships, identity, developmental stage, cultural context, lived experience, or circumstances may increase the likelihood of harm, exclusion, exploitation, or barriers to seeking support. Vulnerability may shift depending on context and should not be viewed as a fixed characteristic of a child.

Examples of Contextual Vulnerability may include:

- Living outside of a student's home culture or country;
- Language barriers, cultural transitions, or limited access to familiar support systems;
- Experiences of discrimination, exclusion, bullying, or identity-based harm;
- Social isolation, difficulty developing belonging, or challenges navigating peer relationships;
- Neurodiversity, differing neurotypes, or learning, sensory, communication, or executive functioning needs that may impact how a student experiences environments, relationships, or support systems;
- Medical, psychological, or mental health needs;
- Online environments, digital communication, or risks related to exploitation or harmful online interactions;
- Family circumstances, instability, or significant life transitions; and
- Experiences away from home, including travel, overnight programs, or unfamiliar environments.

Possible indicators that Contextual Vulnerability may be occurring:

- A student expressing feelings of isolation, exclusion, or not belonging within the school community;
- Difficulty accessing trusted adults, support systems, accommodations, or appropriate communication pathways;
- Increased anxiety, withdrawal, dysregulation, or behavioral changes connected to specific environments, transitions, or social situations;
- Students experiencing repeated peer conflict, bullying, identity-based harm, or social exclusion;
- Learning, sensory, communication, neurodiverse, or mental health needs not being appropriately understood, accommodated, or supported within the environment;
- Increased dependence on a particular adult or peer relationship for emotional safety or belonging;
- Reluctance to participate in school activities, travel experiences, online environments, or community spaces; and
- Policies, practices, environments, or supervision structures that unintentionally create barriers to inclusion, participation, safety, dignity, or access to support.

3.1.6. BOUNDARY CONCERN

Behavior that violates, blurs, or risks violating appropriate professional or interpersonal boundaries between a child and an adult, or between children, but may not yet meet the threshold of abuse. Boundary concerns require attention as they may escalate or indicate grooming or other unsafe dynamics.

Boundary concerns may include:

- Excessive one-on-one contact without transparency or appropriate supervision;
- Communication with a child outside of approved channels or hours;
- Sharing personal information or forming relationships that are overly familiar;
- Giving gifts, special treatment, or preferential attention to a specific child;
- Physical contact that is unnecessary, prolonged, or makes a child uncomfortable; and
- Failure to maintain professional roles and responsibilities.

Possible indicators of boundary concerns may include:

- A child appearing unusually attached to or fearful of a specific adult or peer;
- Secrecy around interactions or communication;
- Attempts to isolate a child from peers or typical supervision;
- Reports of favoritism or discomfort during interactions; and
- Increased private communication through messages, calls, or social media.

3.1.7. GROOMING

Grooming is a deliberate pattern of behaviors used to build trust, emotional connection, dependency, secrecy, or access in order to manipulate, exploit, abuse, or violate boundaries. Grooming may occur between adults and children, between peers, or within other relationships involving a real or perceived imbalance of power, authority, influence, age, status, or vulnerability. Grooming can occur in person, online, or through digital communication and often develops gradually over time, making unsafe or inappropriate behaviors appear normal, acceptable, or difficult to recognize or report.

Examples of grooming behaviors may include:

- Giving excessive attention, gifts, privileges, or special treatment;
- Encouraging secrecy or private communication outside normal expectations or boundaries;
- Creating opportunities for unnecessary one-to-one interactions or isolation;
- Gradually testing or crossing physical, emotional, social, or digital boundaries;
- Using manipulation, flattery, intimidation, emotional dependency, or guilt to influence another person;
- Communicating through unapproved or secretive digital platforms;
- Attempting to isolate an individual from peers, trusted adults, or support systems; and

- Normalizing inappropriate conversations, behaviors, or interactions over time.

Possible indicators of grooming may include:

- Sudden secrecy or reluctance to discuss a particular relationship or interaction;
- Excessive communication, messaging, gifts, or attention from a specific individual;
- Increased emotional dependence, attachment, loyalty, fear, or discomfort related to a particular relationship;
- Boundary violations becoming progressively normalized or minimized;
- Attempts to isolate an individual from peers, family members, or trusted adults;
- Secretive online behavior or inappropriate digital communication;
- Confusion, guilt, pressure, fear, or discomfort related to a relationship or interaction; and
- Behavioral, emotional, social, or academic changes connected to a specific relationship or environment.

3.1.8. SAFETY CONCERN

Any situation, condition, or behavior that places a child at risk of harm or potential harm, whether accidental or intentional. Safety concerns may arise within the school environment, at home, or in the broader community and require timely assessment and response.

