



Anatolia College

Child Protection and Safeguarding Policy and Procedures (June 2021)

Components of the Child Protection and Safeguarding Policy

1. Anatolia College foundational statements
2. Diversity, Equity, and Inclusion
3. Goals of the child protection and safeguarding policy
4. Characteristics of the international community
5. Recognition of abuse
6. In alignment with Greek and international law
7. Safe hiring practices
8. Code of conduct for staff: How to manage safeguarding
9. Concerns and allegations against employees
10. Peer-on-Peer abuse
11. Online Safety
12. Behavior monitoring form
13. Whistleblower policy
14. Steps regarding reporting and responding
15. Confidentiality: Data protection, information sharing, and confidentiality agreement
16. Record keeping & Recording form
17. Anti-bullying policy
18. Special needs protection and safeguarding
19. Communication with parents
20. Training for Anatolia College students
21. Training for Anatolia College employees and visitors
22. Follow-up and debriefing
23. Useful resources
24. Case studies

Links found in this document:

[Child Protection and Safeguarding Form](#)

[Internal Recording Form](#)

[Confidentiality Agreement](#)

[Anti-bullying In-school prevention and intervention protocol](#)

[Body Map](#)

[Body Map instructions](#)

[EYP/Elementary Behavior Monitoring Form](#)

[Secondary Behavior Monitoring Form](#)

for persons reporting a child abuse case

for internal use by the CP Officer only

for persons reporting a child abuse case

for reference

for use by CP Officer & School Nurse only

for reference

for teacher record of student behavior

for teacher record of student behavior

1

ANATOLIA COLLEGE FOUNDATIONAL STATEMENTS

Mission

Anatolia College aims to offer all students a progressive, personalized American international education centered on academic excellence in each student's journey towards self-actualization. This is achieved in a stimulating, multicultural learning environment that emphasizes service, respect for ethical values and awareness of local culture.

Vision

Anatolia College strives to be a growing center of excellence in the region by educating students through best practices for reaching their full potential as adaptable global citizens.

Non-discrimination

Anatolia College admits students of any race, color, religion, national and ethnic origin to all the rights, privileges, programs, and activities generally accorded or made available to students at the school. It does not discriminate on the basis of race; color; religion or belief; national, social or ethnic origin; sexual orientation; gender identity and/ or expression; family medical history or genetic information; or any other factors of identity, in administration of its educational policies, admission policies, scholarship programs, athletic and other school administered programs. Anatolia College will make reasonable efforts and accommodations for qualified students with known disabilities unless the school cannot adequately accommodate the student in specific areas. Anyone found to be engaging in any type of discrimination will be subject to disciplinary action.

Data Protection

Anatolia College understands that the privacy of its students and their families is important. To that end, we have adopted a policy and regulations regarding the collection, use, and dissemination of personal information in accordance with the General Data Protection Regulation.

2

DIVERSITY, EQUITY & INCLUSION

Anatolia College values diversity, equity, and inclusion (DEI) and understands that each student's experience in the world is shaped by many factors, including age, ethnicity, family structure, sex, gender identity, nationality, ability, race, religion, sexual orientation, and socio-economic background.

Furthermore, exposing students, faculty, and staff to a wide range of ideas, experiences, and cultures, examining and challenging preconceptions, and exploring different ways of thinking and knowing

enhance the learning experience and reflect the school's vision of educating students for reaching their full potential as adaptable global citizens.

Importantly, Anatolia College values diversity, equity, and inclusion and our faculty and staff are committed to contributing to diverse, equitable, and inclusive practices. We aim to establish and maintain a welcoming, supportive, and healthy school community on all levels that both embraces differences and promotes respect.

3

GOALS OF THE CHILD PROTECTION & SAFEGUARDING POLICY

The **World Health Organization** states that child maltreatment “includes all forms of physical and emotional ill-treatment, sexual abuse, neglect and exploitation that results in actual or potential harm to the child’s health, development or dignity.” Therefore, safeguarding is “the responsibility that organizations have to make sure their staff, operations and programs do no harm to children, that is they do not expose children to the risk of harm and abuse, and that any concerns the organization has about children’s safety within the communities in which they work, are reported to the appropriate authorities.

This policy supports students, employees, and families at Anatolia College. The goal of this policy is to ensure and set the foundation for a proactive and safe school environment and approach that protects our students by preventing child abuse before it occurs or by ensuring its earliest possible detection, intervention and reporting.

All students have a right to be and feel safe and be treated with respect and dignity. As a school we have the duty of care to the children enrolled. Therefore, all employees have a responsibility to keep students safe and promote their rights and well-being as children. All actions around child protection and safeguarding are taken with the best interests of the child.

The **Student Counseling Office** will ensure that the school community understands the issues of child abuse and neglect, recognizes the signs and symptoms, familiarizes with national, international and local regulations and procedures, receives appropriate training and information, and becomes aware of all procedures and responsibilities to ensure the safety of our students.

Anatolia’s Protection and Safeguarding Case management Team is consisting of:

Academics

- VP of Primary and Secondary Education Division
- Dean/head of school

Senior Administrators

- Anatolia President
- VP of Finance and HR

Legal & Counseling

- Legal Counselor
- School Counselor

For the purposes of this policy, the definition of “**employees**” includes all contracted persons at Anatolia College who directly or indirectly work with students, including faculty, staff, after school activities advisors, substitute teachers, shadow teachers, interns, and all outsourced employees.

For the purposes of this policy, the definition of “**visitors**” includes all non-contracted persons at Anatolia College who directly or indirectly work with students, including visitors, external professionals, parents/guardians on campus or chaperoning students off campus, and volunteers.

Employees and visitors are held to the same standards of child protection and safeguarding behavior, but visitors are not required to fulfill the same hiring and training requirements as employees. For this reason, visitors will always be accompanied by an employee while on campus while with students.

Review of Policies

The annual review of policies and procedures is the responsibility of the Child Protection Case Management team with input from employees.

4

CHARACTERISTICS OF THE INTERNATIONAL COMMUNITY

Globally across cultures, child maltreatment is not always addressed or appropriately dealt with.¹ The international community, like all school communities, can be a vulnerable population with respect to child safety and protection. International children might experience separation from extended families, with parents working or travelling abroad, potentially leading to lack of supervision and safety. They might be having difficulties forming relationships and developing an identity that will provide them with stability and security. Many times, international education can be challenging academically, which might put pressure on students, causing anxiety and need for support. Lastly, international children are often influenced by multiple, and at times, conflicting cultures and value systems, resulting in confusion of social and behavioral expectations.

The same situation can be applied to international school families, who might also feel isolated from their extended families and the previous community, where they might have felt support. Integration is not always smooth and instability in the family environment creates vulnerability. At times, there is lack of control over external factors, or critical life decisions. International school families and their children might be vulnerable because the nature of abuse requires secrecy, isolation and limited access to support, leading to fertile context and conditions for perpetrators to use to their advantage in abusing children.

Another challenge related to the international nature of the school can be the recruitment of internationally mobile individuals. The challenges that arise can be connected to the difficulty to operate

¹ Association of International Schools in Africa, *Child Protection Handbook*, 2016

a criminal check record, upon request and hiring, as well as a result of the legal framework of the country where the school is based. Isolation from local authorities and under-developed child protection systems can make early identification and prevention harder for schools. A safe recruitment policy is essential for the promotion of child protection and safeguarding. This involves having a police background check, asking for references, and offering training to faculty and staff in child protection and safeguarding.

For these reasons, the relationships built with the community play an important role, since it might create a sense of safety and belonging. The school takes on the role of family, offering stability, opportunities for integration, as well as a holistic approach to health and wellbeing.

5

RECOGNITION OF ABUSE

Child abuse² happens when a person – adult or child – harms a child. It can be physical, sexual or emotional, but can also involve a lack of love, care and attention. Neglect can be just as damaging to a child as physical or sexual abuse. Children may be abused by family members, friends, people working or volunteering in organizational or community settings, people they know, or, much less commonly, by strangers. Children suffering abuse often experience more than one type of abuse. The abuse usually happens over a period of time, rather than being a single, isolated incident.

Physical Abuse³

Physical abuse is generally defined as "any non accidental physical injury to the child" and can include striking, kicking, burning, or biting the child, or any action that results in a physical impairment of the child. When physical abuse has occurred, indicators can be behavioral as well as physical.

