International Waldorf School The Hague



Child Safeguarding and Protection Handbook

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

Revised October 2025

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This handbook is adapted from the Quality Schools International (QSI) handbook and is informed by the International Task Force on Child Protection (ITFCP). The school is **bound by the laws of The Netherlands** and must report suspected abuse to local authorities. Non-compliance can lead to legal action.

Chapter 1 - Introduction

IWSTH is committed to fostering a safe and caring environment for the whole school community. We act in accordance with the United Nations Convention on the Rights of the Child, Dutch law, and guidance from the International Taskforce on Child Protection.

Safeguarding is a fundamental part of the school's strategic impact of Wellbeing, Safety and Belonging. It is embedded within all aspects of school life including the curriculum, facilities, professional development, parent education offerings and recruitment practices.

School staff work in partnership with parents and students to promote student safety and wellbeing.

The purpose of this handbook is to create transparency and consistency for all stakeholders in definitions, approaches and processes.

Vulnerabilities of the International School Community

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

- **Key Vulnerabilities: Transience and mobility** of families and staff members impact a student's ability to develop long-term support relationships, leading to attachment issues and isolation from extended family. Students are often caught between cultural and social systems, causing confusion of behavioural expectations. This isolation, common in international families, is a characteristic abusers look for. Abuse is not linked to socioeconomic status or culture; **90% is committed by individuals known to the child**.
- **Signs of Potential Adult Offenders:** The identification of a **"favorite"** student, attempts to be alone with children, private gifts/chats (in person or online), and inappropriate sexualized language or jokes around students.

School Mission, Values, Behavioural Norms, and Student Profile

The foundation of all safety and belonging is held in our school mission, values, behavioural norms and student profile. They function as guidelines for all members in our community and help us create the school we want to be.

Mission

Our mission is to stimulate children in their development to become independent, free thinking young people who can and want to actively participate in society to the fullest extent of their capabilities. We help them develop their basic skills (cognitive, physical, emotional and social areas) in a healthy way and stimulate the development of their own problem-solving skills.

School Values

To promote a culture of safety and belonging, the school upholds the following three values: Belonging, Responsibility and Creativity.

Behavioral Norms

All members of our community, students, parents and staff, believe, model and live these values. We support and hold each other accountable in order to keep our school culture safe and welcoming for all.

The values are manifested through the following behavioural norms:

- Be kind, even if you are not friends with everyone.
- Do not hurt others, even with words.

- Be aware of others and take their feelings into account.
- If something happens that you don't want, you must speak up.
- If someone else shows they don't want something, stop immediately.
- Ensure everyone can play and work pleasantly; collaboration and playing together are key.
- Solve problems together so everyone can enjoy activities quickly. Seeking help from a teacher or an adult on break duty is not a betrayal of friends.
- Respect each other's property and never take anything without asking.

Chapter 2: Definitions of Abuse, Neglect and Bullying

Every child has the right to be protected against harm and all forms of abuse.

Culture, religion or tradition can never be reasons for aggression against children.

Abuse is defined as a relationship dynamic where a more powerful person uses their position to meet their own needs.

Important Note on Indicators: Behavioral indicators alone do not confirm abuse. The **most powerful evidence is a child's self-report**, which **must** be reported immediately to the Child Protection Team (CPT) regardless of other signs. When in doubt, seek help from the CPT.

2.1 Physical Abuse

Definition: Deliberately inflicting or allowing pain or injuries.

Key Indicators: Possible indicators of physical abuse include:

- Bruises, burns, sprains, dislocations, bites, cuts.
- Improbable excuses given to explain injuries.
- Injuries which have not received medical attention.
- Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc.
- Repeated urinary infections or unexplained stomach pains.
- Refusal to discuss injuries.
- Withdrawal from physical contact.

- Self-destructive tendencies, including cutting or suicidal ideation.
- Arms and legs kept covered in hot weather.
- Fear of returning home or of parents being contacted.
- Showing wariness or distrust of adults.
- Being aggressive toward others.
- Being very passive and compliant.
- Chronic running away.

2.2 Neglect

Definition: A parent/caregiver intentionally or unintentionally denying a child things essential for healthy development (food, medical treatment, supervision, education).

Key Indicators:

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

2.3 Emotional Abuse

Definition: Persistently mistreating a child emotionally, causing severe adverse effects on well-being or development (e.g., conveying worthlessness, imposing inappropriate expectations).It includes:

- Conveying to children that they are worthless or unloved.
- Conveying to children that they are inadequate or valued only insofar as they meet the needs of another person.