Safety concerns may include:

- Unsafe supervision or lack of appropriate adult oversight
- Hazardous environments (e.g., unsafe facilities, dangerous materials)
- Risk-taking behaviors that endanger the child or others
- Exposure to violence, substance misuse, or unsafe individuals
- Transportation or dismissal concerns that compromise student safety

Possible indicators of safety concerns:

- Reports of unsafe conditions at home or school
- Frequent accidents or near-miss incidents
- A child expressing fear about their environment or supervision
- Inconsistent or unclear dismissal/pick-up arrangements
- Concerns raised by staff, peers, or caregivers regarding safety

3.1.9. CONFIDENTIALITY & NEED TO KNOW INFORMATION SHARING

The professional and ethical responsibility to protect student and family privacy by ensuring that sensitive information is shared only with individuals who require access in order to support the student's safety, well-being, health, or educational needs.

Examples may include:

- Sharing safeguarding concerns only with designated personnel;
- Protecting medical, counseling, academic, and psychological records;
- Using secure digital systems and approved communication platforms;
- Obtaining informed consent when appropriate; and
- Limiting access to sensitive information based on professional responsibility and legitimate educational need.

Possible indicators that confidentiality practices are not being followed may include:

- Sharing student information in public or inappropriate settings;
- Discussing confidential matters with individuals without a legitimate need to know;
- Unauthorized access to student records or digital systems;
- Inappropriate storage or handling of confidential documents; and
- Failure to follow school expectations regarding consent, privacy, or information security.

3.2. FORMS OF ABUSE & HARM

Abuse, neglect, exploitation, and other forms of harm may present in many different ways and can impact a child's physical, emotional, psychological, social, and developmental well-being. The following definitions and indicators are intended to support awareness, early identification, prevention, and appropriate response to safeguarding concerns within the ACST community. Harm may occur through the actions or lack of action of adults, peers, systems, environments, or online interactions and should always be considered within the broader context of the child's experiences, relationships, identity, developmental stage, and environment.

Important Note: Indicators alone do not confirm abuse, neglect, exploitation, or harm. Safeguarding concerns should always be considered within the broader context of the child's behavior, environment, developmental stage, relationships, identity, lived experiences, and other available information. Multiple indicators, patterns, disclosures, or contextual concerns may warrant additional support, monitoring, assessment, or referral. Professional judgment, collaboration, and timely reporting remain essential components of effective safeguarding practice.

3.2.1. BULLYING/HARASSMENT

A pattern of repeated and intentional behavior by an individual or group that causes physical, emotional, or social harm to a child, where there is a real or perceived imbalance of power. Bullying can occur in person or through digital platforms and may include verbal, physical, relational, or social actions.

Bullying/harassment may include:

- Repeated teasing, name-calling, mocking, or threatening behavior
- Physical aggression such as hitting, pushing, or damaging belongings

- Social exclusion, spreading rumors, or intentionally isolating a child
- Coercion or intimidation to control or influence a child's behavior
- Retaliation against a child for reporting concerns

Possible indicators of bullying/harassment:

- Unexplained injuries or damaged personal belongings
- Reluctance or refusal to attend school or participate in activities
- Sudden withdrawal from peers or social situations
- Changes in mood, including anxiety, sadness, or irritability
- Decline in academic performance or engagement
- Avoidance of specific individuals, places, or situations
- Reports of frequent conflicts with peers

3.2.2. DIGITAL BULLYING & ABUSE

Digital bullying and abuse involves the use of digital platforms, communication tools, online spaces, gaming environments, social media, messaging applications, artificial intelligence tools, or other forms of technology to harm, manipulate, threaten, exploit, embarrass, isolate, or target another person. Digital bullying and abuse may occur between peers, adults, or groups and can negatively impact a student's emotional well-being, safety, dignity, relationships, reputation, belonging, or ability to participate fully in school life. Digital harm may occur on or off campus and can continue beyond the school day through ongoing access to online communication and content.

Online Bullying and Digital Abuse is:

- Using digital platforms, such as social media, messaging apps, games, or email, to repeatedly engage in hostile, threatening, or manipulative behavior that harms a child's mental, emotional, or social well-being;
- Sending intimidating or harassing messages with the intent to cause fear, distress, or harm to the child;
- Publicly sharing or spreading private or humiliating information, images, or rumors about a child without their consent, known as "doxing" or public shaming, and/or
- Excluding a child from online groups, activities, or discussions to socially isolate and alienate them;
- Impersonating or creating fake profiles, known as "catfishing," to deceive, manipulate, or embarrass a child;
- Failing to take reasonable steps to prevent the occurrence or continuation of any of the above behaviors, particularly within the school's digital platforms or other supervised online activities.