Physical indicators of physical abuse include:

- Unexplained bruises or burns
- Unexplained fractures
- Swollen areas
- Evidence of delayed or inappropriate treatment for injuries

Behavioral indicators of physical abuse include:

- Self-destructive
- Withdrawn
- Afraid of going home
- Complains of soreness or moves uncomfortably
- Wears clothing inappropriate to weather
- Bizarre explanation for injuries
- Wary of adult contact

² NSPCC, *Definitions and signs of child abuse*, December 2017, <https://www.nspcc.org.uk/globalassets/documents/information-service/definitions-signs-child-abuse1.pdf>.

³ U.S. Department of Health and Human Services Administration for Children and Families, Children's Bureau, *Definitions of child abuse and neglect*, March 2019, <https://www.childwelfare.gov/pubPDFs/define.pdf>

Neglect⁴

Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse. Neglect is defined as the failure of a parent or other person with responsibility for the child to provide needed food, clothing, shelter, medical care, or supervision to the degree that the child's health, safety, and well-being are threatened with harm.

Physical indicators of neglect include:

- Abandonment
- Consistent lack of supervision
- Hunger, inappropriate dress,
- Poor hygiene
- Inadequate nutrition
- Distended stomach, lice, emaciated

Behavioral indicators of neglect include:

- Regularly displays fatigue, falls asleep in class
- Steals food, or begs from classmates
- Reports that no caretaker is at home
- Self-destructive
- Extreme loneliness and need for affection

Sexual Abuse / Exploitation⁵

Sexual abuse is forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse. Child sexual abuse can involve contact abuse and/or non-contact abuse. Contact abuse happens when the abuser makes physical contact with the child. Despite common beliefs that sexual abusers are strangers, in more than 80% of cases the abuser is likely to know the child they are sexually abusing. Abusers will often try to build an emotional connection with a child in order to gain their trust for the purposes of sexual abuse. This is known as grooming. Sexual exploitation is a type of sexual abuse that includes allowing the child to engage in prostitution or in the production of child pornography.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature such as sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Non-contact abuse involves non-touching activities and it can also happen online. It may include:

- Use of obscene language
- Showing pornography to a child
- Making, viewing or distributing child abuse images

⁴ U.S. Department of Health and Human Services Administration for Children and Families (MARCH 2019), Ibidem.

⁵ U.S. Department of Health and Human Services Administration for Children and Families (MARCH 2019), Ibidem.

- Allowing someone else to make, view or distribute child abuse images

Contact abuse involves touching activities such as:

- Fondling
- Molesting
- Oral sex
- Intercourse

Physical indicators of sexual abuse include:

- Pain, swelling or itching in genital area
- Difficulty walking or sitting
- Frequent urinary or yeast infections

Behavioral indicators of sexual abuse include:

- Role reversal, overly concerned for siblings
- Threatened by physical contact, closeness
- Inappropriate sex play or premature understanding of sex
- Massive weight change/ suicide attempts (especially adolescents)

Emotional Abuse⁶

Emotional abuse is generally defined as "injury to the psychological capacity or emotional stability of the child as evidenced by an observable or substantial change in behavior, emotional response, or cognition" and injury as evidenced by "anxiety, depression, withdrawal, or aggressive behavior." Emotional abuse severely damages a child's emotional health and development. It may be difficult to recognise, as the signs are usually behavioural rather than physical. The indicators of emotional abuse are often also associated with other forms of abuse. Emotional abuse may involve name-calling, insults, put downs or terrorization, isolation, humiliation, rejection, corruption and ignoring.

Physical indicators of emotional abuse:

- Speech disorders
- Delayed physical development
- Substance abuse
- Ulcers, asthma, severe allergies

Behavioral indicators of emotional abuse:

- Habit disorder (sucking, rocking, biting)
- Antisocial, destructive
- Neurotic traits (sleep disorders, inhibition of play)
- Passive and aggressive (behavioral extremes)
- Delinquent behavior (especially adolescents)
- Developmentally delayed

Children who are abused and neglected may suffer immediate physical injuries such as cuts, bruises, or broken bones, as well as emotional and psychological problems, such as impaired social-emotional

⁶ U.S. Department of Health and Human Services Administration for Children and Families (MARCH 2019), Ibidem.

skills, anxiety, eating disorders or depression and post-traumatic stress disorders. All these experiences might lead to changes in the brain development and increase in difficulties in learning, memory and attention. Child abuse and neglect and other adverse childhood experiences can have a tremendous impact on lifelong health and wellbeing if left untreated.

Students often cannot tell others about a touching problem because of the fear of:

- Memory. Children often cope with their abuse by pushing it so far back in their minds that they “forget.” To remember means to feel hurt again.
- Loss of Love. Children often worry that their parents or friends won’t love them once they know about their abuse because now they are “dirty.” This is often because children will take responsibility for their abuse. Children also often fear the separation of their family because of the telling. Offenders work hard to reinforce these feelings in order to keep the child silent.
- Shame & Guilt. Children either know or can sense that what happened, especially a sexual experience with an adult, is wrong. By telling someone and acknowledging that this happened, they fear the shame of the abuse. They fear they will get into trouble for telling. Older children will experience more of a sense of guilt than younger children, especially in sexual abuse.
- Blame. Children fear that they will be blamed for what happened and in the case of sexual abuse that they somehow wanted it. Adults tend to be believed over the child and offenders often state that the child “asked” for the sexual touch or other abuse.
- Harm. Offenders often maintain control over their victims by threatening harm to them or their families if they tell. Children are then burdened with the inappropriate responsibility for keeping their families safe.

Myths and facts about child abuse and neglect

1. **Myth:** Child abuse is carried out by strangers.

Fact: Research indicates that 90% of abuse is domestic and committed by individuals within the family setting, or known to the child. International School Communities tend to have families that move often and are separated from their extended families. This constant mobility is a risk factor for students to become more vulnerable in trusting adults.

2. **Myth:** Abuse is a matter of culture; therefore it can be excused.

Fact: There is no tolerance to or excuse for child abuse. Any form for child abuse or neglect is not supported by any culture.

3. **Myth:** Child abuse is seen in families with specific socioeconomic statuses, especially when residing under poverty.

Fact: Child abuse occurs in all racial, ethnic, socioeconomic, and cultural sectors of society, regardless of their wealth or education. Isolation, which is a risk factor, can be more encountered in international families.

4. **Myth:** It’s only abuse if it is violent.

Fact: Physical abuse is just one form of abuse. Neglect, emotional abuse and sexual abuse are all forms of abuse that lead to the same devastating results and damage for the child’s wellbeing and life. 25% of cases are emotional neglect or abuse which usually leave no hard evidence. Additionally, physical discipline will become physical abuse if it causes harm or injury to a child.

5. **Myth:** Children make up stories about abuse

Fact: A child rarely lies about abuse. A child may change what they’ve said if they’ve been pressured or threatened to deny what’s happened, or they’re afraid of being judged for what happened.

6

IN ALIGNMENT WITH GREEK & INTERNATIONAL LAW AND AGENCIES

Greek Law

Anatolia College is subject to the Greek laws for Child Protection and Abuse. When individuals accept a role working in an education setting they should understand and acknowledge the responsibilities and trust involved in that role. Legislation imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions. Safe practice can be demonstrated through the use and implementation of specific guidelines and a code of conduct.

Article 23

The Greek law, through Article 23, of law 3500/2006, states the following regarding the legal responsibilities of educators:

1. Educators of primary or secondary education who are, in any way, informed or recognize signs of a crime involving domestic violence committed against a student, inform, without delay, the school principal. The school principal immediately reports the criminal act to the prosecutor according to the provisions of paragraph 1, Article 37 of the Code of Criminal Procedure or the nearest police authority. Educators and principals of private schools, as well as those in charge of all forms of Preschool Education Units, have the same responsibilities.

2. During the pre-trial and hearing proceedings, the school principal, who reported the criminal act to the aforementioned authorities, and the educator, who was informed or recognized the signs of it, shall be summoned to court as witnesses, only if the information is not proved by any other means of evidence.

Auxiliary Agencies

As auxiliary mechanisms to the UNCRC, a number of organizations and independent authorities support and strengthen the fight for the protection of child rights. Two of the most important representatives of such actions, in Greece, are the Greek Ombudsman “Συνήγορος του Πολίτη” and the Smile of the Child “Το Χαμόγελο του Παιδιού”.

