aes
American Embassy School
An International Community

Child **Safeguarding** Handbook

Latest Review: *July 2026*

CHILD SAFEGUARDING HANDBOOK

OUR MISSION

The American Embassy School provides a balanced education defined by a joyful pursuit of excellence in academics, athletics, arts, and service. We enable each student to be an inspired lifelong learner and a responsible, compassionate global citizen.

CULTURE OF BELONGING STATEMENT

The American School is a community of diverse learners. We celebrate the strength of our diversity and are committed to nurturing a culture of belonging. All members of our school community actively support every learner's academic, social, and emotional growth.

OUR VALUES

The American Embassy School community is guided by our core values

- Dignity
- Compassion
- Integrity
- Curiosity
- Courage

AES DEFINITION OF LEARNING

At AES, Learning is multidimensional.

- Learners construct deep conceptual understanding.
- Learners develop high levels of transferable competency.
- Learners pursue self-discovery through a reflective journey.
- Learners apply their knowledge and skills to affect positive change in a larger community.

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An International Community

CHILD SAFEGUARDING HANDBOOK

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Overview

At AES, keeping children safe is everyone's responsibility. We are committed to protecting the wellbeing of all students and acting quickly if a child may be at risk. This handbook outlines our shared duty of care, expectations for behavior, and procedures for reporting concerns. All members of our community are expected to understand and follow these guidelines, which align with international best practices and relevant laws. Together, we create a safe, inclusive, and supportive environment for every child.

1.0 Values Statement on Child Rights

At AES, we are collectively committed to nurturing each student's intellectual, physical, social, and emotional development. We all have a duty of care to protect children and prevent them from harm, and to act with appropriate urgency if a child is at risk of harm. Our school community is committed to keeping children safe and promoting the wellbeing of children. To that end, we believe that:

- All children have equal rights to be protected from harm and abuse.
- Everyone has a responsibility to support the protection of children.
- We have a responsibility to build a community that values diversity, equity, and inclusion for each child.
- We 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 safeguarding are taken in the best interests of the child, which are paramount.

AES believes that ***keeping children safe*** is everyone's responsibility and seeks to foster a culture of awareness and commitment to supporting and adhering to the policies and procedures set out in this handbook. Each person in the community is responsible for:

- Familiarizing themselves with the contents of this handbook, or relevant sections thereof.
- Complying with the policies and procedures set out in this handbook.
- Reporting any concern about a student, whether as a result of observed behavior on or off campus, disclosure, or third-party reporting.
- Reporting or intervening in any situation where someone is acting in an unsafe manner or failing to comply with AES protocols.

This handbook is intended to be the definitive and public statement of both current practice and intent. It should be read by existing and prospective faculty, staff, and parents. Summaries of relevant sections will be shared with students, volunteers, coaches, contractors, substitutes, and visitors.

The scope and contents of this handbook are framed to meet the *Expectations for School Communities* published by the International Task Force for Child Protection (ITFCP), along with ensuring compliance with relevant US and Indian laws and regulations.

2.0 Mission, Values and Policies

2.01 Mission

The American Embassy School provides a balanced education defined by a joyful pursuit of excellence in academics, athletics, arts, and service. We enable each student to be an inspired lifelong learner and a responsible, compassionate global citizen.

2.02 Core Values

The American Embassy School community is guided by our core values:

- Dignity
- Compassion
- Integrity
- Curiosity
- Courage

2.03 Our Vision

AES is a destination school for families and educators seeking personalized learning to cultivate intellectual and creative leaders who will make the world a better place.

2.04 Our Inclusion Statement

The American Embassy School is a community of diverse learners. We celebrate the strength of our diversity and are committed to nurturing a culture of belonging. All members of our school community actively support every learner's academic, social, and emotional growth.

2.05 Board Policy

The Board Policy Manual states, inter alia, that:

2.05.01 Student Rights and Responsibilities

Each AES student has the right:

- To be secure and safe in their person and their property.

2.05.02 Student Welfare and Safety

The safety of students shall be ensured through the maintenance of safe facilities and the supervision of students in school buildings, on school grounds, and during school-sponsored activities.

The Director shall implement protocols that ensure a safe, secure, properly supervised learning environment for AES students.

2.05.03 Child Safeguarding

Indian and US Law prohibit child abuse and neglect, which are obstacles to a child's education as well as their physical, emotional, and spiritual development.

The AES Board Child Safeguarding Policy is informed by the following principles:

- **Prevention** through the creation of a positive school atmosphere, the teaching and pastoral support offered to all students, and safe hiring practices of faculty and staff.
- **Protection** by following agreed policy and procedures, ensuring all employees are trained and supported to respond appropriately and sensitively to child safeguarding concerns.

- **Support** for all students who may have been abused and the adults who are within the child's immediate network.

Prevention

- The Child Safeguarding Handbook will be published and updated on the AES website.
- There is an age-appropriate curriculum that is aligned with K-12.
- There is a regular review of the child safeguarding policy and procedures to refine and update them in line with best practices and lessons learned.
- AES faculty, staff, and contracted staff are trained on when and how to report possible child safeguarding concerns.
- AES will make every effort to implement hiring practices to ensure the safety of children.

Protection

- All faculty, staff, and contractors employed at AES must report all child safeguarding concerns to a designated child safeguarding officer immediately and within 24 hours.
- Reported concerns will be addressed in accordance with the procedures outlined in the Child Safeguarding Handbook.
- AES may report cases of suspected child abuse, neglect, or self-harm to the appropriate employer, to the respective embassy, to the appropriate child protection agency in the home country, and/or to local authorities.
- All members of the community and visitors to the campus, including vendors and agencies when students travel, are subject to the AES child safeguarding policy.

Support

- There is regular, appropriate training for Counselors, the Health Office, and the Senior Leadership Team.
- *Regularly identify and evaluate relevant agencies available in India and globally [partnering with AES for Child Safeguarding support].*

3.0 Definitions and Context

AES has adopted the following definitions of abuse, neglect, and exploitation to guide and frame its work in keeping children safe.

3.01 Scope

At AES, the child safeguarding policies and procedures apply to any child attending the school. A "child" is defined as a young person, generally between the ages of 3 and 18+, currently registered and attending AES as a student in full-time education. In specific contexts, reference may also be made to infants/preschoolers (aged 0-3), children (aged 3-12), teens/adolescents (aged 13-18), and/or young adults (18+ still in full-time education). * (*cross reference to Indian Law - where further cross references occur, please refer to the reference section and end of the handbook)

This scope and definition also extend to siblings, alumni, and family members; students visiting the campus from other schools and community groups; and children in communities and schools being visited by members of the AES community while on service, experiential learning, and athletic trips.

3.02 Abuse

Abuse refers to any form of maltreatment of a child, whether by deliberately inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others (see Domestic Abuse below). Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by strangers. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children.

Those working with children should be aware of the indicators of abuse, neglect, and exploitation as outlined below, while understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of children who may need help or protection. Indicators of possible abuse can be found by observing children's behavior at school (such as sexual or physical aggression toward younger children), recognizing physical signs (such as

bruises, broken bones, wearing inappropriate clothes, malnutrition), and noticing family dynamics during routine interactions with parents[1].

Most abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

Definitions of abuse are complex and usually based on child-rearing behaviors, gender and role responsibilities, and social expectations of different cultures throughout the world. The primary determination of abuse is that it occurs within a relationship that is used to meet the needs/desires of the more powerful person without concern for the needs of the child.

It is important to note that physical or behavioral indicators in and of themselves do not necessarily constitute abuse or neglect. Together with other indicators, however, such as family dynamics, they may warrant a referral. A list of possible indicators is given in Annex 1 to this Handbook. Some of the indicators listed may not be immediately visible or apparent, except to a trained professional or health care giver. Most adults and peers, however, should be able to identify changes in behavior that are not age-appropriate developmentally, such as the formation or avoidance of relationships, emotional reactions, and obvious physical symptoms, etc.

For the purposes of definition, the following categories of abuse are generally accepted:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

There are, however, other areas of safeguarding concern that are becoming more prevalent and should be considered:

- Peer-on-Peer abuse
- Depression, anxiety, and Deliberate Self-Harm (DSH)
- Cyber Bullying and online threats
- Sexual Exploitation
- Criminal /Commercial Exploitation

[1] Section III: Psycho-Social Aspects, Manual on Safety and Security of Children in Schools, National Commission for Protection of Child Rights.

3.02.01 Physical Abuse

Physical abuse of a child is defined as the intentional use of physical force against a child that results in — or has a high likelihood of resulting in — harm for the child's health, survival, development, or dignity. This includes hitting, beating, kicking, throwing, shaking, biting, strangling, scalding, burning, poisoning, drowning, and suffocating. Much physical violence against children in the home is inflicted with the object of punishing the child. It shall also include physical harm to a child with a hand or a cane/stick, making children assume an uncomfortable position, e.g., standing on a bench, detention in the classroom, the library, or any closed space in the school, etc.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical harm also includes some cultural practices such as Female Genital Mutilation (FGM), honor killings/disfigurement, and corporal punishment. Corporal punishment includes physical punishment, mental harassment or discrimination, and all forms of sexual offenses [2] *.

Physically abused children find it difficult to relate to their peers and the adults around them. The threat of violence makes them vigilant and mistrustful, and they may be overly domineering and aggressive in their attempts to predict and control other people's behavior, or extremely reserved and withdrawn. Abused children are also vulnerable to instances of overwhelming emotional responses to everyday situations. They may be unable or unwilling to provide plausible explanations for visible signs of injury, such as bruising and burns, etc.

3.02.02 Emotional Abuse

Emotional and psychological abuse is the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or 'making fun' of what they

[2] Section III: Psycho-Social Aspects, Manual on Safety and Security of Children in Schools, National Commission for Protection of Child Rights.

say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotionally abused people are often more withdrawn and emotionally disengaged than their peers, and find it difficult to predict other people's behavior, understand why they behave in the manner that they do, and respond appropriately.

3.02.03 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (see below). Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also may be committed by a person under the age of 18 when that person is either significantly older than the victim or when the perpetrator is in a position of power or control over the child[3].

See Annex 2 for more details on the definition of and penalties for sexual abuse of children under Indian Law.

[3] Section III: Psycho-Social Aspects, Manual on Safety and Security of Children in Schools, National Commission for Protection of Child Rights.

The possibility of sexual abuse should be considered when a parent or other caregiver exhibits the following:

- Is unduly protective of the child or severely limits the child's contact with other children, especially of the opposite sex
- Is secretive, isolated, jealous, or controlling with family members
- Makes up excuses to be alone with the child
- Talks with the child about the adult's personal problems or relationships
- Tries to be the child's friend rather than assume an adult role

It is impossible to describe a typical abuser. They look and act in various ways, can be found in all areas of society, and are often well-respected members of communities. They may appear kind and caring, great with children. Abusers work hard to cultivate this image, so people will not suspect them of it, and will not believe it if they are ever accused of sexually abusing children. Extensive research indicates that:

- Nearly all child sexual abuse is committed by people known to children and families, including:
    - family members such as parents, stepparents, siblings, grandparents, aunts, uncles, and cousins
    - people in a family's circle of trust, such as friends, neighbors, teachers, or coaches.
- Most abusers are male, although females also sexually abuse children.
- Over one-third of abusers are under the age of 20.

Offenders vary in many ways. What they have in common is that they have thought about being sexual with children and have acted on those thoughts.

3.02.03.01 The Grooming Process

Grooming is a subtle, gradual, and escalating process of building trust with a child. It is deliberate and purposeful. Abusers may groom children for weeks, months, or even years—before any sexual abuse actually takes place. It usually begins with behaviors that may not even seem to be inappropriate. Grooming may include:

- Befriending a child and gaining their trust.

- Testing a child's boundaries through telling inappropriate jokes, roughhousing, backrubs, tickling, or sexual games.
- Moving from non-sexual touching to "accidental" sexual touching. This typically happens during play, so the child may not identify it as purposeful, inappropriate touching. It is often done slowly so the child is gradually desensitized to the touch.
- Manipulating the child to keep a secret about what is happening. The abuser may use a child's fear, embarrassment, or guilt about what has happened. Sometimes, the abuser uses bribery, threats, or coercion.
- Confusing the child into feeling responsible for the abuse. Children may not notice or may become confused as the contact becomes increasingly intimate and sexual.
- Grooming may be done online by building an emotional connection with a child for the purposes of sexual abuse or exploitation. This may include enticing, manipulating, or threatening a child into performing sexual acts in front of a webcam, or disseminating child sexual exploitation material online[4].