Possible indicators of online bullying and digital abuse:

- Sudden avoidance of digital devices or visibly distressed reactions to receiving messages or notifications.
- Withdrawal from friends, family, or social activities due to negative online interactions.
- Unexplained mood changes, such as increased anxiety, sadness, or irritability, after using digital devices.
- Declining academic performance or loss of interest in school activities that previously engaged the child.
- Fear of attending school or reluctance to participate in certain online or offline group settings.
- Repeated complaints of physical symptoms, like headaches or stomachaches, when prompted to engage with online platforms.
- Self-blaming, low self-esteem, or statements indicating feeling trapped, helpless, or isolated.
- Refusal to discuss online interactions or attempts to hide online behavior from parents or trusted adults.

3.2.3. EMOTIONAL ABUSE

Emotional abuse is a pattern of behaviors, actions, or interactions by caregivers, authority figures, trusted adults, peers, or systems that negatively impacts a child's emotional development, mental health, sense of safety, identity, or self-worth. Emotional abuse may occur through words, actions, threats, manipulation, rejection, intimidation, humiliation, isolation, or ongoing behaviors that undermine a child's dignity, belonging, confidence, or emotional well-being.

Examples of emotional abuse may include:

- Persistent criticism, humiliation, ridicule, shaming, or derogatory remarks;
- Threatening, intimidating, manipulating, or emotionally controlling behaviors;
- Rejecting, ignoring, excluding, or isolating a child from relationships or activities;
- Exposing a child to ongoing hostility, fear, conflict, or emotionally unsafe environments;
- Making excessive, unrealistic, or developmentally inappropriate demands regarding behavior, achievement, or performance;
- Exploiting, degrading, or undermining a child's identity, dignity, confidence, or sense of belonging; and
- Patterns of interaction that contribute to fear, worthlessness, insecurity, emotional distress, or developmental harm.

Possible indicators of emotional abuse may include:

- Excessive withdrawal, anxiety, fearfulness, clinginess, or emotional distress;
- Behavioral extremes such as aggression, hypercompliance, perfectionism, or social isolation;

- Low self-esteem, hopelessness, or lack of enthusiasm for activities or relationships;
- Frequent self-critical statements, expressions of worthlessness, or feelings of being unloved or unwanted;
- Developmental, emotional, social, or communication delays without an identifiable explanation;
- Persistent physical complaints such as headaches or stomachaches without a clear medical cause;
- Difficulty forming healthy relationships, trusting adults, or regulating emotions; and
- Heightened sensitivity to criticism, rejection, conflict, or perceived failure.

3.2.4. IDENTITY-BASED HARM

Any behavior, action, or language that targets a child based on aspects of their identity, including but not limited to race, ethnicity, nationality, religion, gender, sexual orientation, disability, language, or socio-economic status, resulting in harm to their dignity, safety, or sense of belonging.

Identity-based harm may include:

- Derogatory language, slurs, or stereotypes
- Exclusion or discrimination based on identity
- Mocking cultural practices, beliefs, or appearance
- Hate speech or targeted harassment
- Unequal treatment or denial of opportunities

Possible indicators of identity-based harm:

- A child expressing feelings of not belonging or being targeted
- Reluctance to participate in school activities or community spaces
- Emotional distress linked to identity-related incidents
- Reports of repeated comments or actions targeting identity
- Withdrawal from peers or avoidance of specific groups

3.2.5. PHYSICAL ABUSE

Physical abuse involves actions or omissions that cause physical injury, pain, impairment, or substantial risk of harm to a child's physical or emotional well-being. Physical abuse may include intentional acts of violence, excessive or physically harmful discipline, assault, unsafe restraint, or actions that demonstrate a disregard for a child's safety, dignity, pain, or developmental needs. Physical abuse may occur through direct actions or through the failure to take reasonable steps to protect a child from harm.

Examples of physical abuse may include:

- Hitting, punching, kicking, shaking, or physically assaulting a child;
- Excessive or physically harmful discipline causing pain or injury;

- Burns, choking, unsafe restraint, or other actions that create physical harm or substantial risk of harm;
- Actions resulting in injury to a child's physical or emotional health or development;
- Using physical force, intimidation, or punishment in ways that compromise a child's safety, dignity, or bodily integrity; and
- Failure to take reasonable steps to prevent physical harm from occurring.

Possible indicators of physical abuse may include:

- Unexplained bruises, welts, burns, fractures, abrasions, or lacerations;
- Injuries in various stages of healing or with identifiable patterns or shapes;
- Injuries inconsistent with the explanation provided;
- Frequent injuries or repeated absences following injuries;
- Fearful reactions to adults, physical contact, or going home;
- Attempts to hide injuries or wear clothing inappropriate for the weather; and
- Behavioral changes such as withdrawal, aggression, anxiety, hypervigilance, or fearfulness.

3.2.6. NEGLECT

Neglect is the failure to provide for a child's basic physical, emotional, medical, developmental, educational, or supervisory needs in ways that support their safety, well-being, and healthy development. Neglect may occur through actions, omissions, or ongoing patterns of inadequate care that place a child at risk of harm or compromise their physical, emotional, psychological, or developmental well-being.