The Greek Ombudsman

The “Greek Ombudsman” (“Συνήγορος του Πολίτη”) is an independent body established in 1997 to protect the rights of citizens. It is controlled only by the Greek Parliament and its services are free. Specifically, the “Ombudsman for Children” investigates child rights violations, monitors the implementation of laws and makes suggestions to the state, accordingly; meets children in the places where they live and are educated, discusses the problems that concern them and listens to their views and suggestions, tries to make children aware of their rights, and ensures that children are involved and that their voices are heard on issues that concern them. To ensure all of this, the “Ombudsman for Children” has a close collaboration with Greek authorities and the Public Prosecutor’s Office, when necessary. The operation, as well as the regulations of the Greek Ombudsman, was made official by the National Law 3094/2003 and the Presidential Decree 273/1999.⁷

⁷ The Greek Ombudsman, <https://www.synigoros.gr/?i=stp.en.home>

The Smile of the Child

The Smile of the Child (“Το Χαμόγελο του Παιδιού”) is a voluntary, non-profit child welfare organization based in Athens, Greece. The activities of the organization include, among others, hosting children at risk, providing telephone support, counseling and social integration programs, helping families in need, and organizing informational campaigns.

Helplines

In addition to the aforementioned entities, there are several - free of charge - helplines for child support and emergencies, including the National SOS Helpline for Children (1056), the European Helpline for Children (116111), and the European Hotline for Missing Children (116000).

The Head of Anatolia College and the Child Protection Officer* are aware of and have access to the professional Greek services within social welfare, law enforcement and child health to receive advice and support if needed.

International Law

Anatolia College’s Child Protection Policy is also based on international law and on the United Nations Convention on the Rights of the Child of which Greece is a signatory. These two key articles from the U.N Convention on the Rights of the Child are important:

Article 19 - Protection from abuse and neglect. The State shall protect the child from all forms of maltreatment by parents or others responsible for the care of the child and establish appropriate social programs for the prevention of abuse and the treatment of victims.

Article 34 - Sexual exploitation. The State shall protect children from sexual exploitation and abuse, including prostitution and involvement in pornography.⁸

7

SAFE HIRING PRACTICES

Anatolia College strives to ensure understanding and prioritization of child protection issues by all members of the community. To this end and in the protection of students, Anatolia College recognizes the importance of recruiting and retaining employees who have been vetted through a child protection lens. In accordance with our child protection policy, Anatolia College practices safe recruitment and screening processes to ensure appropriate qualifications of employees, including a multiple interview process, criminal background check, references from previous employers, and a psychometric assessment for each new employee.

More specifically, Anatolia College follows procedures and maintains records to ensure compliance with respect to the following for every employee:

** See Head of Counselling and Psychological Support

⁸ United Nations, Human Rights, *Conventions on the Right of the Child*, 1989.

- Interview procedure
 - Anatolia College personnel hold multiple personal interviews with each candidate.
 - Anatolia College personnel are aware of the child protection and safeguarding protocols.
 - Anatolia College personnel are tasked with asking candidates about child safeguarding and protection experience.

- Anatolia College candidates respond “yes” or “no” to questions about their personal conduct regarding:
 - Having an education license revoked.
 - Having been convicted of a felony or misdemeanor.
 - Having been discharged from a previous position due to violation of code of conduct. .
 - Having been denied professional credentials.

- Job offers will be made conditionally upon:
 - Government-issued background check records from candidate’s passport country.
 - Satisfactory references from at least two previous employers, one of which should be a direct supervisor.

- Employees will be required to:
 - Sign the [Code of Conduct Statement](#) annually.
 - Undergo annual child safeguarding and protection training as part of their September orientation and any time the training is offered at or by the school.

8

CODE OF CONDUCT FOR EMPLOYEES: HOW TO MANAGE SAFEGUARDING

Code of Conduct Statement

Anatolia College is committed to the safety and protection of children. Thus, all employees are required to sign a [Code of Conduct Statement](#) every year (or when updated) in order to confirm their commitment to the protection and safeguarding of our students. This Code of Conduct applies to all employees. All members of the school community, including parents, must be aware of the parameters of the Code of Conduct and the expectation of adult behavior toward children within the school community.

As stated in **Chapter 2**, for the purposes of this policy, the definition of “**employees**” includes all those at Anatolia College who directly or indirectly work with students. This includes faculty, staff, after school activities advisors, substitute teachers, shadow teachers, interns, and all outsourced employees.

The definition of “**visitors**” includes all non-contracted persons at Anatolia College who directly or indirectly work with students, including visitors, external professionals, parents/guardians on campus or chaperoning students off campus, and volunteers.

Position of Trust

The public and private conduct of employees and visitors acting on behalf of Anatolia College can inspire and motivate those with whom they interact. or can cause great harm if inappropriate. They must, at all times, be aware of the responsibilities that accompany their work. They must be aware of their own and other persons’ vulnerabilities, especially when working with children and youth, and they should be particularly aware that they are always in a position of trust and responsible for maintaining appropriate physical, emotional, and sexual boundaries.

Any sexual behavior by an employee or visitor with or towards a student is unacceptable. Employees and visitors may never engage in sexual activity with a student under 18 years of age, or older if the child is an enrolled student at Anatolia College, and sexual activity with a student could be a matter for criminal and/or disciplinary procedures. Students are protected by the same laws as adults in relation to non-consensual sexual behavior. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with children by adults in a position of trust.

Physical Contact with Students

All Anatolia College employees and visitors have a responsibility to be aware of their behavior, either in or out of the workplace in relation to the protection and safeguarding of children. Employees and visitors are to provide safe environments for children and youth at Anatolia College. They must show prudent discretion before touching another person, especially children and youth, and be aware of how physical touch will be perceived or received, and whether it would be an appropriate expression of greeting, care, concern, or celebration. Physical contact with children should occur only when completely nonsexual and otherwise appropriate, and never in private places. Employees and visitors are prohibited at all times from physically disciplining a child. Physical contact with children can be misconstrued both by the recipient and by those who observe it, and should occur only when completely nonsexual and otherwise appropriate, and never in private places. Employees and visitors must intervene when there is evidence of, or there is reasonable cause to suspect, that children are being abused in any way. Suspected abuse or neglect must be reported.

Occasionally, physical contact with students can be appropriate for Anatolia College employees or visitors, however it is important to be in alignment with their professional role and following the student’s needs and care. Every student is different, therefore, Anatolia College employees and visitors should understand signs or communication of confidence and permission, or embarrassment and discomfort. An action that is appropriate with one student, in one set of circumstances, may be inappropriate in another, or with a different child, therefore it is not always easy to judge.

More specifically, employees and visitors should act as an exemplary role model for children. They should not use inappropriate language to or in the presence of students, discuss personal or sexual relationships, make unprofessional, discriminating or demeaning comments to or about students or make or encourage others to make sexual remarks to, or about, a student.

Manner of Dress

The manner of dress and appearance are a personal choice and self-expression, and it might reflect one's cultural background. Employees and visitors should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Employees and visitors should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

Infatuations and crushes

All employees need to recognize that it is not uncommon for pupils to be strongly attracted to an employee and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behavior cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted. Employees and visitors should make every effort to ensure that their behavior is not questionable, encouraging or misinterpreted. Any employee who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the Head of School or the Child Protection Officer. In this way

appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned. The Head of School or the Child Protection Officer should give careful thought to those circumstances where the staff member, pupil and their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all.

Social Contact with Families

Social contact and friendships among employees and parents of students can be a common and acceptable practice, independent of any professional relationship. Employees should recognise that some types of social contact with students or their families could be perceived as harmful or inappropriate, crossing boundaries and causing misunderstandings. It is upon the employee's professional judgement to establish appropriate and balanced social contact. In the same context, communication with students both in the 'real' world and through online interactions should take place within explicit professional boundaries. Employees are responsible for contributing to support for students' online safety and responsibility by supporting our school's guidelines for acceptable use of technology and social media.