How abusers groom adolescents:

- Identifying with the adolescent. The abuser presents himself as the only one who understands him or her.
- Displaying common interests in sports, music, video games, etc.
- Recognizing and filling the adolescent's need for affection and attention.
- Allowing or encouraging the adolescent to break rules (e.g., smoking, drinking, using drugs, viewing pornography).
- Communicating with the adolescent outside the person's role (e.g., teacher or coach), including texting and emailing without parents' knowledge.

[4] Being Safe Online- Guideline and Standard content for raising awareness among Children, Parents, Educators and General Public, National Commission for Protection of Child Rights (NCPCR) has proposed action for schools, accessible at 16613370496305fdd946c31_being-safe-online.pdf

3.02.04 Domestic abuse

Domestic abuse and family harm can encompass a wide range of behaviors and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

3.02.05 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical/dental care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

It is a condition of admission that all students attending AES reside with parents or a legal guardian in Delhi. Children who are left at home alone or with inadequate adult supervision are considered to be at risk. Older siblings who are still at school are not considered adequate caregivers in the absence of parents or other legal guardians.

3.02.06 Peer-on-Peer Abuse

Children can abuse other children (often referred to as child-on-child abuse), and it can happen both inside and outside of school and online. It is essential that all adults understand the importance of challenging inappropriate behaviors between children that are abusive and inappropriate in nature, examples of which are listed below. Downplaying certain behaviors, for example, dismissing sexual harassment as "just banter", "just having a laugh",

"part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviors, an unsafe environment for children, and in worst case scenarios a culture that normalizes abuse leading to children accepting it as normal and not coming forward to report it. Other activities, such as consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, but children still need to know it is illegal, whilst non-consensual sex is illegal and abusive.

Peer-on-Peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based, and discriminatory bullying).
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens, and/or encourages physical abuse).
- Sexual violence such as rape, assault by penetration, and sexual assault; (this may include an online element which facilitates, threatens, and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse, or humiliation used as a way of initiating a person into a group and may also include an online element).

3.02.07 Anxiety, Depression, and Self-harm

Many factors are contributing to a rise in anxiety, depression, and deliberate self-harm amongst youngsters. While these may be an indication of some other form of abuse, frequently they are responses to the world in which children are growing up.

Depression is a serious mental health condition that can cause a person to feel sad, hopeless, and lose interest in activities for long periods of time. Depression can affect people of any age, including children. Although children naturally have mood swings as they grow and develop, depression is different. The disorder can affect how children interact with friends and family. It may prevent them from enjoying school, sports, hobbies, or other normal childhood activities.

In children, depression and anxiety often go hand in hand. Anxiety is a medical condition that causes feelings of fear, panic, or worry about everyday situations. Sometimes, depression or anxiety in children gets chalked up to "growing pains"; however, any episodes that last more than two weeks should be referred to a healthcare professional.

Depression and anxiety are among the most common mental health disorders in children. According to the Centre for Disease Control (CDC):

- 9.4% of children aged 3-17 years (approximately 5.8 million) had been diagnosed with anxiety in 2016-2019.
- 4.4% of children aged 3-17 years (approximately 2.7 million) had been diagnosed with depression in 2016-2019.

Further research suggests that rates of depression and anxiety in children were higher during the COVID pandemic and have yet to normalize back to pre-pandemic levels.

Deliberate self-harm (DSH) is a behavior in which a person commits an act with the purpose of physically harming themselves, with or without the real intent of committing suicide. Teenagers use a number of DSH methods, most commonly cutting, poisoning, and overdosing. Younger children generally scratch or bite themselves.

Research has identified various conducive factors (e.g., peers, school, family, religious milieu) that affect suicidal ideation and self-harm in adolescents.

Recent research links the aggravated effects of bullying (including cyberbullying) to DSH and suicidal ideation.

Research reveals that non-suicidal DSH in adolescents reflects underlying hopelessness and low self-esteem as well as other factors that precipitate attempts to deal with unacceptable inner feelings and/or affect the behaviors of others, such as peers or family members.

Low self-esteem, anxiety, depression, and forms of abuse can also be the cause of eating disorders in adolescents, and DSH and suicide ideation are frequently symptomatic of eating disorders.

3.02.07.01 Substance Abuse

Anxiety, depression, abuse, exploitation, or exposure can lead to substance abuse by children (smoking, vaping, drugs, or alcohol), which is another form of self-harm that can have a considerable detrimental impact on a child's wellbeing and academic performance. Vaping, in particular, is becoming increasingly popular with students and is being exploited by suppliers with many vapes containing high nicotine and/or other addictive drugs.

3.02.07.02 Suicide Ideation

Growing up comes with many challenges. Children and young people often feel pressure to fit in, make friends, do well at school, and discover who they are. And sometimes these challenges can start to feel overwhelming.

Serious case reviews have identified the following factors that can make children more vulnerable to suicide:

- Mental health issues.
- Bullying and cyberbullying.
- Social isolation.
- Self-harm.
- Perceived or actual pressure to achieve.
- The breakdown of relationships, including loss or bereavement.
- The experience of abuse, both recent and non-recent.

Case reviews also found that professionals often wrongly dismiss children's suicide talk and other warning signs of teenage suicide as typical adolescent behavior. Warning signs can include talking or writing directly or indirectly about suicide, withdrawing from friends and family, self-harm, sudden mood swings, a decline in personal hygiene, clearing out or deleting social media accounts, and feelings of rejection or failure. *

3.02.08 Cyber Bullying

Cyberbullying is bullying that takes place over digital devices like cell phones, computers, and tablets. Cyberbullying can occur through SMS, Text, and apps, or online in social media, chat forums, or gaming, where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else, which can cause embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behavior, such as extortion and blackmail.

With the prevalence of social media and digital forums, comments, photos, posts, and content shared by individuals can often be viewed by strangers as well as acquaintances. The content an individual shares online – both their personal content and any negative, mean, or hurtful content – creates a permanent public record of their views, activities, and behavior. This public record can be thought of as an online reputation, which may be accessible to schools, employers, colleges, clubs, and others who may be researching an individual now or in the future. Cyberbullying can harm the online reputation of everyone involved – not just the person being bullied, but those doing the bullying or participating in it.

Cyberbullying has unique concerns in that it can be:

- **Persistent –** Digital devices offer the ability to immediately and continuously communicate 24 hours a day, so it can be difficult for children experiencing cyberbullying to find relief.
- **Permanent –** Most information communicated electronically is permanent and public, if not reported and removed. A negative online reputation, including for those who bully, can impact college admissions, employment, and other areas of life.

- **Hard to Notice –** Because teachers and parents may not overhear or see cyberbullying taking place, it is harder to recognize.

3.02.09 Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a type of sexual abuse. It happens when a child or young person is coerced, manipulated, or deceived into sexual activity in exchange for things that they may need or want, like gifts, drugs, money, status, and affection. Children and young people are often tricked into believing they're in a loving and consensual relationship, so sexual activity may appear consensual. They may trust their abuser and not understand that they're being abused. CSE does not always involve physical contact and can also occur through the use of technology.

Sometimes abusers use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid, or use financial abuse or blackmail to control them.

Anybody can be a perpetrator of CSE, no matter their age, gender, or race. The relationship could be framed or viewed as friendship, someone to look up to, or romantic. Children and young people who are exploited may also be made to 'find' or coerce others to join groups.

Child sexual exploitation is a very complex form of abuse. It can be difficult for parents and carers to understand, and hard for the young person to acknowledge that they are being exploited.

3.02.09.01 Types of child sexual exploitation

CSE can happen in person or online. An abuser will gain a child's trust or control them through violence or blackmail before moving on to sexually abusing them. This can happen in a short period of time.

When a child is sexually exploited online, they might be persuaded or forced to:

- Send or post sexually explicit images of themselves.
- Film or stream sexual activities.
- Have sexual conversations.

Once an abuser has images, videos, or copies of conversations, they might use threats and blackmail to force a young person to take part in other sexual activity. They may also share the images and videos with others or circulate them online. This is a growing area of risk for young people, with perpetrators being located anywhere in the world but able to engage anonymously with their victims through social media.

Children or young people might be invited to parties or gatherings with others their own age or adults and given drugs and alcohol. They may be assaulted and sexually abused by one person or multiple perpetrators. Sexual assaults and abuse can be violent, humiliating, and degrading. It's important to remember that an intoxicated person cannot give consent to sexual activity.

3.02.10 Child Criminal (Commercial) Exploitation (CCE)

At a basic level, commercial exploitation of children can be a matter of simply getting them involved in substance abuse (drugs, tobacco, vaping, and liquor, etc.) as "customers" who become addicted to a product. More serious forms of CCE can include children being forced or manipulated into selling or transporting drugs or money, and similar illegal activities.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. They may still have been criminally exploited even if the activity appears to be something they have consented to.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognized by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. In this regard, the JJ Act provides the legal framework for children found to be in conflict with the law. Further, Section 95 of the BNS criminalizes hiring, employing, or engaging a child to commit an offense.

It is important to note that the experience of girls who are criminally exploited can be very different from that of boys. The indicators may not be the same; however, professionals should be aware that girls are at risk of criminal

exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Extreme cases of CCE include trafficking, kidnapping and ransom, radicalization, etc.

3.03 Globally Transient Students

Globally, transient students are particularly vulnerable to many of these safeguarding issues in that:

- The family unit does not have the immediate support of a wider community of friends and extended family.
- New students can feel isolated and alone when arriving at a new school.
- Many students face considerable pressure to succeed and possibly overachieve.
- Access to suitable professional mental health and counseling support when needed can be very limited.

AES recognizes the importance of the school in identifying and supporting students facing these challenges. Teachers are in a unique position to notice changes in behavior, observe possible signs of abuse, overhear or witness peer-on-peer interactions, or be seen as a trusted adult to whom a disclosure can be made. School counselors are frequently required to provide triage support to both students and families in place of referrals to social services or child protection services in a home country, while making referrals to suitable external professionals where available and appropriate.

4.0 Comprehensive Program

At AES, the Child Safeguarding Leadership Team (CSLT) is responsible for ensuring that AES has an up-to-date and comprehensive, proactive approach to child safeguarding in line with Board Policy that includes:

- Defined roles and responsibilities for child safeguarding.
- A comprehensive screening program for employees and visitors.
- Contractual agreements and commitments.
- Comprehensive training for the various stakeholders.

- Clear and comprehensive policies and procedures relating to all aspects of child safeguarding, including reporting, recording, and responding to reports of concern.
- A commitment to ensuring a safe physical and digital environment.
- Establishment of Community Partnerships to provide additional resources and support.
- An annual process of measurement, self-monitoring, and audit.

The AES Child Safeguarding Policy works for the Child, Parents, and Community.

Research indicates that international communities are as prone to child abuse as other communities. Child abuse is a multifaceted issue that involves the dynamics of the child, the family, and the community. Child Safeguarding at AES works to respond at all three levels.

The Child At Risk includes those with difficult temperament, defiance, health issues, social or academic difficulties, and those unaware of their right to protection.

> AES – seeks to teach children personal safety skills, encourages healthy relationships, provides interventions, and promotes respect.

The Family At Risk includes parents under stress, families with perceived less support and access to resources, socially isolated, unusually high expectations for their children to succeed, and a parental history of inappropriate discipline as children.

> AES – seeks to work with parents to understand appropriate discipline, networks with the community and health services, and teaches parents child protection practices.

The Community At Risk characteristics include limited laws on child protection, limited resources to expat families, unusually high work stress placed on parents, acceptance of inappropriate behaviors towards children (excessive corporal punishment), and unusually high expectations placed on children to achieve.

AES - Strictly implements the Child Safeguarding Policy, trains teachers to recognize abuse, trains counselors in supporting families, trains and supports parents in safeguarding behaviors, networks with community and health services for holistic referrals, and networks with local authorities.

5.0 Organizational Roles and Responsibilities

AES has established a Child Safeguarding organizational structure, which includes:

- Board Member with special responsibility for child safeguarding – Safeguarding Trustee.

- Strategic Safeguarding Lead (SSL): Director.
- Deputy Strategic Safeguarding Lead (DSSL): Director of Teaching and Learning.
- Designated Safeguarding Lead (DSL)
- Deputy Designated Safeguarding Leads (DDSL): Director of Student Support Services and Director of Activities and Athletics.
- Senior Child Safeguarding Officers (SCSOs): Divisional Principals.
- Child Safeguarding Officers (CSOs): Divisional Assistant Principals and Counselors.
- Child Safeguarding Coordinators (CSCs): other departmental heads and school-wide leaders who are responsible for departmental operational procedures that need to consider child safeguarding.