- Imposing inappropriate age or developmental expectations on children.
- Exposing children to domestic violence.
- Causing children frequently to feel frightened.
- Exploiting or corrupting children.

Key Indicators:

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

2.4 Sexual Abuse

Definition: Committing or allowing others to commit any sexual offense against a child. Often preceded by "grooming". May include:

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

Key Indicators:

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

Possible signs of sexual offenders:

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

Signs of student offenders:

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

Signs of adult offenders:

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

Healthy Sexual Exploration versus Problematic Sexual Behaviour

When assessing sexually harmful behavior by children, it may be helpful to consider the behavior along Hackett's Sexual Behaviors Continuum Model below Model below (https://www.icmec.org/wp-content/uploads/2019/07/Hackett-Continuum-of-Harmful-Behavior-Excerpted.pdf).

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

2.5 Bullying

Definition: Unwanted, aggressive, intentionally hurtful and (potentially) repeated behavior involving a real or perceived power imbalance.

Type of Bullying	Description
Physical Bullying	Hitting, kicking, tripping, pushing, or damaging personal property.
Verbal Bullying	Name-calling, teasing, intimidating threats, or abusive language (including "even with words").
Social/Relational Bullying	Harm to a student's reputation or relationships, such as spreading rumors, purposefully excluding someone from a group or activity, or encouraging others to reject a person.
Cyberbullying	Bullying that takes place using electronic technology, including sharing private or mean content about someone, threats, or harassment via school-provided or personal devices.

Bullying

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

Prejudice-Related Bullying

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

Sexting

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

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

Chapter 3: People

3.1 Child Protection Team (CPT)

The CPT develops, monitors, and implements the Child Safeguarding and Protection program, meeting at least **five times annually**.

- **Core Team Members:** Principal (Designated Safeguarding Lead - DSL) (Rodette van Dunné), Wellbeing Team (Mieke van der Merwe and Dean Carter), Safety Officer (Kim Garcia), Learning Support (Helen Claus), Internal Confidential Counsellor (Dean Carter).
- **External Team Members:** External Confidential Counsellor (Aafke Scharloo) should only be contacted by parents after having involved the Core Team Members. The Director (Sebastiaan Cooiman) a Legal Professional (Bas Vosterman) will be consulted for severe cases (Tier 3) of bullying and abuse in collaboration with the Principal.
- **Core Responsibilities of the CPT:** Develop/monitor policy, ensure compliance with local laws, organize annual training for all (new) staff, oversee documentation, manage communication after an allegation, ensure support for all parties involved, and work on prevention through curriculum.

Responsibilities of the Principal/Designated Safeguarding Lead (DSL)

- **Lead the Child Protection Team (CPT):** Serve as the **Designated Safeguarding Lead (DSL)** and oversee the development, monitoring, and implementation of the entire Child Safeguarding and Protection program.
- **Ensure Compliance and Training:**
    - Ensure the school is compliant with the **laws of The Netherlands** regarding child protection and mandatory reporting.

    - Organize and ensure **annual training** is provided for all staff, volunteers, and coaches.

- **Manage Allegations and Disclosure:**
    - Be the immediate point of contact for staff reports (mandatory reporting).
    - Lead the **Follow-Up Protocol**, including determining the **risk of significant harm** and making direct referrals to **local social services, law enforcement, or relevant embassies immediately**.
- **Handle Communication and Confidentiality:**
    - Manage all external communication to the community and media after an allegation or incident.
    - Ensure the **confidentiality and privacy** of the child being harmed is maintained when communicating with the parents of a child who caused harm.
- **Coordinate Anti-Bullying Protocol (as Protocol Coordinator):**
    - Act as the primary **point of contact** for escalating bullying cases from teachers, parents, or children.
    - Be responsible for **updating and implementing** the school's Anti-Bullying policy.
    - **Keep track** of relevant information about bullying cases and social behavior (e.g., ensuring action plans are created and documented in student files).