After school activities, Off campus trips, Events outside the school day, and Overnight trips

This Code of Conduct⁹ is applied for all employees and visitors at all times, including, during after-school activities, day and overnight field-trips, and evening events at the school. Employees and visitors should

⁹ Association of International Schools in Africa, *Child Protection Handbook*, 2016
World YWCA, *Child Protection Policy and Code of Conduct*, 2013

take particular care when supervising students in the less formal atmosphere of an educational visit where a more relaxed discipline or informal dress and language code may be acceptable. When out of school or other activities include overnight stays, within the school premises or during field trips, careful consideration needs to be given to sleeping arrangements. Students and parents should be informed of these prior to the start of the overnight stay.

Intimate Care

Intimate care is any care given when meeting the toileting and hygiene needs of a child. The scope of this care can range from minimal to full depending on age, special needs, disability, or illness. Examples include care associated with toileting, continence, medical procedures, or menstrual management as well as assistance and supervisory tasks such as overseeing washing, toileting, or changing clothes. Most people usually carry out intimate care tasks themselves, but some children are unable to do so because of their young age, physical disabilities, or other special needs. It is important that toilet training in the Early Years is identified as intimate care. Additionally, the same practices will be followed by the School Nurse, in cases of intimate care.

Best practices for Intimate Care

1. Anatolia College employees who provide intimate care are trained in child safeguarding and protection, moving and handling children, and best practice in intimate care. Only members of staff will carry out intimate care with children at the school. Our goal is to support each student to achieve the highest level of autonomy that is possible given their age and abilities.
2. Anatolia College students and employees should have access to clean bathrooms with equipment that is safe and in good working order. There should be a designated staff bathroom and designated student bathrooms. Anatolia College employees will ensure that all the normal precautions are taken to avoid infection such as the use of disposable gloves when appropriate and the proper disposal of waste.
3. In the case of a child with a specific medical or developmental condition, which could impact toilet training, the School Nurse will provide the employees with specific guidelines and advice, after communicating with the parents.
4. Each child's right to privacy will be respected. However, to protect the adult and the child, no adult will be left alone with a child behind a fully closed door, either of the main bathroom or the door of the toilet stall, when carrying out intimate care procedures. Careful consideration will be given to each child's situation to determine how many caregivers might need to be present when a child is toileted.
5. If a Anatolia College employee has concerns about any marks, bruises, or injuries on a child's body, they will immediately report the concern to the Head of School, the Child Protection Officer or the School Nurse.
6. It is important for the school nurse to be informed of all children requiring intimate care beyond the Early Years (ages 3, 4, and 5).

Procedure for Helping a Child to Change Clothes

1. Ascertain the child has had an accident.
2. Offer to help the child change their clothes and make themselves clean.
3. Seek out a second employee to provide support if necessary or inform another employee that you are going to help the child to change.

4. Ensure all changing equipment and resources are ready.
5. Take the child to the designated changing area (usually the toilets) and establish that the child is happy and comfortable with being changed by talking to the child throughout and telling them what you are about to do before each step.
6. Reassure the child and make changing an enjoyable time from beginning to end by chatting and/or singing.
7. If possible, wear disposable gloves. Please note, the use of disposable gloves is not a substitute for good hand hygiene and hands must still be washed at the start and end of the procedure.
8. Encourage the child to undress independently where possible. If further support is needed, the employee is to remove only the clothes required to reach soiled underpants unless further soiling has occurred, and the child needs to be changed fully. Place dirty clothes into a plastic bag to be given to parents or caregivers when the child is picked up at the end of the day. If the child is not picked up by parents or caregivers, the employee will send an email informing them on the situation.
9. If possible, instruct the child to clean themselves with disposable wipes and help as necessary, or if the child is not able to clean themselves do it for them.
10. Help the child to get dressed or encourage the child to dress in clean clothes if they may do so independently.
11. Oversee the child's handwashing and determine if the changing area should be wiped with anti-bacterial spray and dried after use.

9

CONCERNS & ALLEGATIONS AGAINST EMPLOYEES¹⁰

This section aims to create a balance between the need to protect children from abuse and the need to protect employees from false or unfounded allegations. When a student discloses inappropriate behaviors of an employee, the school must respond no differently than if the alleged offender is a family member. Employees have daily access to children and the emotional and physical safety of a child is determined by the access of the offender to the child, thus disclosure of employee offenses must be handled immediately and with seriousness. In case there is an allegation made against an employee, then the Child Protection and Safeguarding team will meet in order to collect evidence in the normal way and then follow the appropriate procedures.

These procedures will be used where the employee has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

All employees are required to report any concerns or allegations about school practices or the behaviour of colleagues that are likely to put students at risk of abuse or other serious harm as well as more

¹⁰ Association of International Schools in Africa, *Child Protection Handbook*, 2016
International Task Force on Child Protection (ITFCP), *Managing allegations of child abuse by educators and other adults, Protocol for International Schools*, 2018

general concerns which may not immediately seem “serious” enough to constitute a formal “allegation”. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Refer to **Section 11** Whistleblower Policy.

Guidelines for employees and visitors to protect against false allegations

- **PRIVACY:** Avoid situations in which you are alone with a child. This includes not transporting students alone in your car. When it is necessary to speak privately with a child, find a space out of earshot, but within sight of others or keep the door open if in a classroom or other school space. The privacy of children in situations such as toileting, showering and changing clothes should be respected (see Section 8).
- **TOUCHING:** Avoid touching areas that are normally covered by swimming suits; breasts, buttocks, and groin and all private areas. In case of assisting a student to change clothes, please refer to the section regarding clothes changing, in Section 8.
- **OVERNIGHT TRIPS:** When supervising overnight activities, adults should not share sleeping quarters with children other than their own.
- **SEXUAL DISPLAYS:** Sexual jokes, innuendos, comments of a sexual nature, kissing, sensual massages, commentary about an individual’s body, leering, whistling, touching, or sexual or obscene gestures, or display of sexually suggestive objects or pictures are not appropriate behavior for employees. Note that this list is not comprehensive.
- **PERSONAL INFORMATION:** Revealing personal information about one's sex life by an employee or visitor is never appropriate.
- **CORPORAL PUNISHMENT:** Do not use corporal punishment in any form. It is the adult's responsibility to set and respect boundaries. When a child attempts to involve an adult in inappropriate behavior, the adult must reject the overture.
- **BOUNDARIES:** It is the responsibility of employees and visitors to set and respect boundaries. When a child attempts to involve an employee or visitor in inappropriate behaviour, the employee or visitor must reject the overture.

Any behavior that is not in alignment with the Code of Conduct for employees, or other suspected abuse or neglect, must be reported to the Head of the School or the Child Protection Officer. Employees should feel safe to discuss and raise these issues, and feel safeguarded regarding their welfare and protection. In case further arrangements need to be made to support staff, the Head of the School and the Child Protection Officer will take immediate action.

It is recognised that dealing with child protection matters is emotionally demanding and very stressful. To ensure a duty of care by Anatolia College, it is important that staff feel supported by adequately trained and experienced employees.

10

PEER-ON-PEER ABUSE

Anatolia College recognizes that abuse can take place among peers and appropriately and systematically responds to this risk of harm, to which children can be exposed or experience. There is no tolerance towards all peer-on-peer abuse forms. This type of abuse is mentioned in a separate chapter, since it involves different parties and follows a modified procedure for intervention. One additional aim of the policy is to prevent, identify and respond to incidents of peer-on-peer abuse. Employees play a very important role in identifying and managing specific cases of peer-on-peer abuse, and respond appropriately to these cases. Faculty and staff will receive relevant training at the beginning of each school year. All employees should be alert to the well-being of students and to signs of abuse, as well as to be mindful of the fact children disclose or present behaviors they have experienced, in different ways.¹¹

Peer-on-peer abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control exercised among children. This could include serious bullying, relationships abuse, child sexual exploitation and harmful sexual exploitation, youth violence, and prejudice-based violence. Additionally, online peer-on-peer abuse involves digital elements, such as sexting, online abuse, coercion and exploitation, peer-on-peer grooming, distribution of sexualized context and harassment.

It is essential that all concerns and allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly. The intervention in this case should include a thorough investigation of the concerns or allegations, as well as the context in which they have occurred; take into serious consideration the allegations and how the child might be at potential risk, a case for which the school will ensure a safeguarding response for all parties involved; take into account the wider context of the abuse and what changes need to be made to the specific contexts to address all children's needs and eliminate any potential risk.