The Child Safeguarding Leadership Team is comprised of:

- Strategic Lead (as required)
- Deputy Strategic Lead (Chair)
- Designated Safeguarding Lead
- Deputy Safeguarding Lead
- 3 Senior Safeguarding Officers – representing each division

This group normally meets monthly and is responsible for the tasks outlined below. These tasks also include arranging quarterly school-wide Child Safeguarding meetings, which include all divisional CSOs (counselors and assistant principals) and CSCs (IT, Security, HR, Nurses, etc.) to socialize procedures, strengthen knowledge and understanding through training and case reviews, and to get feedback on the effectiveness of operational procedures or highlight concerns. Additionally, the Safeguarding Trustee is invited to attend.

5.01 Role of the Board

The Board of Governors provides strategic oversight of safeguarding but does not involve itself in the day-to-day management of child safeguarding in the school. It:

- Appoints a member of the Board as the Child Safeguarding Trustee.
- Receives child protection induction and is required to undertake online training.
- Owns safeguarding as a standing item on the Board agenda (as part of the Director's report).
- Determines the school's Child Safeguarding Policy as defined in the Board Policy Manual.
- Receives a safeguarding report at least annually from the school's Strategic Safeguarding Lead, including anonymous data indicating possible trends, etc.
- Issues an annual safeguarding statement as part of an annual report.

- Receives and reviews any allegations of abuse against the Director.

The Child Safeguarding Trustee's role is to ensure that the Board is properly informed about the school's approach to child safeguarding, including annual reporting, training, and overall compliance with Board policy.

CHILD SAFEGUARDING ORGANISATION STRUCTURE

American Embassy School

Board
Board Chair

Child Safeguarding Trustee

CHILD SAFEGUARDING LEADERSHIP TEAM

Strategic Safeguarding Lead (SSL)
Director

Designated Safeguarding Lead (DSL)
Appointee

Deputy Strategic Safeguarding Lead (DSSL)
Director of Teaching & Learning

Deputy Strategic Safeguarding Lead (DSSL)
Director of Student Support Services

Deputy Strategic Safeguarding Lead (DSSL)
Director of Activities and Athletics

Senior Child Safeguarding Officer (SCSO)
HS Principal

Senior Child Safeguarding Officer (SCSO)
MS Principal

Senior Child Safeguarding Officer (SCSO)
ES Principal

Child Safeguarding Officer HS
Assistant Principal / Counsellors

Child Safeguarding Officer MS
Assistant Principal / Counsellors

Child Safeguarding Officer ES
Assistant Principal / Counsellors

HS Child Safeguarding Team

MS Child Safeguarding Team

ES Child Safeguarding Team

ROC involving a member of staff should be made to SSL or DSSL.

If ROC concerns the Director, it should be made to the Board Chair and DSL

Report of Concern (ROC) about a student at AES should be reported to a member of the divisional Child Safeguarding Team. Any other ROC should be made to the DSL / DDSL

5.02 Role of the Child Safeguarding Leadership Team (CSLT)

The role of the CSLT is to ensure a comprehensive child safeguarding program is in place and to monitor its effectiveness annually. The CSLT generally meets monthly to review and update guidelines and procedures, to monitor reporting data, and assess training needs, etc. Minutes of CSLT meetings are recorded and shared with the team.

Specific tasks include:

- Ensuring a comprehensive child safeguarding program of procedures and protocols is in place in compliance with Board Policy.
- Working within the school's existing structures to ensure the development and adoption of a child safeguarding curriculum to meet the school's needs.
- Ensuring the child safeguarding curriculum is taught and reviewed annually.
- Supporting teachers and counselors in implementing the child safeguarding curriculum.
- Developing and scheduling training for all employees who have direct/indirect contact with students regarding the child safeguarding program.
- Developing and guiding parent education programs to support understanding of the objectives and goals of the policies, procedures, protocols, and curriculum.
- Convening Child Safeguarding workshops for counselors (CSOs), senior leadership team, and departmental managers covering socialization of policy and procedures, undertaking case reviews to assess effectiveness of procedures, higher-level training, and providing feedback.
- Reviewing and updating policies, procedures, protocols, training needs, and curriculum annually.

5.03 Role of the Strategic Safeguarding Lead

It is the responsibility of the Strategic Lead to create a climate and culture where students can thrive. They have a duty to:

- Report to the Board of Governors that systems and structures are in place to safeguard and promote the welfare of students in accordance with Board Policy.

- Include Child Safeguarding as a standing agenda item in their monthly report to the Board, and update the Board of Governors on crisis or risk situations.
- Read, understand, and comply with national/local statutory regulations and guidance related to the safety and well-being of students.
- Establish relationships and reach out to international agencies and authorities to gain support when managing concerns and disclosures of abuse.
- Ensure that AES has effective "safer recruitment procedures" in place and that these are fully adhered to, reviewed, and updated.
- Commission external audits/consultancy reviews of the school's safeguarding procedures as appropriate.
- Receive and review the results of all background checks.
- Reviewing HR records periodically to ensure that records are up to date and properly maintained.
- Receive directly any reports of concern that involve AES employees as possible perpetrators.
- Oversee the work of the Child Safeguarding Leadership Team, and ensure that the Child Safeguarding Handbook is reviewed and updated yearly
- Participate in major case reviews where an internal inquiry or external investigation is required at the request of the Designated Safeguarding Lead, particularly in cases that may cause reputation damage to the school.
- Manage the Crisis Response Process in the event of a major child safeguarding incident.
- Manage the involvement of outside law enforcement, sponsoring organizations, or crisis management agencies.

The Deputy Strategic Safeguarding Lead (DDSL) is tasked with deputizing for the Strategic Lead during periods of absence, particularly in the event of an urgent case review or an employee misconduct report. The Deputy may also be tasked with leading an internal investigation. The DDSL is specifically tasked with ensuring that a K-Grade 12 Child Safeguarding curriculum is in place.

5.04 Role of the Designated Safeguarding Lead

The role of the Designated Safeguarding Lead is to:

- Promote best practice in child safeguarding.
- Undergo regular training to ensure their safeguarding knowledge is up to date and in line with new guidance.
- Ensure that the school's safeguarding policies and procedures are up to date, and that everyone with safeguarding duties is aware of any updates.

- Ensure that all employees, volunteers, and other members of the community are fully trained in safeguarding annually.
- Be available to all employees to discuss any safeguarding issues or concerns.
- Review all reported concerns and ensure relevant Divisional CSLT teams are taking appropriate action to follow up on concerns relating to their students, participating in "green Room" meetings when deemed necessary.
- Regularly review the casework of the Divisional CSLT teams to ensure that follow-up action was appropriate and effective, and that proper records have been maintained.
- Maintain a register of "Students of Concern" – students (and siblings) who have specific safeguarding needs or vulnerabilities.
- Prepare regular reports for the CSLT on the number of ROCs, trends, and other indicators that may indicate specific areas of focus.
- Assisting the Board Chair in the event that there is a Report of Concern made against the Director.
- Manage the screening and evaluation of outside agencies to whom CSOs may refer children and families for further support.

The Deputy Designated Safeguarding Lead is tasked with deputizing for the Designated Safeguarding Lead during periods of absence. In particular, the DDSL is responsible for managing the implementation, socialization, and use of the digital reporting system, CPOMS, and for collating and presenting statistical and trend data from this system to guide the CSLT's work.

5.05 Role of Senior Child Safeguarding Officers (SCSO)

The SCSOs, being the Principal in each Division, are responsible, in the first instance, for leading Divisional Child Safeguarding Teams comprising the Assistant Principal and Divisional Counselors and directing the operational responses to reports of concern or disclosures by:

- Receiving and reviewing all Reports of Concern that have been logged into the system.
- Convening the "Green Room" protocol with at least two divisional Child Safeguarding Officers as a Case Team.
- Ensuring that a Case Team Leader is assigned where further action is deemed necessary.
- Referring cases to, or seeking advice from, the Designated Safeguarding Lead where appropriate.

- Notifying the Strategic Safeguarding Lead when cases involve allegations against a member of staff or are serious enough to pose a reputational risk to the school.
- Developing and maintaining appropriate risk assessment and safeguarding protocols for all off-campus activities.
- Collaborating to ensure consistent, unified messaging across divisions regarding child safeguarding.

5.06 Role of Child Safeguarding Officers

Individual CSOs are responsible for:

- Receiving verbal or written reports of concern relating to students in their division.
- Recording all reports received in accordance with reporting procedures.
- Initiating follow-up action where appropriate or as directed by either the Senior Child Safeguarding Officer or the Designated Safeguarding Lead.

In most instances, follow-up action by CSOs on an ROC will be:

- Principals will meet with parents to follow up on any reports and address any "disciplinary" issues involving students deemed "perpetrators".
- Counselors will generally work with students who are considered "victims" or whose well-being and mental health are of concern.

Where appropriate, Counselors will attend parent meetings to advocate for the student.

5.07 Role of Child Safeguarding Coordinators (CSC)

CSCs are members of the senior leadership team, heads of department, and other senior personnel with operational responsibility for specific activities that are impacted by, or should consider, child safeguarding ramifications. They are expected to meet quarterly with a view to:

- Being trained to Level 2 and possibly Level 3.
- Being fully conversant with AES's CS procedures and helping socialize these within their own departments.
- Reviewing and considering departmental operating procedures through the lens of "child safeguarding" – making recommendations to or seeking the advice of the CSLT.

- Providing feedback to the CSLT based on operational experience.

CSCs are not expected to act as a CSO in the event of a Report of Concern, but should direct any such concern or query to an appropriate divisional CSO or the DSL in the case of a report concerning a child who is not at AES.

5.08 Confidentiality versus Disclosure

The relationship between counselor and student is unique, and positive rapport and trust are essential ingredients to building a therapeutic relationship. The counselors will honor students' privacy and confidentiality to the extent possible, within the limits of ethical and legal constraints. Limits of confidentiality include any indication of harm to self or others and any indication of neglect or abuse. Section 23 of the Mental Healthcare Act, 2017, provides the right to confidentiality to a person with mental illness and specifies some exceptional circumstances wherein such confidential information may be released, such as to protect another person from harm or for public safety. Counselors will also consider the benefits of sharing, usually with a student's permission, relevant information with select teachers and/or administrators on a 'need to know' basis.

In the absence of appropriate child protective services, Counselors will discuss their concerns with the SCSO and DSL before meeting with parents. AES reserves the right to withhold disclosure to parents if it is considered that such disclosure would increase the risk of harm to the child.*

All employees have signed contractual undertakings to maintain confidentiality regarding AES's business. Data Protection and Privacy regulations under GDPR also place a responsibility on the organization to keep personal details private. While this extends to ensuring that confidential matters relating to staff and students are not discussed with anyone outside the organization, those within the organization have a Duty of Care to keep students safe. Therefore, all employees have an ethical and legal obligation to report to an appropriate person (as defined above) or authority if there is any indication of harm to self or others as defined in this handbook. Disclosure is paramount when keeping a child safe and overrides confidentiality.

6.0 Safer Recruitment, Employment and Training

It is the school's responsibility, within reason, to ensure that its employees are suitable people to work with children. AES takes this responsibility very seriously. AES implements several layers of suitability and child safeguarding checks during its recruitment process with the aim of ensuring that:

- Candidates with a criminal record or concerns about their suitability to work with children are not considered for or offered a position at the school.
- Successful candidates agree to assume responsibility for Child Safeguarding during their employment at the school.
- AES maintains appropriate records that may be required for future investigations or inquiries.
- All newly selected teachers and staff must also provide a signed affidavit to the educational institution that they have not been accused of an offense under the POCSO and JJ Act[5]. See below.

AES partners with several recruitment agencies (ISS, Search, and CIS) to ensure that the reference checks and background screening conducted by these agencies complement AES's recruitment protocols.

The school seeks to establish a comprehensive, secure, transparent, and centralized record-keeping system to maintain and retain safeguarding-related documentation for all faculty and staff, in accordance with applicable legal requirements. The school's central safeguarding register is reviewed quarterly by the Designated Safeguarding Lead.

6.01 Safer Recruitment Process

AES seeks to ensure that all employees at the school are verified as being suitable to work with children by:

- Undertaking appropriate reference and background checks on prospective employees
- Ensuring that those conducting recruitment interviews are trained in safer recruitment interviewing techniques to probe a candidate's attitude towards child safeguarding and their suitability to work with children.