Examples of neglect may include:

- Failure to provide adequate food, shelter, clothing, hygiene, supervision, or safe living conditions;
- Failure to provide appropriate adult guardianship or supervision, including leaving children unsupervised for extended or developmentally inappropriate periods of time;
- Failure to seek or provide necessary medical, mental health, psychological, or educational support;
- Ongoing inattention to a child's emotional needs, safety, belonging, or developmental well-being;
- Exposure to unsafe environments, substance misuse, violence, or other situations that compromise a child's safety or development;
- Persistent lack of engagement with school communication, student welfare concerns, or emergency procedures; and
- Failure to make appropriate arrangements for a child's care and supervision during parental absence or travel. ***ACST requires at least one parent or designated guardian to serve as a full-time resident of Tunisia. Parents or***

guardians leaving the country are responsible for notifying the school and providing updated emergency and guardianship information prior to departure.

Possible Indicators of Neglect:

- Poor hygiene, malnutrition, untreated injuries, ongoing fatigue, or inappropriate clothing for weather or activities;
- Frequent absences, repeated lateness, or inconsistent attendance without clear explanation;
- Sudden behavioral changes such as withdrawal, aggression, anxiety, emotional flatness, or social isolation;
- Persistent unmet medical, emotional, psychological, or educational needs;
- Unsanitary, unsafe, or unstable living conditions;
- Difficulty contacting parents or guardians in emergency situations or ongoing lack of response to school communication;
- Reluctance or inability of caregivers to seek support or intervention for a child's identified needs;
- Students being left without appropriate supervision, guardianship, or care arrangements; and
- Expressions of fear, reluctance, or anxiety related to returning home or being left without support.

3.2.7. SELF HARM

Any deliberate behavior in which a child intentionally causes harm to themselves as a way of coping with emotional distress, without necessarily intending to end their life. Self-harm is a significant indicator of emotional distress and requires immediate attention and support.

Self-harm may include:

- Cutting, scratching, or burning the skin
- Hitting or intentionally injuring oneself
- Interfering with wound healing
- Engaging in behaviors that knowingly cause physical harm

Possible indicators of self-harm:

- Unexplained cuts, burns, or marks, often on arms, legs, or torso
- Wearing long sleeves or covering up inappropriately for the weather
- Frequent reports of accidental injuries
- Expressions of emotional distress, hopelessness, or numbness
- Expressions of wish or plan to not be alive or end one's life
- Withdrawal from peers, activities, or previously enjoyed interests
- Possession of sharp objects without clear reason

3.2.8. SEXUAL ABUSE

Sexual abuse involves any sexual act, interaction, behavior, exploitation, or exposure imposed upon a child by an adult, older student, or another individual in a position of power, trust, authority, or developmental advantage. Sexual abuse may involve physical contact or non-contact behaviors and can occur in person, online, or through digital communication and media. Sexual abuse violates a child's safety, dignity, bodily autonomy, trust, and healthy development.

Sexual abuse may also include the creation, possession, sharing, requesting, distribution, or exposure to Child Sexual Abuse Material (CSAM)¹, sexualized digital communication, online exploitation, coercion, grooming behaviors, or image-based abuse involving children or youth.

Sexual abuse often involves grooming, secrecy, manipulation, boundary violations, and misuse of trust or authority. Children and youth may experience confusion, shame, fear, guilt, loyalty to the offender, or difficulty understanding that abuse has occurred. As a result, disclosures may be delayed, inconsistent, indirect, or difficult for students to communicate.

Examples of sexual abuse may include:

- Sexual touching or contact involving a child's body, including through clothing;
- Sexual intercourse, assault, coercion, or forced sexual acts;
- Exposing a child to sexual activity, nudity, sexually explicit material, or Child Sexual Abuse Material (CSAM);
- Sexualized communication, exploitation, manipulation, grooming behaviors, or boundary violations;
- Encouraging, coercing, requesting, possessing, creating, or sharing sexualized images, videos, messages, or digital content involving children or youth;
- Using a child for sexual exploitation, prostitution, or the creation, possession, distribution, or sharing of Child Sexual Abuse Material (CSAM); and
- Online sexual exploitation, inappropriate digital communication, sextortion, or requests for sexual content, images, or interactions.

Possible indicators of Sexual Abuse may include:

- Sexual knowledge, language, behaviors, or interactions that are not developmentally appropriate for the student's age or stage of development;
- Sudden or significant changes in behavior, mood, emotional regulation, relationships, attendance, or academic engagement;
- Fear, anxiety, withdrawal, secrecy, or discomfort related to specific individuals, environments, activities, or situations;
- Difficulty walking, sitting, changing clothes, participating in physical activities, or avoiding locker rooms, bathrooms, medical examinations, or overnight experiences;

¹ The term Child Sexual Abuse Material (CSAM) is the preferred safeguarding and child protection terminology. The term child pornography is no longer considered appropriate because it may imply consent or legitimacy and does not accurately reflect the abusive and exploitative nature of the material.