Responsibilities of the Wellbeing Team

- **Promote Awareness and Prevention**: A key role is to promote awareness and enable prevention, ensuring that systems and programs are in place to support children and families. This includes providing a safe, respectful, and engaging environment where students can develop social skills and resilience.
- **Oversight and Implementation**: Serve as a member of the Child Protection Team and assist in the oversight and implementation of school-wide safeguarding policies and procedures.
- **Support Victims and Families**: Provide support and respond to the needs of children who have experienced trauma from child abuse, neglect, and family violence - with the understanding that members of the Wellbeing Team are not trained counsellors or therapists. This also includes providing support for non-

offending parents of sexually abused children and helping parents of children "at risk" find assistance from relevant agencies and counseling services..

- **Create and Maintain a Support Network**: Create a local support network that includes a multidisciplinary team of law enforcement, social workers, trauma-trained psychologists, and healthcare providers. Help families connect to necessary services and resources, as the school often becomes the primary support system for expatriate families..
- **Documentation and Accountability**: Document suspicions and disclosures confidentially and maintain records. Cooperate fully in any investigation of abuse.

Responsibilities of the Learning Support Coordinator

- Calls regular Student Support meetings with the Wellbeing Team to discuss vulnerable students cases (new, EAL, Learning Needs, Behavioural), possible interventions, and causes for concern.
- Liaises with the teachers to support the vulnerable students in the classes.
- Reports cases of concern to the Principal.

Responsibilities of the Confidential Counsellors

Internal: This counsellor has a child-focused and safeguarding-oriented role. They are approachable for children who experience;

- Bullying
- Exclusion
- Inappropriate behavior
- Problems at home affecting school life.

They communicate at the child's level and create a sense of safety and trust.

Responsibilities of an External Confidential Counsellor: This counsellor should be only contacted after having involved the Core Team Members.

- Providing a safe and confidential space for employees, children and parents to discuss concerns (e.g. harassment, bullying, discrimination).
- Listening, advising, and helping clarify possible next steps.
- Informing employees and parents about their rights, company policies, and complaint procedures.

- Referring to internal or external professionals when needed.
- Assisting in informal resolution where appropriate.
- Maintaining strict confidentiality and impartiality.
- Reporting trends or anonymized issues to the organization (without breaching confidentiality).
- Promoting a safe and respectful work and school environment.

Responsibilities of the Director

The Board of the Foundation is responsible for ensuring a safe and respectful environment, adopting and enforcing the anti-bullying policy, setting the tone as a role model, providing clear reporting structures, overseeing the proper handling of complaints, taking appropriate action where necessary, and safeguarding confidentiality and protection against retaliation.

Chapter 4: Prevention

4.1 Recruiting and Hiring Protocols

Protocols are designed to ensure safety and prevent the hiring of unsuitable candidates.

1. **Screening:** Must include an **Internet search** (with keywords "child protection" and "safeguarding"), government-issued **criminal background checks**, and contact with at least two supervisory references (including the most recent supervisor). References must be asked about the candidate's suitability to work with children and any past allegations.
2. **Interview & Onboarding:** Hiring teams must have two or more trained personnel. Employment is offered via a **conditional letter** pending successful background checks. The **Code of Conduct must be reviewed and signed** upon hiring and with each contract renewal.

4.2 Staff Training

Annual training is required for all staff, volunteers, and coaches, covering topics such as definitions, indicators, prevention measures, and the Code of Conduct. The training should include:

- Definitions of abuse, neglect, and bullying.
- Possible indicators of abuse, neglect, and bullying.
- Statistics of prevalence of abuse and neglect, as closely related to the school’s population and location as possible.

- Myths and facts about child abuse and neglect, especially as related to international school communities.
- Vulnerabilities of international school children.
- Preventative measures to safeguard children.
- Measures to avoid allegations against school community members.
- Procedures for handling disclosure.
- The roles and responsibilities of the administration, faculty, and staff to report and react to suspected, observed, or disclosed abuse.
- A timeline for response.
- Procedures for conducting an inquiry into the suspected, observed, or disclosed abuse.
- Possible actions that will address confirmed cases of abuse.
- A flow chart for steps to be followed after disclosure.
- Communication with children, families, staff, authorities and the media regarding child safeguarding and protection and related issues. Generally, this involves complete confidentiality, except in communicating the report to the Principal, and, if necessary, involved legal authorities. Only the Principal or appointed spokesperson speaks with the community and media.
- Identification and functions of Child Protection Team members.

4.3 Parent Communication

Partnership with parents is key and the school believes that parent involvement is imperative to foster a culture of safety and belonging.

The school will communicate with parents about Child Protection and Safeguarding through the school website, the newsletter, Coffee Mornings, Parent Presentations, Parent Handbook, and contact with teachers.