The internet offers wonderful opportunities for students to learn, share information, develop specific skills and entertain themselves. However, it can also be a means to harm or exploit a peer. Anatolia College has been and is committed to organizing seminars and workshops for students of all grades, to empower and enable them to navigate safely, responsibly and positively on social media. The age-appropriate designed programs include lectures, discussions, materials, and activities that promote the understanding of students, knowledge on specific issues that might arise online, and supporting students to seek support.

Specific signs that a child might be experiencing peer-on-peer abuse can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected;
- physical injuries;
- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;

¹¹ Smellie, D., Eastman, A., & Firmin, C. (2019). *Peer-on-peer abuse toolkit* [PDF]. Farrer & Co.

- broader changes in behavior including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- abusive behavior towards others.

11

ONLINE SAFETY

This section is in progress

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. Anatolia College will reassure that children are safeguarded from potentially harmful and inappropriate online material.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, grooming or online bullying.

12

BEHAVIOR MONITORING

The Behavior Monitoring Google form at Anatolia College provides an initial assessment of behavioral patterns that may be emerging at school, across a specific group of students, at a particular time of the day or location. When the incident log is filled in and a behavior is reported, a clear and objective language used to describe alleged student behavior is crucial. In this way, the actions or behavioral plan that need to be put in place are more clear and well-designed.

[EYP/ Elementary Behavior Monitoring Google form](#)

[Secondary Behavior Monitoring Google form](#)

13

WHISTLEBLOWER POLICY

Anatolia College maintains a Whistleblower Policy to ensure that all employees understand their duty to raise concerns about the actions of any person without fear of repercussions. With regard to child

protection and safeguarding, all employees are required to report any concerns or allegations about school practices or the behaviour of others that are likely to put students at risk of abuse or other serious harm as well as more general concerns which may not immediately seem “serious” enough to constitute a formal “allegation”. There will be no retribution or disciplinary action taken against any employee for making such a report provided that it is done in good faith. Refer to the Whistleblower policy in the Employment Conditions Policy Manual for details about the Whistleblower policy and procedures.

Students are also encouraged to report incidents for which they themselves or others may be the victims. Reporting by students may be verbal or in writing and shared with any school employee, who, in turn, shall communicate this information to a Child Protection Officer and Head of School. The Child Protection Officer shall gather information and provide written documentation including the date, person or persons involved, and any additional relevant information. Specific protocol for the record keeping will be followed.

14

STEPS REGARDING REPORTING AND RESPONDING

It is mandatory for employees, and the general school community, to report incidents of maltreatment and child abuse as soon as possible as per the steps below. Students are encouraged to report incidents for which they themselves or others may be the victims. Reporting by students may be verbal or in writing and shared with any school employee, who, in turn, shall communicate this information to a Child Protection Officer. The Child Protection Officer shall gather information and provide written documentation including the date, person or persons involved, and any additional relevant information. Specific protocol for the record keeping will be followed.

In a situation wherein Anatolia College considers that the behavior of an employee could possibly place a child at risk of harm, reserves the right to proceed with disciplinary actions, up to and including termination/suspension of employment.

Stage 1: REPORTING: When you suspect child abuse

Report child protection and safeguarding issues to the **Child Protection Officer and/or Head of School** as soon as it is suspected. If this is not possible at a given moment, please fill in the [Child Protection and Safeguarding form](#).

Expect an **investigation** of your report and notification that the case was or was not substantiated and expect anonymity.

- **DO NOT** contact the child's family or other persons (relatives, friends, colleagues) for the purpose of determining the cause of injury.
- **DO NOT** feel compelled to prove that a child has been abused or neglected.
- **DO NOT** remove clothing, especially if it covers “private parts”, in order to see an injury.

- **DO NOT** promise confidentiality. Explain that confidentiality is essential UNLESS someone discloses that they or someone else is in danger.

Refer to **Section 13** for confidentiality, data protection, and information sharing.

Stage 2: REPORTING: Ways to find out about abuse or neglect

An allegation may come to light in a number of ways, including:

- a **written statement from the victim** or another member of the school community (including students, alumni, current and former staff, or parents), that describes or implies inappropriate behaviour by an adult – these can come to light in a number of ways, including in correspondence with the school or others, in responses to alumni questionnaires, and in general statements posted on social media;
- a **verbal or non-verbal disclosure (such as through play)** or partial disclosure from the victim or another member of the school community (including students, alumni, current and former staff, or parents);
- the **monitoring** of employee and student information services or social media use;
- **externally** from a member of the public, police, health, or another external agency informing the school; or a legal claim.
- **unofficial sources**, such as rumors, information during advisory, or discussions during outdoor play.

General guidelines: You are not expected to investigate the case but gather basic information about what may have taken place, but it might be crucial to record the actual words used as soon as possible, if not immediately. Asking too many questions might make the other person feel intimidated or guilty. Avoid asking “why” and “how” something took place and establish and record details of all those who may be at risk.

Observation: Children who are being abused or neglected may demonstrate behavior which gives us clues about what is happening to them. The best recourse is to keep your own informal notes. By recording, not in the child’s record, but in your own notes, the child’s name, the date, and the nature of the suspicion, you establish ongoing documentation of what is happening.

Report from another child: Sometimes friends or classmates of maltreated children learn or suspect that their peer is being abused or neglected. Out of concern for that child, the classmate may tell a teacher, often swearing her/him to secrecy. This is a secret the teacher cannot keep. Prompt the classmate to support the student to disclose this information to the teacher. If this does not happen, keep records of the information and observe the student's behavior in the future.

Disclosure by the child: When a child discloses that he or she has been abused or neglected, a teacher or counselor may feel at a loss initially about how to respond. First and foremost, it is necessary to communicate two things to the child: that you are glad the child told you, and that he or she is not to blame. It often helps for children to know that it has happened to other children and that they are not alone.

Refer to **Chapter 5** for further information and identification of types of child abuse.

Stage 3: RESPONDING: Documentation, investigation and action taking

Upon receiving a
<https://docs.google.com/forms/d/e/1FAIpQLScchW6EfVr6-SWsqg4cgdPLVCcooDqzNoWmSHx7B0HQq6jZ1w/viewform> from any individual, the **Child Protection Case Management Team** will take the following steps.

- In case there are **clear indications** of child abuse, then the School will proceed to immediate investigation of the case. **Clear indications** are defined as written statements or verbal disclosure from the victim, external statement or report from a member of the public, police, health, or another external agency informing the school; or a legal claim, parental neglect, as well as physical indicators of physical and emotional abuse, neglect or sexual harassment.
- In case there are **serious warning signs** of child abuse and the parents/guardians do not consent for further investigation of the case by professionals, then the School will proceed to immediate investigation of the case. **Serious warning signs** are defined as non-verbal disclosure from the victim, verbal or written statements from another member of the community, observations of warning emotional and behavioral indicators of physical and emotional abuse, neglect or sexual harassment.
- In case that **inappropriate behavior** of a contracted employee is identified, then a set of disciplinary action measures will be initiated that can include from reprimand letters to termination of employment. For the description of **inappropriate behavior**, please refer to the **Code of Conduct** and **Chapter 9**.
- In case of **inappropriate behavior** of a student is identified, then a set of disciplinary action measures will be initiated that can include from temporary to permanent termination of school admission. **Inappropriate behavior** of a student is defined as any form of physical, sexual, emotional, and financial abuse, and coercive control exercised towards another student. This could include serious bullying, relationships abuse, child sexual exploitation and harmful sexual exploitation, youth violence, and prejudice-based violence. Additionally, **inappropriate behavior** of a student might involve digital elements, such as sexting, online abuse, coercion and exploitation, peer-on-peer grooming, distribution of sexualized context and harassment. Please, refer to **Chapter 10** for further details.
- In case of information from **unofficial sources**, such as rumors, information during advisory, or discussions during outdoor play, then a further investigation and confirmation of the validity of the sources and the information needs to be made by the CPO.
- In case of **allegation** against employees or visitors:
 - An employee or visitor against whom an allegation has been made should always be:
 - treated fairly and honestly and helped to understand the concerns and the processes involved
 - keep informed of the progress and outcome of any investigation and the implications for themselves
 - kept informed about events in the workplace if they have been suspended.
 - Suspension does not need to be automatic. It should be considered in cases where:
 - it is suspected that a student(s) is at risk of significant harm
 - the Greek authorities are investigating the allegation
 - there are grounds for dismissal due to the nature of the allegation.