[5] Section III: Psycho-Social Aspects, Manual on Safety and Security of Children in Schools, National Commission for Protection of Child Rights.

- Embedding a contractual commitment to child safeguarding within employment contracts, including disciplinary action arising in cases of misconduct.

AES is currently reviewing and revising its "Safer Recruitment Process" to ensure that child safeguarding remains an integral part of all stages of the recruitment of new employees. The aim is to deter potential perpetrators from applying to AES by making it clear that Child Safeguarding is central to the school's ethos.

6.01.01 Disclosure and Consent

All successful applicants will be required to complete a comprehensive "Disclosure and Consent Form" which is used to assist with the background screening of candidates before a formal contract of employment is issued. Modified versions will exist for local staff and visitors who are likely to be working with students without full-time supervision. See Annex 3. This meets the requirements for a "signed affidavit" as set out above.

Disclosure and Consent requires that prospective employees:

- Make a self-disclosure of anything that might preclude them from being a suitable person to work with children
- provide sufficient, accurate information by which such a declaration might be verified
- Give consent to AES to use that information to make such inquiries as are deemed appropriate to verify and validate that the candidates meet AES's safer recruitment standards.

A copy of a Disclosure and Consent Form for such screening is referenced in Annex 2. This may be modified to reflect the specific requirements of the screening agency.

Part-time or temporary employees will be subject to appropriate background checks depending on their expected length of service and role. Similarly, visitors (including parents) who are expected to be on campus for a day or more and will be interacting with students without an AES employee present (e.g., consultants) will also be required to complete a modified Disclosure and Consent Form.

6.01.02 Background Screening

As per Section 3(4) of the POCSO Rules 2020, schools must ensure periodic police verification and background checks for every employee, teaching or non-teaching, regular or contractual, or any other person who is an employee of such Institution and comes into contact with the child. They shall also ensure that periodic training is organized to sensitize them on child safety and protection.

The verification and validation of data required to assess the suitability of candidates being considered for employment with AES includes:

- Verification of Identity
- Verification of Qualifications
- Verification of Employment History (10 years)
- Criminal Background checks by external agencies (in all countries where applicants have been resident for more than 6 months over the last 10 years), including any Sex-Offender Registers or applications through civil legal processes that seek to prevent a person working with children and young people.

Additionally, follow-up checks within the employee's home country of record are required every five years thereafter for as long as the employee is employed by AES

6.01.02.01 Expatriate Staff

AES has appointed Skoolspot to conduct background screening for all successful expatriate applicants prior to issuing contracts of employment as part of the onboarding process.

The specific background checks conducted by Skoolspot are based on the screening requested by AES for each individual. This includes criminal checks in previous countries of residence and checking the Global Watchlist and social media.

New employees are also required to provide Police Clearance Certificates from their last place of employment (issued within 6 months of leaving).

6.01.02.02 Host Country Employees

AES has appointed Securitas to undertake full background checks of Indian nationals applying for employment. These background checks cover residential neighborhood, employment, and criminal screening.

6.01.03 Interviewing and Reference Checks

AES undertakes to conduct at least two in-person reference checks (phone or Zoom) with previous employers (normally the Heads of School) to ensure that there is an opportunity for opinions to be expressed which might not otherwise be put in writing.

Any issues of concern are followed up on during the interview process. A list of questions has been developed to probe a candidate's attitudes and experiences regarding child safeguarding, and these form an integral part of the interview process.

Examples of the questions are given in Annex 4.

6.02 Employment

6.02.01 Contracts of Employment

The AES Contract of Employment specifically references the employee's obligation to abide by the school's Code of Conduct.

The Contract of Employment also references the Board Policy Manual, Employment Handbooks, and the Employment Code of Conduct as integral to the conditions of employment.

6.02.02 AES Safeguarding Agreement

Each year, all AES personnel are required to demonstrate their understanding of the school's expectations regarding child safeguarding by signing the AES Child Safeguarding Acknowledgement (Annex 5), which forms an integral part

of their Contract of Employment with AES. The Child Safeguarding Agreement applies to the internal and extended communities, including, but not limited to, employees, parents/guardians, contractors, subcontractors, consultants, Board Members, and guests.

6.02.03 Employment Handbook – Expectations for Employee Conduct

It is important to acknowledge that employees' public and private conduct can inspire and motivate those with whom they interact and/or cause great harm if inappropriate. Employees must, at all times, be aware of the responsibilities that accompany their work.

Employees should be aware of their own and other people's vulnerability, especially when working alone with students, and be particularly aware that they are responsible for maintaining physical and emotional boundaries in such interactions. They must avoid any covert or overt sexual behaviors or language with those for whom they have responsibility. This includes seductive speech or gestures as well as physical contact that exploits or harasses.

They must show prudent discretion before touching another person, especially students, 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. On occasion, it may be necessary to physically restrain a child in danger of hurting themself or others, or to assist a child with hygiene matters. Such contact should be verbally signaled in advance (and consent given if possible) and reported in an ROC afterward.

AES personnel are prohibited at all times from physically disciplining a child.

Physical contact with students 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. One-on-one meetings with students are best held in a public area - in a room where the interaction can be observed - or in a room with the door left open. Classroom windows should not be covered.

School-sponsored overnight trips must have sufficient chaperones who take into account the gender diversity of the student group and provide adequate coverage in the event that a chaperone must leave the trip for any reason, such as escorting a sick child home.

Communication with students is governed by the key safety concept of transparency. Employees should be mindful of the following guidelines:

- Electronic communications with students are to be made whenever possible using a school email or another communication platform. Any electronic communication that takes place over a school network may be subject to review and/or monitoring.
- When using other electronic communication modes, messages should relate to a student's school life. Only group messages should be sent with at least two adults included in the group.
- Employees should not engage with individual current students or recently graduated students on social media platforms.

AES employees should be very cautious when discussing sensitive topics with students (e.g., of a sexual nature). If such conversations occur, a counselor should be informed immediately. AES employees should never agree to or suggest that confidential discussions be kept from school officials or parents when these involve potential abuse.

AES personnel should not smoke or use nicotine products, possess or be under the influence of alcohol or illegal drugs, or make inappropriate reference to the personal use of such, in the presence of students while in a professional capacity (this includes sporting events, "Week without Walls," and any other school-endorsed trips).

Employees should never buy alcohol, drugs, tobacco, e-cigarette paraphernalia, or inappropriate video/reading material to give to students. Employees should be cautious about accepting gifts that may indicate an inappropriate relationship. If this occurs, they should meet with their Principal or DSL.

Employees are mandated to report any concerns about a child to a Child Safeguarding Officer (see "reporting abuse and next steps"). Reports should be made immediately and within 24 hours of witnessing an incident or registering a concern. In the event of a

disclosure by a student, concern that an employee is involved, or consideration that a child is in immediate danger of harm, then a report to a CSO should be made immediately. The reporter's name will be kept confidential if at all possible.

6.03 Contractors, Vendors, and Visitors

In addition to AES employees, there are groups of adults who have unsupervised access to the campus and therefore to students. Before any non-employee is given unsupervised access to the campus, the following requirements are in place:

- All contractors and vendors are required to have/supply up-to-date police clearance certificates as part of their background checks.
- Those working on campus (coaches, volunteers, security guards, catering staff, etc.) are also required to complete a "Self-Disclosure Form, undergo the basic child safeguarding training, and sign an acknowledgment of the Child Safeguarding Agreement annually.

7.0 Training and Education

7.01 Employee Training

7.01.01 Basic

Basic child safeguarding awareness training is required for all Indian staff, regular volunteers, coaches, contracted staff, and vendors. This is delivered online via ChildSafeguarding.com. This training is available in several local languages as well as English. This certificated training is valid for two years. This training is supplemented by face-to-face training delivered by school counselors at the start of each year.

7.01.02 Level 1

Training to Level 1 is delivered to all those who have direct student contact, including teachers, instructional assistants, and Administrators. At present, this training is delivered online via ChildSafeguarding.com, a recognized, certified

online training course that issues official certificates upon satisfactory completion every 2 years. Training is also supplemented by counselors and other CSLT members once each semester.

7.01.03 Level 2 and Level 3 / Specialist Training

Training at Level 2 / 3 is delivered to all members of the CSLT, CSOs, and other departmental managers by an external consultant every three years:

7.01.03.01 Level 2

This comprehensive training is for employees who work with children, young people, and families. It covers the three Rs of recognition, response, and recording. Topics include child abuse, neglect, physical abuse, emotional abuse, and sexual abuse. This may include the health care team and those who have responsibilities as a safeguarding coordinator (CSC), such as the IT director.

7.01.03.01 Level 3

This training is for employees who work with complex cases and have child protection responsibilities, including those related to safer recruitment. It covers a broader range of topics than levels 1 and 2 and prepares staff for unsupervised work.

7.02 Governance and Leadership Training

Board members undergo biennial training in Governance and Leadership relating to Child Safeguarding via ChildSafeguarding.com. Additionally, new members are onboarded using online learning. The safeguarding trustee may be required to undergo further training as deemed necessary.

7.03 Training Records

Records of each employee's annual training are maintained by the HR Department. Separate arrangements are made to ensure employees who start part-way through the year receive the same level of training as those who are trained at the beginning of the year.

The Designated Safeguarding Lead is required to verify that all personnel have undertaken the required training annually by reviewing the training records with the HR Manager.

7.04 Student Curriculum

Research shows that age-appropriate personal safety/abuse prevention programs for children are successful when they are based on the most current research in prevention education.

Child safeguarding education aims to assist students in developing skills in:

- Recognizing and responding to unsafe situations
- Seeking assistance effectively
- Establishing and maintaining non-coercive relationships and strengthening attitudes and values related to equality, respect, and responsibility

The Director of Teaching and Learning is responsible for ensuring a comprehensive, age-appropriate curriculum for Child Safeguarding, developmentally sequenced from Pre-K to Grade 12. The curriculum is currently under review and development in conjunction with divisional counselors who are responsible for curriculum delivery within their respective divisions. The objective is to ensure that students gain an enduring understanding of their right to be kept safe, of how to protect themselves, and of how to advocate for their own and others' safety.

The scope of the Safeguarding Curriculum is summarized in Annex 6.

The curriculum is based on the "Social Emotional Learning and Child Self-Protection Benchmarks and Standards for International Schools" developed by the US Department of State's Office for Overseas Schools in association with the Collaborative for Academic, Social, and Emotional Learning (CASEL) and International Centre for Missing & Exploited Children (ICMEC).

7.05 Parent Education

Child safeguarding at school is a partnership with parents. The school provides opportunities for parents to enhance their knowledge and understanding of:

- School policies and procedures related to child safeguarding.
- The school's curriculum in this area.
- Signs and symptoms of abuse.
- Awareness of risks to which students are exposed.
- How to talk to children and prevention strategies.
- Handling disclosure and reporting as a parent.
- Community resources.

7.06 Promotion and Communication

The following statements are posted on AES's website

Child Safeguarding

The American Embassy School seeks to be a safe haven for all members of our community. We feel a particular responsibility to protect children from child abuse and neglect. To meet this responsibility, the American Embassy School will implement educational programs for students and employees regarding personal safety, child abuse and neglect, and appropriate adult conduct with children. Furthermore, the school will implement and regularly review procedures, including hiring, security, and training practices, to ensure the safety of the children in its care. The Administration shall communicate this policy, appropriate guidelines, and educational resources to students, employees, parents, guardians, and parents/guardians of applicants.

Child Protection (under Employment)

The American Embassy School is committed to safeguarding and promoting the welfare of children and expects all employees to share this commitment. Background checks will be conducted on all successful candidates.

AES is committed to the safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. All new appointments will therefore be subject to rigorous screening to ensure they are suitable candidates to work with children and young people. This includes appropriate checks by external agencies to verify identity, employment history, qualifications, and self-declared criminal/civil offenses, as well as face-to-face interviews with at least 2 professional references from previous employers.

To assess the suitability of a prospective candidate, we must collect, share, and store personal data about each candidate in accordance with our Privacy Policy for Safer Recruitment.

AES publishes the Child Safeguarding Handbook in both English and Korean, in digital and print formats. Links to the digital versions of the handbook are available on the "My AES" Intranet sites (and on the website).

The school will develop digital and printed materials that can be posted around campus or shared with students to reinforce AES's Child Safeguarding Policies and Protocols, including, for example:

- How to report a concern.
- How to Say No to Bullying.
- How to respond to Online / Cyberbullying or grooming.