- Annual parent presentation which will include:
- Definitions of abuse, neglect and bullying.
- Signs and symptoms of child abuse.
- Awareness of risks to which students are exposed, globally and locally.
- Vulnerabilities of international school students in international school communities.
- Talking with children; prevention and empowerment strategies.
- Handling disclosure and reporting as a parent.
- The specific guidelines, protocol, and regulations of the school, including the response of the school in the case of a report of abuse or bullying.

To ensure parent concerns are addressed effectively and efficiently, we ask that parents follow this established communication hierarchy:

- **Step 1: Classroom Teacher** The classroom teacher should always be your **first point of contact**. They have the most direct, daily interaction with the student and are best positioned to address immediate concerns or behavioral transgressions.
- **Step 2: Wellbeing Team / Learning Support Coordinator** If a concern persists after you have consulted with the classroom teacher, these specialists may be engaged to provide additional strategies, intervention, or oversight.
- **Step 3: Principal** The Principal should be contacted if a matter remains unresolved after the classroom teacher and the Wellbeing or Learning Support teams have been fully involved in the process.
- **Step 4: External Confidential Counselor** Should a parent feel that the internal Child Protection Team is unable to reach a satisfactory resolution, an external counselor may be engaged for independent support and guidance.

4.4 Child Safeguarding Curriculum

Teaching the school values, behavioural norms, a variety of Social-Emotional topics and Body Safety / Sexual Education at all grade levels is part of the school's prevention strategy.

The school aims for an environment where everyone feels **comfortable and safe**. While bullying can occur even in a safe school environment, it will always be treated as a serious issue requiring intervention. The school proactively monitors the pedagogical and social climate.

The curriculum is taught Classroom Teachers and the Wellbeing Team, focusing on:

- **Sexual Education:** Topics such as consent, body parts, good touch/bad touch, saying "No!", disclosing, and identifying trusting adults.
- **Social-Emotional Learning (SEL):** Topics such as rights of the child (the right to be safe), relationships, kindness, peer pressure, recognizing and reporting abuse and bullying, emotional management, advocating for others and conflict resolution.

Chapter 5 - Wellbeing and Behavioural Protocol

All members of the school community will live by the school values and adhere to the school behavioural norms.

5.1 Roles and Responsibilities

Protocol Coordinator

The Principal, Rodette van Dunné, is the coordinator for the Wellbeing Protocol. Her tasks include:

- Being the primary **point of contact** for teachers, parents, and children.
- Being responsible for **updating and implementing** the school's policies, with the authority to address teachers about it.
- **Keeping track** of relevant information about bullying and social behaviors.
- **Coordinating and organizing** training in safeguarding and wellbeing.

The Well-being Team and Learning Support Coordinator

- **Support the Coordinator with advice, support and implementation of action steps where relevant.**
- Report any causes of concern to the Coordinator.
- Support students, teachers and families, helping to restore trust and safety for the students involved.

Teachers

Teachers are expected to have an **active attitude**. Since bullying often happens in a **covert way**, teachers must be attentive to signals that indicate bullying. They must **keep a record of incidents** in the student files. They have mandated reporting to the Principal for Tier 2 and Tier 3 behaviours. At the end of every month teachers enter their cases of concern for Tier 2 and Tier 3 behaviours to the Child Protection Team in The Behavioural Report spreadsheet.

Parents

Parents are asked to make an **active contribution** to a safe and social school climate.

- Communication with the classroom teacher can be through the following means: . Communication with all school staff school be respectful and safe.
- If parents receive signals from their child that they or others are experiencing situations that are **threatening or disrespectful**, they must report this to the **class teacher**.

- If parents witness an argument or threatening situation themselves, they must report it **immediately** to the teacher on duty. They may address their own child, but are advised to be reluctant to address other people's children.
- In addition to the teacher, parents may contact any member of the core CPT, and the external Vertrouwenspersoon. Contact details can be found in the parent handbook.

5.2 Breaking down Minor and Major Bullying/Behavioural Incidents and Interventions using a Tiered Approach.

Tier 1: Universal Prevention and Minor/Classroom-Managed Bullying

Tier 1 focuses on universal prevention, reaching all students and working to improve the overall social and emotional climate of the school community. Tier 1 interventions are instructional and non-exclusionary, managed primarily by the classroom teacher to re-teach the expected behavior.