If the employee returns to work following suspension, the employer should consider what help and support might be appropriate and how best to manage the employee's contact with the child concerned if they are still attending school.

Any allegation should be treated seriously and objectively, with those concerned keeping an open mind.

They should not:

- ❖ investigate or ask leading questions if seeking clarification
- ❖ make assumptions or offer alternative explanations
- ❖ promise confidentiality

They should:

- ❖ make a written record of the information given, including the time, date and place of the incident(s), persons present and what was said
- ❖ ensure that all procedures are followed.

Clear records of the incident should be kept at all stages (Refer to **Chapter 15**)

Additional School Support

Additional ways in which the school may support a student and family through a child abuse case include:

- Meetings and discussion with the students involved
- Help gather all information and explain next steps
- Parent notification and meetings
- Involvement of School Nurse
- Conducting psychological assessment
- Arrangement of counseling sessions

15

CONFIDENTIALITY, DATA PROTECTION, AND INFORMATION SHARING

Confidentiality

Anatolia College respects the privacy of those involved in all aspects of child protection cases. The identities of those involved in both the reporting and the incident of suspected child protection violations will be kept confidential to the greatest extent possible. However, those involved must understand that in order for an inquiry into the incident to proceed, certain information must be shared. Information will be shared strictly on a need-to-know basis and only with those directly involved in incident response. These individuals may include but are not limited to the Child Protection Team, Anatolia College leadership, Board of Trustees, and/or Greek child protection officials.

Data Protection

The storing and processing of personal information is governed by the General Data Protection Regulations 2017 (GDPR) and Data Protection Act 2018. More specifically, Anatolia College understands that the privacy of its students and their families is important. To that end, we have adopted a policy and regulations regarding the collection, use, and dissemination of personal information, in

accordance with the General Data Protection Regulation.¹² More specifically, Anatolia College processes personal data for a number of purposes:

- Administer and maintain student records for the purpose of providing student educational services, and alumni services;
- Administer and maintain employee records for the purposes of fulfilling the contract of employment;
- Maintain such records as may be required by legislation (e.g. health and safety, employment, background checks, etc.);
- Responses to queries by individuals relating to their education, or other matter; Keep employees and former employees, informed about matters relating to their employment, pension, or benefits;
- Keep employees, students, parents, and alumni informed about matters relating to Anatolia College;
- Disclose information about students, former students, employees, and former employees to future employers for reference purposes;
- Disclose information about individuals in response to legislative/court orders.

Information Sharing

Anatolia College policy regarding confidentiality and management of school records applies to all record keeping and documentation of incidents of child protection. Only designated faculty and staff, such as the school counselor and the school nurse or the Child Protection Officer have access to confidential documentation regarding child protection matters.

Employees should never use or disclose confidential or personal information about a student or their family, in casual conversations or other context, since this information might be used by other parties to humiliate or embarrass a student.

In case an abuse is alleged or suspected, then employees have the responsibility to break confidentiality and inform the designated person without delay. If a child or parents make a disclosure regarding abuse, the member of the staff should not promise confidentiality, but give reassurance that the information will be treated in a sensitive and effective manner. In case of doubts, please contact the school counselor or the child protection officer.

All parties involved in the reporting and intervention procedure should sign the [Confidentiality Agreement](#).

16

RECORD KEEPING & RECORDING FORM

In case a child abuse incident is reported, objective record keeping is important to gather reliable and accurate information. The [Internal Recording Form](#) will be completed by the Child Protection Officer and only be accessible by the Head of School and the Child Protection Officer.

- Reporter's relationship to the child/victim;

¹² Safer Recruitment Consortium, *Guidance for safer working practice for those working with children and young people in education settings*, 2019

- Child's name, gender, age, address;
- Information on parents/guardians;
- Information about the person who reported the incident;
- Nature and extent of injuries/maltreatment; Identification of type of abuse;
- How did the person that reported the incident become aware;
- Description of action taken by the Child Protection Officer;
- Other information that may be helpful;
- Name of perpetrator, and information on whether there was prior evidence;
- Information about the cause, and those responsible/ involved; and
- If determined that the case warrants making a report to local authorities or agencies, this report should be documented using all forms or information relevant.

In case of a child abuse incident or suspicion for child abuse, please fill in the [Internal Recording Form](#).

As part of best practice, the [Body Map](#) can be used by the school nurse or the child protection officer in order to identify the parts of the body that were abused on the child. Taking photographs of the child's body is not allowed. It should be used together with the [Body Map instructions](#) for reliable reporting.

In accordance with the General Data Protection Regulation (GDPR) of the European Union, data from the Internal Recording Form shall be kept for a maximum of 2 years, from the moment the child disenrolls from the school, with access only by the Head of School and the CP Officer.

17

ANTI-BULLYING POLICY

For Bullying incidents, please refer to the [Anti-bullying In-school prevention & intervention protocol](#).

18

SPECIAL NEEDS PROTECTION AND SAFEGUARDING

An inclusive education is defined as a process which enables all students to be active participants in a context by removing all potential barriers in order to enhance equality of opportunity so that children can develop their full potential in the least restrictive environment (Sebba & Shachdev, 1997). The term 'inclusion of all children' was first introduced by the UNESCO Salamanca Statement (1994) and has been pivotal in encouraging nations to move toward inclusive education.

Children with Special Educational Needs and/or Disabilities are **three times more likely to be abused** than their peers without special needs, and additional barriers can sometimes exist when recognising abuse in children with special needs.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration;
- the potential for children with SEN to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs;
- communication barriers and difficulties and overcoming these barriers.

There are children with difficulties in communicating or understanding, and problems with communication might cause limited ability to learn about safety and protection, and request support. It is important to show them what to do to promote their safety, use role-play to rehearse and practice on a regular basis. They might also have difficulties to make decisions, either due to developmental delays or limits in thinking skills or impulsive behavior. Some children might also have problems distinguishing when situations and people are safe or dangerous, not knowing what to do or react. Specific and explicit instructions and training, in comprehensive ways, on how to behave in certain situations that might become dangerous, is essential and provided in school. Any reports of abuse involving children with SEN will therefore require close liaison between the Child Protection Officer and the Learning Support Coordinator.

Anatolia College commits to support all students with special needs, following all guidelines from the Child Protection and Safeguarding Policy. Anatolia College aims to strengthen the framework for child protection and address social norms which might cause discrimination or stigmatization, focusing on prevention, detection and appropriate response to the specific needs of the children in the case of abuse or neglect.

19

COMMUNICATION WITH PARENTS

Anatolia College promotes open communication with parents. The Child Protection and Safeguarding Policy will be available publicly, so that parents are aware of the fact that referrals about suspected abuse or neglect may be made and what the role of the school in this will be.

Parents will be given opportunities for receiving specific training to promote their understanding of specific policies and procedures of the school and their own awareness on specific issues of child protection and safeguarding.

The school is committed to working in collaboration with parents, since we believe that promoting the health and well-being of our students is an important part of their overall education. At the beginning of every school year, in September, all parents will be informed about the policies of the school, as well as the Advisory-Health-Wellness program that is annually implemented, promoting the students' personal safety and welfare, their knowledge on Rights, Respect and Responsibility regarding their own selves and in relation to their peers, and enhancing their understanding of their bodies, gender, hygiene and relationships/ friendships, and value development. (Refer to **Section 20**)

Most parents exhibiting inappropriate behavior towards their children need support in order to make a change in behavior. That necessary support includes a system that sets clear and defined standards for behavior towards children and that provides necessary support to help the offender meet those standards. Unfortunately, many offenders, given their characteristic lack of empathy, cognitive distortions, levels of stress, and rationalization, will not enter into behavior change counseling, maintaining and continuing their behavior through increasing threats and other forms of manipulation over the abused child. Child protection usually follows the child, especially if the problem is within the family; thus we are morally obligated to do as much as we can to help the next school environment protect the child. When children and parents are present, we always give priority to the child and consider the following:

- ❖ what the child wants to happen and who the child would like to be supported by, both inside and outside school;
- ❖ what language the child feels most comfortable communicating in and how the school can accommodate this;
- ❖ take enough time to get the first communication right; be honest and transparent;
- ❖ and the way the parents and wider community might respond, considering the cultural context, and what steps can be taken to mitigate and/or protect the child from any harmful responses.