8.0 Reporting and Dealing with Reports of Concern

8.01 Step 1: Reporting a Concern

Doing Nothing is not an Option

Everyone is mandated to Report a Concern (ROC) about the well-being or safety of a student at AES to a Child Safeguarding Officer **immediately and within 24 hours. If a student makes a disclosure that indicates an immediate risk of harm, prompt intervention is required.**

A concern may be as a result of a witnessed "incident", verbal or written disclosure, or general observation. Some witnessed incidents may be of a behavioral/disciplinary nature, such as the use of bad language or inappropriate behavior, in which case the employee who witnessed the incident should deal with it immediately, and only log it as a ROC if there is a victim who may have been harmed or a perpetrator who may be displaying signs of an underlying concern of abuse or neglect. If in doubt, the person making the report should check with a CSO.

Faculty have been trained to use the TED questions in response to a student's disclosure. See below. They are not expected to "investigate" or act on the disclosure, but to report it to a Child Safeguarding Officer – normally the relevant divisional Principal, Assistant Principal, or Counselor responsible for the student.

If the ROC involves an employee as a possible perpetrator, the ROC should be made either verbally or in writing to the Director (or to the Board Chair if the ROC concerns the Director). If such a report is first made to a CSO, the report should be logged in the system, but the perpetrator's name should be given verbally to the Director. Subsequent record keeping and investigation will be limited to key members of the CSLT as a result.

Reports are generally made verbally to an SCO but may be put in writing (WhatsApp, **Slack** for faculty and staff, or email) if circumstances preclude a verbal conversation within the timescale. All reports should cover the following information as far as possible:

- Name of the student (victim).
- Name(s) of the perceived perpetrator(s).
- Names of any other witnesses.
- Detailed description of the witnessed incident /disclosure / or reason for the concern, including date, time, and location.
- A detailed, recalled transcript of any conversation with the student(s) involved.

All Reports of Concern must be digitally logged in CPOMS by the CSO or faculty to whom the report is made at the time that the report is made, so that all information is accurately recorded. It is important that there is no "censorship" exercised by the CSO, even if it is felt that the concern is not a safeguarding concern or is more disciplinary in nature. This feedback can be given at a later date if deemed appropriate by the SCSO. The divisional SCSO (Principal), DSL, and DDSL are automatically notified that a report has been logged.

All ROCs, both verbal and written, should be acknowledged by the CSO to whom the report was addressed so that the person making the report knows that it has been received and recorded. The person should be assured that the report will be reviewed by members of the CSLT and appropriate action taken, but that they will not be apprised of the outcome of any investigation, for reasons of confidentiality, unless it is deemed necessary for the ongoing safety of the child while at AES. It is important that people making reports feel valued and respected for sharing their concerns.

8.01.01 Low-level concerns policy

Although this protocol is aimed at guiding schools in responding to concerns that meet the threshold of an allegation, schools should ensure they respond robustly to all concerns about adults' behavior towards or around children, no

matter how small the concern. These concerns are often referred to as Low-Level Concerns. A low-level concern about an adult in the school is any concern, no matter how small, and even if no more than a 'nagging doubt', that an adult may have acted in a manner which:

- is not consistent with an organization's Code of Conduct
- relates to their conduct outside of work, which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of such concerns that may not, depending on the context, meet the threshold of an allegation, include:

- ignoring or disregarding guidance on safe practices
- lack of understanding or recognition of the need for clear personal and professional boundaries, as set out in the Employment Code of Conduct
- demonstrating a failure to understand or appreciate how questionable actions could adversely impact the safety and well-being of a child
- exercising poor judgment with respect to standard policy and procedure.

8.01.02 Use of CPOMS

CPOMS is the Child Safeguarding software used by AES to record and store ROC's. It can generate reports that support trend analysis. To avoid confusion and ensure consistency:

- Initial entry of ROC's by a CSO should identify whether the ROC is in response to a:
    - **Concern** is something observed or overheard that is a possible indicator of some form of harm
    - **Disclosure** is a statement from either a student, friend, or trusted adult that actual harm or threat of harm exists.

8.01.03 Responding to a disclosure by a child or young person

Adults working with children and young people must understand and know how to respond appropriately to disclosures from students, knowing that it is often very difficult for them to disclose abuse. Disclosures may relate to abuse

being perpetrated against the child, making the report or against friends or other family members for whom the child is advocating. Children and young people often cannot easily talk about an abuse problem because they may:

- Try to "forget" in order to cope.
- Worry that they will lose the love of their parents and friends.
- Fear the shame of abuse or getting in trouble for telling (especially older children).
- Fear they will be blamed, since adults are more likely to be believed than children.
- Be under threat by the offender to harm them or their family if they tell.

It is important that the adult remains calm and in control of their feelings in order to reassure and support the child or young person. If a student asks to speak about something that is worrying them, this should be in a neutral setting where it is quiet, and there will be few interruptions.

Possible ways to show care and concern:

- Listen carefully to what the child or young person is saying.
- Refrain from expressions of panic or shock.
- Reassure the child or young person that they are believed and that to disclose was the right thing to do.
- Acknowledge that it is hard to talk about such things.
- Ask open questions without putting words in the child's mouth – known as TED questions:
    - TELL
    - EXPLAIN
    - DESCRIBE
- Indicate that it is necessary to share this information with a CSO (i.e., someone who can provide advice and support). Do not promise to keep the disclosure confidential or secret since all adults have a duty of care to ensure a child is safe.
- Reassure the child or young person that they are not to blame (only if the child indicates this is what they believe).

If the child has questions or concerns that can't be immediately addressed, explain that these will be passed on to the relevant person who can assist.

A child will not be helped if:

- They are probed or guided to provide details; it is important that they can do so in their own way.

- There is an expression of anger or disgust about the alleged abuse.
- Promises are made that can't be kept, such as promising total confidentiality or that things will get better.
- There is an attempt to seek further details beyond those that the child or young person freely wants to discuss.
- The abuser is confronted.

Remember that quizzing children about details may be interpreted as disbelief. The adult's role is to support and listen to the child or young person, not to conduct an investigation.

Respect the student's confidence. This means sharing with the relevant Child Safeguarding Officer, who has a professional responsibility to support a child at risk, but not discussing the information with other staff or family members. Any as-needed sharing should be done by the Child Safeguarding Officer. Write down the basic information, in the student's words if possible. Explain to the student that the concern must be reported to a CSO. Try to let the student know that someone else also will need to talk with him/her and explain why.

If the student does not want to go home, this should be considered an emergency. Report to the Child Safeguarding Officer immediately.

8.02 Step 2: Reviewing and Responding to a Report of Concern

Once a ROC has been logged in CPOMS by a CSO, the divisional SCSO (Principal), DSL, and DDSL will all be automatically notified. The divisional Senior Child Safeguarding Officer will be responsible for:

- Determining whether further action is required in response to the reporting concern, in consultation with the DSL if necessary.
- Assigning the role of Case Officer to one of the divisional counselors as appropriate.
- Convening a Child Response Team, which comprises at least two Divisional CSOs, including an administrator and a counselor as Case Officer, and assigning follow-up action as appropriate. This may include having further conversations with the student or the person reporting the concern, or collecting data in preparation for a "green Room" discussion.
- Other staff members may be included in the Green Room discussion (IT, Health Office, Security, etc.), depending on the nature and location of the concern.

- Convening a "Green Room" meeting of the Child Response Team where the ROC is considered, together with all additional information, to assess the extent to which a child is deemed to be at risk and what further action is to be taken. Other CSO's may be invited to participate in a "Green Room" discussion depending on the nature of the concern. e.g., CSOs from other divisions.

A summary of the Green Room Protocols is given in Annex 7.

The SCSO will chair the Green Room meeting at the end of which it will be agreed which, if any, of the following actions are required:

- Meeting with parents and/or student to follow up.
- Complete a Risk Assessment. (See below)
- Recommendation for a referral to an external therapist
- Further "internal inquiries" to clarify an incident (such as interviews of witnesses, review of CCTV footage, emails, or internet searches, etc.) or appointment of an external investigation in the case of serious allegations.
- Include the student (and siblings) on the "Student of Concern" Register for ongoing monitoring.

8.02.01 Risk Assessment

Those present at the Green Room meeting will undertake a Risk Assessment to determine the perceived level of risk to the child(ren) and to guide the urgency and scope of the possible intervention. In cases of suicide ideation, the relevant Counselor will conduct a more in-depth risk assessment as to the child's likelihood to commit suicide (using the protocol developed by the American School Counselors Association or similar).

The Risk Assessment considers:

- Is the child assessed to be at risk of self-harm?
- Is the child assessed to be at risk of being harmed by others?
- Is there a concern relating to suicide ideation, and if so, has the counselor done a full Risk Assessment for this?
- Would direct intervention at this stage increase perceived risk?
- Does the school have the capacity to support the child and/or family?
- Does the team have all the information necessary to make the above assessments?

8.03 Step 3: Next Steps following a Green Room review

In situations where the Green Room assessment indicates that there is reasonable suspicion of abuse or neglect or serious concern for the child's mental health or wellbeing, a plan of action will be developed to assist the child and family. Actions that may take place are:

- Meetings with the family to present the school's concerns.
- AES provides support for the child and family.
- Referral of the student and family for external professional counseling.
- Notification to the management of the sponsoring employer of the concern with the child/family.
- Consultation with the consulate/embassy of the country of the involved family.
- Consultation with the school lawyer or another attorney.
- Consultation with or referral to local authorities according to Indian law
- Reporting to an international authority, if appropriate, via the channels listed on the International Centre for Missing and Exploited Children website.

In the situations where students and families are referred to external professional counseling, it is normal practice to get the family's permission for the school counselor and therapist to share confidential information as appropriate to ensure that the child is fully supported

In situations where there is no reasonable cause to suspect abuse or neglect, the Team will still consider whether the provision of support to the child and family would be beneficial.

It is important that follow-up activities are conducted in a manner that ensures that information is documented factually and that strict confidentiality is maintained.

Once the team has developed and enacted an action plan, they will allocate a case manager (normally the relevant Counselor) to follow up on the following, as applicable:

- Maintain contact with the child and family.
- Provide the child's teachers with resource materials and strategies for supporting the student.
- Maintain contact with outside therapists to update on the child's school progress.

8.04 Allegations involving an AES Employee

In the event that the abuse or neglect allegation involves an AES employee, the steps described above will be followed in conjunction with the following actions.

8.04.01 Investigation

- AES personnel who are involved in or accused of abuse will immediately be removed from any contact with students, and the situation will be quickly and thoroughly investigated by the school administration.
- The Director leads an internal inquiry (normally in conjunction with the Designated Safeguarding Lead) or determines whether an external investigator should be brought in. The investigator will conduct a prompt, confidential, and thorough investigation to determine whether there are reasonable grounds to believe that abuse occurred. A written report will be submitted to the Director. The school will maintain records of all investigations.

If the Director is implicated, the Board Chair will lead the inquiry/investigation and receive all reports.

8.04.02 Consequences

If the investigation indicates that there are no reasonable grounds to support allegations of abuse, the Director will issue a statement to that effect to the AES employee in question.

- AES employees who violate any of the regulations above will, at a minimum, be officially reprimanded in writing. This will take place in a meeting involving the Director and/or divisional principal, together with HR. The first offense may result in immediate termination, depending on the circumstances.
- If inappropriate behavior did exist but does not constitute abuse, the perpetrator will be subject to the disciplinary procedures set out in the Employment Code of Conduct.
- In serious cases, consideration will be given to whether the offense meets the threshold for reporting to the Indian Authorities, in accordance with the School's lawyers' advice.

AES has a duty of care and responsibility to ensure that:

- Employees are treated fairly, and any and all allegations are fully investigated to reach a conclusion.
- Employees are not forced to resign; rather, they have their employment terminated in cases where allegations have been made but not necessarily proven.
- Employees are not forced to sign non-disclosure or confidentiality agreements that prevent the transparent sharing of information about child safeguarding concerns, complaints, inquiries, or investigations.
- All employment references are honest and transparent regarding a person's suitability to work with children. If there are any concerns, the reference should indicate that the person requesting the reference should speak to the referee in person to get the full disclosure.
- Adequate records are kept securely for a determined period of time to assist with any investigation should further allegations be made, having regard to any statute of limitations under Indian or US law.