Bullying Behaviors Classified as Minor Infractions:

These are low-level, disruptive behaviors that can be handled within the classroom setting without the immediate need for administrative intervention.

- **Isolated Social Conflict:** Initial, mild instances of disrespectful behavior, such as gossiping, excluding peers from a group, or mild pushing and physical contact.
- **Inappropriate Physical Contact (Non-malicious):** Actions commonly described as "horse-play," rough housing, tripping, or shoving that occur without a clear intent to harm.
- **Verbal/Written Misconduct (Isolated):** Rude comments, teasing, minor acts of dishonesty (lying), or the use of vulgar/obscene language or profanity that is not directed toward a specific individual (e.g., swearing at an inanimate object).

Tier 1 Interventions:

To manage these minor behaviors, staff utilize proactive strategies:

- Clear definitions of school-wide expectations and consistent modeling of appropriate behaviors.
- Non-verbal cues, such as a nod or thumbs-up, to signal expectations.
- Refocusing techniques, including structured short breaks away from the frustrating activity, movement, or grounding exercises like box breathing.

- Explicit instruction, including teaching students "signals and routines" for communicating when a peer's behavior is unwanted and needs to stop.

Tier 2: Targeted Support and Emerging Chronic Bullying

Tier 2 provides a necessary additional layer of support for students whose Tier 1 strategies have not been sufficient. This involves collaborative management between the teacher and school support personnel, such as counsellors or administrators, often initiated following multiple documented instances of minor behavior.

Bullying Behaviors Requiring Tier 2 Support:

These behaviors are characterized by escalation due to frequency or early indicators of targeted, harmful intent.

- **Chronic Recurrence:** The primary trigger for Tier 2 support is the persistence of Level 1 behaviors despite the implementation of classroom-managed interventions.This also includes persistent issues like repeated defiance, insubordination, or chronic peer conflict.
- **Specific, Non-Pervasive Harassment:** This includes mild and early stages of insulting someone based on a specific characteristic, such as their race, ability, or disability.

Tier 2 Interventions:

Effective Tier 2 supports are continuously available, require low effort from teachers, and are accessible quickly, often within 72 hours of referral. The interventions are structured and group-oriented, providing increased instruction and positive reinforcement.

- **Check-In/Check-Out (CICO):** Students meet regularly with a coach or mentor to develop and review behavioral goals and receive specific, daily feedback on their progress.
- **Small Group Social Skills Instruction:** Targeted lessons focus on developing protective skills for handling bullying and resisting victimization. Curriculum may focus on fostering empathy, active listening, and constructive conflict resolution.
- **Home/School Behavior Plans:** Structured plans involving the family to ensure that behavioral development and skill practice extend beyond the school day.

Tier 3: Intensive Support and Severe/Chronic Bullying

Tier 3 provides highly intensive, individualized support for students displaying dangerous, highly disruptive, or profoundly chronic behaviors that create significant barriers to learning.Tier 3 practices require a strong foundation in Tiers 1 and 2 to ensure resources are properly allocated.

Bullying Behaviors Classified as Major/Severe Incidents:

These behaviors are immediately administratively managed due to their severity or are Major infractions resulting from chronic failure to respond to Tier 2 support.

- **Aggression and Intent to Harm:** Behaviors such as intentional physical aggression, fighting, hitting a staff member, or shoving when there is clear intent to inflict harm.
- **Severe Harassment/Intimidation:** Prolonged harassment, repeated threats or acts of violence, or behavior that is so severe, persistent, or pervasive that it creates an intimidating or threatening educational environment.This includes severe harassment based on characteristics like race, ethnicity, sexual orientation, disability, or religion.
- **High-Level Property Destruction:** Intentional destruction of valuable school property or vandalism.

Tier 3 Interventions:

The strategies at this level are comprehensive and function-based, meaning they are tailored to address the root cause of the specific behavior.

- **Multi-disciplinary Team and FBA/BIP:** Tier 3 requires a team with administrative, coaching, and behavior support expertise to develop highly individualized academic and/or behavior intervention planning. This planning often results in a Behavior Intervention Plan (BIP).
- **Comprehensive Wraparound Services:** These services involve person-centered support from multiple agencies, including mental health and social work professionals.