20

TRAINING FOR Anatolia College STUDENTS

At Anatolia College, we believe in teaching safeguarding as part of a broad and balanced curriculum. There are many opportunities for children to learn about safeguarding and protection throughout the school day, and any opportunities to further discussions about relevant topics should be taken. However, to best educate and protect students, the school has designated times to teach several lessons on child safeguarding and protection to each class in the school, throughout the school year.

Anatolia College's Student Counseling Services have developed and integrated a child protection curriculum into their whole school Advisory-Health-Wellness programs. Below, is a list of the child protection and safeguarding topics that is implemented in the students' curriculum annually:

- My Body My Space Sexual Education Program
- Internet Safety Program
- Anti-Bullying Program
- Kindness Program
- Month of Differences Program
- Mental Health Awareness Month

In addition, the Anatolia College Student Counseling Services team will annually introduce and educate students on the current Child Protection and Safeguarding Policy and procedures and will create, review, and implement the following Child Protection and Safeguarding Programs:

- Grooming Awareness

- Online Learning Safety

21

TRAINING FOR Anatolia College EMPLOYEES & VISITORS

Anatolia College gives emphasis on the prevention of child abuse, therefore child protection and safeguarding training opportunities for all employees is implemented annually.

The training for Anatolia College employees and visitors will be provided in two ways:

1. Training for employees and visitors regarding the Child Protection and Safeguarding Policy, as well as the Code of Conduct will take place every September, during the New Faculty Orientation for newly-hired employees and during the Faculty Orientation for the returning employees.

The Faculty Orientation training will cover the following topics:

- Familiarizing and understanding this policy and procedures manual
 - Awareness of the types of abuse and warning signs
 - Vulnerabilities of international schools and community
 - Code of conduct for employees
 - Developmental levels and expectations from different age-groups, on critical thinking, decision making and understanding of children, with a focus on sexual and cognitive development
 - Diversity, Equity, Inclusion Policy, specifically for teachers, and the Learning Support Department
 - Focus on how to handle and respond to disclosure, and how to report it, as well as the importance of confidentiality
 - Role-play and simulation of disclosure, as well as discussion and practice on case studies
 - Introduction to resources and online trainings
 - Opportunities for consultation on an individual setting
 - Special medically-based training for the school nurse only
2. Throughout the year, on a monthly basis, employees will watch short videos that will be focusing on specific units of the Child Protection and Safeguarding Policy. At the end of each video, employees will be asked to take a quiz to demonstrate understanding.

Online trainings available on:

- [National Association of School Nurses](#)
- [Royal College of Nursing](#)
- [National Society for the Prevention of Cruelty to Children](#)
- [Child Protection Certificate](#) - ECIS
- [Children's rights in theory and practice](#) - provided by Harvard University
- [National Online Safety](#)

22

FOLLOW-UP AND DEBRIEFING

After an allegation is addressed, Anatolia College will follow specific steps to follow-up with the incident and ensure that debriefing on future learning and feedback takes place. The debriefing aims to consider what could be done differently or better in the future, such as:

- Has the incident highlighted any training needs for staff, parents, or children?
- Did the allegation reveal inadequate boundaries between children and adults in the school?
- Did children, employees, or parents have concerns about the adult and did they raise these with anyone? If so, how were these concerns dealt with? If not, why not?
- How did the school support and care for the victims and was this appropriate? Could something have been done differently? ¹³

Changes in procedures and assessment are prone to changes and evaluation. Communication about how the effort is developing, and feedback from leadership and the community reflecting on the procedure, is essential to future improvement of child abuse prevention initiatives and programs.

This feedback should include:

- Regular reminders (newsletters, bulletins, newspaper articles, etc.) of the responsibilities associated with maintaining safe environments and the results associated with doing so;
- Annual evaluation and review of the child protection and safeguarding policy and procedures and focus on the the vigilance necessary to protect children;
- Availability of policies and procedures for child protection and safeguarding from the school community and annual feedback from faculty and staff, as well as students;
- Schedules for training for staff, parents and students, organizational and administration changes;
- Checklists about what is necessary to have in place or to have accomplished in order to be considered in compliance with the organization's policies;
- Review of checklists on what modifications need to be made to the Child Protection and Safeguarding Policy.

23

USEFUL RESOURCES

¹³ International Task Force on Child Protection (ITFCP), *Managing allegations of child abuse by educators and other adults, Protocol for International Schools*, 2018

- [European Society for Child and Adolescent Psychiatry](#)
- [US Department of State Child Protection resources](#)
- [CIS Child Protection Resources](#)
- [Advice for parents or caregivers concerned about the mental health or emotional well being of a child or young person](#)
- [AISA Child Protection Handbook](#)
- [Managing allegations of child abuse by educators and other adults](#)
- [Peer-on-Peer abuse toolkit](#)
- [Center for Disease Control and Prevention](#)
- [Unicef](#)

24

CASE STUDIES

Case study 1

Sarah Jones (student, aged 18) is a student at Hilltop School (an independent boarding school for 13 to 18 year olds). Sarah disclosed to the DSL six months ago that she thought she had been raped by Benjamin Green (student, aged 17) at a party in London during the school holidays. Sarah had not wanted the DSL to tell her parents (she was worried that they would blame her for the incident), or the police (she was worried that the police would want to investigate which would mean that everyone would find out about the incident). The DSL and the Principal respected her wishes at the time, given her age and the fact that the incident had taken place outside of school. They had discussed the allegation with Benjamin and asked him not to contact Sarah on social media. Both students are boarders. Since then, Sarah has displayed increasingly concerning behaviour. A few weeks ago she left the boarding house without permission at the weekend. She returned late on Saturday evening very drunk. She shouted and swore at her housemistress. She was suspended from school for one week. Whilst on suspension Sarah made a formal report to the police that Benjamin Green had raped her six months previously.

The local police contacted the school later that day, and informed the DSL of Sarah's report and that the police were going to interview Benjamin and investigate the allegation. They also said that Sarah had told them that she was very worried about seeing Benjamin in school, and that she did not think that she could come back to school if he was there. The DSL informed Benjamin of Sarah's formal report straight away and his mother picked him up from school later that day. They were planning to attend the police station voluntarily. The DSL alerted the School's Principal to the developments, explaining that he "did not know what to make of the allegation" because he was concerned for Benjamin who was "a star student who had never caused any trouble in the past." The DSL also explained that he was worried about the stigma that would be associated with Benjamin as a result of the police investigation. The DSL was also worried about Sarah, particularly given the comments she had made to the DSL last month about suicide. The DSL sought the Principal's guidance on next steps and whether the School needed to suspend Benjamin.

Case study 2¹⁴

Karla Olivares (aged 5) is a student at Greengrove Primary School. Karla told her mother one morning that she did not want to wear a skirt to school. When her mother asked why Karla said that she didn't want "those boys" to hurt her again. Karla then disclosed to her mother that two boys in her class had taken her behind a tree in the playground the day before, they had lifted her skirt and touched her inappropriately in a way that hurt her. Karla was too upset to say who the boys were, and her mother had taken her to the Doctor for a full examination. Karla's father then contacted the Headteacher to inform her of the disclosure. He said that he thought that the "predators" might be Sam and Yen, two boys in Karla's class who he said had been "causing trouble for some time now". Karla's father was very upset and angry and said he and his wife were outraged that this could have happened at school. He referred back to previous concerns that he had raised with the school about its security. He also demanded an immediate investigation which he said should include interviews with all staff and children "until we can find out who the predators are". Finally, he said that "once the predators are known they must of course be expelled immediately".

Case study 3¹⁵

Paul (student, aged 15) is a student at King George secondary school. Paul has become increasingly unhappy at school over the past two years. He recently told his father that he was being badly bullied by a number of boys and girls in his class, and that this had been going on for over two years. He explained that they had posted nasty comments about him on Instagram, that they would steal his lunch, chase him, and make him do things during Mr. Reed's class which he found humiliating – like repeat sexually explicit comments from social media. They also forced him to drink unpleasant things which made him physically sick. Mark Stone, another student aged 14, was also picked on and made to do this. Paul's mother informed his form tutor Mr. Reed, who said that he would investigate the matter.