8.05 Incident Response

8.05.01 Record Keeping

The following information will be collected and filed:

- Notes from CSLT / Green Room discussions.
- Emails that pertain to the case.
- Description of action taken.
- Correspondence with the student.
- Correspondence with the student's family.
- Correspondence with external agencies.
- A timeline of events, actions, and conversations.
- Any pertinent CCTV coverage or other documentary evidence that may be necessary should follow-up legal action be required.

All documentation of the case will be kept securely by the Designated Safeguarding Lead with soft copies attached to the ROC record in CPOMS. Reports of Concerns regarding an AES employee will be handled with confidentiality and stored securely.

8.05.02 Crisis Management

Cases of alleged child abuse can cause significant reputation damage to the institution and emotional harm to the people involved, including the wider community. It is critical that, where a serious case of abuse is reported or suspected, a Crisis Management Team is convened and appropriate external support is brought in immediately to assist the school in managing the discovery and recovery process effectively for all concerned. The Director will advise the Board Chair if deemed necessary. *

9.0 Providing and Maintaining a Safe Environment

AES is committed to providing and maintaining a safe environment both on campus and during off-campus activities. This encompasses:

- Clearly stated expectations for parents /legal guardians and students
- Campus Access and Security
- Digital Access and Security
- Field Trip Risk Assessment

9.01 Expectations for Parents and Students

9.01.01 Admissions Process

As part of the application and admissions process for new students, AES seeks to identify prospective students who may be considered vulnerable, either due to special learning needs or because they were the subject of child safeguarding concerns at previous schools. The Admissions process requires referrals from the previous school(s) attended, including a counselor recommendation for Middle and High School candidates. For Pre-Kindergarten and Elementary candidates, a teacher recommendation is required, along with a response to the question: "To your knowledge, has the student been involved in a child safeguarding case?." A positive response is followed up by the appropriate Director of Student Support Services or AES

counselor to ensure that AES has the relevant information and is well-positioned to provide ongoing support as needed.

Parents are also required to sign an Enrollment Agreement, which, inter alia, requires them to confirm that:

- They have read the AES Child Safeguarding Handbook and are prepared to uphold its tenets.
- They will ensure that when they are absent for any reason, a temporary caretaker is assigned to a suitable adult and that the school is notified of such arrangements.

  We understand that our child must reside with at least one of their parents or legal guardian in the New Delhi/NCR area. Should we parents/legal guardians need to travel outside of Delhi (no longer than two weeks) our child must reside with a responsible adult, not an adult child who is attending AES. This temporary caretaker must be able to act in the child's interest medically and financially. We understand that we must have an appointed temporary caretaker before we leave New Delhi/NCR and that the information must be shared with the School in advance.

- The school has details of one or more emergency contacts who can act in "loco parentis" should a student require emergency medical care when parents are unavailable.

9.01.02 Enrolled Families

Parents are to reconfirm their commitments above during the annual re-enrollment process and to ensure that contact details, etc., are updated.

The Family Handbooks published by each division set out additional expectations which are pertinent to Child Safeguarding, including:

- Statements relating to the rights and responsibilities of students, including:
  - *Students have a right to the safety of both persons and property, including the right to safe and clean school facilities.*
  - *Students have the right to learn in an environment free of physical, emotional, psychological, and verbal harassment or bullying.*
  - *Students are expected to behave in a responsible manner that safeguards and does not endanger the health and physical or psychological well-being of others.*

- Behavioral expectations and consequences of actions, which include:
  - Verbal, physical, written, cyber, or sexual bullying.
  - Possession of e-cigarettes, vaping pens, or other illegal substances, alcohol and tobacco, weapons, etc.
- A statement relating to Harassment and Bullying – see below.
- The AES Child Safeguarding vision statement.

9.01.03 Bullying and Harassment

AES believes that every student has the right to learn without fear in an atmosphere of mutual trust and respect. Every individual is expected to be responsible for his or her own behavior, exercise self-discipline, and refrain from behavior that interferes with other students' right to learn or endangers the health or well-being of others. AES will not tolerate harassment or bullying. All incidents of harassment and bullying will be reported and investigated. In substantiated cases, the school's actions will be reported to the parents of all students involved, including the target. The school will offer a proactive, sympathetic, and supportive response to students who have been targeted, which could include, but is not limited to, counseling, mediation, or assertiveness training. The bully will also receive the understanding needed to change the behavior. All actions will be documented to track the conduct of the students involved and to assess the effectiveness of the school's interventions in enforcing its zero-tolerance policy against bullying and harassment.

Harassment is improper behavior that is directed at and/or is offensive to another student or a member of the staff, and that the student knows (or ought to know) would be unwelcome. It includes objectionable conduct, comment, or display on a one-time or repeated basis which demeans, belittles, or causes humiliation or embarrassment, and includes harassment based on grounds of discrimination which are prohibited – race, national or ethnic origin, color, religion, age, gender, marital status, sexual orientation, physical appearance, or disability.

Bullying is a form of harassment. It is improper behavior by one or more students directed at another student, offensive, and interferes with the well-being of the targeted student. It includes teasing, name-calling, threats, unwanted physical contact, or violence, often on a repeated basis, which demeans, belittles, humiliates, or frightens the other student.

Harassment and/or bullying of a student or employee of AES by a student or group of students is considered a serious violation of school rules and will result in any or all of the disciplinary consequences outlined in Policy 8.40 Student Discipline.

AES recognizes several types of harassment/bullying:

- Verbal includes name-calling, insulting remarks, verbal teasing, frightening phone calls, violent threats, extortion, taunting, gossip, spreading rumors, racist slurs, threatening electronic communications, and anonymous notes.
- Physical includes poking, slapping, hitting, tripping or causing a fall, choking, kicking, punching, biting, pinching, scratching, spitting, twisting arms or legs, damaging clothes and personal property, threatening gestures, setting fires, assault with a weapon, stealing
- Social/emotional includes excluding someone from a group, isolating, shunning, spreading rumors or gossip, arranging public humiliation, undermining relationships, teasing about clothing or looks, giving dirty looks, and aggressive stares.
- Digital sending offensive /humiliating /threatening messages or images via computer or cell phone (cyber-bullying).

9.01.01.01 Guidelines for Dealing with Reports of Bullying and Harassment

Consistent with processes for resolving other complaints or grievances at AES, reports of harassment and bullying will be resolved at the lowest level possible. Therefore, a member of the school community who believes he or she has been subjected to harassment or bullying should first consider telling the person(s) that the conduct is offensive and requesting that they stop.

If it is difficult for a student to speak directly to the person, or if the offensive behavior does not stop after the request to cease, or if the student or parent feels that they need assistance with an ongoing issue of social meanness or bullying, they should bring it to the attention of a teacher, division counselor, and/or division Principals. The situation will be assessed as either a counseling issue or a discipline issue (by the divisional principal) and referred accordingly for further action. These actions will be developmentally appropriate and may range from a session with the counselor to disciplinary meetings

with the administration. For serious or repeated incidents of misconduct, consequences may include suspension or expulsion from AES as stated in the Parent Student Handbook for each division.

Where a student is "harmed" by the behavior or the perpetrator is displaying characteristics that may need further assessment, any incident should also be reported as a ROC in case there are other similar incidents that indicate a pattern of behavior that is more concerning.

Note: A person who knowingly makes a false report of harassment and bullying may also be considered to have violated this policy and subject to the courses of action and consequences herein.

9.01.01.02 Education and Prevention

Preventing social meanness and bullying requires a thoughtful educational program. The school will include in its educational program information about social meanness and bullying, as appropriate, so that everyone understands the intent of these guidelines, appropriate ways to interact with others, and what to do if a person feels they are being affected by social meanness or bullying as defined by these guidelines.

In accordance with NCPCR's Manual on Safety and Security of Children in Schools, National Commission for Protection of Child Rights, AES seeks to provide accessible, confidential, secure and effective means of reporting incidents of bullying, for victims and for bystanders who are aware of it taking place and to identify and manage incidents of bullying, including appropriate counselling and sanctions/ punishments on those engaged in bullying.

9.02 Campus Access and Security

AES employs 3 Security Officers to oversee a team of about 80 contracted security personnel providing 24/7 security coverage, including:

- Control of access gates, including visitor and delivery screening.
- CCTV monitoring
- Campus patrols

9.02.01 AES Visitors to School Policy

All visitors (excluding parents) to the campus are required to make a prior appointment and notify the guards. Failure to make a prior appointment may result in a visitor being refused entry. All visitors are required to sign in and wear an ID badge at all times.

Parents are issued IDs that must be worn on campus at all times. Parents and their guests are welcome to visit the school – provided guests are signed in. When interested in visiting their child's class, parents are required to make advance arrangements with the teacher, as unscheduled visits to classrooms can be distracting to teachers and students.

Outside students, educators, alumni, or interested observers are granted visiting privileges only with prior permission of the Director or his/her designee and are expected to be supervised by a staff member or security guard at all times.

The Director is responsible for ensuring procedures are in place to manage visitors on campus, including cases in which visitors are denied entry and/or escorted from the premises. The use of RFID campus automated access systems is currently under review. AES also has additional visitor sign-in guidelines, including an orientation video available to guests, such as those from visiting schools or other institutions.

9.02.02 Community Use of Campus

Outside of normal school hours, the campus is used by:

- Basketball, Badminton, and Soccer groups for AES students, under the supervision of external coaches, in the evenings.
- Scout groups that include non-AES students.
- Families use the pool and facilities over the weekends.
- Local community groups as part of the student service program (teaching English, etc.).
- Korean and Israeli schools.
- AES sports teams for practice and competition.

While coaches hired by AES are subject to the same screening and training as Contractors and Vendors, the use of the campus and supervision of students outside normal school hours are parental responsibilities.

9.02.03 Campus Supervision

Teachers and Teaching Assistants provide campus supervision in the morning (8.00 – 8.30), during breaks, and during lunch for elementary and middle school students. There is no campus supervision after school except through the designated After School Activity (ASA) program.

Students who remain on campus after school and are not participating in ASA should be supervised by their parents.

9.02.04 CCTV coverage

AES has about 150 CCTV cameras positioned to monitor perimeter security and record activity around campus.

The primary purpose of CCTV coverage on campus is to deter crime and enable the leadership team to investigate incidents, accidents, or child safeguarding allegations. All visitors to campus should be aware that their movements will be recorded through appropriate signage and other measures. All recordings are stored for 60 days and may be viewed and downloaded only by an authorized member of the senior leadership team, with the express consent of the Director, to investigate an alleged incident. Downloaded content may be stored for up to three years if it relates to a serious incident that is the subject of further investigation. Any downloaded recording will be deleted once an investigation has been fully resolved, unless there are ongoing legal or criminal proceedings by the authorities.

CCTV coverage on campus is confined to "public areas". Toilets, changing rooms, classrooms, and offices are not covered by CCTV. Campus coverage focuses on corridors, washroom entrances, common play areas, plant rooms, and restricted-access areas. CCTV recordings are deemed to be "confidential" in accordance with AES's Privacy and Data Protection Policy. Data Subjects may not request viewing access to such data or request that their images be removed, as the volume of recordings makes it impossible to fully comply with such requests. However, any Data Subject who believes that

they may have been involved in a "recorded incident" or their personal property has been damaged in a "recorded incident", may request that the recordings for the appropriate time period be viewed by an authorized person with the permission of the Director in order to establish exactly what happened and determine further action if necessary. They may also request that any portions of recordings in which they appear that have been downloaded as part of an investigation be deleted once the investigation is complete.

9.03 Bus Service

AES buses are equipped with air-conditioning, air purifiers, a first-aid box, CCTV, GPS, Panic Buttons, Seat Belts, and an attendance system to ensure the accountability and safety of bus riders. In addition to the driver and attendant, a Bus Monitor is assigned to each bus to ensure rider safety. AES Bus Monitors are trained in emergency response, First Aid, and CPR, and undergo periodic Child Protection and fire safety and evacuation training. Further, all buses are covered by the Safetrax Bus Tracking and Safety Solution. Safetrax offers a Parents App that can be downloaded on a cell phone. The App allows parents to track the bus's location, receive proximity alerts, and check their kids' boarding status.

9.04 Online Safeguarding

AES is very aware that children may have access to inappropriate content online or may be the victims of cyber-bullying or grooming through the various social media and gaming platforms that they use. The Director of IT (a Child Safeguarding Coordinator), in conjunction with divisional Technology Coordinators, seeks to take all reasonable precautions to ensure that students at school are not at risk on-line though a variety of measures and safeguards, including:

- Use of Firewalls and subscription filtering tools that restrict access to certain sites that are age-inappropriate or content-inappropriate.
- Filters and restrictions within platforms such as Google also restrict access to certain sites. Teachers and students must apply to have sites unblocked if deemed necessary for a particular lesson or project.
- Digital Citizenship curriculum at all levels teaches students how to stay safe online and protect personal data (based on Common Sense Media curriculum framework).