Table 2: Discipline Thresholds: Differentiating Minor (Classroom) and Major (Office) Incidents

Incident Type	**Severity/Context**	**Management Responsibility**	**Bullying-Related Example**	**Referral Trigger to Principal**

Minor Behavior (CM)	Low level disruption, isolated, no intent to harm.	Classroom Teacher	Rude comments/Teasing (non-chronic), Play-fighting/Horseplay.	**Chronicity:** 3 documented instances of the same minor behavior within a defined period (e.g., 7 days or 1 quarter).
Major Behavior (OM)	High severity, causes harm, substantial disruption.	Administrator/Office	Severe bullying, physical fighting/aggression (intent to harm), Threats/Intimidation.	**Severity:** Immediate referral, regardless of offense history.

Tiered Responses to Bullying Behaviors

Tier Level	**Scope and Focus**	**Example Bullying Behaviors (Severity/Frequency)**	**Management Strategy**
Tier 1	Universal Prevention (80-90%)	Isolated teasing, mild exclusion, non-recurring inappropriate language, minor conflict/rough housing, rude comments.	Classroom Managed (Instructional/Non-verbal cues)
Tier 2	Targeted Support (5-15%)	Chronic Tier 1 behaviors (persistence), early stages of bias-based insults, repeated defiance, peer conflict requiring group support.	Collaborative Managed (Small group instruction, CICO, Home/School Plan)

Tier 3	Intensive Individualization (1-5%)	Prolonged harassment, intentional physical aggression, severe threats, targeted severe discrimination, chronic major behaviors.	Administratively Managed (FBA/BIP, Multi-disciplinary Team)

5.3 Restorative Approach to Inappropriate Behavioural Incidences and Bullying.

The school adopts a zero-tolerance towards bullying, however approaches to bullying and problematic behaviours are done through restorative practices and supported by the Time-Out and Suspension Protocol. Initially, wrongdoing is seen as not only "breaking a rule", but violating school values and harming the relationships within the school community. The focus is on growth, learning, healing and repair rather than on punitive measures. First line interventions focus on students causing the harm, taking responsibility and fixing the harm that has occurred for the benefit of the person being harmed, themselves, and for the community.

The person causing the harm must reflect on the impact of their behaviour, acknowledge they had choice (and can choose differently in the future), and take steps to repair the damage done. All involved students will be supported with this process by the classroom teacher and Wellbeing Team. Interventions may include group restorative circles, individual conversations, and behavioural plans.

Integrated Multi-Tiered System of Restorative Supports (R-MTSS Framework)

Tier Level	**Population Served**	**Primary Goal**	**Restorative Practice Examples**	**Focus of Intervention**
Tier 1 (Universal)	All Students (80-90%)	Prevention, Community Building, and Defining Shared Expectations.	Proactive Community-Building Circles, Affective Statements, Re-teaching Expected Behaviors, Positive Acknowledgment Systems.	Proactive, Relational, Instructional, Systemic Culture Change.

Tier 2 (Targeted)	Students at Risk / Specific Conflict (10-15%)	Early Conflict Resolution, Repairing Moderate Harm, Preventing Escalation.	Impromptu Conferences (Staff-led), Formal Restorative Conferences (Facilitator-led), Peer Mediation, Restorative Agreements/Restitution.	Responsive, Corrective, Dialogue-based, Needs-focused Accountability.
Tier 3 (Intensive)	Individualized / Chronic/Complex Behavior (1-5%)	Reducing Intensity/Frequency, Complex Conflict Resolution after Suspension, and Successful Re-Entry.	Supported Re-Entry Circles (following exclusion), Family-Group Meetings, Wraparound Supports, Integration with BIPs/IEPs.	Individualized, Therapeutic, Restoring Community Membership.

Chapter 6: Procedures

These are procedures for reporting Tier 2 and 3 behaviors and how to handle disclosures of abuse and bullying.

6.1 Reporting Procedures for Tier 2 and 3 behavioural incidences.

Bullying is never entirely preventable, but when it occurs, the school acts **quickly and accurately**.

A. Initial Reporting and Teacher Action (Step 1)

1. A teacher, parent, or child reports a situation where the rules of conduct are not being followed and the children involved are **unable to resolve it themselves**.
2. The report is made to the **class teacher**.
3. The class teacher must **always investigate** the report and have a conversation with the parties involved.
4. The teacher can make agreements, seek solutions, or take pedagogical measures to prevent repetition.