- Evidence of pain, bleeding, irritation, bruising, or injury involving genital, anal, or oral areas;
- Pregnancy or sexually transmitted infections in a child or adolescent;
- Self-harm, dissociation, depression, running away, emotional distress, or significant changes in mental health or well-being;
- Secretive online behavior, inappropriate digital communication, possession or sharing of sexualized images, or concerns related to grooming, coercion, sextortion, exploitation, or online abuse;
- Sudden distress, panic, withdrawal, or fear related to phones, devices, messaging platforms, or social media interactions; and
- Sudden attachment, fearfulness, compliance, avoidance, or discomfort related to a particular adult, older student, peer, or relationship.

4. REPORTING & FOLLOW-UP PROCEDURES

4.1. REPORTING CONCERNS

Student safety and well-being must always take precedence over concerns about certainty, proof, factual accuracy, or whether abuse, neglect, exploitation, or harm can be conclusively established. Individuals should not delay reporting while attempting to verify information, gather evidence, determine intent, assess guilt, or speak directly with the person who is the subject of the concern.

Safeguarding concerns may arise from observations, disclosures, boundary violations, patterns of behavior, changes in a student's well-being, or situations that create discomfort or raise questions about a student's safety. Reporting a concern does not imply wrongdoing, misconduct, or guilt. Rather, it allows the appropriate child protection team members to review the information, assess risk, determine whether additional information is needed, and decide on appropriate next steps.

When a concern exists, individuals should prioritize reporting rather than investigating. It is the responsibility of the Child Protection Team to assess concerns and determine appropriate actions. When in doubt, report the concern.

4.2. REPORTING PATHWAYS

ACST encourages all members of the school community to report safeguarding concerns as soon as possible. Reports may be submitted through multiple pathways, including:

- Completion of the school's Safety Concern Report form;
- Email communication to a member of the Child Protection Team, Designated Safeguarding Lead (DSL), Principal, or other appropriate school leader;
- Verbal reports made directly to a trusted adult, counselor, administrator, teacher, coach, or Child Protection Team member; or
- Other school-approved communication methods, such as messaging platforms used for school business.

Individuals receiving a verbal report or concern are responsible for ensuring that the concern is documented and submitted through the school's designated reporting procedures as soon as possible.

ACST also provides an anonymous reporting option through the Safety Concern Report form. While anonymous reports will be reviewed and taken seriously, individuals are encouraged to identify themselves whenever possible. Identifying the reporter allows the Child Protection Team to gather additional information, clarify concerns, provide updates when appropriate, and more effectively support the review and response process.

All reports are handled confidentially and shared only with individuals who have a legitimate need to know in order to support student safety and well-being.

4.3. INITIAL REVIEW & RESPONSE

Once a safeguarding concern is reported, the Designated Safeguarding Lead (DSL) will coordinate an initial review in collaboration with appropriate members of the Child Protection Team. The purpose of this review is to assess student safety, determine appropriate next steps, identify any immediate support needs, and ensure concerns are addressed in accordance with school policies and safeguarding procedures.

Reports are handled confidentially and shared only on a need-to-know basis. Depending on the nature of the concern, the school may implement safety measures, provide student support, consult with appropriate professionals, engage families, or make referrals or reports to external agencies when required.

4.4. SAFEGUARDING RESPONSE PROCESS

4.4.1. PHASE 1: REPORT & DOCUMENT

The reporting phase begins when a concern, disclosure, observation, boundary violation, allegation, or other safeguarding concern is identified. The purpose of this phase is to ensure concerns are reported promptly, documented accurately, and brought to the attention of the appropriate safeguarding personnel. Individuals are responsible for reporting concerns, not investigating them.

During this phase:

- Student safety and well-being are prioritized.
- Immediate risks to safety are addressed.
- The concern is reported through an approved reporting pathway.
- Factual information is documented.
- The concern is shared with the Designated Safeguarding Lead (DSL) or appropriate Child Protection Team member.
- Confidentiality is maintained.

- All concerns are documented using a Safety Concern Report by reporter or the first child protection team member who receives the report.

4.4.2. PHASE 2: INITIAL REVIEW

The Initial Review phase is coordinated by the Designated Safeguarding Lead (DSL) in collaboration with appropriate members of the Child Protection Team. The purpose of this phase is to assess risk, identify immediate support needs, determine whether additional information is required, and establish an appropriate course of action.