- Vetting and approval processes for new apps before they are installed on students' devices.
- Storage of emails which may be reviewed in the event of a safeguarding allegation.

Any instances of online bullying or hate speech shared by students and reported will be investigated by the Divisional Principal and Director of IT and dealt with accordingly.

It is impossible to prevent students from accessing all inappropriate content, as age restrictions depend on the content's developer. Students are also adept at bypassing administrative restrictions placed on school-owned devices or accessing content on their own personal devices. It is therefore that everyone is aware of the potential risks and reports concerns about online activities that may be harmful to students.

9.05 Field Trips and Off-Campus Activities

AES has considered and implemented appropriate measures to safeguard students on school-sponsored trips. These measures include:

- Number, appointment, and training of Chaperones.
- Accommodation arrangements for overnight trips.
- Selection and vetting of Service Providers, including activity leaders.

9.05.01 Trip Lead Chaperones (Faculty and Staff)

Trip Lead Chaperones are faculty and staff who supervise students on a trip. The focus for Trip Chaperones is to prevent students from being harmed. Only those AES employees who have had full background screening and child safeguarding training may be designated as lead chaperones.

For most trips, a minimum of two Trip Chaperones will be required to fulfill the responsibility to protect and supervise students on a trip.

One of the Chaperones must be designated as Trip Leader / Chaperone-in-Charge. This person is responsible for ensuring that the risk management plan is followed, but also understands and is willing to take responsibility for making decisions on the ground should conditions change unexpectedly. It may not always be possible to communicate with the Admin-in-Charge or Trip Coordinator back on campus in a timely manner if, for example, weather conditions make an activity unsafe or disrupt travel plans.

There will be some trips where it might be appropriate for only one Trip Chaperone. This will usually be limited to low-risk day trips within the Delhi area with only a small number of Secondary students.

There will be some trips where a minimum of three adult Trip Chaperones will be required. This provides the student group with the capacity to continue receiving a high level of care if one Trip Chaperone is sick or required to accompany a student who needs to leave the main group to obtain medical treatment or for evacuation. This should be a consideration on trips with "high impact" activities where the risk of an injury is higher than normal. Alternatively, consideration should be given to the practicality of sending another chaperone to join the trip to provide support if necessary.

The number of adults supervising a group of students on a trip will vary depending on the students' experience, the Trip Chaperones, the activities, the length of the trip, and many other factors that affect supervision and risk.

On some trips, it may be appropriate to use a more conservative ratio to ensure there are enough Trip Chaperones to adequately supervise the students. The more conservative ratio will be based on the outcome of the risk management planning process.

Adults on the trip, such as bus drivers, nurses/medics, and guards, are not to be included when determining if the trip has the appropriate number of Trip Chaperones.

Non-staff parents cannot serve as lead chaperones or hold any position of responsibility during the trip unless they are designated as medics. At times, volunteers to support student supervision may be needed to help AES meet required safety ratios. All volunteers participating in overnight trips or in potentially unsupervised situations with students must have completed basic safeguarding awareness training and undergone appropriate police vetting. This ensures a safe and secure environment for our entire school community.

9.05.02 Overnight Trips

Trip Participants will be accommodated so that:

- There is appropriate separation between genders (male and female), and that consideration is given to safe arrangements for students on the trip where gender identity does not conform to this distinction.

- Students are separated from adults. As far as practicable, 2 or more students should share a room so that they can assist each other in the event of an emergency/illness, etc.
- If a student has a compelling reason to request single sleeping arrangements, this must be approved by the parents (there may also be an additional cost) after full consideration of all child safeguarding aspects.
- Students should be able to lock the door from the inside for their own sense of security and safety, but in the knowledge that the Trip Chaperones have the means to open rooms from the outside in the event of an emergency. This will depend on the key systems available in the hotel and will need to be reviewed and discussed on a case-by-case basis.
- If a faculty chaperone is also the parent of a student on the trip, approval may be given for the parent and child to share a room, if appropriate.

If an adult enters a student's bedroom, then the adult should be accompanied by another adult as far as practicable. In the event of an emergency response where this is not always achievable (e.g., where a student has self-harmed and the other trip chaperone is some distance away), the adult must announce his/herself before entering, keep the door open so as to be visible, and, if possible, ask other student(s) to be present throughout the exchange. The adult must ensure that a full report is made to the Trip Coordinator regarding the circumstances in which emergency action was needed.

Students must not enter adult bedrooms. The only exception is that students are permitted to enter a nurse's bedroom, which has been designated as the room for providing medical care to students. Where a student is ill and needs adult supervision during the night, all members of the trip should be aware of this; doors should remain open, and parents/admin-in-charge should be made aware of the arrangements being made to assist the student while keeping them safe.

9.05.03 Service Providers

AES contracts with external service providers to assist with experiential learning activities off campus (such as Week without Walls), including transport, ground services coordination, activity coaching and supervision, accommodation, catering, etc. While it is not possible to ensure that every

employee of every service provider has been properly screened and trained, AES ensures that:

- Service providers screen and vet any employee who will have direct and prolonged contact with students during a trip, such as activity coordinators and coaches.
- Service providers understand and commit to AES's "Code of Conduct" relating to Child Safeguarding.
- Students are never left unsupervised by service provider employees, so far as is practicable.

10.0 Resources and Reviews

10.1 Community Partnership Resources

The availability of external organizations within Delhi who might be in a position to assist the school and/or families in the event of serious cases of child abuse is limited. To this end, AES is building a network of external agencies in India and abroad that may be able to assist.

- US Embassy (US Embassy Families)
- Individual counselors/psychologists
- Kailash Satyarthi Children's Foundation (or similar)
- External consultants who are experts in the field of Child Safeguarding and the handling of child abuse cases.

Referral to external agencies will be at the recommendation of the relevant CSO assigned as Case Officer or the Designated Safeguarding Lead.

10.2 Measurement, Analysis, and Audit

The CSLT is responsible for:

- Compliance and quality/effectiveness.
- Annual self-audit to assess the policy and procedures.
- Analysis of policies and procedures every three years.
- Continuous quality improvement.
- Effectiveness and measurement.

The results of such reviews are reported to the Board annually as part of the DIRECTOR's annual review.

10.02.01 Policy Review

The Board undertakes a full review of Board Policy every three years, although the Safeguarding Trustee may recommend amendments and changes as deemed necessary to ensure that the Board Policy continues to reflect good practice and to meet AES's aspirations to provide a safe and secure environment.

The CSLT will seek feedback from the wider community during one of the quarterly safeguarding sessions and document any lessons learned during periodic case reviews as a basis for ensuring that the Child Safeguarding Handbook is kept up to date annually. A full review of all documentation and procedures will be conducted every 3 years under the leadership of the DSL. Where appropriate, AES will engage an external consultant to conduct a comprehensive independent audit of its policies and procedures.

Annex 1: Possible Indicators of Abuse

Possible Indicators of Physical Abuse

Physically abused children exhibit a range of signs, including:

- Bruises, burns, sprains, dislocations, bites, cuts
- Improbable excuses given to explain injuries
- Injuries that have not received medical attention.
- Injuries to the body in places that aren't normally exposed to falls, etc.
- Repeated urinary infections or unexplained stomach pains.
- Refusal to discuss injuries.
- Withdrawal from physical contact.
- Fear of returning home or of parents being contacted.
- Showing wariness or distrust of adults.
- Self-destructive tendencies.

- Being aggressive towards others.
- Being very passive and compliant.
- Chronically running away.
- Excessive need to use the toilet without a medical reason.
- Inappropriate clothing (extra baggy or very revealing).
- Arms and legs are kept covered in hot weather (not related to religious attire).

Possible Indicators of Emotional Abuse

Emotionally abused children exhibit a range of signs, including:

- Low self-esteem.
- High anxiety.
- Inappropriate emotional response to painful situations.
- Chronically running away.
- Compulsive stealing.
- Obsessions or phobias.
- Delayed speech or sudden speech disorder.
- Sudden under-achievement or lack of concentration.
- Difficulties with school attendance.
- Difficulty making friends.
- Attention-seeking behavior.
- Incontinence and mysterious pains.
- Persistent tiredness.
- Lying.
- Delayed physical, mental, and emotional development.
- Inappropriate need for physical contact.

Possible Indicators of Neglect

Neglected children exhibit a range of signs, including:

- The child is unwashed, hungry, and/or improperly clothed
- The child does not appear to receive appropriate medical or dental attention
- Parents are uninterested in the child's academic performance
- Parents do not respond to repeated communications from the school
- The child does not want to go home
- Both parents or legal guardians are absent from Delhi for any period of 24 hours or greater
- Parents cannot be reached in case of an emergency.

Possible Indicators of Sexual Abuse

- Pain or irritation in the genital area.
- Vaginal or penile discharge.
- Excessive toilet usage without a medical reason.
- Difficulty with urination.
- Sexually transmitted disease (STD).
- Fear of people or places.
- Aggression.
- Regressive behaviors, bed wetting, or stranger anxiety.
- Excessive masturbation.
- Sexually provocative behavior.
- Stomach pains or discomfort when walking or sitting.
- Being unusually quiet and withdrawn or unusually aggressive.
- Suffering from what seem to be physical ailments that can't be explained medically.
- Showing fear or distrust of a particular adult.
- Mentioning receiving special attention from an adult or a new "secret" friendship with an adult or older student.
- Refusal to continue with school or usual social activities.
- Sexual behavior, language, or knowledge too advanced for their age.
- Change in clothing style (extra baggy or very revealing).

Possible indicators of Depression, Anxiety, and Deliberate Self-Harm

The following may be signs of depression in children, and if they persist beyond a couple of weeks, medical advice should be sought:

- Behavioral problems at school.
- Changes in eating or sleeping habits.
- Feelings of sadness or hopelessness.
- Lack of interesting, fun activities.
- Low energy levels or general tiredness.
- Mood changes, such as irritability.
- Development of eating disorders such as bulimia and anorexia.

Signs of anxiety in children may include:

- Anxiety about the future.
- Fear of being away from a parent.
- Physical symptoms of panic, such as sweating or dizziness.
- Refusal to go to school or take part in social activities.
- Worry that a parent or loved one may die.

Methods of self-harm**:**

- Pinching.
- Scratching.
- Cutting.
- Poisoning.
- Drug overdose.
- Battery (hitting).
- Biting.
- Shooting.
- Burning.
- Hanging.
- Jumping from bridges, buildings, or other high places.

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Annex 2: Sexual Abuse under Indian Law

Sexual offenses against children and women are criminalized in Chapter V of the Bharatiya Nyaya Sanhita 2023 ("BNS"), the criminal code in India. The Protection of Children from Sexual Offences Act, 2012 ("POCSO") also criminalizes such acts against children. The relevant definitions under the POCSO are:

- Sexual Assault: Includes any act with sexual intent which involves physical contact without penetration. [Section 7].
- Aggravated Sexual Assault: Includes sexual assault by the management or staff of an educational institution on a child in that institution. [Section 9(f)].
- Penetrative Sexual Assault: Includes penetrating penis to any extent, or any other object or manipulating or applying mouth to the vagina, mouth, urethra or anus of a child or makes the child to do so with him or any other person. [Section 3].
- Aggravated penetrative sexual assault: Includes penetrative sexual assault by the management or staff of an educational institution on a child in that institution. [Section 5(f)].
- Sexual Harassment: Includes uttering words, making sounds or gestures, making a child exhibit any part of their body, showing any object or media to a child for pornographic content, enticing a child for pornographic purposes, threatening to use in media a depiction of the child's body or child's involvement in a sexual act, and constantly following or watching a child. [Section 11].

Sexual abuse against children is also criminalized in India through various provisions of the BNS. Relevant provisions in this regard are:

- Section 96 criminalizes and imposes imprisonment up to 10 years on a person who induces a child to go to a place or do an act with the intent or knowledge that the child may be forced or seduced to illicit intercourse with another person.
- As per Section 98, whoever sells, lets to hire or disposes of a child for prostitution, illicit intercourse or for any immoral purpose, will face imprisonment up to 10 years.
- Similarly, buying a child for such purposes is punishable with imprisonment with a minimum of 7 years as per Section 99.
- Sections 63, 64,65 and 70 specifically deal with rape on a woman. Notably, if rape is committed by a guardian, teacher or a person in a position of trust or authority towards the woman, the punishment is rigorous imprisonment of a minimum of 10 years, extendable to life as per Section 63.
- Section 64 increases the punishment for rape of a woman under 16 years of age to a minimum of 20 years extendible to life imprisonment, while rape of a woman under 12 years of age is punishable with a minimum of 20 years imprisonment and can also attract death penalty.