5. The Anti-Bullying Protocol Coordinator/Principal and Wellbeing Team may be asked for advice.

B. Escalation and Coordinator Involvement (Steps 2-3)

- **Step 2:** If parents or colleagues feel they are receiving too little response from the class teacher, they can directly contact the **Anti-Bullying Protocol Coordinator/Principal**.
- **Step 3:** The class teacher contacts the Coordinator if there are **multiple reports** about the same child, or if the teacher has questions about their own observations.
    - An **action plan** is drawn up by the teacher and Coordinator to prevent recurrence.
    - This plan is **included in the student's file** (for tracking).
    - The plan must include an **evaluation date**, and the plan and evaluation must be fed back to the Coordinator.
    - The **parents** of the children involved are informed by the class teacher.
    - The Wellbeing Team supports the students (and teachers and parents) involved, according to their skill set and will refer to outside support when relevant.

C. Intensive Intervention and Specialist Referral (Steps 4-5)

- **Step 4:** If the problem has not been resolved after the evaluation, a plan is set up **around the children involved, together with the Coordinator**.
    - Parents are **actively involved** at this stage.
- **Step 5:** If the issue persists, the problem may be more than just bullying.
    - The Coordinator registers the child(ren) with the **Learning Support Coordinator**.
    - Extra help can be arranged or a referral to an external specialist can be made.

6.2 Reporting Requirements for receiving a Disclosure (of abuse or bullying)

Any employee who suspects or is told of abuse (in or out of school) has a mandatory responsibility to report it. **All disclosures must be reported to a member of the Child Protection Team**.

Disclosure and Follow-Up

School staff are not investigators; the role is to **listen and report**.

What to Do (The "Do's")	**What Not to Do (The "Don'ts")**
Listen without judgment and without asking leading questions. Use open-ended questions (who, what, when).	Do not ask for excessive detail.
Respond calmly and matter-of-factly. Even if the story the child tells is difficult to hear, it is important not to register disgust or alarm.	Do not make judgmental or disparaging comments about the abuser; it is often someone whom the child loves or with whom the child has a close relationship.
Reassure the student that you believe them, they did the right thing by telling you, it was not their fault. Concentrate on the immediate safety and needs of the student; ask what the student needs or wants right now.	Do not let a child swear you to secrecy.
You will do everything you can to help to make the abuse stop, which may involve getting the help of someone the student trusts at school. Ask if he or she feels comfortable reporting the abuse to the Principal or Wellbeing Team, and if it would help if you were present. If not, tell them you have to tell a member of the CPT.	Do not tell other people about the disclosure other than the CPT and the local authorities. Keep everything confidential.
Immediately report to the Designated Safeguarding Lead (Principal) or a CPT member. As soon as possible, make a detailed written report of the conversation.	Do not confront the abuser.

Follow-Up Protocol (Led by CPT)

1. Action: If a risk of significant harm is determined, a referral must be made to local social services, law enforcement, or relevant embassies immediately.
2. Parent Communication: Encourage the child to tell their parents. If they are unwilling, the school must contact the parents/caregivers to inform them of the harm.
3. Confidentiality: All communication to the community/media is handled by the Principal or appointed spokesperson. When informing parents of the child causing harm, the confidentiality and privacy of the child being harmed must be maintained.

Chapter 7: Code of Conduct Summary and Policies

Code of Conduct: Core Professional Obligations

I Will (Positive Action)	**I Will Not (Prohibited Action)**
Comply with mandatory reporting to the CPT.	Touch or speak to a child in a sexual or other inappropriate manner.
Maintain appropriate **physical boundaries** and only touch children in ways that are appropriate, public, and non-sexual.	Inflict any physical or emotional abuse (e.g., striking, humiliating).
Work only in areas that are **observable and interruptible** (never alone in private).	Possess or be under the influence of alcohol or illegal drugs while working with children.
Maintain **confidentiality** in a report (only sharing with the CPT and relevant authorities).	Engage in **private communications** with children via text/social media/email, except for activities strictly involving school business.

Violation of this Code may result in disciplinary action up to removal from the school.

- **Behavior to Avoid Allegations:** All adult-child interactions must be **observable and interruptible**.
    - **NEVER** be alone with a child, including transporting them alone in a car. Private conversations must be within sight of others.
    - Electronic communication with students must only occur on **school-provided and monitored platforms**.
    - Avoid touching areas normally covered by swimsuits (breasts, buttocks, groin). Hugs should be from the side over the shoulders.
    - Do not use sexual jokes, comments, or gestures.
    - Do not share sleeping quarters with students (other than your own child) on overnight activities. **Corporal punishment is strictly forbidden**.