She met with Mr. Reed last week. He told Paul's mother that he had had a quick word with some of the students in question, who were clearly just "having a bit of fun," and that she should not be overly worried about it. He said that he had spoken to Mark's mother, Mary, who had said that Mark told her he was "honoured to have been chosen" to perform the same tasks for the students in question. He said that he was always present during Mr. Reed's class, and that he thought they were a very good and fun way to bring the class together. When Paul's mother asked about the racist and sexist language that Paul had told her was routinely used in the class, Mr. Reed said that he had overheard some jokes, although generally he thought they were "in the right spirit".

Abuse by Adult

Case study 4¹⁶

Mr. Ford asks a security guard for the key to the sports hall. He says that he is coaching a pupil, Amina, after school to help her with her application for a sports scholarship. He explains that Amina has been having a very difficult time with her parents and that he feels like a father figure to her. He says that she has also been having relationship difficulties with her ex-boyfriend and that she finds sport helpful in helping her to manage her problems. The security guard informs the Child Protection Officer. Mr. Ford is

¹⁴ Smellie, D., Eastman, A., & Firmin, C. (2019). *Peer-on-peer abuse toolkit* [PDF]. Farrer & Co.

¹⁵ Smellie, D., Eastman, A., & Firmin, C. (2019). *Peer-on-peer abuse toolkit* [PDF]. Farrer & Co.

¹⁶ ECIS Online Course, *Level 2 Certificate in Child Protection - Support Staff, Nov. 2020*

absent from school suddenly with no explanation. A few months later, there are rumours amongst the staff that he was in a sexual relationship with Amina, a pupil at the school who is 15 years old. A few months later, the school is criticised in the local and international press for “covering up” abuse by a teacher. The article says that a teacher sexually abused a female student on sports trips. The girl’s parents are taking legal action against the school and are quoted in the article as saying that their daughter was “groomed” by the sports teacher and persuaded to share naked images of herself with him. Apparently the girl did not say anything because she didn’t want to make the teacher angry. The article says that staff had concerns about the close relationship that the teacher had with the pupil. However, they did not raise them because “that sort of relationship was not uncommon at the school” and they were not sure whether the teacher’s behaviour was inappropriate.

Case study 5¹⁷

Jordan was an 11 year old boy with what had been described by his parents as a slight learning disability. He was enrolled in a Drama Camp. Vincent, the head instructor, knew he was on a time clock to help the students all learn their parts for the community performance on Friday evening. Jordan seemed distracted and was now successfully distracting other children. Vincent called the children to attention. With a four page script in hand, Vincent tapped Jordan on the head and said, “Jordan pay attention, and focus.” Jordan, yelled out “Ouch, you aren’t supposed to hit me.” Vincent rolled his eyes, and said, “Jordan that wasn’t a hit, it was a slight tap. Please pay attention, we have lots of work to do.”

By 11:00 p.m. Jordan's mom had contacted Child and Family Services, reporting her son had been hit in the head by a leader at the Drama Camp. A protection worker was at the Drama Camp door the next morning with the report in hand. The protection worker recommended for the protection of the other students, the Camp and Vincent, that Vincent should be suspended with pay until the investigation was complete.

The Board of the Drama Camp could hardly believe that this small incident had been reported to Child and Family Services. After conducting an internal investigation which took less than two days, the Drama Camp Board came to the opinion it was nothing that they would call “abuse” and called Vincent back to work. Three weeks later the external investigation was still in process. Child and Family Services challenged the Drama Camp for bringing Vincent back to work prior to the official investigative report being completed. In the meantime, Jordan's mom had taken the complaint to the media and was spreading the word to other parents of the abuse that her son had experienced at the Drama Camp.

Case study 6¹⁸

When Ross arrived at work on Monday morning, he saw the message light flashing on his telephone. He called in to pick up messages, and there were two calls that had been left, one on Friday evening and one early Monday morning. The call on Friday night was from a mother of two siblings (Bobby and Brianna) that were registered at Day Camp. The mother was agitated and said that her children had revealed to them at supper some of the games that had been played at Day Camp. According to the kids the summer staff had been playing “Fear Factor” with the campers. The Dares had escalated to grotesque activities including drinking out of the port-a-potty, running around camp in their underwear, sucking Kool-Aid out of the counsellor’s belly buttons and licking in between the counsellors toes.

¹⁷ Case Studies. (n.d.). Retrieved November 15, 2020, from <https://www.plantoprotect.com/en/about-us/news/case-studies/>

¹⁸ Case Studies. (n.d.). Retrieved November 15, 2020, from <https://www.plantoprotect.com/en/about-us/news/case-studies/>

Needless to say, the mother was upset. She had called other parent's of children that were registered at the Day Camp and together they were calling Child and Family Services (Children's Aid) to report the camp and the counsellors. Ross then listened to the second message on the machine. This call was from a Case Worker with Child and Family Services. They called to say they wanted to meet Ross within the hour at the camp setting. Ross jumped in his car and drove to the camp location to meet the case worker. He was greeted by the teen staff members that were running the Day Camp. They had no idea why they had visitors coming to the camp on a Monday morning.

Case study 7¹⁹

Clive has been brought to you by his teacher. His face seemed to be pondering why an adult actually wants to talk with him. He resides with his sister, brother-in-law and their two children. He appeared to be a very smart child and has some faded marks on his hands and legs, clear indications of beatings he had suffered over a period of time. He is unkempt. At seven years old Clive still wears pampers. His teacher indicated that he has problems retaining his faeces, which she speculated could be a result of abuse. When asked questions about sharing any bad thing that he has ever experienced he readily responds "my big sister does beat me nearly every day. Day before yesterday I got licks on my belly and my foot. She does beat me with shoes, slippers, belt, whip, anything. A time she pelt me with a big brick and burst my head then she put antibiotic on it. I then went to wash my clothes, clean the concrete, fetch water and sweep the yard." "Everybody does beat me even my lil nephew, he is two. My mother does beat me too when she comes. She burst my mouth already, and a time she black and blue my face. My brother-in-law does beat me for everything. He does beat me with rope, wire and big wood. I am not like anybody in my house; only my lil niece, she is five she doesn't beat me, she does play with me and she does cry when anybody knocks me.

General Considerations

In which cases should an external party concerning itself with children's care be called in?

Should the school ask the Child Protection Officer or an external child protection service to carry out an assessment of children involved in an incident, including any risk of harm that they may pose to other children – at or outside the school, and to use the results of that assessment to inform the support that is provided to them?

Should the school, in accordance to the child protection policy, and in cooperation with their Child Protection Officer, complete a safety plan for each student who may be affected by the alleged abuse (if appropriate)? The safety plan should set out, for example:

- a. How best to safeguard and support children involved – are there any specialist services that the school can refer them to?
- b. How best to inform and engage with students' parents, who may not be aware of their allegation or formal report.
- c. What will the likely impact be on the students involved should there be a formal investigation carried out, and how can this impact be minimised?
- d. Who should be told about the allegation internally to ensure that the children are safeguarded appropriately?

¹⁹ *Worksheet 4 : Case Studies to assess child protection needs* [PDF]. (n.d.).

<https://www.hands.org.gy/files/Worksheet%204%20-%20Case%20Studies%20to%20assess%20child%20protection%20needs.pdf>

How can the allegation be kept confidential (where possible and appropriate), and what should be communicated to students, staff and parents if the allegation becomes public?

What aspects of the school's systems need to be strengthened as a result of the alleged incident? For example, do staff need training on peer-on-peer abuse, and their own as well as the school's responsibilities in reporting and responding to alleged incidents, including those that take place outside of school? Does the school teach students effectively and facilitate discussion about sex and consent?

Consider who is best placed to investigate the alleged incident, and how it can be carried out in a way which minimizes the impact on the children and ensures that they are supported throughout.

Consider the school's wider reporting obligations.

Consider how to keep the allegation confidential where possible and appropriate, and what to communicate to students (age appropriately), parents and staff if the allegation becomes public.

Consider what aspects of the school's systems need to be strengthened as a result of the alleged incident. For example, should the school's supervision arrangements in the playground and any other locations be improved? Does the school educate the children effectively and in an age appropriate manner about how to stay safe from abuse? Does the school communicate with parents effectively about children's safe and healthy development, and problematic and harmful behavior in young children?

Consider the school's key principles and guidelines for protection, and adjust planning and supervision for higher risk activities (such as summer camps) accordingly.