During this phase:

- The concern is reviewed by the DSL and/or Child Protection Team.
- Immediate safety concerns are assessed.
- Appropriate members of the response team are identified.
- Relevant records and available information may be reviewed.
- Additional information may be gathered when appropriate.
- Immediate support needs are identified.
- Confidentiality and need-to-know information sharing are maintained.
- Initial next steps are determined.

4.4.3. PHASE 3: RESPONSE INTERVENTION

Based on the information available, the Child Protection Team determines and implements appropriate actions to support the student and address the concern. Responses will vary depending on the nature, severity, and context of the concern.

During this phase:

- Student safety plans may be implemented.
- Counseling, health, or well-being supports may be provided.
- Families may be engaged when appropriate.
- Additional supervision or protective measures may be established.
- Relevant school personnel may be consulted.
- External professionals or agencies may be contacted when necessary.
- Concerns involving staff members or external providers are managed through applicable procedures.
- Actions and decisions are documented.

4.4.4. PHASE 4: FOLLOW-UP, ON-GOING SUPPORT, & RECORD MANAGEMENT

Safeguarding is an ongoing process. Following an intervention, the Child Protection Team continues to monitor student well-being, evaluate the effectiveness of supports, and maintain appropriate records. The goal is to ensure students remain safe, supported, and connected to learning.

During this phase:

- Student well-being is monitored.
- Safety plans and support measures are reviewed.
- Follow-up meetings or check-ins may occur.
- Referrals and external support services are monitored.
- Appropriate school personnel receive guidance as needed.
- Safeguarding records are maintained and updated.
- Information continues to be managed on a need-to-know basis.
- Records are stored securely in accordance with school policy.
- Additional action is taken if new concerns emerge.

Safeguarding concern identified

Disclosure · observation · allegation · boundary violation · other concern



Phase 1 – Report & Document

Concerns are reported promptly, documented accurately, and brought to the appropriate safeguarding personnel.

Ensure immediate safety

- Prioritise student safety and well-being
- Address immediate risks to safety
- Maintain confidentiality

Report the concern

- Use an approved reporting pathway
- Notify the DSL or a Child Protection Team member
- Share the concern without delay

Document accurately

- Record factual information only – observations, not conclusions
- Complete a Safety Concern Form
- Filed by the reporter or the first Child Protection Team member who receives the report



Phase 2 – Initial Review

Coordinated by the Designated Safeguarding Lead (DSL) with appropriate Child Protection Team members to assess risk and set a course of action.

Assess the concern

- DSL and/or Child Protection Team review the concern
- Assess immediate safety concerns
- Identify immediate support needs

Gather information

- Review relevant records and available information
- Gather additional information when appropriate
- Share on a need-to-know basis

Determine the course of action

- Identify the appropriate members of the response team
- Decide whether additional information is required
- Establish initial next steps

**Phase 3 – Response Intervention**

The Child Protection Team determines and implements actions to support the student. Responses vary by nature, severity, and context.

Support the student

- Implement student safety plans
- Provide counseling, health, or well-being supports
- Establish additional supervision or protective measures

Engage others

- Engage families when appropriate
- Consult relevant school personnel
- Contact external professionals or agencies when necessary (Legal requirements permitting)

Manage & document

- Manage concerns involving staff or external providers through applicable procedures
- Document all actions and decisions

**Phase 4 – Follow-up, Ongoing Support & Record Management**

Safeguarding is an ongoing process. The team keeps students safe, supported, and connected to learning.

Monitor & review

- Monitor student well-being
- Review safety plans and support measures
- Hold follow-up meetings and check-ins
- Monitor referrals and external support services

Sustain support

- Provide guidance to school personnel as needed
- Keep students connected to learning
- Take additional action if new concerns emerge

Manage records

- Maintain and update safeguarding records on a need-to-know basis
- Store records securely in accordance with school policy

4.5. CONCERNS OR ALLEGATIONS INVOLVING STAFF MEMBERS

Concerns or allegations involving ACST employees will be managed in accordance with the procedures outlined in the Personnel Handbook. Any concern related to abuse, neglect, boundary violations, grooming, professional misconduct, or other safeguarding matters involving a staff member must be reported immediately to the Designated Safeguarding Lead (DSL), Principal, Human Resources Director, or Superintendent. The safety and well-being of the student will remain the primary consideration throughout the response process. All reports will be handled promptly, confidentially, and in accordance with principles of due process, applicable school policies, and safeguarding expectations.

4.6. CONCERNS OR ALLEGATIONS INVOLVING EXTERNAL PROVIDERS

ACST recognizes that students regularly interact with external providers, including coaches, instructors, tutors, consultants, contractors, volunteers, chaperones, and other individuals who support school programs and activities. Concerns related to abuse, neglect, grooming, boundary violations, professional misconduct, or other safeguarding matters involving an external provider must be reported immediately through the school's safeguarding reporting procedures. Reports should be directed to the Designated Safeguarding Lead (DSL), Principal, Athletics & Activities Director (when applicable), Safety & Security Manager, Human Resources Director, or Superintendent. The school will conduct an initial review, implement appropriate protective measures, and determine whether additional action, including suspension of duties, termination of agreements, or referral to external authorities, is required. External providers are expected to comply with all ACST safeguarding policies, training requirements, and reporting expectations as a condition of their engagement with the school.