Chapter 8 Protection for Online Learning

Attendance Monitoring

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

Reporting a Concern

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

Recruitment and Training

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

Online Safety

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

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

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

- All online lessons should be **observable and interruptible**, just like classroom lessons. Make sure that the Principal and classroom parents, have a link to all Zoom or other video calls. Administrators and parents should be able to see all online assignments.
- It is the teacher's responsibility to share links, course codes, and other access information for any online platforms they are using with school administrators and parents, in addition to students.
- Whenever possible, use passwords to protect video calls so that only those you invite to the call may participate.
- Principals must observe lessons and video calls. Just like in classrooms, administrators don't need to stay for the whole lesson, but should drop in on calls or lessons frequently to see how things are going.
- One-on-one lessons are discouraged. It is preferable to have two adults present, or more than one student. If a one-on-one lesson is necessary, it **must also be observable and interruptible**. Make sure your administrators know you are having a one-on-one call and have the link so they can drop in.
- Participate in video calls from an appropriate place in your house—not your bedroom. Encourage students to participate in video calls from a shared space, like the kitchen or living room, or to open their bedroom door if the bedroom is their workspace.
- QSI discourages video recording online lessons in which students are present. If it is possible to record only the teacher for other students to watch later, that is fine. And of course, instructional videos that involve only teachers are fine. The reasoning for not recording students is:
    - From GDPR and similar data protection standpoints, recording and storing videos of students is largely forbidden.
    - Classrooms on school campuses are regularly observed, but not regularly recorded. We are trying to make students as comfortable online as

possible, and respect physical classroom relationships by not enacting measures online that might have a negative effect on those relationships.

- Dress appropriately for video calls.
- Just like in the classroom, report any child protection concerns to the director or your child protection team.

Child Protection Curriculum

When face-to-face instruction is interrupted, we still want to ensure that students are safe during online instruction. Students will receive lessons on how to stay safe online.

Child-on-Child Abuse Policy

Expected Action

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

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

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

DO:

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

- Consider the child's language needs and whether support in another language is necessary;
- Reassure the child that they have done the right thing in coming forward and that they are currently safe; and
- As soon as possible following the disclosure, make a written report and write notes from the conversation.

DO NOT:

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

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

1. **Gather the Facts**

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

2. Consider the Intent (Risk Assessment)

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

3. Consult with Team

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

4. Decide on the Course of Action

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

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

5. Inform Parents

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

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

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

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

Points to consider

- **What is the age of the children involved?** How old are the young people involved in the incident and is there any age difference between those involved? If the student doing harm is aged 18 or older, then that student may face legal prosecution as an adult.
- **Where did the incident or incidents take place?** Was the incident in an open, visible place to others? If so, was it observed? If not, is more supervision required within this particular area?
- **What was the explanation by all children involved of what occurred?** Can each of the young people give the same explanation of the incident and what is the effect on the young people involved? Is the version of one young person different from another and why?
- **What is each of the children's own understanding of what occurred?** Do the young people know and understand what they are doing? Does the young person's explanation relate to something they heard or learned about that prompted the behavior? Is the behavior deliberate? Does the young person who is causing the harm have an understanding of the impact of their behavior on the other person? In dealing with an incident of this nature the answers are not always clear. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from local authorities, the Regional Supervisor, or the Crisis Management Team.
- **Is there repetition?** Has the behavior been repeated on more than one occasion? Has the behavior persisted after the issue was previously discussed?

Next Steps

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

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

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

After Care

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

Preventative Strategies for Schools and Settings

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

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

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

Addendum 5

Electronic Device Confiscation Guidelines

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

Guidelines: If a concern is raised about messages or content on an electronic device used by a minor student that may contain CSAM or other evidence of child abuse that may be used as evidence in a legal case, any devices involved will be confiscated by the Principal. A confiscation is conducted in the presence of the student (if possible) and by a committee of three members, i.e. Principal, teacher, and Wellbeing Team. The committee shall seal the confiscated device in aluminum foil and tape with the date and hour of confiscation and signatures of all members of the committee, which cannot be removed without being destroyed. Detailed minutes of confiscation shall be prepared.

The confiscated device shall be kept in a locked cabinet which only the Principal can access, unless the device in question belongs to the Principal in which case the child protection team will appoint an acting Principal. The Principal, will give the device to law enforcement officials as soon as possible.

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

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