- As per Section 68, a person in a position of authority or fiduciary relationship with a woman induces or seduces such woman in his custody or under his charge or present in the premises to have sexual intercourse with him not amounting to the offence of rape, shall be punished with rigorous imprisonment of a minimum of 5 years.
- As per Section 70, if a woman under 18 years is raped by a group of persons with common intention, each of such persons is punishable with life imprisonment or death.

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Annex 3: Disclosure and Consent Form

A full Disclosure and Consent Form is sent to applicants who have been short-listed to fill a vacancy. This form requires self-disclosure as follows:

APPLICANT SELF-DECLARATION (extract from full form)

YES = a True Statement NO = additional information is required below

The full name details that I am providing on this application are genuine and accurate	YES / NO
My name has not been changed or altered in any way (other than as formally notified and recorded in this application) by way of marriage, deed poll, or other means	YES / NO
My date of birth has not been altered or in any way changed since my birth (unless formally notified and recorded in this application)	YES / NO
All qualifications provided by me to this organization are genuine	YES / NO
I am not barred from teaching in any country in the world	YES / NO
I have no criminal record or court case pending against me	YES / NO
I am not on any list of individuals barred from working with children or otherwise disqualified to work with children, administered by any authority, or subject to sanctions imposed by any regulatory body	YES / NO
None of my family has been subject to an Emergency Protection Order (or similar where children may have been removed), taken by the Police or Social Care (or similar authorities)	YES / NO
Authorities have not attended a home (where children lived) where I have been resident, to deal with a domestic abuse or violence-related matter	YES / NO
There are no Family Court, Civil Court or Criminal Justice System incidents or appearances that relate to me or any member of my immediate current or previous family(s), including being the subject of a Sex Offender Order, an FGM Order, an injunction regarding my own or other children, or of any military court martial.	YES / NO

Neither I nor any member of this household has been placed on the Sex Offender Register in this or any other country	YES / NO
I do not and have never taken, possessed, or distributed exploitative (pornographic) images (in hard or electronic copy) of children under the age of 18 years	YES / NO
I have never been the subject of a Record of Concern lodged under an employer's Child Safeguarding / Protection protocols.	YES / NO
I am not aware of any other information, which, if known to AES, is likely to cause AES to consider me unsuitable to work for AES in a position that involves working with and/or being entrusted with the care of children and/or youth.	YES / NO

If you answered NO to any of the above questions, please provide a detailed statement.

Question Number	**Details (Brief Description, Date, Location**

I, _____ , declare that the personal information given in this form is true and correct to the best of my knowledge. By signing below, I give Skoolspot permission to perform an investigation into my past employment and education and to share such finding with American Embassy School. If hired, this authorization is valid for the duration of my employment.

_____ _____

Signature Date (mm/dd/yyyy)

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Annex 4. Interview Questions for Child Safeguarding

The following example questions are provided by the International Taskforce on Child Protection Safer Recruitment Checklist. AES interview panels must select 3-4 Applicant Interview questions to ask all candidates for the same position and document their responses.

AES requires that a minimum of two face-to-face references be sought by either the Principal or Director from administrators in similar positions with previous employers to ascertain whether there are any concerns about a candidate's suitability to work with children, which may not necessarily be put in writing.

Example Applicant Interview Questions

1. Can you give an example of something that you have done that demonstrates your commitment to protecting a child or a young person?
2. Can you give an example of a time when you became aware of someone acting unprofessionally at work? What did you do? How did you feel about what you had to do?
3. Can you give us an example of when you found it difficult to work with someone [in a team] who did not share your values, beliefs, or ideas? Why do you think you found it difficult? How did you feel about it? What did you do to resolve the situation?
4. Can you tell me/ us about a situation when you saw someone at work stretch or bend the rules beyond what you felt was acceptable? What action did you take?
5. What are your attitudes towards child protection – how have these developed over time?
6. What are your feelings about students who make allegations against staff?
7. Can you tell me/us about a time when you had to conform to a policy or procedure you did not agree with - what did you do?
8. Role-specific: Ask a question related to the safeguarding requirements for the role applied for.
9. Country-specific: Ask a question to probe the applicant's attitude, values, and beliefs related to local culture and practice.
10. If there are gaps in your employment, can you tell us the reasons you left work for a period of time?

Example Referee Questions

1. Do you have any concerns about the applicant working unattended with children?
2. Did any of the applicant's colleagues, students, or parents express such concerns?
3. Would you rehire the applicant? (why or why not, according to the response received)

4. Do you have any concerns about the applicant's behavior around children or young people?
5. Have any allegations or concerns been raised about the applicant regarding the safety and welfare of children, child protection, young people, or colleagues, including any disciplinary action?
6. How were these matters investigated and resolved?
7. Were any sanctions put in place - please describe - do any of these remain in force?
8. Please see the job description and person specification attached and comment on the applicant's suitability to carry out this position.

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Annex 5: Child Safeguarding Agreement

Child Safeguarding Agreement

At AES, we are collectively committed to nurturing the intellectual, physical, social and emotional development of each student. We all have a duty of care to protect children and prevent them from harm, and to act with appropriate urgency if a child is at risk of harm. Our school community is committed to keeping children safe and promoting the wellbeing of children. To that end, we believe that:

- All children have equal rights to be protected from harm and abuse.
- Everyone has a responsibility to support the protection of children.
- We have a responsibility to build a community that values diversity, equity, and inclusion for each child.
- We 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 safeguarding are taken in the best interests of the child, which are paramount.

As an AES employee, I undertake to uphold the AES Values Statement on Child Safeguarding and understand that I am contractually obligated to abide by the Child Safeguarding Agreements as listed below

I Will:

- Report suspected child abuse or neglect immediately and **within 24 hours** to a Child Safeguarding Officer or sooner if there is an immediate risk of harm requiring urgent intervention.
- Act as a role model for students through my words and actions.
- Maintain physical boundaries at all times and ensure that physical contact – when necessary – is only in appropriate, public, and consensual ways.
- Ensure that bathroom visits are safe and respectful of student privacy.
- Follow these tenets when supervising school field and overnight trips.
- Meet individually with a student only in an open, observable setting, or online with parent consent, in a neutral space.
- Notify another adult when meeting with students outside of school hours.
- Protect AES data and comply with AES's Data Confidentiality Agreement (Section 2).
- Report any breach of this agreement to a Leadership Team member or the Director.

I Will Not:

- Initiate or encourage any physical contact while alone with a student.
- Transport students without parental consent unless it is a medical emergency.

- Use alcohol (unless at school-sanctioned events approved by the Director) or other inappropriate (illegal) substances on school property or while participating in student-related activities away from AES.
- Accept gifts from or give personal gifts to students without their parents' knowledge.
- Invite a student to my home or arrange to meet with a student away from school property/school online learning platforms.
- Provide lessons virtually in a non-neutral space, such as a bedroom.
- Engage in private communications with students and ex-students who are minors via text messaging, email, Facebook, Twitter, or similar electronic or social media forms except for activities strictly involving school business and utilizing school-approved platforms.
- Take or post photos or other information about students for non-school-related reasons.

I understand that as a person working with students under the auspices of AES, I am subject to a criminal background check. My signature confirms that I have read the Child Safeguarding Agreement and understand that any action inconsistent with, or failure to take, any mandated action under this agreement may result in disciplinary action as described in the AES Employment Code of Conduct.

Signature:

Name:

Date:

Annex 6: Safeguarding Curriculum – Enduring Understanding

(based on Child Self-Protection Standards and Benchmarks from Office of Overseas Schools)

Rights of the Child

Students will understand that:

- Advocating for the right to be safe from harm and supported promotes well-being for self and others
- knowing when and how to seek help from others and acting on that is a lifelong skill that supports and promotes safe practices.

Recognizing and Responding to Abuse

Students will understand that:

- Their ability to recognize and respond to unsafe practices, including abuse, facilitates and supports mental and physical health.
- knowing when and how to seek help from others and acting on that is a lifelong skill that supports and promotes safe practices.

Safe vs Unsafe

Students will understand that:

- Advocating for the right to be safe from harm and supported promotes well-being for self and others
- Knowing when and how to seek help from others and acting on that is a lifelong skill that supports promote safe practices
- The use of self-awareness skills supports positive relationship decisions and promotes safety
- The importance of seeking help when necessary and demonstrating a willingness to do so supports wellbeing and safety

Trusted Network

Students will understand that:

- The importance of seeking help when necessary and demonstrating a willingness to do so supports wellbeing and safety
- Knowing when and how to seek help from others and acting on that is a lifelong skill that supports promote safe practices

Responsible Decision Making

Students will understand that:

- Healthy, effective decision-making skills help avoid risks and enhance well-being.
- The ability to make constructive and respectful choices about personal behavior and social interactions supports the well-being of self and others.

Self Advocacy

Students will understand that:

- The ability to make constructive and respectful choices about personal behavior and social interactions supports the well-being of self and others
- The importance of seeking help when necessary and demonstrating a willingness to do so supports wellbeing and safety

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Annex 7: Green Room Protocols

Green Room Members: Divisional Principal and/or Assistant Principal, together with one or more Divisional Counselors. In addition, the Designated Safeguarding Lead and other CSOs may be invited to attend depending on the nature of the concern.

Protocol

Record Keeping: The Green Room should be set up as an Action within the ROC by the meeting convener, and the minutes should be recorded to "complete" that Action. Any further actions arising from the meeting (such as "Meet with Parents") should be set up as additional Actions within the same ROC. Any relevant documentation should be uploaded to the ROC (e.g., email exchanges, the student's ROC report, etc.).

WHO?	WHAT?	HOW LONG?
Senior Child Safeguarding Officer (Principal)	Welcome, Norms and Grounding. Nominate someone to take notes, global notes, if not already documented.	3 minutes
Case Officer (Counselor)	The counselor presents the case, sharing factual information from the report of concern. The counselor should include previously known information/documented information about the child. Make sure the report is factual. Any interpretation or inference drawn from what was observed, said, or alleged should be clearly stated as such.	5-10 minutes (or longer, based on case)
Other Members	Ask clarifying questions to the effect of: • Review data from all systems, such as medical records, disciplinary records • Number of absences • Does the child receive ongoing support services of any type? (ILP?) • What other facts do we know? Siblings? • What other details exist? • Should this child be allowed to go home after school?	5-10 minutes max

	• Is the child in imminent danger?	
Senior Child Safeguarding Officer (Principal)	Wrap up. What are the next steps? • Agree on: who is doing what? If meeting with parents/students, clarify the purpose and time frame. Ask: Is there anything that needs clarification? Is everyone clear on the next steps, how we will proceed, and your individual roles moving forward? • Decide whether the student should be included in the "Students of Concern Register" for ongoing monitoring. • Has an accurate and complete record of the meeting been made, and copies of any additional information collected been properly stored?	

Notes:

The primary role of the Counselor designated as Case Officer is to support and advocate for the student. Any ongoing investigation work or meetings with parents, etc., should therefore be assigned to other members of the team, although the Case Officer may be in attendance.

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References and Acknowledgements

Mental Health UK

National Library of Medicine

Stopbullying.gov

MANUAL ON SAFETY AND SECURITY OF CHILDREN IN SCHOOLS Developed by NATIONAL COMMISSION FOR PROTECTION OF CHILD RIGHTS

Summary of Child Protection Laws in India, published by Kailash Satyarthy Children's Foundation

Specific references to Indian law are cross-referenced and available on request from the Child Safeguarding Leadership Team as outlined in 5.2 Organizational Roles and Responsibilities.

International Centre for Missing & Exploited Children / International Taskforce on Child Protection:

- Safer Recruitment Checklist
- Expectations for School Communities 2021
- Safeguarding Standards
- Definitions, signs, and indicators of abuse
- Characteristics of an Effective Abuse Prevention Curriculum
- Child Protection Training Checklist
- MANAGING ALLEGATIONS OF CHILD ABUSE BY EDUCATORS AND OTHER ADULTS Protocol for international schools

UK Department of Education:

- Keeping children safe in education 2024 - Statutory guidance for schools and colleges (definitions of abuse, neglect and exploitation)