APPENDIX A: ANNUAL LETTER TO PARENTS/GUARDIANS

Dear Parents and Guardians,

At the American Cooperative School of Tunis (ACST), the safety, well-being, dignity, and rights of children and youth are fundamental to our mission and values. We believe that every student has the right to learn, grow, participate, and thrive in an environment where they feel safe, respected, supported, and valued. To support this commitment, ACST maintains a comprehensive Child and Youth Protection Policy that guides our efforts to prevent harm, respond to concerns, and promote student well-being across all aspects of school life.

ACST's Child and Youth Protection Policy is grounded in international child protection principles and the United Nations Convention on the Rights of the Child (UNCRC), to which Tunisia is a signatory. The policy reflects our commitment to protecting children and youth from abuse, neglect, exploitation, and other forms of harm while promoting their rights, safety, dignity, and well-being.

In particular, the UNCRC recognizes:

Article 19 – Protection from Violence, Abuse, and Neglect

Children have the right to be protected from all forms of physical or mental violence, injury, abuse, neglect, maltreatment, or exploitation while in the care of parents, guardians, or any other person responsible for their well-being.

Article 34 – Protection from Sexual Exploitation and Abuse

Children have the right to be protected from all forms of sexual exploitation and sexual abuse.

Safeguarding is a shared responsibility between the school, families, students, and the broader community. ACST has a responsibility to provide a safe learning environment, implement safeguarding practices, respond appropriately to concerns, and educate students about personal safety and well-being. Parents, guardians, and other community members are expected to support these efforts by modeling appropriate conduct, upholding the principles outlined in the Child and Youth Protection Policy, and reporting concerns when they believe a child may be at risk of harm.

Educational Components of ACST's Child and Youth Protection Program

As part of our commitment to prevention, education, and student well-being, ACST will:

- Provide age-appropriate instruction that helps students understand personal safety, healthy relationships, boundaries, consent, digital citizenship, and how to seek help from trusted adults;
- Educate students about their rights and responsibilities as members of a safe and respectful community;
- Provide opportunities for students to learn how to recognize, respond to, and report situations that may impact their safety or well-being;
- Provide annual safeguarding and child protection training for employees, coaches, volunteers, and external providers;
- Implement safe recruitment, screening, and onboarding practices for adults working with students; and

- Provide information and resources to help families support the safety, well-being, and healthy development of children and youth.

ACST encourages all members of the community to report concerns related to abuse, neglect, bullying, harassment, exploitation, grooming, boundary violations, mental health concerns, or any situation that may place a child or youth at risk of harm. Individuals do not need proof or certainty before making a report. When in doubt, report the concern.

Thank you for your continued partnership in helping ACST remain a safe, caring, and supportive learning community for all students.

In Partnership,

Dr. Zak Palsha
Superintendent

APPENDIX B: ACST COMMON AGREEMENT (EXPECTATIONS OF CONDUCT WITH CHILDREN)

ACST COMMON AGREEMENT (EXPECTATIONS OF CONDUCT WITH CHILDREN)

"To ensure the safety of children and the well-being of our school community"

Every individual in the school community should be treated with dignity and respect. As a school, we have a special obligation to children. As such, we promote a safe and positive community. The ACST Common Agreement is a set of written guidelines designed to safeguard children and all members of the school community and ensure safe teaching, behavior, and practice within ACST.

It is our responsibility to promote the welfare of children. As a member of the ACST community,

I will:

- Treat all students with dignity, respect, fairness, and inclusion regardless of their identity, background, abilities, beliefs, culture, language, family structure, gender, sexual identity, nationality, race, ethnicity, religion, or other personal characteristics.
- Foster an environment where students feel safe, valued, supported, and able to fully participate in school life.
- Address behaviors, language, or actions that may cause harm, exclusion, discrimination, harassment, or humiliation to others.
- To the best of my ability, promote the good health, welfare, and safety of all members of our school community and uphold high ethical standards.
- To the best of my ability, ensure the safety of students while they are under my supervision, both on and off campus.
- Comply with all school procedures and guidelines related to student safety, supervision, chaperoning, and coaching.
- Treat everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Conduct one-on-one meetings with children and/or youth in settings that are open and visible to others; as well as never be alone at school activities without another adult being notified or present.
- Use only school-approved communication platforms to contact or communicate with students
- Use positive reinforcement rather than criticism, competition, or comparison when working with children and/or youth, while also adhering to the school's policies on student discipline.
- Maintain appropriate physical boundaries at all times and touch children, when necessary, only in ways that are appropriate, public, and non-sexual.
- Maintain appropriate emotional, sexual, and digital boundaries at all times.
- Cooperate fully with any inquiry or investigation into the suspected harm or abuse of children or youth, regardless of the parties involved.
- Avoid transactions with students, parents, or vendors that may be perceived as conflicts of interest.
- Comply fully with the school's policies on anti-harassment, representation and confidentiality standards, safeguarding of property and funds, and the honoring of contracts.

- Comply fully with the school's safeguarding reporting requirements and promptly report concerns, disclosures, boundary violations, suspected abuse, neglect, exploitation, misconduct, or other situations that may impact a student's safety, dignity, or well-being.
- Maintain the confidentiality of all student records, including academic, medical, and disciplinary information, unless disclosure is legally required.

I will not:

- Initiate or encourage any unnecessary or inappropriate physical contact with a student.
- Engage in behavior that seeks to build inappropriate emotional or physical closeness with a student, such as giving special favors, creating secret relationships, or using attention, affection, or gifts to develop a relationship that could lead to professional boundary violations.
- Transport students without parental consent unless it is a medical emergency.
- Invite a student to my home or arrange to meet with a student away from school property without parental consent.
- Meet individually with a student in a closed or unobservable setting.
- Use personal communication platforms or accounts (e.g., personal email, personal social media, personal phone numbers) to contact or communicate with students, regardless of whether the communication is related to school activities. All communication must occur through approved school channels.
- Share, post, store, or distribute student images, information, or personal data in ways that are inconsistent with school policy, parental consent, student privacy expectations, or safeguarding principles.
- Post photos or other information about students for non-school-related reasons that could increase the vulnerability of students.
- 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.
- Furnish, allow access to, or permit the consumption of alcohol, tobacco, illegal drugs, or inappropriate materials by students.
- Accept or give gifts to children or youth without the knowledge of their parents or guardians.
- Engage in discrimination, harassment, intimidation, stereotyping, exclusion, humiliation, or other forms of identity-based harm toward students or members of the school community.
- Use language, actions, jokes, comments, gestures, or digital communications that demean, marginalize, target, or create an unsafe environment for others based on their identity or personal characteristics.
- Ignore, minimize, or fail to respond appropriately to incidents of identity-based harm that may impact student safety, well-being, dignity, or belonging.

I understand that:

- Electronic communications on school platforms may be subject to monitoring to ensure transparency and student safety.
- All individuals working with children must undergo appropriate background checks, training, and onboarding requirements established by the school prior to assuming responsibilities and during the period of employment.
- Any action inconsistent with this, or failure to take action as mandated by this Common Agreement, may result in disciplinary action up to and including removal from ACST.

I confirm that I have read and understood the **ACST Common Agreement** and agree to follow the above standards of practice.

Print Full Name: _____

Signature: _____

Date: _____

APPENDIX C: SAFETY CONCERN FORM

This form is designed to report concerns related to student safety and well-being, during or outside of school. All reports are taken seriously and handled with maximum confidentiality and care to ensure appropriate support and follow-up.

Emergency Contact Information

If a student is in immediate danger, please contact the Designated Safeguarding Lead, Superintendent, or Safety & Security Manager immediately.

- Designated Safeguarding Lead- Name, Email, Phone Number
- Superintendent - Name, Email, Phone Number
- Safety & Security Manager- Name, Email, Phone Number

What Happens Next

All reports are reviewed by the appropriate safeguarding team and handled in a timely, confidential manner, with information shared only on a need-to-know basis in accordance with school safeguarding procedures.

1. Reporter (optional)

- Name (optional):
- Role (student, parent, staff, coach, other):
- Contact information (optional):
- If a student is in immediate danger, please contact the Superintendent or Safety & Security Manager immediately.

2. Student(s) Involved

- Name(s):
- Grade / Age:

3. Concern

- Type of concern (select all that apply)
 - Bullying/harassment
 - Boundary concern
 - Digital Bullying*
 - Emotional harm*
 - Identity-Based harm
 - Neglect*
 - Physical harm*
 - Self harm
 - Safety concern
 - Sexual abuse* or misconduct
 - Other: _____
- What happened? (brief description):
- Where did it happen? (on campus, trip, online, etc.):
- When did it happen? (date/time or ongoing):

4. Person(s) Involved

- Name(s) and role(s) (if known):

5. Safety

- Is the student currently safe? (Yes / No / Unsure)
- Is this urgent? (Yes / No)
- If a student is in immediate danger, please contact the Superintendent or Safety & Security Manager immediately.

6. Additional Information

- Any witnesses or additional details:

7. Acknowledgment

- I confirm this information is accurate to the best of my knowledge. (Yes)

Optional Add-On

Would you like us to contact you for follow-up? (Yes / No)